

# City of **NEW HAVEN, INDIANA**



## *Americans with Disabilities Act* **Self-Evaluation and Transition Plan - Update**



**FINAL VERSION**

**JUNE 2024**

Prepared by:



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## List of Abbreviations/Acronyms

AASHTO – American Association of State Highway and Transportation Officials  
ABA – Architectural Barriers Act of 1968  
ACTCP – ADA Coordinator Certification Program  
ADA – Americans with Disabilities Act of 1990  
ADAAG – 1991 ADA Accessibility Guidelines  
ADASAD – 2010 Americans with Disabilities Act Standards for Accessible Design  
ALS/ALD – Assistive Listening System/Assistive Listening Device  
ASL – American Sign Language  
CDBG – Community Development Block Grant  
CFR – Code of Federal Regulations  
DOJ – U.S. Department of Justice  
DOT – U.S. Department of Transportation  
DW – Detectable Warnings  
FHWA – U.S. DOT Federal Highway Administration  
HR – Human Resources Department  
INDOT – Indiana Department of Transportation  
ISA – International Symbol of Accessibility  
IT – Information Technology  
LPA – Local Public Agency  
MUTCD – Manual on Uniform Traffic Control Devices  
NVDA – Non-Visual Desktop Access  
OPDMD – Other Power-Driven Mobility Devices  
PAR – Pedestrian Access Route  
PCA – Pedestrian Circulation Area  
PROWAG – Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way  
PSA – Programs, Services, & Activities  
RA – Rehabilitation Act of 1973  
ROW – Right-of-Way  
SETP – Self-Evaluation and Transition Plan  
TDD – Telecommunications Devices for Deaf Persons  
TS – Turning Space  
UFAS – Uniform Federal Accessibility Standards  
VRI/VRS – Video Remote Interpretation/Video Relay System  
WAI – Web Accessibility Initiative  
WAVE – Web Accessibility Evaluation Tool  
WCAG – Web Content Accessibility Guidelines

## Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens aged 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure.

The City of New Haven (City) completed a self-evaluation and transition plan (SETP) project in 2012 that included a low level evaluation of existing administrative policies and inventory of curb ramps and sidewalks within the public right-of-way (ROW). This update to the original SETP is intended to evaluate City facilities that were not included in the 2012 project and perform a comprehensive evaluation of City Programs, Services, & Activities (PSA).

The City has made efforts over the years to improve accessibility, including contracting a consultant to assist with meeting their ADA compliance obligations for this updated ADA Transition Plan, and making improvements specifically to improve accessibility based on the recommendations of the 2012 SETP. The scope of the facility evaluations was limited as noted below for the facilities included in this update. Many accessibility issues noted in the 2012 SETP should be assumed to remain in need of corrective action to meet the 2010 ADA Standards for Accessible Design (ADASAD) or Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). The following City facilities were evaluated as part of this updated SETP:

### City Facilities (Owned, Leased, or Hosting Programs)

- City Hall/Police
- Public Works
- Public Parking lots – review of two public parking lots, located at Ann Street/Main Street/Summit Street and north of Main Street west of Broadway Street.

It is important to note that facilities and PSAs for fire protection and parks and recreation are under the joint jurisdiction of City-Adams Township entities that are separate from City government. There was no evaluation of either set of facilities as part of this Transition Plan since those agencies are separate Title II entities and sponsors of the programs at those facilities, though some of the properties may be under City ownership. This Transition Plan update, combined with previous findings from the 2012 SETP prepared by the City, outlines a majority of the necessary steps to become compliant with the requirements of Title II of the ADA. The City will strive to ensure that all residents and visitors are able to access all services, programs, and activities, and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the City will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be attained, an alternate means to offer the same opportunities to persons with disabilities should be provided.

In addition to City facilities, the self-evaluation reviewed existing City PSAs within each department. The focus of this review began with distribution of a questionnaire to each department, followed by interviews or other

data gathering if needed to better understand the responses or the operation of each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department.

It is the goal of the City to make facilities for all PSAs fully accessible within 5 years, though this will be largely dependent on a number of economic factors and future changes to the ADASAD or other unforeseen requirements that would necessitate additional improvements to City facilities. The City has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the City is fully compliant with ADASAD and Title II.

The self-evaluation update identified architectural barriers at City facilities within the limited areas of the scope of review. The estimated cost to correct these deficiencies is over **\$130,000**, with additional costs for the pedestrian ROW facility deficiencies identified in the 2012 Transition Plan that have not already been addressed and additional corrective actions for ROW facilities that have yet to be evaluated for compliance. In some cases, the cost of corrective action could not be defined due to additional investigation being needed that is outside the scope of an ADA self-evaluation. Investigation of structural walls, plumbing and other utilities within walls, compliance with plumbing and other codes, etc. are examples of additional investigations that might make estimating costs difficult as part of this plan. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “High”, “Medium”, or “Low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. In some cases, the priority was adjusted based on the type of facility and proximity to high use areas. The improvements will be categorized into a 5-year phasing program to spread out the cost for implementation and address the most serious deficiencies at the most used City facilities. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances, there are procedural changes or other modifications that can be made to provide equal access to City programs. Additions and some modifications are not required until renovations are completed. These modifications are noted within this report.

The City welcomes input on the contents of this Transition Plan at any time. Comments, requests, suggestions, etc. should be provided to the City’s ADA Coordinator Jennifer Basting, at (260) 748-7033 or email at [JBasting@newhaven.in.gov](mailto:JBasting@newhaven.in.gov).

The statements and findings contained in this updates Transition Plan and supporting information are the opinion of DLZ based on our knowledge and interpretation of ADA requirements. Nothing in this document should be considered as legal advice. Clients are urged to seek appropriate legal assistance as needed on ADA issues. Some links provided within this document may be outdated due to recent changes in the web address.



# 1

## Introduction and Overview





## 1.0 Introduction and Overview

### 1.1 Introduction

The [Americans with Disabilities Act of 1990](#) (ADA), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The DOJ is the lead agency that oversees the ADA. The ADA itself is not enforceable by any state or local governmental unit code official. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by Section 504 of the Rehabilitation Act of 1973. The ADA was signed into law by President George Bush on July 26, 1990, extending civil rights protections to individuals with physical or mental disabilities in the following areas:

1. **Title I** – Employment (all Title II employers and employers with 15 or more employees)
2. **Title II** – Public Services (state and local government, including public school districts and public transportation)
3. **Title III** – Public Accommodations and Services operated by Private Entities
4. **Title IV** – Telecommunications
5. **Title V** – Miscellaneous

New Haven is located within Allen County in northeast Indiana (Figure 1-1), east of Fort Wayne. The City had an estimated population of 15,843 in 2022 and contains a total land area of approximately 11.8 square miles. The City is classified as a “public entity” pursuant to Title II of the ADA and is also required to comply with Title I, which requires state and local government entities to practice non-discrimination in all parts of the employment process.

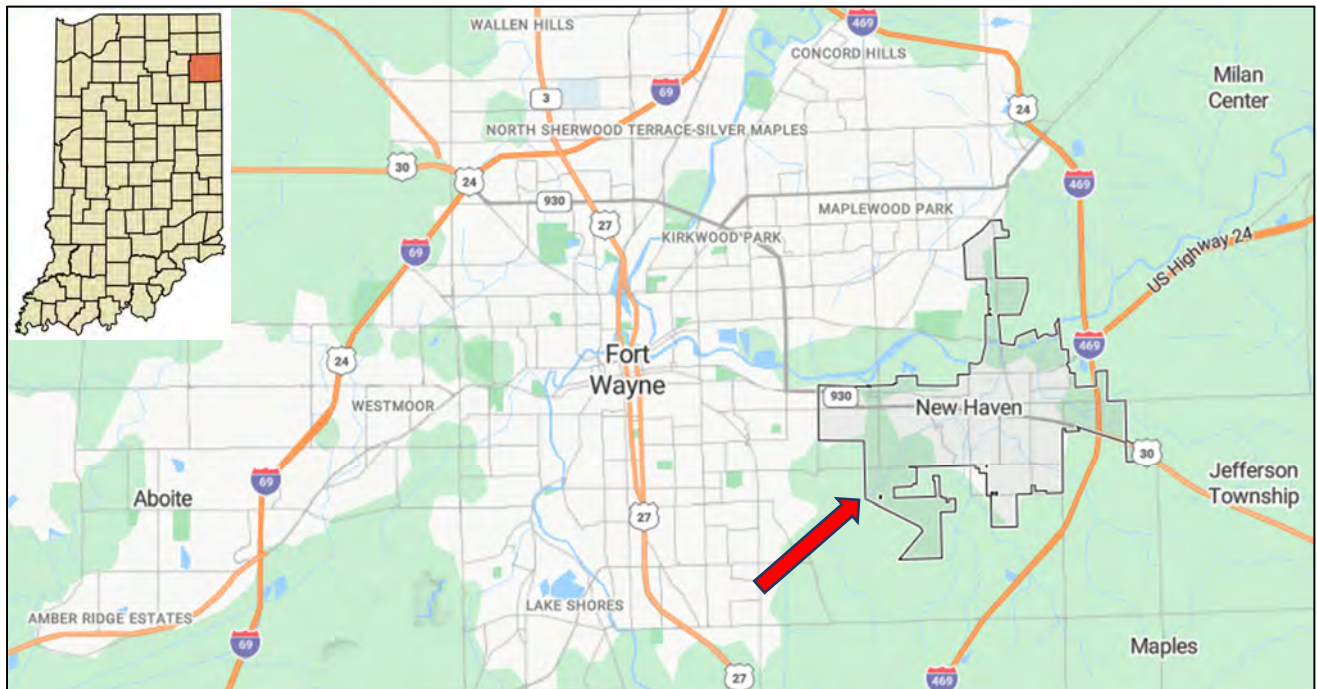


Figure 1-1 – City of New Haven Location Map.

Source: Bing Maps

## **1.2 Purpose**

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent broad areas subject to Federal regulation. Each volume of the CFR is updated once a calendar year and is issued on a quarterly basis.

Relative to the ADA, on July 26, 1990, the DOJ issued rules implementing Title II, which is codified at [28 CFR Part 35](#), and applies to New Haven. Title II requires state and local governments to make their programs and services accessible to persons with disabilities. This requirement extends not only to physical access at government facilities, programs, and events, but also to policy changes that state and local governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of state and local governments.

The ADA regulations [ref. U.S. DOJ [28 CFR Part 35, Subpart A, 35.105 and 35.150\(a\) and \(d\)](#)] require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the self-evaluation is to identify potential problems before they occur, so that discrimination complaints will not be necessary. By identifying the PSAs that do not comply, the City can take action to remove those barriers to ensure that the City is not discriminating against individuals with disabilities. Title II of the ADA stipulates that New Haven is required to perform six administrative responsibilities:

The City is committed to complying with the tenets of Title II of the ADA of 1990, and other Federal and state statutes and regulations intended to make City-owned and operated facilities, programs, services, and activities accessible to persons with disabilities. This ADA Self-Evaluation & Transition Plan (SETP) establishes a new benchmark for compliance with ADA and identify a plan to remove barriers.

## **1.3 Transition Plan Overview**

New Haven became aware of the need to be in full compliance with the requirements of the ADA by the Indiana Department of Transportation (INDOT), who sent letters to all Local Public Agencies (LPA) requiring them to have a compliant ADA Transition Plan to remain eligible for federal funding. The City responded by preparing

## **TITLE II ADMINISTRATIVE RESPONSIBILITIES**

Title II of the ADA stipulates that the Title II entities are required to perform six administrative responsibilities as part of the transition plan process:

- Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance [[28 CFR 35.107 \(a\)](#)]
- Administer and write a self-evaluation of the programmatic barriers in services offered by the local government and 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 on the transition plan [[28 CFR 35.105](#)]
- Publicize and inform applicants, participants, and beneficiaries of the policy of non-discrimination on the basis of disability related to City services, programs, and activities [[28 CFR 35.106](#)]
- Establish a complaint/grievance procedure to respond to complaints of non-compliance from the public [[28 CFR 35.107 \(b\)](#)]
- Develop a transition plan if structural changes are necessary for achieving program accessibility [[28 CFR 35.150 \(a\) and \(d\)](#)]
- Retain the self-evaluation and provide it for public inspection for three years [[28 CFR 35.105 \(c\)](#)]

a Transition Plan in 2012 (see Appendix C) that partially addressed the requirements of the ADA, including review of only the administrative Programs, Services, and Activities (PSA) and an inventory of curb ramps and sidewalks. INDOT subsequently sent letters as part of their annual re-certification process for LPAs requiring that Transition Plans be updated. The City contracted with DLZ Indiana, LLC, to assist with preparing this update in response to this most recent INDOT letter.

The 2012 SETP prepared by the City included development of some of the basic administrative PSAs, including publication of a 'Non-Discrimination Notice', designation of an ADA Coordinator, development of an ADA Grievance Procedure, and identification of PROWAG as the design standard for pedestrian facilities in the public ROW. The 2012 SETP also included an inventory of curb ramps and sidewalks in five (5) steps:

1. Review of aerial mapping to determine the locations of curb ramps and sidewalks.
2. Field evaluation and inventory of various attributes of curb ramps and sidewalks, including various dimensional, slope, and condition factors. A "Condition Rating" was provided for each.
3. Mapping of compliant and non-compliant features.
4. Request for review and public input on the mapping, which was posted on the City website and at City Hall.
5. Updates to the inventory based on the public review.

The results of the 2012 SETP included identification of 805 curb ramps and 315,291 linear feet (59.7 miles) of sidewalks within the City public ROW. The City noted that 535 (66.4%) of curb ramps and 10,798 linear feet (3.4%) of sidewalks were non-compliant. There were no estimates provided for the cost of corrective actions at non-compliant facilities, so the overall program cost and schedule is unknown. The City committed within the 2012 SETP to spend \$26,000 annually on curb ramp and sidewalk improvements.

This SETP update included an evaluation of non-ROW facilities of the City that have not been reviewed and which provide a variety of PSAs. No evaluation of ROW facilities, including those that have not been evaluated previously (i.e., on-street parking and pedestrian pushbuttons) or review of the accuracy of previously collected data was performed as part of this SETP update. Facility audits were performed in areas open to the public and employee common-use areas. Other areas within City-owned facilities that are not accessible to the public must also be accessible for employees with disabilities as a requirement of Title I. Accessibility in employee work areas will need to be assessed on a case-by-case basis based on the needs of the individual and nature of their disability. The City is committed to ensuring that all workspaces are accessible pursuant to the requirements of each job and making the necessary modifications and reasonable accommodations when needed for an employee with a disability to perform essential job functions.

All the recommendations in this plan for structural or programmatic solutions to facilitate the opportunity of access to all individuals are subject to review, revision, and approval of the City Council and appropriation of funding to implement the improvements. These recommendations are intended to serve as the transition plan and framework for implementation.

This transition plan update is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes, existing accessibility guidelines change, or new guidelines are established. In its efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the transition plan:

- Designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA.

- Implementation activities will be part of the City's annual Capital Improvement Plan and other budgetary allotments for various improvements required.

#### **1.4 Legislative Background & Framework**

For more than 50 years, New Haven has been subject to many of the non-discrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the [Architectural Barriers Act of 1968](#) (ABA) and [Section 504 of the Rehabilitation Act of 1973](#) (RA).

Congress' first significant effort to address discrimination on the basis of disability was its enactment of the ABA, which provided that all buildings constructed, altered, leased, or financed by the U.S. Government shall be accessible to, and usable by, individuals with physical disabilities.

Section 504 of the Rehabilitation Act states: "No otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive Agency". It also requires Federal agencies to provide accessible programs and facilities.

The ADA was effective on January 26, 1992 and modeled after Section 504. The ADA applies to state and local government entities, public accommodations, public transportation, and commercial establishments. The key points of understanding for ADA are:

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered to the public.
- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- Outdoor recreation standards as they relate to ADA for a variety of facilities were included in the 2010 ADASAD. Standards for amusement rides, boating and fishing facilities, exercise machines and equipment, golf and miniature golf facilities, play areas, and swimming/wading pools and spas went into effect on March 15, 2012, for all new or altered facilities.

The primary focus of this SETP updates is to assess the compliance of new and altered areas of City facilities and PSAs related to Title II of the ADA.

Governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic functions. Public entities are not required to take actions that would result in undue financial and administrative burdens. However, they are required to make reasonable modifications to PSAs where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

One important way to ensure that Title II's requirements are being met in communities of all sizes is through self-evaluation, which is required by the ADA regulations. Self-evaluation enables local governments to pinpoint the facilities, programs, and services that must be modified or relocated to ensure that local governments are complying with Title II requirements of the ADA. A public entity that employs 50 or more employees must retain its self-evaluation for a minimum of three (3) years.

## **1.5 Facility Access versus Program Access**

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be physically accessible. Individuals with disabilities cannot be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant. The ADA requires all City programs, but not all City buildings, to be accessible. The regulation implementing Title II, 28 CFR Part 35 (as amended September 15, 2010) contain two “safe harbor” provisions. Under the first “safe harbor” provision, elements of existing facilities that already comply with either the 1991 ADA Accessibility Guidelines (ADAAG) or Uniform Federal Accessibility Standards (UFAS) are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012. Under the second “safe harbor” provision elements comprising a path of travel to an altered primary function area are not required to comply with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access.

The City is required to provide program access, which means that PSAs when viewed in their entirety, are readily accessible to and usable by individuals with disabilities. When choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the City is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community. [[28 CFR 35.130\(a\)-\(b\)\(1\) \(vii\)](#)]
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity. [[28 CFR 35.130\(b\)\(2\); \(d\)](#)]
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters. [[28 CFR 35.130\(f\)](#)]
- Allow a person with a disability to participate in a program, service or activity regardless of disability. [[28 CFR 35.130\(g\)](#)]
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity. [[28 CFR 35.130\(b\)\(8\)](#)]
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities [[28 CFR 35.130\(b\)\(7\)](#)]
- Furnish auxiliary aids and services when necessary to ensure effective communication. [[28 CFR 35.160\(b\)\(1\)-\(2\)](#)]
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities. [[28 CFR 35.163](#)]



- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location. [[28 CFR 35.150\(b\)\(1\)](#)]
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities. [[28 CFR 35.151](#)]

### **1.6 Undue Burden**

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. For example, assume that a community sponsors college-level classes that may be used toward a college degree. To be eligible to enroll, an individual must have either a high school diploma or a General Educational Development certificate ("G.E.D"). If someone lacks a diploma or G.E.D. because of a cognitive disability, it is unlikely that the community would have to alter the requirement to provide equal access. Modifying the rule would change the class from college level to something less than college level and would fundamentally alter the original nature of the class.

The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the City must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

### **1.7 ADA Self-Evaluation and Transition Plan Requirements**

The purpose of this ADA SETP is to document the City's review of access to facilities and PSAs by individuals with disabilities in order to determine if there are any discriminatory or potentially discriminatory PSAs.

In accordance with the Title II requirements for self-evaluation, the City:

- 1) Identified all the public entity's programs, activities, and services. [[28 CFR 35.105\(a\)](#)]
- 2) Reviewed all the policies and practices that govern the administration of the City's programs, activities, and services. [[28 CFR 35.105\(a\)](#)]

If structural changes are identified to provide program accessibility as part of the self-evaluation, the ADA identifies specific elements to be included in the transition plan. At a minimum, the elements of the transition plan are:

- 1) A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities. [[28 CFR 35.150 \(d\)\(3\)\(i\)](#)]
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. [[28 CFR 35.150 \(d\)\(3\)\(ii\)](#)]
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period. [[28 CFR 35.150 \(d\)\(3\)\(iii\)](#)]
- 4) The name of the official responsible for the plan's implementation. [[28 CFR 35.150 \(d\)\(3\)\(iv\)](#)]

### 1.8 Self-Evaluation and Transition Plan Process

A work plan and method to assess City-owned and operated facilities and PSAs for compliance with the ADA will be implemented to complete the ADA SETP. This work plan included:

- Facility audits at City facilities
- Self-evaluation of City PSAs
- Confirming the City has met all administrative procedures
- Identify required/suggested training for City staff
- Prioritize facilities improvements for accessibility
- Develop transition plan
- Adoption

Recommendations included in the SETP update are intended to serve as the transition plan and framework for implementation. All the recommendations in the plan for structural or programmatic solutions to facilitate the opportunity of access to all individuals are subject to review, revision, and approval of the City Council.

### 1.9 Facility Audit

In 2022, audits of building and facility interiors and exterior site features were performed by DLZ staff. The reviews identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The locations of City facilities that were reviewed in 2022 (by number) are shown on Figure 1-2; addresses for each can be found in the appendix.

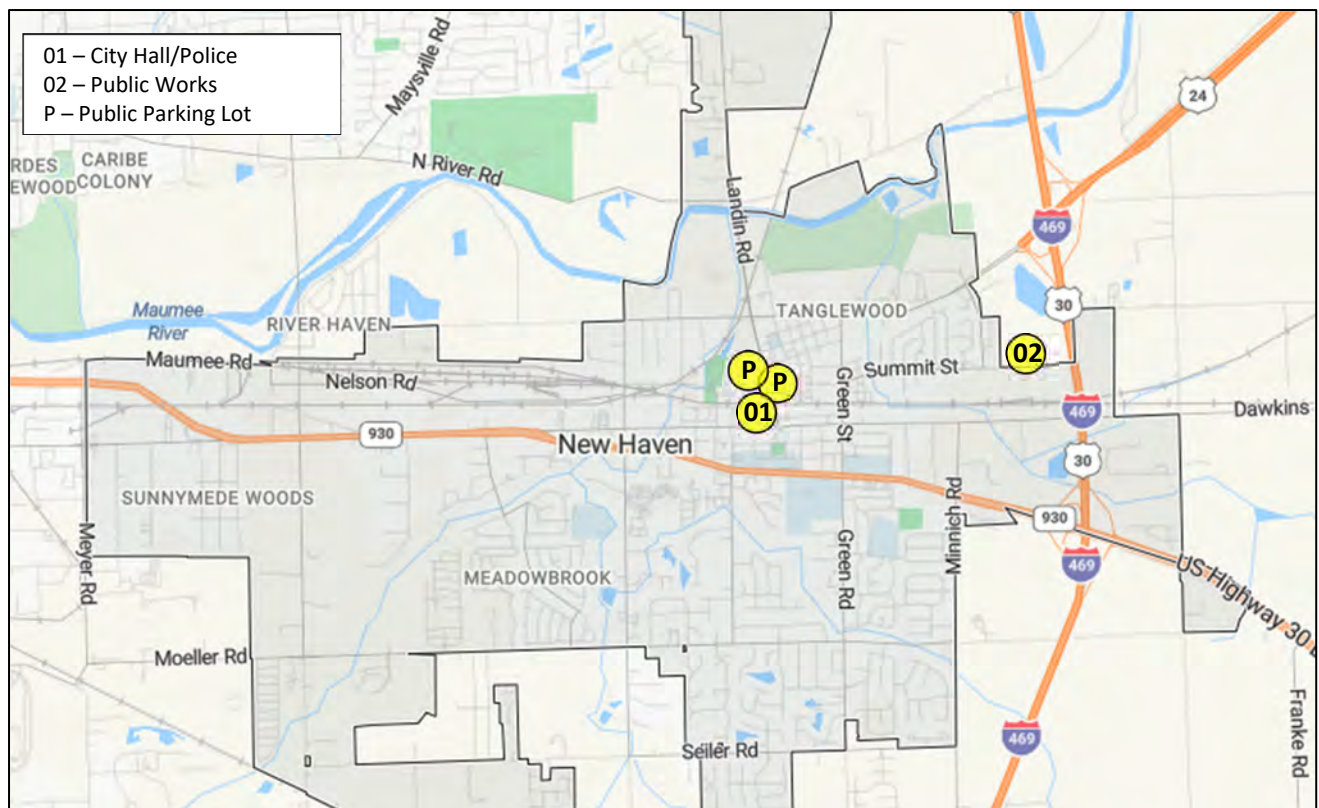


Figure 1-2. New Haven Facilities Location Map.

Source: Bing Maps



Photographs of architectural and site conditions at the time of inspections for building amenities were taken for the record. The specific site and architectural improvements recommended to remove barriers and improve accessibility will be listed in the Transition Plan appendices. In addition, the City is responsible for facilities within the public ROW within the City, which were reviewed for the 2012 SETP project. No ROW facilities were reviewed for this updated Transition Plan.

Note that there are additional facilities and PSAs that are shared between the City and Adams Township via joint boards for fire protection and recreation. Property ownership for fire stations and parks varies, with some being owned by the City, likely due to the date of formation of the joint boards being after platting of the properties. Due to the administration of these facilities and staff being controlled by a separate Title II entity, no review was performed for either and both would be required to have their own ADA SETP for their facilities and PSAs:

- The East Central Fire and EMS Department is a consolidation of a fire protection territory for New Haven, City of Woodburn, Adams Township, and surrounding townships. The East Central Fire & EMS Protection Territory Board governs fire protection services and includes members from the various communities.
- The New Haven-Adams Township Parks and Recreation Park Board manages policies, procedures, and all other administrative governing for New Haven-Adams Township Parks and Recreation. They also appoint the Parks Department director along with determining salaries and any funding for programs, activities, and facility maintenance.

#### **1.10 City Administration and Departments**

The City of New Haven operates under a Mayor-Council form of government. The mayor is responsible for implementing policies and carrying out the business City government while the City Council is a seven-member elected council that determines all matters of policy.

There are a number of departments that provide City PSAs that are accessible to the public (in addition to the fire and parks as noted in the previous section), all located at the City Hall/Police Department (815 Lincoln Highway East) unless otherwise noted. The level of interaction of each Department is classified as extensive (high numbers daily), regular (variable but generally low numbers daily to weekly), limited (generally weekly or less), or none. These Departments and descriptions of their functions and types and regularity of interaction with the public are:

- **Mayor's Office** – The Mayor's Office has the responsibility for a number of day-to-day functions for City government. The Mayor's duties include enforcing City ordinances and State statutes, providing at least annual updates to the Common Council on the finances and general condition of the City, provide information to the City Council pertaining to City affairs, ensuring the efficient governance of the City, and presentation of the budget for City Council review. The Mayor also has a number of powers used to oversee the operations of the City, appointments of staff, and serving as Chair of the Board of Public Works and Safety (BPWS). The Chief of Staff within this department is responsible for overseeing and managing special projects critical to the city of New Haven's development, coordinating efforts across departments, and ensuring timely completion, in addition to advising the mayor on strategic initiatives, policy matters and key decisions and providing guidance and direction to the senior staff to enhance overall organizational effectiveness. The Mayor's Office has extensive interaction with the public.
- **Clerk-Treasurer** – The Clerk-Treasurer's Office is responsible for the overall finances of the City, including accounts payable, City budget, grants, investments, payroll, and utility billing. They provide accounting

and control services for all financial activities of the City, the East Central Fire Station, the New Haven-Adams Township Parks and Recreation Department, and other auxiliary organizations. The department has extensive public interaction. In addition, the Clerk-Treasurer is the Secretary for the City Common Council, BPWS, and the East Central Fire & EMS Protection Territory Board, preparing agendas and minutes for all meetings.

- **Engineering** – The Engineering Department is the City's contract manager for the construction of municipal utilities, roads, associated with redevelopment of aging City infrastructure, and new developments. The Engineering Department is responsible for the planning, coordination, and preparation of the City's bid procedures, estimates, plans, and specifications. They are also responsible for other design matters for public works construction and improvement projects for the City's sanitary sewers, storm drainage systems, street resurfacing and construction, and waterline projects. The Engineering Department has regular public interaction.
- **Human Resources** – New Haven's Human Resource Department strives to provide all City Government departments with policy direction involving Human Resource management issues while being an administrative support system to the functions related to the management of all City department employees. The Human Resource Department is committed to partnering with all City departments to ensure that employees have all resources necessary to employ workers with the ability to recruit, develop, and retain talent within the community while simultaneously providing service to the City and its ever-changing needs. Interaction with the public is extensive.
- **Community and Economic Development** – While the City pursued the development of the community for generations, the Community and Economic Development Department was only created in 2019. The Community and Economic Development department supports the administration, businesses, and the community to create a vibrant and thriving city. The department is responsible for working with developers, property owners, businesses, and residents to generate new investment, enhance the tax base, create employment opportunities, and ensure that desirable goods and services are readily available. In addition, the Department organizes the City-led annual events, and manages all communications coming out of the administrative offices. Business retention and development are key goals, as well as sharing information to the members of the community and the media. Interaction with the public is extensive.
- **Public Works (2201 Summit Street)** – New Haven's infrastructure, including streets and curbs, storm and sanitary sewers, bridges, water mains, hydrants, pumping stations, and wells, are in the care of the employees of the Public Works Department. In addition to the maintenance of the city infrastructure, Public Works also works to supply water to city residents and business. In addition to keeping good relations, Public Works publishes a Water Quality (CCR) Report that is available to everyone. Interaction with the public is limited.
- **Planning** – New Haven's Planning Department is critical to the city's growth and development. Planning works to ensure continued and improved effectiveness in making our City a desirable place to live and develop. They do this by properly implementing and adopted policies and enforcing land use regulations. They also handle city ordinances, zoning and floodplain maps, address management, data collection, and zoning verification. The Planning Department has regular interaction with the public.
- **Police** – The Police Department provides police protection services in the City and has extensive public interaction. The New Haven Police Department takes pride in offering a range of services, including safety awareness programs for students in public and private schools. Officers provide personalized assistance, from helping citizens locked out of their vehicles to conducting routine property checks for those on vacation or away for an extended period. The department includes sworn and reserve officers, dispatchers, K-9 unit, and code enforcement.

- **City Utilities** – The City Utilities Office administers water, sanitary sewer and storm water properties within the city limits and surrounding territory. The office is also responsible for new service connections, transfers of service, or service termination for water and sewer and billing and collection of payments for utility services. The City Utilities office has extensive public interaction.

### **1.11 Department Self-Evaluation**

As part of this self-evaluation update, DLZ provided questionnaires to the ADA Coordinator in order to better understand the operation and services offered by various City departments regarding ADA compliance. A questionnaire was provided by the ADA Coordinator to some departments for additional information. A copy of the blank questionnaires is in Appendix B. Responses provided by each department were used to compile the information in this SETP. PSAs were evaluated, and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Section 2.19 Department Self-Evaluation - Findings & Recommendations.

### **1.12 Public Outreach**

Public outreach was performed during the initial ADA Transition Plan development in 2012, including making a copy of the Transition Plan available for public comment from December 15, 2012, to February 1, 2013, on the City website and at the New Haven Planning office at City Hall. Information about the results of that outreach is contained in that document. It is suggested that the City advertise the availability of this updated Transition Plan and make it available for public review and comment on the City website.

The City welcomes input on the contents of their Transition Plan at any time. Comments, requests, suggestions, etc. should be provided to the ADA Coordinator, Jennifer Basting, at (260) 748-7033, or email at [JBasting@newhaven.in.gov](mailto:JBasting@newhaven.in.gov).



# 2

## Self-Evaluation of City Programs, Services, and Activities (PSA) – Findings & Recommendations



## 2.0 Self-Evaluation of City Programs, Services, and Activities (PSA) - Findings & Recommendations

This section of the self-evaluation summarizes the review of current City-wide PSAs based on correspondence with City staff and responses to the program accessibility questionnaire received from City departments and divisions. The findings and recommendations contained in this section will provide the basis for the implementation of specific improvements for providing access to City programs. Within the following sections, items quoted directly from a source are enclosed in quotes (“”) and italicized. In some cases, emphasis or special attention to portions of text is justified. In those cases, text is bolded and underlined as well (“**emphasis added**”). Some of the information provided in the following sub-sections may be repeated or referenced in a similar manner multiple times since it applies under multiple categories.

An unusual and somewhat unique aspect of the PSA review for the City is that while facilities overseen by independent boards for parks and fire service are often owned by the City, many PSAs at those facilities are not those of the City. The City opted to exclude an evaluation of facilities operated by these boards for this Transition Plan update, but the review of those facilities, including parks and related buildings, the Community Center, and fire stations, is essential to fully understand the barriers that exist to PSAs for all entities at those facilities. The evaluation of PSAs below is limited only to facilities that are owned by the City and overseen by City administration under City Council or BPWS. Only after a review of the facilities and PSAs of all three entities is completed can accessibility be properly determined and addressed through either facility alterations or changes to the way PSAs are provided, including moving PSAs to accessible facilities.

### 2.1 Program Evaluation Interdepartmental Memo

The self-evaluation of the City's PSAs required and involved the participation of many City departments. New Haven evaluated its PSAs to determine current levels of service and the extent to which its PSAs created barriers to accessibility for persons with disabilities. DLZ distributed questionnaires to the City contact as one measure to determine the level of ADA compliance, with several departments being provided a department specific questionnaire (See Appendix B).

The primary purpose of the questionnaires was to allow DLZ staff to better understand how each department operates and the PSAs provided by each so that an accurate assessment can be made of architectural and procedural barriers that might be present and how each can be corrected to provide access. The level of investigation into the operations of the various departments was generally consistent with the amount of interaction with the public and the extent of the public PSAs offered by each. Note that the response rate to the questionnaire is often less than 100%. In some instances, the information provided below may not be accurate due to either lack of response to the questionnaire, inaccurate answers being provided on submitted questionnaires, or the lack of detail in some responses.

### 2.2 Overall Findings – General Policies and Practices

The self-evaluation of the Departments identified common accessibility issues between all City departments. The findings from the City departments can be organized into the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures

- Public Meetings
- Accommodations to Access PSAs
- Special Events and Private Events on City Property
- Ordinances, Design Standards, and Other Documents
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Employment
- Department Self-Evaluation Findings & Recommendations

The findings and recommendations in the following subsections generally apply to all departments except where noted.

### **2.3 Public Information**

The City is required to notify the public of their rights and protections under the ADA ([28 CFR 35.106](#)), which states: *“A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.”* In addition, notices regarding ADA should be included in a number of other situations to inform the public of their rights and opportunities to ensure accessibility, including signage directing the public to accessible routes and entrances.

#### **Self-Evaluation General Findings:**

- The City Council created the position of ADA Coordinator pursuant to Resolution R-12-9, adopted on the December 11, 2012. At that time, the Director of Planning and Economic Development was designated as the ADA Coordinator. Currently, the person performing this role is Jennifer Basting, the Regulatory & Compliance Administrator in the Engineering Department. No information was provided regarding when the change occurred.
- No public meeting agendas for any board or commission meetings included an ADA compliance statement or information about how an accommodation can be requested to allow a person with a disability to participate in a meeting.
- Signage directing visitors at City buildings along an accessible route is lacking and the International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances, though there are limited entrances visible from public parking or the public ROW that are not accessible.
- The City published an ADA Notice of Non-Discrimination in the 2012 Transition Plan to communicate policy towards persons with disabilities (see Appendix C). It is not available on the website.
- The website provides no dedicated page for ADA or other civil rights information and does not include the identification of the ADA Coordinator.
- Printed materials reviewed have no information regarding ADA accommodation.



- The staff directory on the website does not identify the ADA Coordinator, who is a staff person within the Engineering Department.

**Recommended Action:**

- Ensure the ADA Coordinator responsibilities are assigned to a person in a position that is relevant to other job duties, such as engineering, human resources, or facilities. This helps to ensure a basic understanding of at least some of the requirements, which can be supplemented with training.
- Consider use of a dedicated email address for all ADA inquiries by the public (i.e., accommodation requests, questions, grievances, etc.), which can be directed to multiple staff members that might need to be aware. A simple email address, such as [ADA@newhaven.in.gov](mailto:ADA@newhaven.in.gov), could have emails delivered to the ADA Coordinator, Planning Department (who typically staffs a majority of boards/commissions), City Manager, HR Director, etc. This would ensure someone receives the notification/request in a timely manner and can react accordingly. Ensure a clear process is in place to confirm receipt and initiation of the necessary actions internally to respond to the request.
- Ensure that all public meeting agendas for all boards/commissions have a non-discrimination statement that provides information regarding how someone needing a meeting accommodation would proceed and who to contact. The notice states *"Individuals with disabilities who require accommodations for participation in meetings must request accommodations at least 3 business days ahead of the scheduled meeting. Contact Jennifer Basting, ADA Coordinator, at (260) 748-7033."* In some cases, the contact person may vary by board/commission, ensure there is adequate redundancy in where notifications are sent to ensure coverage during vacations and other times when staff may not be available.
- Standard language for a Notice of Non-Discrimination should be used by all departments for all City publications and printed materials. This statement should include, at a minimum, the following language: *"The City of New Haven acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. In order to assist individuals with disabilities who require special services for participation in or access to City sponsored public programs, services and/or meetings, the City requests that individuals make requests for these services as early as possible but not less than three (3) business days ahead of the scheduled program, service and/or meeting. To make arrangements, contact Jennifer Basting, ADA Coordinator, at (260) 748-7033."*
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other City activities. The City should endeavor to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- Non-discrimination language should appear on both hard copies and documents posted on the City website.
- The ADA Coordinator and other staff that may receive requests for accommodation should have a list of qualified individuals to contract for services to provide information in alternate accessible formats.
- Signage directing visitors to City buildings should be placed along the accessible routes at locations that are clearly visible to minimize backtracking and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.
- The City should consider forming an ad-hoc committee comprised of the ADA Coordinator and representatives from various departments, particularly those that have extensive interaction with the public or those that are responsible for various City facilities. The responsibilities of this committee can be reviewed and established internally in conjunction with the administration.
- Ensure that all live and recorded videos that are provided on the City's Facebook and other sites include closed captioning.
- Provide ADA-related compliance documents on the website (see also Section 2.5).



- List City agencies, departments, and specialized services that offer Telecommunications Devices for Deaf Persons (TDD), video phone (VP), and Video Relay Interpretation/Video Relay System (VRI/VRS) in printed directories (see also section 2.5).
- Consider a dedicated page for accessibility and other civil rights issues on the City website (see also Section 2.5). Ensure that all relevant documents are provided on the page related to civil rights laws.

## **2.4 Designation of ADA Coordinator**

The ADA regulations require any public entity with fifty (50) or more employees to designate at least one employee to coordinate ADA compliance ([28 CFR 35.107 \(a\)](#)). Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. The ADA Coordinator's role is to plan, coordinate, organize, facilitate, and promote compliance efforts. The Coordinator responds to requests for accommodations or barrier removal. The Coordinator also receives and investigates complaints and grievances.

### **Self-Evaluation Findings:**

- The City of New Haven City County created the position of ADA Coordinator by Resolution R-12-9 at their regular meeting on December 11, 2012. At that time, the Director of Planning and Economic Development was appointed. The position is currently held by the Regulatory and Compliance Administrator within the Engineering Department.
- The website provides no dedicated 'ADA/Title VI' page on the City Departments list.
- The website/staff directory does not include the name and contact information for the ADA Coordinator.

### **Recommendations:**

- Information regarding the identity of the City's ADA Coordinator should be provided to staff, posted at all City facility locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the City website.
- The designated ADA Coordinator should be familiar with the requirements of ADA and get appropriate training and continuing education to ensure compliance by the City.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.
- It is recommended the City publish the name, address, e-mail address, and phone number of the ADA Coordinator in appropriate public notices, agendas, and City publications frequently distributed to the general public. This information should be updated whenever there are changes in personnel.

## **2.5 Grievance/Uniform Complaint Procedures**

A public entity that employs 50 or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA ([28 CFR 35.107 \(b\)](#)).

### **Self-Evaluation Findings:**

- The City published a grievance procedure during the 2012 Transition Plan (See Appendix C).
- The City does not have a standardized complaint form.
- The grievance procedure designates the ADA Coordinator as the person charged with completing the investigation of all grievances, outlines the process and timeline, and includes an appeal process.
- There are no reports of any formal ADA grievances being filed with the City.

**Recommendations:**

- The City should ensure proper and comprehensive documentation and tracking of complaints is maintained by the ADA Coordinator. Centralized record keeping of such information will help the City to regularly update its compliance efforts, and plan for additional compliance implementation. If requests for accommodation are directed to a different staff person, ensure there is a procedure in place to standardize documentation of the process utilized that is consistent and provided to the ADA Coordinator.
- Consider development of a standardized Complaint Form (see sample in Appendix C) to ensure all information is provided to permit the City to respond in a timely manner.
- Consider providing the Grievance Procedure as a separate document from the 2012 Transition Plan and provide a PDF format on the recommended ADA/Title VI web page to make it easier to find. Ensure also that the Complaint Form can be downloaded or an option exists for an online form to be completed.
- Ensure that references to the ADA Coordinator are generic for publications/documents that are not regularly updated. If the name of the person is used in documents, ensure that the name is updated when the staff person serving in that capacity changes.
- The City should review its current administrative policy and be able to provide the ADA Complaint Form in an alternate accessible format, i.e., Braille, audiotape, e-text, large print, etc.
- Administrative PSAs should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.
- The City should make efforts to inform City staff and the general public of the name of the City's ADA Coordinator, grievance procedure, the steps for handling grievances, and the City policies for resolution of grievances.

## **2.6 Public Meetings**

Public meetings are routinely held by various City departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.150 \(a\)\(1\); \(b\)\(1\)](#)). While most of the meetings are open to the general public and advertised as required by law, the public does not regularly attend several of the meetings of the groups noted.

**Self-Evaluation Findings:**

- The following boards/commissions meet at various times on City business and would be considered open meetings that can be attended by anyone. Some of the boards involve the City but are not necessarily programs of the City. There are additional committees that involve City staff and/or elected officials, but do not have regular published schedules and may not be included below. Meetings are held at various facilities as noted below, several of which may not be owned by the City, with most being at the City Hall Council Chambers-Room 135B (815 Lincoln Highway East), New Haven Community Center (7500 SR 930 East), or East Central Fire/EMS Department Fire Station 3, Door #15 (910 Hartzell Road):
  - City Common Council – 1<sup>st</sup> and 3<sup>rd</sup> Tuesdays of the month, location varies and meetings are held at all three primary meeting room locations
  - Board of Public Works & Safety – 1<sup>st</sup> and 3<sup>rd</sup> Tuesdays of the month, location varies and includes the New Haven Community Center and East Central Fire/EMS Department Fire Station 3
  - Plan Commission – 2<sup>nd</sup> Tuesday each month, location varies and includes the New Haven Community Center and East Central Fire/EMS Department Fire Station 3

- Redevelopment Commission – 2<sup>nd</sup> Wednesday each month, East Central Fire/EMS Department Fire Station 3
- New Haven-Adams Township Parks and Recreation Park Board, New Haven Community Center, 1<sup>st</sup> Wednesday each month
- East Central Fire & EMS Protection Territory Board – 4<sup>th</sup> Wednesday each month, varies and includes East Central Fire/EMS Department Fire Station 3 and New Haven City Hall
- Board of Zoning Appeals – 3<sup>rd</sup> Wednesday each month at the City Hall Council Chambers (Room 135B), 815 Lincoln Highway East
- Economic Development Commission – 1<sup>st</sup> Wednesday each month, Fire Station 3
- No public meeting agendas for any board or commission meetings included an ADA compliance statement or information about how an accommodation can be requested to allow a person with a disability to participate in a meeting.
- The ‘Agenda Center’ includes agendas and minutes for meetings of City boards and commissions. Some PDF documents, especially meeting minutes that have signatures, are scanned documents and may not be readable by all screen reading programs used by persons with visual impairments. Examples of scanned documents include the March 5, 2024, meeting of the BPWS ([https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/\\_03052024-593](https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/_03052024-593)) and City Council on February 6, 2024 ([https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/\\_02062024-581](https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/_02062024-581)). Both examples are scanned only because of signatures and would not be readable by most programs or by persons that do not have conversion software.
- Several departments noted that they sponsor various public meetings, which are held in City buildings or facilities of related entities that are jointly responsible (City-Township).
- Meetings of the New Haven Council are shown live on the City's Facebook page (<https://www.facebook.com/NewHavenIn>). There are videos of recorded City Council and BPWS meetings, along with other videos, available on the site also. Many of the meeting videos provided closed captioning, but some do not and would not be accessible to people who are deaf.
- The Council Chambers on the 1<sup>st</sup> floor of City Hall has no ALS or signage provided that indicates the presence of the ALS. Many public meetings of the City are held in that space.
- The New Haven Community Center meeting room has audio amplification, it is unknown whether the space provides an ALS/ALD as required.
- The East Central Fire/EMS Department Station 3 conference room does not have audio amplification, so an ALS/ALD is not required.
- Agendas and meeting minutes for the City Council and BPWS, along with other public boards and commissions, are available on the City website at the ‘Agenda Center’ (<https://www.newhaven.in.gov/AgendaCenter>). The site includes both current and archived information, though information varies for some.
- No requests for special accommodations, including American Sign Language or other interpreters, has been made at public meetings.

**Recommendations:**

- The City should continue to schedule and hold public meetings in the most accessible locations whenever possible. Meetings which the public regularly attends should be made the highest priority. Consider having an accessibility evaluation performed for facilities that host City PSAs but have not been evaluated. Particular priority should be given to the Community Center and Fire Station 3 meeting rooms.
- Ensure that all public meeting agendas for all boards/commissions have a non-discrimination statement that provides information regarding how someone needing a meeting accommodation would proceed and who to contact. The notice states “*Individuals with disabilities who require accommodations for*

*participation in meetings must request accommodations at least 3 business days ahead of the scheduled meeting. Contact Jennifer Basting, ADA Coordinator, at (260) 748-7033.* In some cases, the contact person may vary by board/commission, ensure there is adequate redundancy in where notifications are sent to ensure coverage during vacations and other times when staff may not be available.

- Ensure that all documents on the website are in an accessible format and not scanned documents. For documents where signatures are provided, post a scanned signature with appropriate Alt-Text or include a notation on the web document PDF that “*signed originals can be reviewed in the Clerk’s Office*” or similar statement to eliminate the posting of scanned documents.
- The City should develop procedures for providing auxiliary aids such as obtaining sign language interpreters, readers, descriptive services, and other assistive technologies when requested.
- The City should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Provide meeting agendas and minutes in alternative formats when requested.
- The City should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all City departments for their programs and events.
- Ensure that agendas and minutes for City boards and commissions are provided in accessible formats on the website and ensure that they are relatively easy to find. The current ‘Agenda Center’ is a distinct button on the home page and was able to be located. Also ensure that a process is in place to post agendas in a timely manner in advance of meetings and that the information posted for each entity is current. For example, publication of meeting notices/agendas late on a Thursday for a Monday meeting or similar time frame around a weekend may not allow for adequate time for a person to realize they would like to attend a meeting based on an agenda topic and request an accommodation to allow them to participate. For example, as of April 2024, the most recent agenda posted and the posting date for the following is noted:
  - East Central Fire & EMS Protection Territory Board agenda is from June 28, 2023, and has a posting date of June 27, 2023. This short lead time would not likely permit time to process requests for accommodation.
  - Park Board agenda is from November 6, 2023, with posting date of November 1, 2023. While this amount of lead time is adequate, it is not clear if there have been meetings of this entity since November. Ensure all agendas and minutes for public entities are posted.
- Ensure that a compliant ALS is provided and maintained in the Council Chambers and Community Center meeting room, both of which have audio amplification. Provide the required number of listening devices are available. Ensure that there are also the required number of hearing-aid compatible listening devices available and that signage indicating the presence of the ALS is maintained.
- The meeting room in Fire Station 3 does not utilize audio amplification but consider providing a compliant ALS and ALDs within this space, especially for meetings of City Council and BPWS. If installed in the future, this space and other rooms must be equipped with an ALS and the appropriate number of assistive listening devices. The City should review which meetings are held in locations without audio amplification and consider the ability of someone with hearing loss to participate in those meetings. Relocating meetings with agenda items of potential impact/interest to people with hearing loss to rooms with an ALS should be considered.
- Standard language for all City publications regarding availability of and requests for accommodations should be provided to departments.



- Ensure that all live and recorded videos of public meetings of City boards and commissions include an option for closed captioning, including those on the City Facebook site.
- The City should develop procedures for obtaining and providing auxiliary aids such as sign language interpreters, readers, descriptive services, and other assistive technologies. (See also section 2.11.)
- The City should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings upon request, even if the request is not made in advance.

## **2.7 Accommodations to Access Programs, Services, and Activities**

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. A public entity may not adopt policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have discriminatory effect. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.130 \(b\)\(3\)](#); [35.150 \(a\)\(1\)](#); [\(b\)\(1\)](#)).

### **Self-Evaluation Findings:**

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to City programs, services, or activities.
- The Engineering Department noted on the questionnaire response that they do have a policy related to installation of signs for accessible on-street parking in residential areas upon confirmation of the need. There does not appear to be a written policy or procedure and no detail was provided related to how the need is confirmed.
- The Planning Department staff noted that they had utilized a relay service to communicate with a resident regarding an issue of interest.
- The Police Department noted that there have been times both on traffic stops and when responding to a home of someone who has called 911 that officers have changed their procedures to correspond with the hearing impaired. In these instances, officers have used notebooks with written messages back and forth to communicate with the citizen.
- The Police Department noted that they would typically use patrol vehicles to transport individuals that are arrested to the Allen County jail but would call the jail van if needed to transport a person with a mobility device or that has a service animal with them at the time of their arrest.
- Public meetings are held in locations that are thought to be accessible to persons with mobility impairments and staff had no recollection of any previous complaints or issues.

### **Recommended Action:**

- Information directing the public how to request accommodations should appear on all public notices, announcements, and public meeting agendas. All City departments and divisions should be provided with the City's ADA compliance statement for accommodations.
- Front line staff, such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities. This would include various scenarios for interacting with persons with hearing loss, including when writing notes back and forth may be effective and when either the length or technical nature of the interaction would suggest involvement of an ASL interpreter (including via VRI/VRS). This may also include working with advocates for people with disabilities to develop a form to be completed by persons requesting an

accommodation that lists the options that are available and which the applicant believes would be effective.

- The City should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services, and activities.
- The City should ensure that staff understands how to utilize the services provided for telephone interaction with persons with hearing loss (TDD, Relay Indiana, Deaf Link, etc.) to provide two-way communication for persons with hearing disabilities.
- Consider formalizing and publishing the process for a resident with a disability to obtain a 'RESERVED' parking space in front of their home on the street and the criteria to be used by the City to evaluate such requests. Consider providing a 'RESERVED' space rather than an accessible parking space that could be used by anyone with a valid parking placard or license plate.
- Consideration should be given to developing policies and training related to law enforcement regarding officer interactions with persons with disabilities. Consider developing formal policies to provide consistency and direction for officers on topics that could include:
  - Conducting traffic stops and effective communication for drivers with hearing loss, including recognizing when a driver may have hearing loss or be hard of hearing.
  - Accommodations that can be provided for special programs that may be implemented to ensure access to residents with disabilities, such as ride along programs, Citizen's Academy, National Night Out, Blue Santa or similar holiday programs, etc.
  - Policy on the transportation, detention, and interrogation of detainees that require special accommodations due to:
    - The use of a mobility device, especially a wheelchair, that require special vehicles.
    - Transportation policy for service animals and the ability of the detainee to retain their animal during detention, including conditions when the person may be separated from their service animal and how the service animal will be cared for to ensure it is segregated from other animals at a shelter and be immediately available to the detainee upon their release.
    - Consideration of expedited procedures for processing of detained persons with disabilities, especially non-violent offenders that require special medical attention, have a service animal, etc. for processing and release.
    - A policy on when mobility devices or other personal property may be removed from the detainee when it may be a security concern or used as a weapon, including mobility aids (walkers, canes, etc.) and prosthetics.
- The ADA Coordinator should monitor programmatic access, making any necessary changes to ensure access and document compliance efforts. This would include requesting persons needing an accommodation for access to a program provide information about the type of accommodation they believe would be effective for them to gain access to the program.

## **2.8 Special Events and Private Events on City Property**

The City could provide opportunities for private organizations to utilize City facilities for special or private events. Contained within the ADA are two titles that pertain to public and private entities. Public entities are not subject to Title III of the ADA. Conversely, private entities are not subject to Title II. In many situations, however, public entities have close relationships with private entities that are covered by Title III (Public Accommodations), with the result that certain activities may be at least indirectly affected by both Titles. This is the case with certain special events or private organizations that may use City facilities.



**Self-Evaluation Findings:**

- The City does not appear to allow the public to rent any spaces at City facilities.
- The City has a process for special events in the City ROW that includes completion of an application with various questions. Nothing on the form provides information about the potential impact of the event on pedestrians with disabilities and nothing in the rules governing special events requires ensuring access for pedestrians with disabilities to existing facilities is maintained or provided (i.e., no obstruction of curb ramps, PAR, or accessible on-street parking).
- The City sponsors a variety of special events on City property, including Holiday Homecoming, Summer Fest, Patriot Day, Fall Lawn-In Festival, and others.

**Recommended Action:**

- Ensure that if facilities are made available to the public that they are accessible to the greatest extent possible and that fully accessible facilities and amenities are clearly identified on the City website.
- Consider having City staff review an accessibility checklist for temporary events sponsored by the City as part of the planning. A good resource published by the ADA National Network entitled 'A Planning Guide for Making Temporary Events Accessible to People with Disabilities' can be reviewed at [https://adata.org/sites/adata.org/files/files/EventPlanningGuide\\_Final\\_2015.pdf](https://adata.org/sites/adata.org/files/files/EventPlanningGuide_Final_2015.pdf).
- Ensure that privately sponsored events on City property follow a similar evaluation for accessibility as that noted above.

## **2.9 Ordinances, Design Standards, and Other Documents**

Title II entities typically have a number of documents that specify requirements, design standards, and other requirements for construction of various facilities. Often, these documents reference pertinent guidance, such as state DOT, International/State Building Codes, etc. A review of documents that contain, or should contain, provisions related to accessibility was done by searching key words where possible. Note that not all documents were checked for compatibility of screen reading programs.

**Self-Evaluation Findings:**

- The 2012 ADA Transition Plan is located on the City website Document Center files under Human Resources at <https://www.newhaven.in.gov/DocumentCenter/View/171/American-with-Disabilities-Act-ADA-Transition-Plan-PDF>.
- The City provides an ADA Accommodation Request Form located on the City website Document Center files under Human Resources at <https://www.newhaven.in.gov/DocumentCenter/View/170/American-with-Disabilities-Act-ADA-Accommodation-Request-Form-PDF>. The form is not specific about being for employees, the public, or both.
- The 2023 New Haven Annual Report for the Engineering Department noted that the City constructed 31 new ADA ramps, 1266 feet of new trails, and 16,298 feet of new sidewalks.
- The 'Driveway/Sidewalk Application/Permit' was reviewed. There is nothing on the application or driveway specification drawing that includes the requirement that the sidewalk be constructed through the driveway to maintain a maximum 2% cross slope for pedestrians.
- Chapter 153 of the New Haven Land Usage Codes designates the Allen County Building Department to administer and enforce building codes within the city limits. The County utilizes various Indiana building codes within the various articles of Title 675 of the Indiana Administrative Code. All plan review is done by the State.



- No information was provided regarding any specific training for Engineering Department plan reviewers or inspectors related to ADA requirements.
- The 2012 ADA Transition Plan includes under the heading 'Design Standards-Sidewalks' the following text: *"Sidewalks: Sidewalk curbs constructed as part of planned development, sidewalk curbs replaced by or for the City of New Haven, or sidewalk curbs replaced by or for a property owner through a city match funding program shall be constructed in accordance with the **PROWAG (Public Right-of-Way Accessibility Guidelines) regulations and standards.**"*
- The City of New Haven Engineering Department has developed and adopted a 'Standards & Specifications' (published June 4, 2019, and revised date August 3, 2021). Review of the document found the following items of note:
  - Section 5.02.02 'Sanitary Sewer Structures' states under the sub-heading 'Castings', **"Casting frames and covers located in pedestrian areas shall comply with all current ADA requirements."**
  - Section 6.02.02 'Storm Sewer Structures' states under the sub-heading 'Castings', **"Casting frames and covers located in pedestrian areas shall comply with all current ADA requirements."**
  - Section 7.05 'Concrete Curb, Curb Ramp, Driveway, Sidewalk' states in the introduction to the section, **"Existing walks, driveways, or curbs, when disturbed or damaged by construction, shall be replaced to their original condition with construction as per new sidewalks or curbs, and Americans with Disability Act (ADA) compliant."**
  - Section 7.05.02 'Curb Ramps' states, **"Curb ramps located at intersections shall be constructed in compliance with the most current requirements of the ADA and PROWAG."**
  - Section 7.05.04 'Sidewalks' states, **"Cross slope of the sidewalk shall not exceed 2%."**
- The Engineering Department noted that they use INDOT, PROWAG, and City of Fort Wayne standards for design of ROW facilities.
- The City of New Haven Engineering Department has developed and adopted a 'Standard Construction Details' (published June 4, 2019, and revised date August 3, 2021). Review of the document found the following items of note:
  - Detail Numbers Road-1 through Road-3 include a notation for the maximum sidewalk cross slope to be 2%.
  - Detail Numbers Road-12 through Road-17 include information related to design of various perpendicular curb ramps, with Road-12 including a number of 'General Notes' that apply to all curb ramps. All notes and details appear to be consistent with the requirements of PROWAG related to dimensions and slopes of curb ramps, grade breaks, detectable warning surfaces, turning spaces (TS), flares, and clear spaces (CS).
  - Detail Numbers Road-18 and Road-19 include information related to design of parallel curb ramps. All notes and details appear to be consistent with the requirements of PROWAG related to dimensions and slopes of curb ramps, grade breaks, detectable warning surfaces, and TS.
  - Detail Numbers Road-20 and Road-21 include information related to design of blended transitions and depressed corners. All notes and details appear to be consistent with the requirements of PROWAG related to dimensions and slopes, detectable warning surfaces, and TS.
  - Detail Number Road-22 includes information related to design of median cut-throughs and perpendicular ramps. All notes and details appear to be consistent with the requirements of PROWAG related to dimensions and slopes of curb ramps, grade breaks, TS (landings), detectable warning surfaces, and TS.
  - Detail Numbers Road-23 through Road-25 includes information related to placement and configuration of detectable warning surfaces and truncated dome requirements. All notes and details appear to be consistent with the requirements of PROWAG.

- Detail Road-33 includes information related to residential driveway entrances. The detail notes a maximum cross slope for the sidewalk of 2% but that note is included outside of the driveway. It is not clear that the 2% cross slope must be maintained through the driveway for the sidewalk and no cross section is provided that would reinforce that requirement.
- Detail Road-37 includes information related to typical concrete sidewalk. All dimensions and cross slopes provided are consistent with the requirements of PROWAG.
- The City Code of Ordinances (2023 S-5 Supplement) was reviewed and found the following relevant items:
  - The code uses the term 'handicap' and various tenses of the word to describe a disability.
  - Chapter 33 'Finance and Funds' within 33.31 'Sidewalk Matching Fund' includes authority to establish this fund for repair and maintenance of sidewalks, which costs *"shall be shared between property owners and the city."*
  - Chapter 70 'Motor Vehicles and Traffic' includes within 70.165 'Parking Prohibited in Specified Places', *"No person shall park a vehicle, except when necessary to avoid conflict with other traffic or in compliance with law or the direction of a police officer or traffic-control device in any of the following places or manner: (A) On a sidewalk or where any portion of said vehicle, or any item on, or contained in, or attached to said vehicle, obstructs any portion of a sidewalk; (E) On a crosswalk;"*
  - Includes in 70.173 'Restricted, Impaired Mobility Parking' *"No person shall stop, stand or park a vehicle in a space designated for impaired mobility parking unless the vehicle bears a license plate or decal issued by the state or another state containing the international wheelchair symbol or such other symbol as the Commission of the Bureau of Motor Vehicles of Indiana or any other state shall designate to distinguish a vehicle used by or to transport an impaired mobility person. A list of such restricted parking areas is to be maintained on file in the office of the city's Clerk-Treasurer."*
  - Chapter 71 'Parking Schedules' includes in Schedule IV 'Restricted, Impaired Mobility Parking Areas' four areas for on-street parking to be reserved parking for persons with impaired mobility.
  - Chapter 73 'Recreational Vehicles' within part 73.20 'Definitions' several exceptions for mopeds and pocket bikes, *"An electric personal assistive mobility device presently defined in I.C. 9-13-2-49.3."*
  - Chapter 93 'Street, Sidewalks, and Alleys' includes the following:
    - Within part 93.04 'City Authority over Sidewalks; Sidewalk Dimensions' notes within (A) *"All sidewalks shall at all times be under the direction of the Common Council or the City Engineer."*
    - Within part 93.08 'Required Installation of Public Sidewalks within City Limits' *"Public sidewalks, of not less than four feet in width and complying with the City Engineer specification, shall be installed, in the future, in all areas, zones or districts within the corporate limits of the city whenever a new structure, off-street parking lot or improvement is erected, installed or placed or occupancy and use is made thereof, hereafter."*
    - Within part 93.35 'Removal of Snow from Sidewalks' *"Every occupant or owner of a house or any other buildings, the owner, proprietor lessee, persons entitled to the possession of any vacant lot or any person in charge of any church, jail, public hall or other building in the city shall, during the winter season and during the time when show shall continue on the ground, by 10:00 a.m. each and every morning clean the sidewalks in front of the house or other buildings and in front of lots, and shall keep them free from ice and snow during the day."*
  - Chapter 119 'Outdoor Dining Areas' includes provisions in part 119.01(C) that defines the rules for sidewalk dining areas and requires in *"(2) The outdoor dining area **shall at all times leave at least four feet of flat sidewalk for pedestrian and wheelchair traffic, free from obstructions.**"*
  - Chapter 130 'Offenses Affecting Persons and Property' includes the definition of 'handicap' as *"With respect to a person means:*

- (a) A physical or mental impairment which substantially limits one or more of such person's major life activities.
- (b) A record of having such an impairment, or
- (c) Being regarded as having such an impairment.
- (d) An impairment described or defined pursuant to the Federal Americans with Disabilities Act of 1990.
- (e) Any other impairment defined in 910 IAC 2-3.

*The term HANDICAP shall not include current illegal use of or addictions to a controlled substance as defined in Section 802 of Title 21 of the United States Code 910 IAC 2-3-2(14); nor does the term HANDICAP include an individual solely because that individual is a transvestite."*

- Within Section 130.011 'Other Forms of Discrimination', prohibits discrimination in (A) employment, (B) labor organizations, (C) public accommodations, (D) education, and (E) other unlawful practices on the basis of "handicap".
- The City Unified Development Ordinance was reviewed and found the following relevant items:
  - Chapter 157.404 'Development Design Standards', part (N)(1)(d) states, *"If the proposed roadway is to be dedicated to New Haven, the design shall comply with the requirements of the Americans with Disabilities Act, including but not limited to the Public Right-of-Way Accessibility Guidelines."*
  - Chapter 157.407 'Parking', part (C)(3) 'Compliance with the Americans with Disabilities Act' states, *"The design and construction of all new off-street parking areas shall comply with the applicable requirements of the Americans with Disabilities Act (ADA)."*
- The New Haven Comprehensive Plan (dated February 2023), prepared by City staff and a consultant, was reviewed, with the following items of note included within:
  - On page 33 under the heading 'Neighborhood Design', there are references to ADA compliance and Universal Design. An example provided is the construction or repair of driveways to meet the street at a slope as flat as possible to allow residents that use wheelchairs to *"more safely roll onto the road"*. Driveways should typically not be relied upon in most situations for wheelchairs to travel from/to the adjacent sidewalk and street and that path of travel should not be encouraged. More important would be to ensure sidewalks through driveways do not present a travel barrier to pedestrians due to extreme cross slope changes.
  - Most land use types are encouraged to provide sidewalks or multi-use paths that connect to other pedestrian infrastructure and on-street parking where appropriate.
  - Relevant goals within the section 'Transportation and Connectivity' include *"Promoting efficient and safe modes of transportation, including biking, walking, trains, vehicular travel, and public transit, ensuring connectivity throughout the city, enhancing corridor connections from north to south, and improving infrastructure."* This was supported by survey responses that indicated a desire for a need for more connectivity, especially between parks and trails.
  - Implementation Strategy 3 includes *"Adopt a complete streets ordinance and explore development incentives to encourage neighborhood connectivity through sidewalks and trails."*, with action steps of identifying gaps in sidewalk infrastructure and areas in need of maintenance or improvement and also exploring funding opportunities for bicycle and pedestrian infrastructure, trails, and sidewalk improvements.
  - Implementation Strategy 5 includes the action step of identifying gaps in sidewalk infrastructure to improve connectivity.
- Since park facilities and PSAs are under the jurisdiction of a separate Title II entity than the City but the City is part of the entity, a cursory review of the New Haven-Adams Township 2023-2027 Parks and Recreation Master Plan (dated April 2023), prepared by staff and consultants was reviewed and the following relevant items noted:

- The document includes an 'Assurance of Accessibility Compliance with Architectural Barriers Act of 1968 (as amended) Section 504 of the Rehabilitation Act of 19732 (as amended) and Title II of the Americans with Disabilities Act of 1990 (as amended)'.
- Section 2 'Key Plan Initiatives & Strategies' includes within sub-part 1.06 *"Create an ADA Transition Plan for the park system"*.
- Section 3 'Scoping' includes a statement that *"ADA improvements are warranted."*
- Section 5 'Accessibility' includes discussion specific to offering barrier-free facilities and PSAs. It notes within this section that an ADA self-evaluation of park facilities was done in 2010 but no details are provided about the results. This section also notes that a new self-evaluation will be conducted in 2023 as funding allows. It also notes that the ADA Grievance form and complaint procedures need to be updated, with an example of both included at the end of this section.
- Section 9 'Priorities and Strategic Action Schedule' includes line items for various accessibility improvements each year. It is unknown in most cases where those funds should be expended and the barriers that would be removed due to a lack of a current, comprehensive barrier assessment of facilities.
- Several facilities in Appendix B 'Parks Assessment' are noted as needing various accessibility improvements.
- The City does not appear to have a policy on service animals being permitted in all City facilities and no signage was observed noting they are permitted.

#### **Recommended Action**

- Consider developing a dedicated site for ADA/Title VI related information on the website, ensuring it can easily be found on the home page. All documents related to civil rights compliance by the City should be provided there.
- The 'Document Center' was found only via search of the website ([www.newhaven.in.gov/documentcenter](http://www.newhaven.in.gov/documentcenter)). Consider a master location for all documents not related to boards/commissions or civil rights on that page, as well as documents accessed on the current 'Permits & Applications' button on the home page.
- Continue specifically referencing the most current versions of ICC, INDOT, ADASAD, and PROWAG related to compliance of facilities and ROW for consistency. Ensure that all documents adhere to the most stringent standard when they are updated.
- Ensure that all applications and drawings for public permits specifically provide requirements for ADA compliance, especially at driveways regarding cross slopes for pedestrians crossing the driveway.
- Ensure that City Engineering Department staff that inspect, design, and/or review designs for facilities in the ROW are well versed on the requirements of PROWAG and receive the necessary training and continuing education to ensure compliance.
- Ensure that sidewalk replacement policies or ordinances (including Chapter 33 of the Code of Ordinances) is consistent with case law and regulations related specifically to ADA compliance responsibilities of ROW facilities. Confirm the most current case law regarding City sidewalks being a City program or facility and the ability of the City to assess fronting property owners for costs of construction or repair of sidewalks within the public ROW. Examples include Barden v. City of Sacramento, Culvahouse v. City of LaPorte, Hamer v. City of Trinidad, and Frame v. City of Arlington.
- Continue to ensure that the City's 'Standards and Specifications' and 'Standard Construction Details' are consistent with the requirements of PROWAG and also to not specify slopes that are the maximum allowed by ADA. With the recent adoption of PROWAG by the U.S. Access Board and impending adoption by a federal agency that would make PROWAG the enforceable standard, simply referencing PROWAG would be an option for all design standards and construction details in the City's public ROW.

- For all documents, ensure updates reflect current nomenclature. For example, remove all forms and tenses of “handicap” and replace with the appropriate tense of “accessible” or “disability”.
- Provide relevant references to the various ADA standards and guidelines in all documents that reference design and construction.
- Consider utilization of special funding opportunities, including American Rescue Plan Act funding, to make improvements specific to disability access at City facilities.
- Ensure that reserved on-street parking requests for a driver with a disability provides a reserved space for the approved applicant and not simply an accessible parking space that anyone with a valid accessible parking placard or plate could use. This would provide the greatest level of meeting the intent of the City and the applicant by providing the space only for the applicant that has met the criteria of the ordinance.
- Consider an educational campaign regarding the barriers presented to persons with mobility impairments of blocking sidewalks with parked vehicles, even when those vehicles are within driveways, and other temporary obstructions and the prohibition by ordinance Chapter 70 from obstructing the PAR and Chapter 93 for removal of snow.
- Ensure that outdoor dining areas permitted in Chapter 119 consider not only the required four feet of clear width but also that the clear area be free of protrusions or other hazards and provide a compliant cross slope. Where possible, the PAR should be continuous by requiring outdoor dining areas to be nearest the curb rather than immediately adjacent to buildings.
- Ensure that Chapter 73 and other ordinances or City policies that apply are consistent with the ADA requirements of OPDMD. OPDMD is defined in the new rules as *“any mobility device powered by batteries, fuel, or other engines . . . that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices... such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair”*. OPDMDs are required to be permitting in all locations where wheelchairs are allowed unless there is a clear and obvious safety reason to exclude them in some areas. See guidance on OPDMDs at the USDOJ website at [www.ada.gov/opdmd.pdf](http://www.ada.gov/opdmd.pdf).
- Consider the items noted regarding statements in the Comprehensive Plan, particularly use of driveways as access points between the sidewalk and street. The Plan provides important items to enact, including complete streets, infrastructure improvements, and eliminating gaps in the pedestrian network.
- Work in collaboration with the Park Board and staff to have an ADA Transition Plan completed that includes a comprehensive review of facilities and PSAs. There are significant instances of dual responsibility between the City and New Haven-Adams Township Parks and Recreation related to ownership of facilities and use for various PSAs of both entities. The same would hold true between the City and the Fire Authority but to a much lesser extent.
- Consider developing a service animal policy that meets the requirements of federal law in regard to where service animals (dogs) must be allowed and the conditions in which they can be asked to be removed or restricted. See guidance at [www.ada.gov/service\\_animals\\_2010.htm](http://www.ada.gov/service_animals_2010.htm).

## **2.10 Contracted Services and Contractors**

Public entities cannot use contract procurement criteria that discriminates against persons with disabilities ([28 CFR 35.130 \(b\)\(5\)](http://www.federalregister.gov/?date=2012-03-26)). In addition, selected contractors should be held to the same nondiscrimination rules as the City.

### **Self-Evaluation Findings:**

- No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.



**Recommended Action:**

- All City contracts should be reviewed to ensure that they include specific, detailed ADA language to require that contractors that provide City services to the public comply with the ADA.
- It is recommended that the City consider a means to maintain compliance when contracting for services or when leasing facilities by:
  - Including ADA compliance requirements in new requests for proposals.
  - Reviewing ADA requirements when contracts or leases are negotiated, revised, or renewed.

**2.11 Customer Service, Satisfaction, and Input**

ADA requires a public entity to provide an opportunity to interested persons and organizations to participate in the self-evaluation process. For three years after completion of the self-evaluation, a public entity must maintain a record of any problems identified ([28 CFR 35.105](#)).

**Self-Evaluation Findings:**

- Public notices of the 2012 Transition Plan were posted on the City website.
- Letters were sent to a number of disability advocacy organizations to inform them of this ADA Transition Plan update and solicit input on the content of the draft ADA Transition Plan. An online survey was also posted, which was anonymous and used to determine public interest, demographics of respondents, and general perceptions of accessibility at City facilities and PSAs.
- No complaints or grievances were reported related to inability to accommodate customers with disabilities or inability of persons with disabilities to access City programs or facilities.
- The website has a feature called ‘SeeClickFix 311’, which allows residents to provide information about a variety of topics to inform the City of issues that need to be addressed. Examples include street and sidewalk issues, a streetlight out that is out, trash/yard waste service not completed, fire hydrant maintenance, and more. There are no specific options to report an accessibility concern other than the ‘Sidewalk Issue’ or ‘General Concern’ option on the list ([https://seeclickfix.com/web\\_portal/5CfaUbAc4sgE3ZLPXCm1GzFz/issues/map](https://seeclickfix.com/web_portal/5CfaUbAc4sgE3ZLPXCm1GzFz/issues/map)).
- The website includes an online engagement site ‘Our Community, Your Voice’ that is accessed from the home page via the ‘About’, ‘City Notifications’ button.

**Recommended Action:**

- Ensure that the public has the opportunity to provide input and comments on the City’s ADA compliance efforts, budgeting, and prioritization.
- Conduct periodic customer satisfaction surveys or gather input from recipients of City services using an alternate method, such as public hearings or focus groups. An additional emphasis should be made to survey individuals with disabilities and organizations representing individuals with disabilities.
- Partner with persons with disabilities, their caregivers, and disability advocates to identify concerns and gather comments on capital improvement projects to improve accessibility to people with disabilities during design. Valid comments provided to the City should be considered in the scheduling and prioritization of projects.
- Ensure that formal grievances are carefully tracked through resolution, consistent with the grievance procedure.
- Consider adding a specific topic button on ‘SeeClickFix311’ for accessibility issues, which could include issues with ROW or non-ROW facilities.
- Consider formal sessions for online or other public engagement related to accessibility and PSA access on the ‘Our Community, Your Voice’ site.

## **2.12 Equally Effective Communication**

The ADA calls for public entities to provide applicants, participants, members of the public, and companions with disabilities with communication access that is equally effective as that provided to persons without disabilities ([28 CFR 35.160\(a\)-\(d\)](#)). The regulations also require that the public entity provide the appropriate auxiliary aids and services where necessary to give people with disabilities an equal opportunity to participate in, and enjoy the benefits of a service, program, or activity of a public entity. The law stipulates that the individuals can request the auxiliary aids and services of their choice and that the City will honor the request unless a suitable substitute exists or the request is not required under the law. In addition, the City may provide qualified interpreters via video from a remote location as long as it can meet the performance requirements of [28 CFR 35.160\(d\)](#).

### **AUXILIARY AIDS AND SERVICES**

#### **Self-Evaluation Findings:**

- The City has not provided people with disabilities written materials and publications in Braille or large print text, nor have they been asked to do so.
- The Council Chambers on the 1<sup>st</sup> floor of City Hall has an audio amplification system but no ALS. Not all public meetings of the City are held in that space, with facilities of the Parks Board and Fire Authority also sponsoring various meetings of City boards and commissions.
- No departments stated that they have hired/utilized transcription services and readers.

#### **Recommended Action:**

- The City should provide staff training and information regarding auxiliary aids and effective communication, including the use of TDD and relay services for communicating with persons with hearing loss.
- The City should ensure that all City meeting rooms have an ALS and also ensure the proper number of listening devices and types of devices are available. Compliant signage that includes the International Symbol of Access for Hearing Loss should be provided outside of all entries to rooms that provide an Assistive Listening System and Devices. Signs should include guidance on where the devices are located.
- Work with the other authorities to ensure a compliant ALS and ALDs, with signage, are available as required at all meeting rooms that sponsor City board/commission meetings.
- The City should have a complete list of auxiliary service providers, i.e., Braille transcription services, computer assisted transcript, dictation and transcription, American Sign Language (ASL) interpreters, etc.
- The City should ensure that reasonable accommodations are provided to employees that request it and documentation of the review and approval of the accommodations are maintained in City records with necessary private information redacted.
- Staff should continue to assist customers through various means of accommodation for program access and be offered training on various techniques that may be used to provide instant assistance rather than having to wait for a translator or interpreter to be hired to assist.

### **INTERPRETER SERVICES**

#### **Self-Evaluation Findings:**

- No departments have hired interpreters as an accommodation or to assist interviews for investigations, including assistance for the hearing impaired.
- The City has no contracts in place for on-site interpretation services.

**Recommended Action:**

- The City should consider a City-wide contract for qualified sign interpreter services that departments could utilize as needed. A list of interpreters should be maintained by the ADA Coordinator.
- Interpreters should be provided upon request for accommodations or in situations where an interpreter is known or likely to be needed.
- The City should explore the viability of providing qualified sign interpreters from a remote location and transmitting the participant's response to the interpreter in instances when an interpreter is needed without advanced notice being provided for customer service, in accordance with [28 CFR 35.160\(d\)](#).

**TELECOMMUNICATIONS DEVICES FOR THE DEAF**

**Self-Evaluation Findings:**

- TDD/TTY numbers are not listed for the City or any City departments on the website or staff directory on the website, as there are none.
- The Planning Department staff noted that they had utilized a relay service to communicate with a resident regarding an issue of interest.
- Phone systems in City facilities are all currently compatible with TDD systems.

**Recommended Action:**

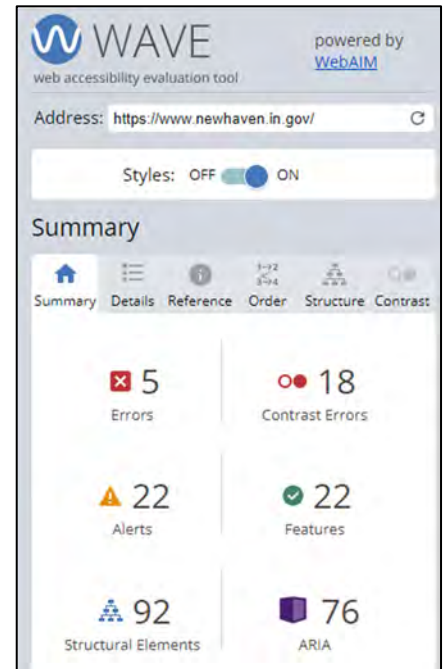
- Where the City uses an automated answering system for receiving and directing incoming telephone calls, the City should enable this system to provide real-time communication with individuals using auxiliary aids and services, including TDD and telecommunications relay systems ([28 CFR 35.161\(b\)](#)).
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications, including those from relay services. Information and training should be provided on an ongoing basis.
- The ADA requires all Public Safety Answering Points (PSAPs) to provide direct, equal access to their services for people with disabilities who use teletypewriters (TTYs) or TDDs, including 9-1-1 services. The Title II regulation specifically prohibits emergency telephone service providers from relying on relay services. Relay services do not provide "direct access," because they require the services of a third party and are far more time-consuming than direct TTY calls. However, if a person placing a call to a PSAP voluntarily chooses to rely on a telephone relay service, the PSAP must answer and respond appropriately to such a call. PSAPs must train their call takers to effectively recognize and process TTY calls. Call takers must be trained in the use of TTY equipment and supplied with information about communication protocol with individuals who are deaf or hard of hearing, or who have speech impairments. Ensure compatibility of 9-1-1 equipment and proper training of staff.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD, Video Phone (VP), and VRI/VRS communications. Information and training should be provided on an ongoing basis.

**WEBSITE**

Currently there are no adopted standards for websites that apply to Title II or Title III entities. However, numerous lawsuits have been filed recently, alleging discrimination due to websites not meeting the Web Content Accessibility Guidelines (WCAG), which apply to federal websites. Some decisions that make it to Federal Appeals Courts may be binding to all similar entities in that court jurisdiction. It is very likely that the WCAG will be the enforceable standard for all websites at some point in the future. It is highly recommended that all Title II and Title III entities work towards modifications to websites to meet WCAG sooner rather than later.

**Self-Evaluation Findings:**

- The City website home page address is <https://www.newhaven.in.gov/>. The website appears to be designed and managed by CivicPlus®. The City indicated that upgrades were in process to improve accessibility of the website.
- The website includes an 'Accessibility' tab at <https://www.newhaven.in.gov/accessibility>, which includes general information about website accessibility.
- The website utilizes pull down menus with multiple layers that may be confusing for some people to use.
- Running an accessibility check with the Web Accessibility Evaluation Tool website (WAVE - [wave.webaim.org/](http://wave.webaim.org/)) generated the following information (see report for the home page). Some errors were found, with limitations such as contrast errors and structural elements being more plentiful. Other pages on the City site had similar results.
- Many City forms are available on the website in Portable Document Format (PDF). The 'Agenda Center' includes agendas and minutes for meetings of City boards and commissions. Some PDF documents, especially meeting minutes that have signatures, are scanned documents and may not be readable by all screen reading programs used by persons with visual impairments. Examples of scanned documents include the March 5, 2024, meeting of the BPWS ([https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/\\_03052024-593](https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/_03052024-593)) and City Council on February 6, 2024 ([https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/\\_02022024-581](https://www.newhaven.in.gov/AgendaCenter/ViewFile/Minutes/_02022024-581)). Both examples are scanned only because of signatures and would not be readable by most programs or by persons that do not have conversion software.
- The website has links to outside websites for various payments, including utility bills, registration for recreation programs, etc. The accessibility of these websites was not evaluated.
- The City website provides direct links to several social media sites, with additional sites found with a search (search was not exhaustive). Note that the Parks Department has additional social media sites but since they are a separate Title II entity information is not provided below.
  - City Facebook – [www.facebook.com/NewHavenIn/](https://www.facebook.com/NewHavenIn/) - created on November 9, 2019, and includes videos dated as far back as January 7, 2019, for the Board of Works, City Council, and various informational and special events videos. Closed captioning appears to be provided beginning with the City Council meeting of June 9, 2020, but some videos after that date did not have captioning provided. All recent videos appear to have closed captioning provided.
  - City X (Twitter) – [https://twitter.com/newhaven\\_in?lang=en](https://twitter.com/newhaven_in?lang=en) – created in December 2019, but does not appear to be actively maintained since the most recent post was dated July 7, 2020.
  - City Instagram – <https://www.instagram.com/cityofnewhavenin/> - appears to be have been created in January 2020, and provides a variety of information of general interest. The most recent post was in February 2024.
  - YouTube – <https://www.youtube.com/watch?v=qjGxbjPrUII> – the link to YouTube on the City's website includes only one video with music and various photos of the City. This video was posted on September 13, 2020.
- The link to access current agendas for the New Haven-Adams Township Park Board (<https://www.newhaven.in.gov/250/Park-Board>) is not active and gives an error message.
- The City IT staff has no formalized training on the ADA and compliance requirements for websites.



- Content on the website is generally readable by the screen reader program Non-Visual Desktop Access (NVDA).
- The GIS site for the City is provided by a link on the Planning Department site (<https://gis.newhavenin.org/portal/home/>), with additional services provided in cooperation with Allen County iMap (<https://www.acimap.us/assessors.html>). The accessibility of the iMap site was not evaluated.

**Recommended Action:**

- The City's website should be reviewed by the web developer to maintain, update, and monitor website accessibility. The World Wide Web Consortium (W3C) has recently updated Web Content Accessibility Guidelines (WCAG) to version 2.2, which should be the goal for all web updates to meet. When the website is redone, consider simplification in the presentation of the information and limit the use of pulldown menus. The following may provide useful information:
    - Utilize an accessibility checklist similar to that published by the [Access Board](#).
    - The University of Wisconsin Trace Center (<https://minds.wisconsin.edu/handle/1793/6747>) provides resources and on-line information that might assist the City in development and implementation of an accessible website.
    - The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible ([www.w3.org/WAI/](http://www.w3.org/WAI/)).
    - The [General Services Administration \(GSA\)](#) provides resources on their website for development of compliant websites.
    - The ADA National Network provides regular live webinars, which are also archived, with information on various ADA topics. Registration is free. The archived presentations entitled 'Evaluating Websites for Accessibility' (from September 5, 2019) and "An Introduction to Website Accessibility" (from May 5, 2022) can be found at <https://www.accessibilityonline.org/ao/archives/>.
  - Consider consolidation of the 'Agenda Center', 'Document Center', and other locations on the website that provide information and/or documents the public would normally look for, such as meeting agendas, minutes, forms, etc. These are currently accessed on various web or department pages and often difficult to find. The City's website development team should work to develop and refine procedures to design, maintain, update, and monitor website accessibility.
  - The City should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, programs, services, or activities.
  - Ensure that all PDF documents are directly converted to PDF and not a scan of the original document. Scans are not compatible with many reader programs and cannot always be converted to a readable format by free PDF reader programs. For documents with signatures, consider inserting scanned signatures in JPG or similar format or simply noting where a signed original can be obtained if needed. Ensure that non-PDF format documents are properly formatted and usable by screen reader programs. Consider running a test of all documents to be posted to the website to ensure compliance and compatibility with screen readers prior to posting.
  - The City should consider providing a dedicated ADA web page and include all documents and policies related to accessibility and other civil rights issues (e.g., Title VI). The site should prominently display the name and contact information for the City ADA Coordinator, and also provide direct links to all ADA-related documents (Transition Plan, grievance and complaint procedures, ADA Notice, etc.).
  - Ensure that all documents are updated as needed to provide the name of the current ADA Coordinator when the person in that position changes. Include the ADA Coordinator on the phone directory on the website.
-



- Consider having the Information Technology (IT) Department and other staff responsible for web content download NVDA or other commonly used screen reader program to test content ([www.nvaccess.org/download/](http://www.nvaccess.org/download/)) and also consider having vision impaired advocates assist with review of the website and various documents for readability by programs.
- Ensure that any social media pages that are linked directly from the home page are actively updated. Both the X (Twitter) and YouTube sites have no recent postings.
- If agendas and other information for non-City boards (e.g., Park Board) are to be included on the 'Agenda Center' or 'Document Center', ensure that information is regularly updated and provided in a timely manner.
- Consider adding a general disclaimer on the website *"The City of New Haven cannot confirm the accessibility or security of third-party websites"*.
- Provide compliant captioning of all video live stream and video recordings provided on the website to allow persons with hearing loss to have access to this program of the City. In addition, provide equally effective communication upon request, which could include written transcripts of meetings.

### **2.13 Alternate Communication Formats**

A public entity has a responsibility to provide information in alternative formats to comply with [28 CFR 35.160](#). This section of the ADA requires state and local government entities to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Communication access involves providing content in methods that are understandable and usable by people with reduced or no ability to: speak, see, or hear and limitations in learning and understanding. Some alternative formats can be produced in-house at minimal costs, i.e., large print, disks, and e-mail attachments. Other formats, such as Braille and audio-formats, may need to be produced by a vendor. Alternate communication formats that are likely to be requested include, but are not limited to: audio-formats, Braille, large print, captioned films and video, electronic text/disk/CD-ROM, or sign interpreted films and video.

#### **Self-Evaluation Findings:**

- The ADA Coordinator is the main point of contact for requesting and providing information in alternate formats on a request for accommodation basis.
- Many City departments and offices produce printed information that is distributed and available to the public.
- No departments stated that they had received requests for documents to be provided in alternate formats.
- The City has not been asked to provide written materials and publications in Braille or large print text.

#### **Recommended Action:**

- Ensure that requests for alternative communication formats follows a process similar to other accommodation requests. While the ADA Coordinator should be part of the process, there may be situations where multiple staff would be notified of requests to ensure prompt action. Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner. Consider use of a dedicated email address for all ADA inquiries by the public (i.e., accommodation requests, questions, grievances, etc.), which can be directed to multiple staff members that might need to be aware. A simple email address, such as [ADA@newhaven.in.gov](mailto:ADA@newhaven.in.gov), could have emails delivered to the ADA Coordinator, Planning Department (who typically staffs a majority of boards/commissions), City Manager, HR Director, etc. This would ensure someone receives the notification/request in a timely manner and can react accordingly. Ensure a clear

process is in place to confirm receipt and initiation of the necessary actions internally to respond to the request.

- The ADA Coordinator should be provided with the results of how requests for information in alternate formats was responded to and maintain files for all accommodation requests and efforts of the City to respond.
- The City should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- The City should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings. Many requests can be done internally by staff with the proper knowledge of how to accommodate these requests.

#### **2.14 Fees and Surcharges**

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services, or activities accessible to persons with disabilities ([28 CFR 35.130\(f\)](#)).

##### **Self-Evaluation Findings:**

- There was no evidence of fees charged to individuals *with* disabilities that were not charged to individuals *without* disabilities to access programs, services, and activities.

##### **Recommended Action:**

- The City should continue to monitor and review PSAs to ensure that fees and surcharges are not charged to individuals *with* disabilities that were not charged to individuals *without* disabilities.

#### **2.15 Information and Signage**

A public entity is required to ensure that individuals with disabilities are directed to an accessible entrance to a building and to the location and existence of accessible services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility ([28 CFR 35.163](#)). Paragraph (b) requires the public entity to provide signage at all inaccessible entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.

##### **Self-Evaluation Findings:**

- Accessible directional and informational signs are limited or not present at City facilities and City-owned sites.
- Inaccessible entrances do not provide signage directing users to accessible entrances.
- Signage within City buildings varies. Signage, where provided, outside of all permanent spaces (i.e., rooms) is required to be a compliant sign that includes visual and tactile letters and Braille that is positioned according to ADASAD. The recommendations in Appendix A may exceed the requirements and recommend compliant signage outside of all spaces to maximum accessibility, especially for people with vision loss or who are blind. Locations where signage is always required includes outside of enclosed stairways, within enclosed stairways (where the number of levels exceeds 2 generally), all restrooms, and all emergency egress doors. Some signs, including restrooms, stairways, etc. should also provide a compliant pictogram on the sign. Some locations provide mostly compliant signage, but other facilities frequently exhibit non-compliances including the following issues with signs: signage that is missing, signage mounted in the wrong location or wrong height, signs that provide no tactile characters and/or Braille, signs that have Braille or fonts that are not compliant, etc.

**Recommended Action:**

- An accessible signing strategy for City facilities should be developed for interior and exterior directional, informational, and permanent room signs. See the Appendix A of this updated SETP for details.
- Ensure that all non-accessible or restricted entrances provide directional signage indicating the location of the accessible public entrance(s) for each facility. Locate signage to be visible from approaches along accessible routes to minimize backtracking. Ensure all accessible entrances for facilities with non-accessible entrances include a large ISA sign at or near the door to identify it as an accessible entrance to the facility.
- Design standards for accessible signs should be created to guide the production and installation of the accessible signs.
- Signage replacement projects within facilities should include replacement or installation of accessible signs as required to meet ADASAD requirements.

**2.16 Staff Training**

On-going compliance with the ADA can only be achieved if City staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although specific training is not required by the ADA (other than ensuring that users of VRI technology and other involved individuals can quickly and efficiently set up and operate the VRI), training regarding the requirements of the ADA is strongly recommended to fully understand the City's obligations for compliance.

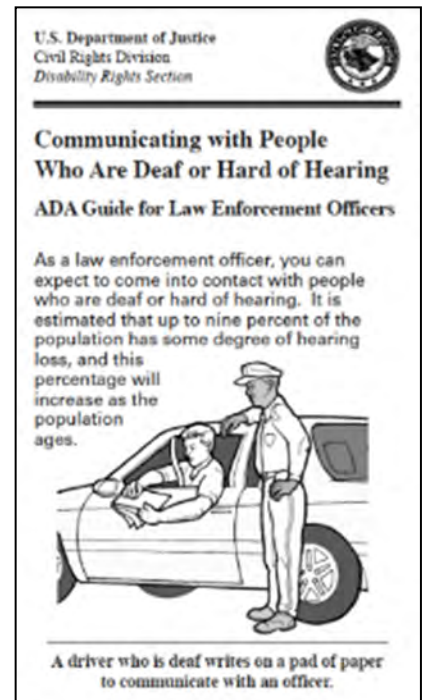
**Self-Evaluation Findings:**

- The ADA Coordinator completed her final test of certification in the ADA Coordinator Training Certification Program (ACTCP) in December 2023.
- The Engineering/Public Works Department noted that staff has taken online courses specific to ADA topics.
- The ADA Coordinator attended a remote online training in 2023 for Title VI and ADA Nondiscrimination Information Session for LPAs, provided by INDOT.
- The Engineering Department staff has attended ADA training sessions at the annual Purdue Road School conference.
- The HR Director has attended some ADA-related training, but no detail was provided about the content.
- The State of Indiana mandates various training for police officers and all officers are required to take 24 hours of training annually for continuing professional training. Relevant topics available through the Indiana Law Enforcement Academy (ILEA) on the website (<https://www.in.gov/ilea/mandated-in-service-training/>) includes courses on Mental Health, Disabilities, Autism, Alzheimer's, and Dementia. The Police Department noted that they use Police One training for all required annual training, which is assigned throughout the year to all officers.

**Recommended Action:**

- The ADA Coordinator should continue to explore training opportunities on various accessibility issues as part of the ACTCP continuing education credits requirements. In addition, the ADA Coordinator should explore relevant training opportunities for other staff that may be available, both in person and remotely. Ensure that documentation for all training related to ADA that is taken by employees or provided to the employees is maintained by the ADA Coordinator, including the topic, location, date(s), and record of attendance.

- The City should provide training to staff regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:
  - Requirements of the ADA for New Haven
  - Consequences of Non-Compliance
  - Acceptable Terminology and Phrases
  - Grievance/Complaint Procedures
  - Reasonable Accommodations
  - Awareness and Sensitivity
  - Disability Etiquette – a good resource is <https://unitedspinal.org/disability-etiquette/>
  - Accessible Locations for Meetings
  - Consequences of Non-Compliance
  - Barriers to Access – Programmatic and Physical
  - Auxiliary Aids and Services
  - TDD/TTY and use of Relay Services
  - Building Evacuation Procedures to Assist Persons with Disabilities, especially in multi-story buildings with public access to upper floors
- Training materials and handbooks should be prepared/provided, if needed, in alternate formats for all employee training.
- The ADA Coordinator should continue to provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public.
- It is recommended that the Police Department continue to receive training on ADA accessibility issues related to their activities and mandated annual training required by ILEA. In particular, training on communicating with people who are deaf or hard of hearing (reference <https://archive.ada.gov/lawenfcomm.htm>) and developing a policy on the topic as well (refer to [www.ada.gov/lawenfmodpolicy.pdf](http://www.ada.gov/lawenfmodpolicy.pdf)). Review of other guidance should be done as well, including the publication “Commonly Asked Questions About the Americans with Disabilities Act and Law Enforcement” ([www.ada.gov/qanda\\_law.pdf](http://www.ada.gov/qanda_law.pdf)).
- Additional training materials may be made available to officers on ‘Disabilities and Law Enforcement’, which is available on the U.S. Department of Justice web site ([www.ada.gov/policeinfo.htm](http://www.ada.gov/policeinfo.htm)) and ‘Commonly Asked Questions About the ADA and Law Enforcement’ (<https://www.ada.gov/resources/commonly-asked-questions-law-enforcement/>).
- City inspectors, designers, and plan reviewers should be familiar with the requirements of ADA standards and guidelines that pertain to the facilities they are responsible for. This would include ensuring compliance with the most stringent regulation (ADA-specific at a minimum) for facilities constructed by the City or private contractors prior to acceptance or approval.



## **2.17 Emergency Evacuation Procedures**

The City is required to establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. These plans and procedures should include identification of assembly locations for persons with disabilities in each facility, staff assigned to ensure that

assembly areas are checked prior to leaving buildings during an emergency, identification of assembly locations for pickup and transport of persons with disabilities, and location of accessible shelters to be used for various types of emergencies. Depending on the nature of the emergency, some shelters may not be appropriate.

**Self-Evaluation Findings:**

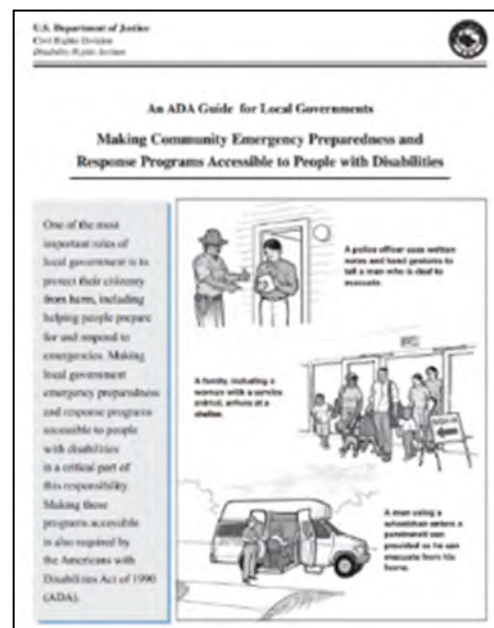
- The City of New Haven works in conjunction with the Allen County Office of Homeland Security and is a member of the Allen County Homeland Security Advisory Council (HSAC), which is comprised of a variety of representatives from various communities and organizations in Allen County. The HSAC supervises and controls the Allen County emergency management and disaster preparedness program and coordinates with the Indiana Department of Homeland Security (IDHS), United States Department of Homeland Security, and the Office for Domestic Preparedness, and many other State and Federal agencies.
- The Allen County Office of Homeland Security is responsible for writing, updating and disseminating the Emergency Operations Plan (EOP) and securing Memoranda of Understanding (MOU) and Mutual Aid Agreements as part of that document. They receive new and updated requirements from IDHS and relay them to cooperating agencies, including the City.
- The County participates in the Smart911 service, which allows all county residents, including those in New Haven, to sign up to receive alerts and notifications for weather, traffic, and other emergencies.
- Emergency evacuation plans were present at many City buildings. The Chief of Staff indicated that he was responsible for ensuring administration staff exit the building, no other departments noted that they have established emergency evacuation procedures to safely evacuate persons with disabilities in any of the facilities.
- The Smart911 registration allows for input of information for emergency responders to be aware of, including information about members of the household, service animals, and health information.
- Based on departmental questionnaire responses and observations during facility evaluations, it appears that at least some City facilities have plans in place for special preparation for emergency events, such as pre-determined meeting places, drills, and safety coordinators for each building. At most City facilities, fire escape signage and information on tornado and lockdown procedure is provided but is visual only. Generally, the evacuation routes are identified on a building layout diagram. Established procedures are in place for a variety of emergencies. However, it is not confirmed that all departments have established emergency evacuation procedures to specifically address safe evacuation of persons with disabilities.

**Recommended Action:**

- The City should review and update, if necessary, response procedures to include evacuation procedures to evacuate people with disabilities from all buildings. Excellent resources can be found at:
  - [www.ada.gov/emergencyprepguide.htm](http://www.ada.gov/emergencyprepguide.htm)
  - [www.access-board.gov/files/ada/guides/amoe.pdf](http://www.access-board.gov/files/ada/guides/amoe.pdf)
- The City should work with the Allen County Office of Homeland Security to ensure the EOP includes information related to the City's role in emergencies. This may include identification of evacuation routes and location of emergency shelters to be used for various types of emergencies and ensuring that vehicles used to evacuate residents are accessible, as are all of the emergency shelters. This is especially important for caregivers of persons with disabilities and group homes that are able to transport their clients.
- The City should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities, to all employees and volunteers charged with assisting in evacuations.



- Stress the importance of ensuring that non-profit agencies that coordinate and maintain the list of shelters identify and communicate which are accessible for various disabilities. Work closely with advocacy groups to update lists of homebound individuals and others needing assistance in the event of evacuation, including providing this information when registering in the Smart911 system.
- Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in the community who may require special assistance in the event of an emergency or natural disaster and encourage residents with special needs to register with the City to ensure that proper assistance can be provided if needed. Registration can be done by a variety of means but ensure it will include an option for persons without cell phones that may not be capable of registering with the Smart911 system.
- All City staff should be made aware of the location of the posted accessible evacuation routes within their facilities once the emergency evacuation plans have been prepared/updated. These routes should be conspicuously posted for the public within each facility.
- Include within evacuation plans for each building guidelines for the evacuation of persons with disabilities for various emergency situations. Each Department should use these guidelines to create their own emergency evacuation plans, which should:
  - Address what to do when an alarm is triggered;
  - Establish meeting places for assistance and evacuation at staircases;
  - Establish floor captains who will ensure that each floor is vacated prior to leaving themselves and ensuring that persons that need assistance are removed to safety.
- Ensure that in any emergency plans that are prepared or revised that the City includes specific information related to the special needs of persons with disabilities during the various types of emergency situations. Examples could include working with the County to:
  - Involve persons with disabilities and their advocates and caregivers in planning for emergencies.
  - Identify potential sources of equipment that can be made available for persons with disabilities in the event of an emergency. This equipment could include wheelchairs, walkers, etc. that might be left behind at homes or damaged during an evacuation.
  - Determine the feasibility of a voluntary, confidential registration of residents that would need special assistance during an evacuation or emergency that require utilization of temporary or longer-term sheltering. This is an option for Smart911 but not everyone has the ability to use a computer to register and could be a database prepared and maintained by the Police or Fire Department.
  - Ensure that designated shelters are accessible and able to meet the needs of persons with disabilities, including those with service animals.
  - Consider the potential special food and dietary requirements for some persons with disabilities in the provision of food in the event of an emergency.
  - Seek out volunteers with special training to assist persons with disabilities in all phases of an emergency and particularly at shelters, including ASL interpreters, mental health services, etc.
  - Ensure that all departments with emergency responsibilities understand them and know what is required for different types of emergencies.



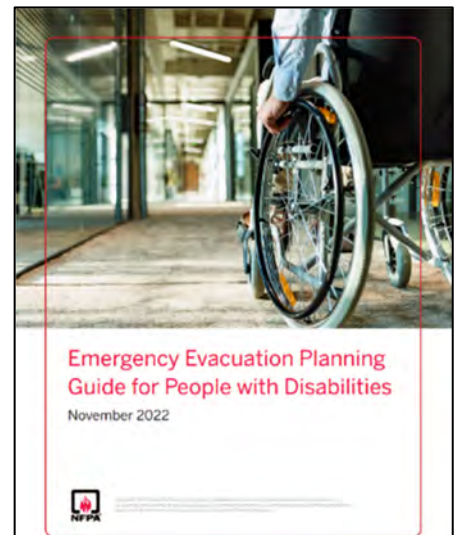
- Continue to partner with groups able to provide specialized assistance in emergencies and ensure each understands the potential needs on them.
- Consider adding details for Emergency Support Functions (ESF) that pertain to assisting persons with different disabilities for the different types of emergencies.
- Provide additional details after consultation with experts on how to ensure equally effective communication is provided to persons with disabilities in an emergency. Examples could include ensuring closed captioning is provided on television broadcasts, that ASL interpreters are provided for all televised briefings and updates, etc.
- Consider special events at City facilities to offer voluntary registration for residents without internet access and those that may need assistance with the registration process for Smart911 or other voluntary registration for individuals that may need special assistance in an emergency.
- Revisit emergency plans and signage for each facility. Include guidelines for the evacuation of persons with disabilities for various emergency situations. Verify on a regular basis that each department is aware of what to do when an alarm is triggered; aware of meeting places for assistance and evacuation at staircases; and have identified floor captains who will ensure that each floor is vacated prior to leaving themselves and ensuring that persons that need assistance are removed to safety or sheltered safely until emergency personnel can evacuate them.
- Consider providing special equipment for evacuation of persons in wheelchairs in multi-story facilities and/or ensuring the City emergency personnel have this type of equipment available. This equipment allows emergency personnel to safely transport people down stairs that are not able to do so independently and without having to be carried where elevators cannot be used for evacuation.
- City emergency responders should review and complete the Title II Emergency Management checklist at [www.ada.gov/pcatoolkit/chap7emergencygmtadd1.htm](http://www.ada.gov/pcatoolkit/chap7emergencygmtadd1.htm) for additional information about ensuring the Hazard Mitigation Plan considers persons with disabilities adequately.
- Excellent additional resources can be found at:
  - [U.S. Department of Homeland Security](http://U.S. Department of Homeland Security)
  - [National Fire Protection Association](http://National Fire Protection Association)
  - [www.ada.gov/emergencyprepguide.htm](http://www.ada.gov/emergencyprepguide.htm)
  - [U.S. Department of Health and Human Services](http://U.S. Department of Health and Human Services)
  - [onlinepubs.trb.org/onlinepubs/tcrp/tcrp\\_rpt\\_150.pdf](http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_150.pdf)
  - [www.nad.org/resources/emergency-preparedness/](http://www.nad.org/resources/emergency-preparedness/)

## 2.18 Employment

Title I of the ADA requires public entities not to discriminate against persons with disabilities in all parts of the recruitment and employment process ([28 CFR 35.140](#) and [29 CFR 1630.4](#)). It is recommended that employment-related items be discussed with a labor attorney and/or human resources specialist familiar with ADA and case law related to essential job functions, reasonable employee accommodation, and other employment issues. The findings and recommendations below are based on limited knowledge of these issues but warrant mention and consideration to allow the City to further evaluate the need for potential updates and/or changes.

### Self-Evaluation Findings:

- The HR Department primarily provides services to job applicants, City employees, and retirees.



- The City of New Haven Employment Handbook (dated January 1, 2022) appears to be prepared by the City. The handbook applies to all City employees, other than police and fire.
  - Section 2 'Application and initial Employment' states:
    - '202 Equal Employment Opportunity'. "202.01. *The City will provide equal employment opportunity to all employees and applicants for employment. The City realizes that equal employment opportunity benefits the City and its employees through the full utilization of all human resources. The City has and will continue to provide equal employment opportunity to all qualified persons and reaffirms its commitment that there will be no discrimination against, or harassment of, applicants or employees because of race, color, sex, religion, national origin, age, genetic information, disability, veteran status, sexual orientation, gender identity, or any other protected status. The City will continue to recruit, hire, promote, transfer, take corrective action and make all personnel decisions, including those related to compensation and benefits, non-discriminately and without regard to any protected status in accordance with applicable law. Further, the City will make reasonable accommodations for qualified applicants and employees with known disabilities who can perform the essential job functions with or without such accommodations."*
    - '203 Americans with Disabilities Act'. "203.01. *Qualified individuals with disabilities are not to be excluded from participation in or benefit from the services, programs, or activities of the City. It is the policy of the City not to discriminate against a qualified individual with a disability in job application procedures; the hiring, advancement, or dismissal of employees; employee compensation, job training; and other terms, conditions, and privileges of employment. It is the intent of the City to comply with all applicable requirements of the Americans with Disabilities Act (ADA).*"
    - '203 Americans with Disabilities Act'. "203.02. *The City will reasonably accommodate persons with a disability on a case-by-case basis, which may include making facilities readily accessible to individuals with a disability, restructuring jobs, modifying work schedules and/or equipment, or similar accommodations.*"
    - '203 Americans with Disabilities Act'. "203.03. *Employees who require an accommodation should inform their immediate supervisor or Human Resources.* Such employees may be required to provide medical information necessary to determine appropriate accommodations as identified by regulation and subject to HIPAA Medical Privacy Laws and other applicable state and federal regulations."
    - '203 Americans with Disabilities Act'. "203.04. *Accommodations may not create an undue hardship for the City or other employees. An individual who cannot be reasonably accommodated for a job without imposing an undue hardship may not be selected for that position. The City will engage in an interactive process with the individual to determine whether a reasonable accommodation is available.*"
    - '203 Americans with Disabilities Act'. "203.05. *All employees are required to comply with safety standards. Individuals who pose a direct threat to the health or safety of other individuals in the workplace, and where the threat cannot be eliminated by reasonable accommodation, may not be hired, or retained.*"
    - '203 Americans with Disabilities Act'. "203.06. *Generally, a "direct threat" means a significant risk to the health or safety of themselves or others that cannot be eliminated by reasonable accommodation. Benefits provided to disabled individuals who are qualified to perform the work must be consistent with the benefits provided to other employees. Any individual who believes he/she has received treatment inconsistent with the policies set forth above or any*

**other requirement of ADA, may file a complaint with the ADA Coordinator, Elected Official(s), or Human Resources.**

- Section 4 'Employee Standards of Conduct' states:
  - '414 Workplace Conduct'. "414.05. *Unlawful Harassment and Discrimination. Harassment or discrimination on the basis of any legally protected characteristic is strictly prohibited. **Demeaning, hostile, or offensive conduct based on membership in a group defined by characteristics such as** race, religion, color, national origin, gender, age, **disability**, genetics, veteran status, citizenship, sexual orientation, gender identity, or any other characteristic protected by law, and has the purpose or effect of unreasonably interfering with an individual's work performance, creating an intimidating, hostile or offensive work environment, or otherwise adversely affecting an employee's employment opportunities is prohibited."*
  - "414.05.02. This policy also prohibits sending, showing, sharing, or distributing in any form, inappropriate jokes, pictures, comics, stories, etc., including but not limited to via facsimile, e-mail, cell phone or other electronic devices, social media, and/or the Internet, such as YouTube, Twitter, and Facebook. **Harassment of any nature, when based on** race, religion, color, sex, national origin, age or **disability**, genetics, veteran status, citizenship, sexual orientation, gender identity, or any other characteristic protected by law is prohibited and will not be tolerated."
  - "414.07.02. **A complaint may be filed verbally, or in writing** to the employee's Supervisor or Department Head or to the Director of Human Resources."
- The Personnel Policies of the East Central Fire Territory include very similar provisions as the City Handbook.
- The HR Department utilizes an 'ADA Reasonable Accommodation Request Form' for applicants or employees with a disability upon request. The form is from the Job Accommodation Network.
- The employment application states that "It is the policy of the City to provide equal employment to all qualified persons without discrimination on the basis of sex, race, color, religion, age, marital status, national origin, citizenship, **disability**, veteran status, or any other status protected under local, state and federal law."
- Review of various examples of job descriptions for positions at the City noted the following relevant items:
  - Job descriptions appear to be prepared internally by City staff and were in different formats, possibly due to some departments preparing their own descriptions. The HR Department noted in the questionnaire that if department managers were comfortable with preparing job descriptions based on what their employees do there is collaboration with the department head and HR when writing job descriptions.
    - One format was on Human Resources Department letterhead and most included in the following order the position name and salary range, definition or job overview, essential functions, other duties (some), qualifications (abilities, education, and experience), physical demands, other demands, FLSA status, and who the person reports to. Some job descriptions in this format included an 'Environmental Elements' section that included the statement "Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions". One description included this same statement in the 'Physical Demands' section.
    - Another format was on City letterhead and included in the following order the position name, definition of the position, essential functions, qualification, education and experience, physical demands and other demands, environmental elements, who the person reports to, and salary and benefits information. Most job descriptions in this format included the statement Some job descriptions included the statement "Reasonable accommodations may be made to enable

*individuals with disabilities to perform the essential functions*” within the ‘Environmental Elements’ section.

- Positions within the Planning and Zoning Department were not on any letterhead and typically included the position name, primary job functions, secondary job functions, typical and/or equipment knowledge, critical skills/expertise, educational requirements, reporting responsibility, physical requirements, work environment, and safety requirements, with no classification or salary information included.
- None of the job descriptions reviewed provide a date of when they were prepared and revised.
- Several different job descriptions included responsibility in some capacity on ADA reporting and compliance.
- Several job ads were reviewed online at the City Job Board (<https://bsaonline.com/HrPositions/SearchResults?uid=2515&SalaryRange=-&Title=False&MunicipalityFilters=2515%3A%3ACity%20of%20New%20Haven&HideAppliedTo=False>). Postings included various information about the job description. Most include a link to the application for employment on the website but required an account being created on BS&A Online.
- Not all job descriptions required a valid driver’s license, while those that did appeared limited to positions that required operation of City vehicles in the performance of the job.

**Recommended Action:**

- The City should consider providing on-going training on how to provide services to persons and employees with a range of disabilities and developing strategies for appropriate modifications.
- The City should confirm that HR and other staff members that receive phone calls are trained in the use of TDD equipment or other means of communicating over the telephone with a person with hearing disabilities, including relay services.
- Ensure all applicable web pages and documents include a statement about the City being an ‘Equal Employment Opportunity’ employer or other statements compliant with applicable laws.
- Determine the potential need for alternate ways for individuals to apply for jobs if they do not have internet access. This could include providing information about where computers can be available (libraries, schools, City facilities, etc.), providing hard copies of applications for employment in both regular and alternate formats (e.g., large print), etc.
- The City should continue to practice the City policies of non-discrimination as required by ADA and other applicable laws.
- Ensure that electronic copies of all documents are available to City employees which are fully accessible and usable by persons that use screen reading programs. Existing scanned documents should be replaced by original PDF conversions. If signatures are desired, insert them as a picture in the PDF and ensure alt-text is provided. Run an accessibility test of all documents to ensure issues are repaired prior to the distribution of the documents to employees.
- The City should continue to practice the City policies of non-discrimination as required by ADA and other applicable laws for recruiting, hiring, training, assignments, compensation, benefits, transfers, layoffs, returns from layoffs, education, and promotion.
- Members of the public, including individuals with disabilities and groups representing individuals with disabilities, should be encouraged to submit suggestions to the City ADA Coordinator/HR Department on how the City might better meet the needs of individuals with disabilities pursuant to employment policies.
- Consider requiring all City employees, including police officers, to document all interactions with persons with disabilities, including the type of disabilities encountered, communication and any other issues due to the disability, and how the City employee was able to effectively communicate with the individual(s).



This type of documentation can be good examples to share with other City employees, including in-house training, and also create a documented file of ADA compliance efforts for the City.

- The City should consider carefully examining and updating all job descriptions as needed. Updates should ensure a standardized format for all job descriptions and could include modernizing language to simplify the existing information as often suggested by HR professionals at the National ADA Symposium, as well as a job analysis to ensure accuracy of information relied upon to update job descriptions, if needed.
  - Provide job functions identified as 'Essential' based on documentable evidence about the existence of the position for performance of the function, the limited number of employees that can perform the function, and the specialization and expertise required to perform the function. Further evidence would include employer judgment, amount of time performing the function, the consequences being serious if an infrequently performed function is not performed when needed, etc.
  - Ensure that 'Performs Related Duties as Assigned' is not included as an essential job function.
  - Do not include marginal or peripheral functions of positions within Essential Job Functions area, though these lesser functions can be included elsewhere if appropriate.
  - Use clear, concise, non-technical language and avoid gender-specific language, jargon, technical language, ambiguity, and language that may screen out individuals with disabilities.
  - Updates should include 'ADA Compliant Language'. Examples include modifying statements such as 'stand or sit' to 'stationary position', 'talk/hear' to 'communicate, convey, express oneself, exchange information', 'use hands/fingers to handle or feel' to 'operate, activate, use, prepare, inspect, detect, position', 'see' to detect, perceive, identify, recognize, observe, inspect, assess', 'carry or lift' to 'transport, move, position, put, install'.
  - Ensure requirements in all sections are actual requirements of the position and avoid use of subjective words such as 'normal' when describing visual acuity, hearing, etc. Determine need for requirements such as sense of smell or taste, depth and/or texture perception, color perception, etc., which for many jobs is unlikely to be needed to perform the duties of the job.
  - Ensure that all job descriptions include a brief statement at the bottom regarding reasonable accommodations being provided to allow qualified persons to perform essential job functions.
  - Review which jobs require a valid driver's license or commercial driver's license for the employee to perform job duties due to the need to operate a City vehicle. Remove the requirement from jobs that do not since many persons with disabilities are not able to obtain a driver's license, instead substituting the requirement with providing a valid photo ID issued by a governmental agency.
  - All job descriptions should include a date and dates of revisions to ensure those can be tracked.
- Ensure that the job description for the position that is designated as the City's ADA Coordinator includes this within the duties and the person in this position should have relevant experience and knowledge of the ADA and other civil rights laws related to Title I and Title II.
- An excellent resource to review when considering updates or modifications to various documents, including job descriptions, is the Job Assistance Network at <https://askjan.org/topics/jobdesc.cfm> and the U.S Department of Labor, Office of Disability Employment Policy at <https://www.dol.gov/odep/#>.
- Consider an alternative means of applying online that does not include a requirement for an account with BS&A or other third-party site. This could include a fillable form or other way for someone to provide the required application and information.

## **2.19 Department Self-Evaluation Findings and Recommendations**

DLZ distributed a questionnaire to the ADA Coordinator that requested information about various departments and PSAs of the City. This information included departmental specific items to provide information to help DLZ better understand the PSAs of each related to ADA understanding, training, and accommodation (see Appendix C). DLZ reviewed responses and coordinated clarifications and questions with

the ADA Coordinator. The questionnaire also allows DLZ to gain an understanding of how well the person completing the questionnaire understands the obligation to ensure their programs are accessible and how to provide accommodations. Additional inquiries were also made during the facility evaluations. A general summary follows.

**Self-Evaluation Findings:**

- The City has numerous departments with extensive, daily public interaction that is both in person and over the telephone.
- No departments reported having interacted with persons with various disabilities and expressed an ability to find a way to successfully provide accommodation.
- No departments identified a person to be the liaison with the ADA Coordinator.
- No departments responded that the programs offered for persons with disabilities were different in any way.
- Many departments have publications, documents, and forms that are reviewed, provided, or submitted to them by the public. Many of these documents are completed at the service counter.

**Recommended Action:**

- Public interactions with persons needing special accommodation due to a disability is likely to occur for all departments at some point. Training should be provided to all departments to review how to accommodate various disabilities and provide the same level of service.
- All departments should have a liaison identified that will interact with the ADA Coordinator and be responsible for ADA compliance in their department.
- Continue to ensure that all programs offered do not segregate customers with disabilities or not provide the same type and level of service.
- Ensure that all publications, documents, and forms that are provided to the public can be made available in alternate formats easily. This would include large print versions and electronic versions in multiple file formats. All departments should have an accessible workspace or clipboard that can be provided to someone that cannot reach counters that are above required height.
- Many departments evaluated have barriers present, all of which can be addressed by architectural modifications, various methods of equal accommodation, or changes in procedures.
- Funding will be a key component in some instances but many improvements in service to persons with disabilities can be done inexpensively and within a short time frame.
- The report includes a number of ways that departments can accommodate persons various disabilities, but circumstances and barriers vary between departments. Training of staff is a key component to knowing how to accommodate and provide equal service to persons with disabilities of all kinds.

**2.20 Facility Self-Evaluation Findings and Recommendations**

As part of this SETP update, DLZ performed a self-evaluation of the following City facilities. As noted earlier, no review of ROW facilities or facilities for parks or fire have been completed by DLZ. In most cases, items noted as not meeting ADASAD remain and will continue to be addressed annually as the City implements their Transition Plan.

- City Hall – complete evaluation of all public areas and employee common use areas.
- Public Works – all public areas and employee common use areas
- Public Parking lots – review of lots north of Main Street west of Broadway Street and the public lot in the southwest quadrant of Main Street and Ann Street

A comprehensive review of accessibility at all various areas of these facilities was performed consistent with ADASAD and the scope of the work. Specific information by facility can be found in Appendix A.

**Recommended General Actions:**

- Specific priorities for each facility and corrections needed, with costs, to fully comply with ADA standards are included in the following section of this report and the appendix of this ADA Transition Plan update. In some cases, recommendations provided exceed the minimum requirements to maximize accessibility.
- In some cases, comprehensive costs for alteration of some spaces, especially restrooms, may not be possible due to additional investigation required outside the scope of an ADA self-evaluation. Additional investigations required for spaces that need to be enlarged by removing a wall could include structural review for load bearing, review of plumbing or ductwork in the wall, etc. Appendix A identifies the cost for these items as “TBD” or in some locations includes a cost that is a placeholder and provided as an order of magnitude estimate only.
- There are many interim fixes that can be implemented immediately to address various deficiencies and provide equal access to all users until permanent solutions are implemented. Other improvements are relatively low cost and should also be considered for implementation in early phases of the Transition Plan. These include:
  - Restripe parking lots to provide compliant spaces and access aisles, with proper signage, at locations closest to accessible entrances at all facilities. When a facility has multiple parking lots, precedence should be given to the lots that have the most use by the public and are closest to facility entrances or amenities. However, all lots that serve an accessible entrance must provide accessible spaces.
  - Develop a master signage plan for all facilities that includes exterior directional signage to accessible entrances and required signage within each facility. Ensure that at least one entrance at all facilities is fully accessible until the required 60% of public entrances can be made accessible and that non-accessible entrances are adequately signed to direct the public to the accessible entrance(s).
  - For objects that protrude inside buildings, either move these items closer to the floor where they are cane detectable, move them outside the pedestrian circulation route in buildings, or place a permanent object that is cane detectable below them. Ensure that vegetation is trimmed so it does not protrude into the path of circulation outside of facilities.
  - Provide a cup dispenser at all interior non-compliant drinking fountains below 48” height at a level location that can be used by anyone at functional drinking fountains, along with a waste container, until a new compliant hi-lo drinking fountain is installed. Note that this is a very short-term solution since some users may not be able to utilize a cup to drink for various reasons.
  - Develop a lockset replacement plan for all doors that have knobs or other non-compliant hardware and/or locks that require grasping and turning to operate. In rooms with doors that have knobs, ensure staff can see into the hallway in the event someone on the outside cannot open the door. Consider a policy that doors with non-compliant hardware are left open at all times during business hours.
  - In rooms with light switches above 48” that are operated by the public, consider installation of occupancy sensors and timer controls for lighting control. The 1991 ADAAG allows up to 54” height, so in many cases this recommendation is not required until the space is altered.
  - In areas that have all electrical outlets below 15” and/or above 48”, consider mounting a power strip or extension cord to the wall that is accessible within the required height range. This is especially important in today’s electronic age, with people often looking to charge their mobile devices. This should be looked at as only a short-term solution.

- Ensure that compliant pedestrian routes exist from parking to the accessible entrances for all buildings. This may entail new construction or reconstruction of existing sidewalks. Also ensure that compliant accessible routes are provided from the public ROW to accessible entrances to City facilities.
- Determine if adjustments can be made to interior door closers to reduce the opening pressure to 5 pounds or less and/or slow the closing time to at least 5 seconds from 90 degrees open to 12 degrees from closure. If this cannot be attained, a new closer will need to be purchased and installed. Closers can also be removed from some doors.
- Review corrective actions needed for at least one accessible set of restrooms for each facility initially and provide signage to direct persons from non-accessible restrooms to the accessible one. Depending on the size and use of a facility, one set may not be adequate and one set per floor or wing may be more appropriate.
- Ensure that all public assembly areas (meeting rooms) with audio amplification have a compliant ALS installed and the proper number and types of ALDs available, with signage installed alerting people where they are available. Consider providing the same for public meeting spaces without audio amplification.
- Consider automatic door openers at facilities with inadequate space in alcoves, excessive opening force requirements, or closing speeds that are too fast for exterior doors. Installation of power-assisted doors does not eliminate the need for compliance with applicable clear spaces and other ADASAD requirements for doors.
- While 36" is the required height for most service counters, many locations may require a person to complete forms or other documents/applications. Ensure that all departments that have public contact at service counters with a surface above 34" have compliant work surfaces available for persons to complete paperwork or review documents. A clipboard can be used as an accommodation temporarily until the counter can be altered and consider all alterations to service counters be to 34".
- Move furniture or other obstructions that could be in the way of required clear spaces for persons using wheelchairs, such as door maneuvering spaces, operable parts of various items, etc.
- Lower or install an additional coat hook in each restroom stall and rooms where coats may be hung on the wall that is at 48" maximum height.
- Consider installation of kick plates and filler strip on the push side of all doors with glass or vents below 10" above the floor to prevent glass breakage by wheelchair users.
- Reposition items in restrooms that are too high, including soap dispensers, mirrors, paper towel dispensers, etc. In some instances, it may be less costly to provide an additional amenity within compliant height (e.g., add a second mirror on different wall, install a second soap dispenser, etc.).



# 3

## Self-Evaluation of Pedestrian Facilities in the Public ROW





## 3.0 Self-Evaluation of Pedestrian Facilities within the Public ROW

This section of the SETP summarizes the approach for the review of ROW facilities performed for the 2012 Transition Plan. No confirmation of conditions for facilities evaluated in the 2012 Transition Plan was completed, and no additional ROW features were evaluated as part of this Transition Plan update. Facilities that may be encountered within the public ROW include pedestrian access routes (PAR), curb ramps, street furnishings, accessible pedestrian signals, transit stops and transit shelters, roundabouts, marked or metered on-street parking, and rail crossings. The following discussion includes the status of the review for each of the facility types to date and the results and recommendations.

### 3.1 ROW Facility Evaluation Status

The 2012 Transition Plan included information about the inventory of ROW facilities performed for the project. The plan noted that the City had inventoried all curbs and sidewalks to determine their ADA compliance. The plan stated that the inventory was completed in five (5) steps:

1. Aerial maps – aerial maps were used to identify locations that include sidewalks and/or curbs. City staff assisted in this process to assure sidewalks and curbs were not missed.
2. Field evaluation and inventory – once sidewalks and curbs had been mapped, a field investigation of each was completed to measure and/or evaluate the characteristics of each segment of sidewalk and curb, with each given a ‘Condition Rating’. The features evaluated included:
  - Measured width
  - Cross slope observation (2% maximum)
  - Heaving
  - Continuity
  - Joint condition
  - Ramp width
  - Ramp slope
  - Ramp turning space
  - Ramp clear space
  - Detectable warnings

The ‘Condition Rating’ was assigned a letter “grade” that was to reflect the barrier presented for the facility, with different colored symbols used on mapping that corresponded to the grade. Details regarding the assessment procedure and rating process is provided in Section 3.2, with the grade given as follows:

- A – ADA Compliant, no concerns (green)
  - B – Minor problem noted, but no immediate needs (orange)
  - C – One major problem or multiple minor problems, needs some attention (yellow)
  - D – Multiple major problems, possibly impassible for wheelchairs (pink)
  - F – Broken, impassable by wheelchairs, difficult for pedestrians (red)
3. Preparation of Mapping – mapping was prepared for the facilities that identified the location and rating of all sidewalks and ramps.
  4. Public Review and Comment – the mapping was to be made available to the public on the City website and on display at City Hall from December 15, 2012, until February 1, 2013, for review comment.

5. Inventory Update – the inventory was to be updated as necessary to reflect staff and public comments to provide a final list of accessibility issues that exist.

No other ROW facilities have been evaluated, with the quantity of street furnishings, pedestrian signals, transit stops and transit shelters, roundabouts, marked or metered on-street parking, and rail crossings being fairly low. A short summary of each follows:

- Street Furnishings – the downtown area of the City is the primary location where street furnishings are present. These furnishings include benches, planters, tree grates, bicycle racks, trash receptacles, etc. that are typically found along the PAR and pedestrian circulation area (PCA), which would include any pedestrian area adjacent to but outside of the required 48" level PAR.
- Pedestrian Signals – pedestrian pushbuttons are located at a limited number of intersections both within the downtown and along arterial and collector roads that may be under the jurisdiction of Allen County or INDOT. Often, the required location and placement of pedestrian pushbuttons needs to be coordinated with alterations to the PAR and/or curb ramps and local road agencies are encouraged to work with County and state agencies to ensure all accessible facility improvements are considered when work is performed.
- Transit Stops/Shelters – transit facilities are most commonly the responsibility of an agency that is most often a separate Title II entity. Since those agencies do not control the public ROW, they collaborate with road agencies to place their facilities, including fixed route stops and shelters. It is also common for transit agencies to coordinate with property owners for placement of these facilities outside of the public ROW. There is a shared responsibility of both the local road agency and transit authority to ensure these facilities are compliant. Citilink is the transit agency within the greater Fort Wayne area and provides only one (1) fixed route into New Haven, with stops located on private property only and not within the public ROW.
- Roundabouts – accessibility improvements at roundabouts, other than typical requirements at all street crossings, are required only where there is more than one (1) entering or exiting lane for vehicles. At those locations, advanced warnings of the pedestrian crossing are required that include flashing lights of various types, see PROWAG for options and details of these requirements. The City does not appear to have any roundabouts on local streets that would require these treatments.
- On-Street Parking – where parking is permitted within the ROW and individual parking spaces are marked or spaces are metered, accessible on-street parking spaces must also be provided that meet the requirements of PROWAG. Other locations, which are most commonly within residential areas, which allow parking on the street but individual spaces are not marked or metered, there is no requirement for accessible spaces to be provided. Typically, one (1) accessible space is required for each 25 on-street spaces provided on each block. That space should be located where it would be most appropriate based on a variety of factors. The downtown area of the City is the primary location where marked on-street parking is provided.
- Rail Crossings – at-grade railroad crossings of the PAR have specific requirements for accessibility within PROWAG. The City has a railroad track that bisects the full length of the corporation limits parallel and just north of Lincoln Highway. There are additional spurs of this track within the City limits, but they do not appear to cross any PAR. This should be verified.

The City needs to ensure that the 2012 evaluation of the PAR and curbs included evaluation of all features required by PROWAG, including dimensional and slope features and presence of all required level clear areas, such as turning spaces, clear areas, landings, etc.

### **3.2 Curb and PAR Assessment Procedures**

The 2012 Transition Plan includes a description of how the assessment of sidewalks and curbs was performed and the procedure for determining the rating. Appendix B of the 2012 Transition Plan included the results of the sidewalk and ramp evaluations. The procedure used four (4) different evaluation factors, with each having a numerical score that indicated the importance of the factor. Higher scores would indicate a higher priority for repair or improvement at those locations, with the highest possible score being 10 and lowest being 1. The details of the four (4) factors and score with description included:

- Condition – this factor likely takes into consideration the results of the evaluation from Step 2 of the inventory. While no details were provided in the 2012 Transition Plan, it is assumed that locations with features that deviate from the requirements of PROWAG would be given a higher value. Locations with a rating of ‘B’ were given one (1) point, ‘C’ two (2) points, and ‘D’ or ‘F’ three (3) points. It is not clear how the determination of the ratings was done and is likely subjective based on the opinion of the person performing the evaluation.
- Vicinity of Pedestrian Destinations – this factor takes into account the proximity of the location to a destination of a pedestrian. The 2012 Transition Plan listed commercial businesses, schools, parks, government buildings/offices, libraries, and churches as examples. The ratings used included ‘Nothing Nearby’ for zero (0) points, within one block of a destination was given one (1) point, within one block of multiple destinations was given two (2) points, and adjacent to a park, school, government building, or library was given three (3) points.
- Public Interest – this factor takes into consideration the extent to which the public has expressed an interest in improving a location. If no comments have been provided the location is given zero (0) points. If multiple public comments have been received the location is given one (1) point, with locations that are the subject of a formal ADA grievance receiving two (2) points.
- Local Priority – this factor is intended to be used by local decision makers to provide an emphasis to a specific need based on a special concern at each location. The 2012 Transition Plan specifically mentioned public safety, anticipated heavy pedestrian traffic volumes, and special site conditions as considerations, with ‘No Special Concerns’ at or near the location scoring zero (0) points, some special concerns getting one (1) point, and special local emphasis scoring two (2) points.

By totaling the cumulative score for each location, the City intends to use the areas with higher scores as areas that are likely higher priority of repairs and improvements.

### **3.3 Discussion**

Evaluation of facilities within the public ROW can be a very labor intensive and costly process and there are many ways the data is collected and evaluated. Regardless of the methodology, the results should provide a sound basis for making decisions on where funding should be allocated to make improvements for accessibility. The process and procedures used by the City for sidewalks and curbs may provide that guidance but likely only to a limited extent. While the scoring is based on both condition and contextual factors, there will likely need to be other considerations in the capital planning process to ensure that alterations. Additional detail is needed to determine the precision of the various measurements and how the different factors within the scoring criteria were weighted in determining the condition. For example, cross slopes are typically the biggest barrier to access for pedestrian facilities within the public ROW and should be given a greater weight than other deviations, such as joint condition or heaving except where those features deviate significantly from PROWAG. Further, while complaints can be important in prioritization, they should be used to elevate the subjective evaluation based on other factors and not necessarily as one of the primary scoring

criteria. If each measure was collected to industry standards, a re-evaluation could easily be done to diversify the scoring and give greater weight to measures that have a greater impact on accessibility.

Overall, the 2012 Transition Plan reported that the City has 805 ramps and 315,291 feet (59.7 miles) of sidewalks. A total of 535 ramps (66.5%) and 10,798 feet (2.0 miles) of sidewalk were deemed not compliant. Non-compliant ramps were rated 'B' for 14 locations (2.6%), 'C' at 314 locations (58.7%), and 'F' at 207 locations (38.7%). Sidewalk ratings were 1654 feet 'B' (15.3%), 5356 feet 'C' (49.6%), and 3788 'D' (35.1%). If this data is accurate, the City should be commended for the small proportion of sidewalks that are not compliant and usability of their network. Without detailed review of the data collected in 2012, DLZ cannot confirm the accuracy of the data collection and evaluation process.

The City pledged in the 2012 Transition Plan to use Motor Vehicle Highway (MVH), Local Road & Street (LR&S), and County Economic Development Income Tax (CEDIT) funds to repair, modify, or reconstruct sidewalks and ramps, with \$25,000 to be spent annually. The City also noted that the Mayor would meet with the ADA Coordinator in January each year to review the previous years' efforts for ADA Transition Plan implementation and adjust accordingly. This process is to continue until all sidewalks and ramps are ADA compliant and the ADA Transition Plan is fully implemented.

# 4

## Transition Plan





## 4.0 Transition Plan

The Transition Plan describes how New Haven will be transitioning to full compliance with the ADA and the applicable standards. Public entities, like the City, are required to provide access to City PSAs for all recipients. Thus, the City must provide access for individuals with disabilities and document areas of non-compliance. Additional documentation should be provided as barriers are removed.

If structural changes are identified to provide program accessibility as part of the self-evaluation, the ADA identifies specific elements to be included in the transition plan. At a minimum, the elements of the Transition Plan are:

- 1) A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [\[28 CFR 35.150 \(d\)\(3\)\(i\)\]](#)
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [\[28 CFR 35.150 \(d\)\(3\)\(ii\)\]](#)
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [\[28 CFR 35.150 \(d\)\(3\)\(iii\)\]](#)
- 4) The name of the official responsible for the plan's implementation. [\[28 CFR 35.150 \(d\)\(3\)\(iv\)\]](#)

The transition plan is a reaction to the findings of the facility audits, assessments of City PSAs, and input from the public. Recommended actions for City PSAs can be found in Section 2.0. Note that the relationship described earlier between the City and the joint City-Adams Township parks and fire authorities related to ownership of various properties and facilities, as well as use of these facilities by the City for PSAs, makes not only the full cost of alterations difficult to assess but also the accessibility of City PSAs since those facilities have not been evaluated for accessibility. It is recommended that the City confer with both joint entities about performing both an evaluation of facilities as well as PSAs to fully understand the potential barriers that exist to access to the public and employees with disabilities for all three Title II entities.

The specific architectural and site improvement modifications required in the areas of City facilities reviewed as part of this Transition Plan update to make programs accessible are listed in the New Haven City Facility Reports (see Appendix A). Facility reports include areas of facilities evaluated within the scope of this updated Transition Plan for limited areas of facilities operated by the City. Each facility report contains a list of items that do not meet current ADASAD standards and barrier removal actions. Not all of these barriers must be removed by making renovations to the facilities in order to provide program compliance with the ADA. Removing barriers limiting access to programs or those which present a safety hazard should be the City's first priority. Additional requirements remain in other facilities reviewed in as part of the 2012 Transition Plan, including sidewalks and curb ramps. There are additional ROW facilities that have not been evaluated during either self-evaluation process and should be reviewed during implementation to ensure compliance.

### 4.1 Phasing of Corrections

A phased implementation of the required corrections to remove physical barriers at City-owned facilities is recommended and required. The City, like most Title II agencies, has limited funds and cannot immediately make all facilities fully compliant with ADA standards. Prior to setting priorities, baseline criteria needed to be established to develop a starting point for ranking the deficient facilities identified during the self-evaluation.

Site priorities were determined by evaluating each site's level of use, social need, civic function, and the general uniqueness of the site. At the time of the development of this report, few public complaints had been received about City-owned facilities. Complaints were not used as criteria to determine the phasing of improvements for any particular site, though future complaints could be the basis for funding improvements.

Each of these criteria is assumed to have equal weight and no priority over another:

- **Level of Use:** Is the facility utilized quite frequently and by a large cross-section of the public?
- **Social Need:** Does the facility provide a social service or program for less fortunate or transient citizens?
- **Civic Function:** Does the facility provide access to civic programs and services that implement the civil and political rights provided by the government?
- **General Uniqueness of the Site:** Does the building, facility, or site provide a distinct program or service that cannot occur at a different location or facility?

#### **4.2 Public Outreach and Public Comments**

Public participation on the 2012 Transition Plan was limited to a public comment period on the draft ADA Transition Plan. The draft Transition Plan was made available on the City's website and Planning Department office at City Hall from December 15, 2012, to February 1, 2013. No information was provided regarding the results of the 2012-2013 public comment period. The 2012 Transition Plan also noted that after adoption, it would be available on the City website, Planning Department, and New Haven Public Library.

As part of this updated ADA Transition Plan, additional outreach was performed. That outreach included an online survey, which was intended to determine the public's interest and other general information about the City's ADA compliance efforts. The City should consider occasional outreach during the implementation of their Transition Plan to solicit input on the prioritization of accessibility improvements and also ensure that complaints about accessibility are given a priority when the barrier can be corrected by alterations to facilities.

The timing of the improvements by site within each transition phase will be determined by the City based on their preferences and criteria. In general, the required physical improvements to meet ADA specifications at City facilities were split into three priority groups:

- High priority improvements
- Medium priority improvements
- Low priority improvements

#### **4.3 Priorities for Barrier Removal**

In continuing to prioritize barrier removal, it should be the City's intent to evaluate all areas of potential deficiency and to make structural changes where necessary and when equal accommodation cannot be made in another manner, consistent with the discussion provided in the original Transition Plan. The timing of the improvements by site will need to be determined by the City based on their preferences and criteria as established by elected and appointed official, staff, and the public.

All barriers to access are not equal in the impact they have on persons with various disabilities to have equal access to City facilities or PSAs. Following evaluation of facilities and programs, a prioritization was done to identify a ranking system to utilize when determining which capital improvements need to be considered first and those that could be implemented in subsequent years. Barriers were prioritized based on the subjective determination of the impact on ease of access, which was made by reviewing the existing conditions, amount of deviation from the applicable standard/guideline, and context of each situation. The highest priorities include barriers that would prohibit access or make use/access of an amenity extremely difficult. The priority is lessened as the deviation is reduced and for items that may be rarely used or not essential for a person with a disability to access a facility or program.

As discussed in Chapter 3, the City has performed a review of limited ROW facilities in 2012, and expended effort to make improvements for accessibility since that time. The City has utilized this prioritization to implement several accessibility improvements based on the previous Transition Plan. While information by year was not provided, the 2023 New Haven Annual Report for the Engineering Department noted that the City constructed 31 new ADA ramps, 1,266 feet of new trails, and 16,298 feet of new sidewalks in 2023. It is assumed that all construction was done to improve existing conditions or add new infrastructure that meets the relevant ADA requirements.

The costs to remove barriers by priority for each non-ROW facility are shown in Table 4-1 and detailed for each facility in Appendix A. In addition, a time frame had to be identified to determine an average annual budget to consider. For the purposes of this report, a 5-year time frame was utilized. Using this, it is conceivable that at the end of 5 years, all non-compliant ADA issues would be addressed throughout all City-owned facilities. This assumes that standards and guidelines are not modified. This further assumes that funding is available each budget cycle to make the necessary improvements. It is highly unlikely given the economy that this is realistic, particularly when considering that there are also likely to be a large number of other improvements needed by the City as part of regular maintenance, upkeep, and repairs.

In some instances, it may be advantageous to construct all improvements at a site at once rather than correct the high priority barriers first and come back at a later date to correct the medium or low priority barriers. For some sites, the total cost of construction for the corrections requires that they be spread out over two or more phases. New Haven has the right to modify the priorities based on funding levels and changes in City programs, activities, and services to have flexibility in accommodating community requests and complaints. Interim resolutions, such as assigning aids, temporary signing for alternate routes or sites, and modifications of programs, activities, and services may be implemented at the City's discretion to handle existing insufficiencies or access complaints received. All costs noted in Appendix A and Table 4-1 are 2023 cost opinions, based on the conditions noted in each appendix, and subject to change based on market conditions, economic conditions, inflation, material selection, etc. Multiple phases of projects, multiple bidding packages, design parameters, etc. all have an impact on project costs that cannot be finitely identified in a study with this level of detail and uncertainty related to funding. No costs are included for design, inspection, or other costs likely to be incurred as part of any construction project at City facilities.

Based on the costs developed to address the architectural and engineering improvements required to fully comply with ADASAD, a total of approximately \$130,000 in improvements would be required (2023 costs) to achieve ADA compliance at the City facilities listed on Table 4-1. It is important to note at this point that many of the noted deficiencies are not significant barriers to access and some improvements are not required until such time as a major building renovation is completed. This does not avoid the need for New Haven to ensure all programs are accessible by some means. If New Haven were to set a goal for

implementing all of the recommended improvements within a 5-year time frame, it would require an annual budget of approximately \$26,000 (in 2023 dollars) to bring all of the City facilities evaluated in the appendix of this report up to current ADA standards (no inflation included). These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, etc. A majority of the cost of improvements are in the City Hall and that facility should be the priority, especially public areas. There may be grants available to make some of these improvements and this should be investigated further.

<b>TABLE 4-1. CITY OF NEW HAVEN – ADA SELF-EVALUATION STUDY AND TRANSITION PLAN</b>				
<b>Cost of Correction for Interior and Exterior Elements by Site</b>				
<b>Facility Name</b>	<b>Low Priority</b>	<b>Medium Priority</b>	<b>High Priority</b>	<b>Total Project Cost</b>
<b>City Hall/Police</b> 815 Lincoln Highway E	\$91,565	\$14,700	\$1,000	\$107,265
<b>Public Works</b> 2201 Summit Street	\$15,415	\$2,600	\$500	\$18,515
<b>Public Parking Lots (2)</b> Location Varies	\$4,450	\$0	\$0	\$4,450
<b>TOTALS</b>	<b>\$111,430</b>	<b>\$17,300</b>	<b>\$1,500</b>	<b>\$130,230</b>

**Notes:**

1. Some corrective actions identified may not be required if equal facilitation/access is provided in another manner, or changes are made to the City's procedures. Other non-compliant items have low-cost alternatives until permanent solutions are implemented.
2. Costs included are only to provide compliance under Title II of the ADA and is limited to areas of City facilities open and accessible to the public at all times and employee common use areas. This does not eliminate the need for the City to provide accessibility within work areas for employees with disabilities, as needed, to allow them to perform their required job duties. Cost includes only construction estimates.
3. Actual schedule for implementation of the Transition Plan is dependent on a number of factors unknown at the time of preparation of the Transition Plan, including, but not limited to: availability of funding with the City budget, reprioritization based on input from persons with disabilities, award of grants or other funding to make corrective actions, changes to the ADA Accessibility Guidelines or other guidance that is not available at this time, etc.

New Haven should identify the most urgent access needs at the various facilities based on their experiences, other capital projects, and the results of the self-evaluation. There should also be a review of potential barriers at facilities under the oversight of the joint City-Adams Township entities for parks and fire, especially those that are owned by the City and those that the City uses to host various PSAs, including meeting of public boards and commissions. A review of facility utilization and programs provided at each is critical to assisting in prioritizing which facilities should be given priority for improvements and also the potential for relocating City PSAs to accessible facilities.

In addition, utilizing the results of the 2012 Transition Plan for limited ROW facilities, the City is likely to have addressed a number of the locations where non-compliant conditions were identified, putting them on track to address all identified issues in the next 5 years. The City should consider updating the ROW inventory in the near future to evaluate facilities that have not been reviewed to assist in making informed decisions about the priority for corrections and seek funding for construction for all available sources.

#### **4.4 Transition Plan Phasing**

One of the most important compliance efforts for a Title II entity is to ensure that all programs provided to the public are accessible in some manner. Often there are short-term or temporary accommodations that can be made to provide this accessibility. Where these types of accommodations can be made, the priority for permanent corrections is reduced until an alteration is made to correct architectural barriers. Often, removal of architectural barriers can be accomplished during implementation of normal maintenance activities at the various facilities or as part of other capital improvements already anticipated.

An entity like New Haven has the important task of reviewing a number of facilities and programs to ensure access is provided. The programs of the City cross numerous departments and facilities, with some programs not being provided in City-owned facilities (i.e., those of the joint New Haven-Adams Township parks and fire authorities). The phasing of improvements for accessibility is not something to typically be done by any one individual without consultation of various department heads. The completion of this Transition Plan Update is a key step to identifying the required facility and programmatic access needs. The next logical step is the formation of a committee of key department heads to review the results and formulate a strategy and capital improvement plan to make the necessary alterations. This committee is typically chaired by the ADA Coordinator and facilities staff, with participation by departments responsible for ROW facilities. Procedural and other changes that cross department lines should also be reviewed by a committee of key department heads, typically chaired by the ADA Coordinator. Changes within departments can be done by each department head for their individual department.

Generally, the improvements to be made are often suggested in the following order, though there may be facilities where the prioritization may differ. The prioritization noted below may not apply strictly to all situations and previous discussions on prioritization should also be considered:

1. Approach and Entrance – compliant parking, accessible route from parking to the public accessible entrance, and an accessible entrance are essential to providing a way for persons with disabilities to be able to enter a facility. Without a means of getting into a facility, any amenities or programs inside are not accessible even if all items inside comply with ADA standards.
2. Access to Services – within each facility, ensuring that all programs have an accessible route and are physically accessible. This especially includes access to assembly areas, meeting spaces, service counters, and other public uses. As noted earlier, in some cases it may be possible to modify the location of a program within an accessible facility or provide equivalent facilitation to provide the same service level to persons with disabilities until physical improvements can be completed.
3. Restroom Access – access to a compliant, wheelchair accessible restroom, preferably one per floor for each gender or unisex. In many facilities that do not provide compliant restrooms, additional investigation is required to determine the extent and feasibility of alterations. This is especially true when the number of fixtures may be reduced, as these are set by other codes. In the absence of being able to provide fully compliant facilities, there are provisions to provide facilities that comply with ADA to the greatest extent possible without violating other codes. However, in the absence of providing something that is usable, other options may be a better solution.
4. Other Access – access to lower priority items, such as drinking fountains, electrical outlets, etc.

Considering the above general recommendations, each facility needs to focus on the above priority order for improvements. Facilities need to have improvements done to provide at least basic access to programs or determine another means to provide access. That could include relocating a program elsewhere within the facility that is accessible or relocating a program to an accessible facility until it can be accessible at its current location. Utilization of signage to identify the location of the accessible routes and entrances, accessible restroom locations, etc. can be very helpful until all necessary improvements can be made.

The ADA Coordinator, possibly through an ADA Committee, should work closely with the City Council to make funding available where possible to make the most urgent improvements to ensure all programs are accessible. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc. The City is



committed to becoming ADA compliant within the confines of preserving existing programs and services to all and budgetary limitations. Many of the items that are not compliant with current standards may be compliant with previous standards and are not required to be modified until a building renovation is completed. Any facility changes after the sites were surveyed are not reflected in these basic cost estimates. Additionally, it is the City's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA and relevant standards and guidance and to document constructed improvements and facilities that are brought up to current ADA standards. Finally, the site surveys performed for this report are not to design level detail and are intended to be used to give a framework to the Transition Plan update. When the Transition Plan update is approved, and the planning stages are begun for implementation of the first improvements, a more detailed survey of each facility may need to be performed, and improvements designed by licensed professionals that are knowledgeable with ADA as well as all other applicable codes, including building, plumbing, and fire codes. At this time, costs are estimated but precise costs cannot be determined until final design, and the Transition Plan should be adjusted to reflect this knowledge.

Note that if any complaints are received regarding access to specific facilities or City programs, it may alter the priorities of the improvements. If the City receives complaints about access at a particular site that is not slated for upgrades for several years, they should consider adjusting the Transition Plan phasing to accommodate the implementation of improvements to be sooner or as necessary.

#### **4.5 Plan Updates and Enforcement**

Modifications to the City's PSAs should be drafted, implemented, and documented by the ADA Coordinator. Examples of some of these changes were provided in the Self-Evaluation in Chapter 2. These changes should have little cost of implementation, mainly consisting of the time to develop the language of the policy and program changes, time to train City staff, and administrative costs. Some of the language for City ADA documentation has been suggested in this report, but these are not exhaustive. It is also important for the ADA Coordinator to continue to receive the necessary training and continuing education opportunities provided by the ACTCP to implement this Transition Plan and keep apprised of changes to ADA standards and guidelines.

# 5

## ADA Tool Kit



## 5.0 ADA Tool Kit

### 5.1 Introduction

In order to facilitate access to all City programs and departments, the City will maintain program accessibility guidelines, standards, and resources. This information is available to all employees and volunteers. The City will add to these guidelines when necessary to address its needs and include information and technological devices that help staff and volunteers communicate with individuals with a variety of disabilities. The City will periodically review the components of this section, as new technologies are developed in order to ensure that the best types of modifications are included. This section also contains the accessibility standards of care that govern new construction and alterations to facilities.

If you need any additional assistance, please contact:

Jennifer Basting, ADA Coordinator  
Phone: (260) 748-7033  
Email: [JBasting@newhaven.in.gov](mailto:JBasting@newhaven.in.gov)

### 5.2 Federal Accessibility Standards and Regulations

#### U.S. Department of Justice

The U.S. DOJ provides many free ADA materials including the ADA text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, Braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the DOJ website ([www.ada.gov](http://www.ada.gov)).

The ADA publications identified below may not have been updated to reflect the revisions to the ADA regulations that took effect on March 15, 2012.

- *ADA Regulation for Title II*. This publication describes Title II of the ADA ([www.ada.gov/regs2010/ADAregs2010.htm#titleII\\_final\\_2010](http://www.ada.gov/regs2010/ADAregs2010.htm#titleII_final_2010)), Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under Section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth Standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.
- *Title II Technical Assistance Manual (1993) and Supplements*. This 56-page manual ([www.ada.gov/taman2.html](http://www.ada.gov/taman2.html)) explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance.
- *Accessibility of State and Local Government Websites to People with Disabilities*. This is a 5-page publication providing guidance ([www.ada.gov/websites2.htm](http://www.ada.gov/websites2.htm)) on making state and local government websites accessible.

## U.S. Access Board

The full texts of Federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded from the Access Board's website (<https://www.access-board.gov/>). In addition to regular print, publications are available in large print, disk, audiocassette, and Braille. Multiple copies of publications can be ordered by sending a request to [pubs@access-board.gov](mailto:pubs@access-board.gov). In addition to the guidelines, guidance material is also available to assist staff in understanding and implementing Federal accessibility guidelines.

The following publications are currently available from the U.S. Access Board.

### Guidelines and Standards for Facilities

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The City should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

- *ADA Standards for Accessible Design (ADASAD)*. This document ([www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA, including special provisions where applicable for elements designed specifically for children ages 12 and under. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the DOT, under the ADA.
- *Accessibility Guidelines for Play Areas*. The Access Board has developed accessibility guidelines for newly constructed and altered play areas. This bulletin is designed to assist in using the play area accessibility guidelines and provides information regarding where the play area guidelines apply, what a play component is considered to be, how many play components must be an accessible route, and the requirements for accessible routes within play areas. ([www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas))
- *Accessibility Guidelines for Recreation Facilities*. The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADASAD. They cover the following facilities and elements: amusement rides, boating facilities, fishing piers and platforms, miniature golf courses, golf courses, exercise equipment, bowling lanes, shooting facilities, swimming pools, wading pools, and spas. These summaries were updated following issuance of ADASAD (<https://www.access-board.gov/guidance.html>).
- *Accessibility Guidelines for Federal Outdoor Developed Areas*. The Access Board developed accessibility guidelines for the construction and alteration of facilities covered by the Americans with Disabilities Act (ADA) of 1990 and the Architectural Barriers Act (ABA) of 1968. The guidelines ensure that the facilities are readily accessible to and usable by people with disabilities. The Access Board issued the current guidelines in 2004, which contained provisions for several types of recreation facilities, including boating facilities, fishing piers and platforms, golf facilities, play areas, sports facilities, and swimming pools. The Access Board amended the 2004 guidelines in 2013 by adding new provisions for trails, picnic and camping facilities, viewing areas, and beach access routes constructed or altered by Federal agencies or by non-federal entities on Federal land on behalf of a Federal agency pursuant to a concession contract, partnership agreement, or similar arrangement. (<https://www.access-board.gov/files/aba/guides/outdoor/outdoor-guide.pdf>).

#### Guidance Material and Advisory Reports for Facilities

The following publications provide additional information on specific aspects of the above guidelines and standards for facilities. Employees are encouraged to refer to these publications to obtain more detailed and up-to-date information when evaluating and implementing accessibility improvements to facilities. Note that several websites have been reconfigured and some outdated information removed. Some web addresses or hyperlinks may not be functional and not all information contained in the documents references current standards.

- *U.S Access Board Technical Guide, Using the ADA Standards*. This document covers the facilities covered by the ADA, the ADA regulations, and the ADA accessibility standards. (<https://www.access-board.gov/files/ada/guides/using-ADASTandards.pdf>)
- *Detectable Warnings Update (March 2014)*. Currently, the Access Board is in the process of developing guidelines on public rights-of-way that, once finalized, will supplement the new ADASAD and be the enforceable standard for ROW facilities. This update was expected in 2013 but as of publication of this SETP is still pending. While ADASAD covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public ROW. Constraints posed by space limitations at sidewalks, roadway design practices, slope, and terrain raise valid questions on how and to what extent access can be achieved. Guidance on providing access for blind pedestrians at street crossings is also considered essential. This bulletin outlines the requirements of detectable warnings, a distinctive surface pattern of domes detectable by cane or underfoot, which are used to alert people with vision impairments of their approach to streets and hazardous drop-offs. Note that detectable warnings are required in very few locations outside of the public ROW and are often installed in parking lots and similar site conditions where they are not required and should not be placed. Overuse of detectable warnings can lead to confusion for persons with vision loss and can create unsafe conditions for persons using mobility devices. (<https://www.access-board.gov/prowag/other/dw-update.html>)
- *Assistive Devices for People with Hearing, Voice, Speech, or Language Disorders*. The terms assistive device or assistive technology can refer to any device that helps a person with hearing loss or a voice, speech, or language disorder to communicate. These terms often refer to devices that help a person to hear and understand what is being said more clearly or to express thoughts more easily. With the development of digital and wireless technologies, more and more devices are becoming available to help people with hearing, voice, speech, and language disorders communicate more meaningfully and participate more fully in their daily lives. Health professionals use a variety of names to describe assistive devices:
  - *Assistive Listening Devices (ALDs)* – help amplify the sounds you want to hear, especially where there’s a lot of background noise. ALDs can be used with a hearing aid or cochlear implant to help a wearer hear certain sounds better.
  - *Augmentative and Alternative Communication (AAC) Devices* – help people with communication disorders to express themselves. These devices can range from a simple picture board to a computer program that synthesizes speech from text.
  - *Alerting Devices* – connect to a doorbell, telephone, or alarm that emits a loud sound or blinking light to let someone with hearing loss know that an event is taking place.

Information about assistive devices can be found at [www.nidcd.nih.gov/health/assistive-devices-people-hearing-voice-speech-or-language-disorders](http://www.nidcd.nih.gov/health/assistive-devices-people-hearing-voice-speech-or-language-disorders).



#### Guidelines for Transportation

- *ADA Accessibility Guidelines for Transportation Vehicles*. This publication provides minimum guidelines and requirements for accessibility standards for transportation vehicles required to be accessible by the ADA, including over-the-road bus and tram systems. ([www.access-board.gov/guidelines-and-standards/transportation/vehicles/adaag-for-transportation-vehicles](http://www.access-board.gov/guidelines-and-standards/transportation/vehicles/adaag-for-transportation-vehicles)).
- *ADAAG for Transportation Vehicles; Over-the-Road Buses*. This publication outlines the amendments to the accessibility guidelines for over-the-road buses (OTRB) made by the Architectural and Transportation Barriers Compliance Board and the DOT to include scoping and technical provisions for lifts, ramps, wheelchair securing devices, and moveable aisle armrests. Revisions to the specifications for doors and lighting are also adopted. The specifications describe the design features that an OTRB must have to be readily accessible to and usable by persons who use wheelchairs or other mobility aids. (<https://www.access-board.gov/guidelines-standards/vehicles/update-buses-vans/guidelines-text/>)
- *American Association of State Highway and Transportation Officials (AASHTO)*. AASHTO is the organization that maintains the “Green Book” for design of roads and highways and has begun to address accessibility of pedestrian networks. Several AASHTO publications, which can be ordered from the AASHTO website (<https://www.transportation.org/>), address accessible circulation systems, including: *AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities* (1<sup>st</sup> edition) and *Guide for the Development of Bicycle Facilities* (3<sup>rd</sup> edition).
- *Federal Transit Administration (FTA)*. FTA regulates and enforces requirements of the ADA covering transportation facilities and systems. FTA maintains a technical assistance line on ADA questions (888-446-4511) and on their website ([www.fta.dot.gov](http://www.fta.dot.gov)).
- *Securement of Wheelchairs and Other Mobility Aids on Transit Vehicles*. As a public or private transit authority, the responsibility of safe, efficient service from public agencies who offer transportation services has been enlarged to affording ridership to people using a wide variety of mobility aids. In considering not only the many types of mobility aid devices, but also the variety and sizes of lifts, and the numerous makes of buses and vans, it can be easily seen that there is no single, definitive solution to accessibility on mass transit vehicles. Various publications can be found that report on the experience of transit agencies that have taken the initiative to involve the ridership in needs assessment and have established policies, educated operators, and informed the public to achieve greater accessibility in their bus transit systems. See the example at [trid.trb.org/view/362763](http://trid.trb.org/view/362763).

#### Guidance Material for Communication

- *Information and Communication Technology, Revised 508 Standards and 255 Guidelines*. These standards address access to information and communication technology (ICT) under Section 508 of the Rehabilitation Act and Section 255 of the Communications Act. Section 508 requires access to ICT developed, procured, maintained, or used by federal agencies. Examples include computers, telecommunications equipment, multifunction office machines such as copiers that also operate as printers, software, websites, information kiosks and transaction machines, and electronic documents. The Section 508 Standards, which are part of the Federal Acquisition Regulation, ensure access for people with physical, sensory, or cognitive disabilities. The Section 255 Guidelines cover telecommunications equipment and customer-premises equipment — such as telephones, cell phones, routers, set-top boxes, and computers with modems, interconnected Voice over Internet Protocol products, and software integral to the operation of telecommunications function of such equipment. (<https://www.access-board.gov/ict/#508-chapter-1-application-and-administration>).

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The City should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

### **5.3 Resources for Providing Accessible Programs & Facilities**

- *ADA Document Portal*: This website ([adata.org/ada-document-portal](https://adata.org/ada-document-portal)) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- *The U.S. Department of Labor, Office of Disability Employment Policy*: [www.dol.gov/odep/](https://www.dol.gov/odep/): The Office of Disability Employment Policy (ODEP) is the only non-regulatory federal agency that promotes policies and coordinates with employers and all levels of government to increase workplace success for people with disabilities.
- *National Center on Accessibility (NCA)*: The Center (<http://ncaonline.org>) is a cooperative effort between the National Park Service (NPS) and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. Initiated in 2005, this longitudinal study is primarily the result of questions that the National Center on Accessibility has, for many years and continues to receive from organizations, agencies and individuals who desire to make their trails accessible; are interested in an unobtrusive surface that blends and is friendly to the environment; and provides a quality trail experience for people with and without disabilities.
- *National Center on Health, Physical Activity, and Disability*: Founded in 1999, the National Center on Health, Physical Activity, and Disability (NCHPAD) is a public health practice and resource center on health promotion for people with disability. NCHPAD seeks to help people with disability and other chronic health conditions achieve health benefits through increased participation in all types of physical and social activities, including fitness and aquatic activities, recreational and sports programs, adaptive equipment usage, and more. (<https://www.nchpad.org/>)
- *National Park Service*: NPS has many programs that address the issue of providing accessible recreation services to people with disabilities. These include Wilderness Accessibility for People with Disabilities ([www.ncd.gov/publications/1992/December1992#8-1a](https://www.ncd.gov/publications/1992/December1992#8-1a)) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program ([www.nps.gov/accessibility.htm](https://www.nps.gov/accessibility.htm)), lists applicable laws, standards, and authorities, implementation strategies, roles, and responsibilities. It also addresses NPS policies and provides links to additional information sources.

### **5.4 Technical Resources**

The City should utilize the many disability-related resources available through the internet. A former source to begin at was AbleData, which was maintained by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education. AbleData was discontinued in September 2020 due to a realignment of the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR) and no information was provided about when or if the resources previously available (over 40,000) would be provided in the future (<https://acl.gov/about-acl/about-national-institute-disability-independent-living-and-rehabilitation-research>). The previous AbleData site provided up-to-date links to assistive technologies and disability-related resources and to provide objective information on such assistive products as:

- *Aids for Daily Living*: Products to aid in activities of daily living, including bathing, carrying, childcare, clothing, dispenser aids, dressing, drinking, feeding, grooming/hygiene, handle padding, health care, holding, reaching, time, smoking, toileting, and transfer.
- *Blind and low vision*: Products for people with visual disabilities, including computers, educational aids, information storage, kitchen aids, labeling, magnification, office equipment, orientation and mobility, reading, recreation, sensors, telephones, tools, travel, typing, and writing (Braille).
- *Communication*: Products to help people with disabilities related to speech, writing, and other methods of communication, including alternative and augmentative communication, signal systems, telephones, typing, and writing.
- *Computers*: Products to allow people with disabilities to use desktop and laptop computers and other kinds of information technology including software, hardware, and computer accessories.
- *Controls*: Products that provide people with disabilities with the ability to start, stop, or adjust electric or electronic devices, including environmental controls and control switches.
- *Deaf and hard of hearing*: Products for people with hearing disabilities, including amplification, recreational electronics, signal switches, and telephones.
- *Deaf and blind*: Products for people who are both deaf and blind.
- *Education*: Products to provide people with disabilities with access to educational materials and instruction in school and in other learning environments, including classroom and instructional materials.
- *Environmental Adaptations*: Products that make the built environment more accessible, including indoor environment, furniture, outdoor environment, vertical accessibility, houses, polling place accessibility, lighting, and signs.
- *Housekeeping*: Products that assist in cooking, cleaning, and other household activities, as well as adapted appliances. Includes food preparation, housekeeping, cleaning, ironing, laundry, and shopping.
- *Orthotics*: Braces and other products to support or supplement joints or limbs.
- *Prosthetics*: Products for amputees, including lower and upper extremity.
- *Recreation*: Products to assist people with disabilities with their leisure and athletic activities, including crafts, electronics, gardening, music, photography, sewing, sports, and toys.
- *Safety and Security*: Products to protect health and home, including alarm and security systems, childproof devices, electric cords, lights, and locks.
- *Seating*: Products that assist people to sit comfortably and safely, including seating systems, cushions, and therapeutic seats.
- *Therapeutic Aids*: Products that assist in treatment for health problems and therapy and training for certain disabilities, including ambulation training, biofeedback, evaluation, exercise, fine and gross motor skills, perceptual motor, positioning, pressure/massage modality equipment, respiratory aids, rolls, sensory integration, stimulators, therapy furnishings, thermal/water modality equipment, and traction.
- *Transportation*: Products to enable people with disabilities to drive or ride in cars, vans, trucks, and buses, including mass transit vehicles and facilities, vehicles, and vehicle accessories.
- *Walking*: Products to aid people with disabilities who are able to walk or stand with assistance, including canes, crutches, and walkers.
- *Wheeled mobility*: Products and accessories that enable people with mobility disabilities to move freely indoors and outdoors, including wheelchairs (manual, sport, and powered), wheelchair alternatives (scooters), wheelchair accessories, transporters, stretchers, and carts.
- *Workplace*: Products to aid people with disabilities at work, including agricultural equipment, office equipment, tools, vocational assessment, vocational training, and workstations.

## Assistive Technology Vendors and Service Providers

- National Center for Accessible Media – A research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces, and communities. NCAM has developed an authoring tool to make web- and CD-ROM-based multimedia materials accessible to persons with disabilities. Called Media Access Generator (MAGpie, versions 1.0 and 2.01) create captions and audio descriptions of rich media and can be downloaded on their website ([ncam.wgbh.org](http://ncam.wgbh.org)).
- American Sign Language Interpreters – A pool of on-call American Sign Language (ASL) interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a 24-hour basis to handle emergency procedures. The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, unique circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. Resources and contacts for qualified sign language interpreters and information for the deaf and hard of hearing are at the following locations. Inclusion or exclusion of contacts below is neither an endorsement nor disapproval of their qualifications or abilities. There are a number of additional firms that provide ASL interpretation services:
  - Deaf & Hard of Hearing Services (DHHS), Division of Disability & Rehabilitative Services (DDRS), 402 W. Washington St., Rm. W453, P.O. Box 7083, Indianapolis, IN 46207-7082, 1-800-545-7763, <http://www.in.gov/fssa/ddrs/2637.htm>
  - LUNA Language Services (<https://luna360.com/>) – provides qualified interpreters for on-site ASL interpreting services across the state of Indiana, including Certified Deaf Interpreters (CDIs). Also capable of fulfilling out-of-state appointments when needed, either on-site or via video remote interpreting (VRI). Their ASL Department can provide:
    - Tactile interpreting services
    - Manual forms of English
    - Oral interpreting
    - Real-time captioning and Communication Access Real-Time Translation (CART) services
    - Video Remote Interpreting (VRI)
    - ASL Video Translation
  - Registry of Interpreters for the Deaf – a national membership organization, they play a leading role in advocating for excellence in the delivery of interpretation and transliteration services between people who use sign language and people who use spoken language. In collaboration with the Deaf community, RID supports our members and encourages the growth of the profession through the establishment of a national standard for qualified sign language interpreters and transliterators, ongoing professional development and adherence to a code of professional conduct ([www.rid.org/](http://www.rid.org/)). The Indiana Chapter of Registry of Interpreters for the Deaf (ICCID) is an affiliate chapter of RID and located on the grounds of the Indiana School for the Deaf in Indianapolis (<https://www.icrid.org/>).
  - Deaf Services Center, Inc. – Empowers those who have hearing loss or are non-English users to fully access the English language in communicating with others. (<https://www.dsc.org/>)
  - Propio Language Services (<https://propio-ls.com/propio-one/>) provides on-demand audio, video, web conferencing, and telehealth interpretation services, as well as in-person interpretation. Based in Overland Park, Kansas, Propio provides a wide variety of services, including an app (Propio ONE) that can be used over smart devices for VRI and over-the-phone interpretation services with a subscription.

- Assistive Technology

Systems and devices amplify sound for persons with hearing disabilities should be available for public meetings and conferences. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals.

- *Relay Indiana*: Relay Indiana, a service of InTRAC, is a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired. This service allows users with special telecommunication devices to communicate with standard users through specially trained Relay Operators. InTRAC also provides free, loaned equipment to those who qualify.
- *Indiana Assistive Technology Act (INDATA) Project*: Easterseals Crossroads has been providing assistive technology solutions in Indiana since 1979. In 2007, Easterseals Crossroads partnered with the State of Indiana, Bureau of Rehabilitative Services to establish the Indiana Assistive Technology Act (INDATA) Project. The INDATA Project is one of 56 similar federally funded projects designed to increase access and awareness of assistive technology.  
<https://www.eastersealstech.com/about/the-indiana-assistive-technology-indata-project/> and <https://www.indata.at4all.com/>.
- *Relay Indiana*: Relay Indiana, a service of Indiana Telephone Relay Access Corporation (InTRAC), is a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired. This service allows users with special telecommunication devices to communicate with standard users through specially trained Relay Operators. InTRAC also provides free, loaned equipment to those who qualify. (<https://relayindiana.com/>)
- *Closed Caption Machine* - To the extent practical, City divisions should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- *Enlarging Printed Materials* - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- *Optical Readers* - Equipment that can translate printed information into an audio format should be available to Departments.
- *TDD* - To the extent necessary, City Divisions should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.
- *TDI* – TDI's (formerly known as Telecommunications for the Deaf and Hard of Hearing, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI's online resources ([tdiforaccess.org/](http://tdiforaccess.org/)) include information about telecommunications access such a TTY, pagers, telephony, VoIP, and more.

### **Guide to Disabilities and Disability Etiquette**

The National Organization on Disability reports that more than 59 million Americans have a disability. This section is for anyone — with or without a disability — who wants to interact more effectively with people with disabilities. The ADA was conceived with the goal of integrating people with disabilities into all aspects of American life, particularly the workplace and the marketplace. Sensitivity toward people with disabilities is not only in the spirit of the ADA, it makes good business sense. It can help the City expand its services to citizens, better serve its customers and improve relationships with its employees.

There are a number of excellent resources available on disability etiquette, including:

- United Spinal Association – publishes a disability etiquette guide that offers tips on interacting with people with disabilities (<https://unitedspinal.org/disability-etiquette/>).
- Job Accommodation Network (JAN) – information on recruitment, interview, new employee, and workplace etiquette (<https://askjan.org/topics/disetiq.cfm>) and there is also a link to a downloadable



publication on this important topic (<https://askjan.org/publications/Topic-Downloads.cfm?pubid=962715&action=download&pubtype=pdf>)

A summary to disabilities and disability etiquette has been included below. The information will allow staff members to become familiar with a variety of types of disabilities and help them to be more sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

When supervisors and co-workers use disability etiquette, employees with disabilities feel more comfortable and work more productively. Practicing disability etiquette is an easy way to make all people feel more comfortable and welcomed in their environment.

There is no reason to feel awkward when dealing with a person who has a disability. This section provides some basic tips for City staff to follow. If a City employee is ever unsure how to best serve a person with a disability, just ask them.

- **Ask Before You Help** – Just because someone has a disability, do not assume they need your help. If the setting is accessible, people with disabilities can usually get around fine without assistance. Adults with disabilities want to be treated as independent people. Offer assistance only if the person appears to need it. If they do want help, ask what type of help they would like before you offer any assistance. What you think they may need may not be what they really need.
- **Do Not Touch!** – Some people with disabilities depend on their arms for balance. Grabbing them – even if you mean well – could knock them off balance and create an injury. This is especially true of a person using a cane, crutches, or walker. When someone is in a wheelchair, never pat their head or touch their wheelchair (or scooter) without permission. This equipment is part of their personal space and touching it is considered rude.
- **Engage Your Mind Before Engaging Your Mouth** – Always speak directly to the person with the disability NOT to their companion, aide, or sign language interpreter. Making small talk with a person who has a disability is great; just talk to them like you would anyone else. Respect their privacy and don't ask questions about their disability unless they invite the discussion. If you are with a child who asks, don't make the situation awkward for everyone; let the person with the disability respond directly to the child. They are used to children's questions.
- **Make No Assumptions** – People with disabilities are the best judge of what they can or cannot do. Do not make any decisions for them about participating in any activity or what they may or may not be able to do. Simply respond to their questions and let them make their own decisions. Depending on the situation, it may be a violation of the ADA to exclude someone because of a wrong decision on what they're capable of doing.
- **Respond Graciously to Requests** – When people who have a disability ask for an accommodation at a City-owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.
- **Terminology** – PUT THE PERSON FIRST! Always say "person with a disability" rather than "disabled person". This recognizes that they are a person first, not a disability first. If someone has a specific disability, it would be a "person who is blind", a "person who is deaf", or a "person with dwarfism". Each

person may have their own preferred terminology, and if you're not sure what to use, just ask them. Most, however, will recognize the effort when you just refer to them as "people".

- Avoid outdated, politically incorrect terms like "handicapped" or "crippled". Be aware that many people with disabilities dislike jargon and euphemistic terms like "physically challenged" and "differently abled". Say "wheelchair user" instead of "confined to a wheelchair" or "wheelchair bound". The wheelchair is what enables the person to get around, but they are neither confined by it nor bound to it. The wheelchair is liberating, not confining.
- With any disability, avoid negative, disempowering words like "victim" or "sufferer". Say "person with AIDS" instead of "AIDS victim" or person who "suffers from AIDS".
- It's okay to use idiomatic expressions when talking to people with disabilities. For example, saying "It was good to see you" and "See you later" to a person who is blind is completely acceptable. They will use the same terminology, and it's inappropriate to respond with questions like, "How are you going to see me later?"
- People in wheelchairs will say things like, "Let's go for a walk" and it's okay for you to say it too. The situation will only become awkward if you make it so.
- Many people who are Deaf communicate with sign language and consider themselves to be members of a cultural and linguistic minority group. They refer to themselves as Deaf (with a capital D) and may be offended by the term "hearing impaired". Others may not object to the term, but in general it is safest to refer to people who have hearing loss but communicate through a spoken language as "people with hearing loss" and those who have a profound hearing loss as "people who are Deaf".

### **Community Groups, Organizations, Associations, and Commissions**

There are a large number of groups nationally, regionally, and within each state that provide specialized services, information, and advocacy for persons with all disabilities. A number of advocacy groups are listed below, the list is not intended to be complete by any means:

- *Ability Resources, Inc.:* Ability Resources Inc. (<http://www.abilityresources.org/>) was founded in 1976. Their mission is to assist people with disabilities in attaining and maintaining their personal independence. One way this can be achieved is in the creation of an environment in which people with disabilities can exercise their rights to control and direct their own lives.
- *ADA National Network:* The ADA National Network (<http://adata.org/>) provides information, guidance and training on the Americans with Disabilities Act (ADA), tailored to meet the needs of business, government and individuals at local, regional and national levels. The ADA National Network consists of ten Regional ADA National Network Centers located throughout the United States that provide local assistance to ensure that the ADA is implemented wherever possible.
- *American Council of the Blind:* ACB ([www.acb.org](http://www.acb.org)) is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800.424.8666) or by e-mail at [info@acb.org](mailto:info@acb.org).
- *American Association of People with Disabilities:* The American Association of People with Disabilities ([www.aapd.com/](http://www.aapd.com/)) is the largest non-profit, non-partisan, cross-disability organization in the United States.
- *National Association of the Deaf:* NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website ([www.nad.org](http://www.nad.org)).
- *Indiana Association of the Deaf:* IAD is a dynamic and growing organization with strategic partners, and individual members. The IAD serves as an advocate for more than 400,000 Deaf and Hard of Hearing Hoosiers. The mission of the Indiana Association of the Deaf is to preserve, protect, and promote the

civil, human, and American Sign Language (ASL) linguistic rights of Deaf people in Indiana.

<https://www.iadhoosiers.org/>

- *National Federation of the Blind*: NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided online resources ([www.nfb.org/](http://www.nfb.org/)) for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed-circuit TV (CCTVs). There is also an Indiana state chapter (<https://nfb-in.org/>).
- *National Organization on Disability*: The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources. ([www.nod.org/](http://www.nod.org/))
- *Paralyzed Veterans of America*: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website ([www.pva.org/](http://www.pva.org/)) provides information on useful sports publications and a list of contacts.
- *United Spinal Association*: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website ([www.unitedspinal.org/](http://www.unitedspinal.org/))
- *World Institute on Disability*: WID is an international public policy center dedicated to carrying out research on disability issues and overcoming obstacles to independent living. WID maintains an on-line information and resource directory on technology, research, universal design, and the ADA. ([www.wid.org/resources](http://www.wid.org/resources))
- *State of Indiana Division of Disability & Rehabilitative Services (DDRS)*: [www.in.gov/fssa/ddrs/2637.htm](http://www.in.gov/fssa/ddrs/2637.htm)
- *Indiana Disability Rights (IDR)*: <https://www.in.gov/idr/>
- *Disability Resources, Inc., Guide to Disability Resources on the Internet – IN*: Disability Resources, inc. is a nonprofit 501(c)(3) organization established to promote and improve awareness, availability and accessibility of information that can help people with disabilities live, learn, love, work and play independently. [www.disabilityresources.org/INDIANA.html](http://www.disabilityresources.org/INDIANA.html)
- *Indiana Resource Center for Families with Special Needs (IN\*SOURCE)*: The mission of IN\*SOURCE is to provide parents, families, and service providers in Indiana the information and training necessary to assure effective educational programs and appropriate services for children and young adults with disabilities. [insource.org](http://insource.org)
- *ADA-Indiana*: The mission of ADA-Indiana is to serve as a statewide resource for promoting the implementation of the Americans with Disabilities Act in Indiana. [www.adaindiana.org/](http://www.adaindiana.org/)
- *Great Lakes ADA Center*: The Great Lakes ADA Center's mission is to increase awareness and knowledge with the ultimate goal of achieving voluntary compliance with the Americans with Disabilities Act. This is accomplished within targeted audiences through provision of customized training, expert assistance, and dissemination of information developed by various sources, including the federal agencies responsible for enforcement of the ADA. The Center provides information, materials, technical assistance and training on the Americans with Disabilities Act of 1990 (ADA). The six states within the region served by the Center include: Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. <https://www.adagreatlakes.org/#>
- *Indiana Council on Independent Living (ICOIL)*: Their mission is to effectively lead a statewide Independent Living Movement that empowers people with disabilities. [www.icoil.org/index.html](http://www.icoil.org/index.html)

- *The Arc of Indiana*: The Arc of Indiana is committed to all people with developmental disabilities realizing their goals of learning, living, working and playing in the community. [www.arcind.org/](http://www.arcind.org/)
- *American Council of the Blind of Indiana (ACBI)*: The American Council of the Blind of Indiana, an affiliate of the American Council of the Blind, strives to increase the independence, security, equality of opportunity, and quality of life, for all blind and visually impaired persons in Indiana. Their mission is to increase the independence, security, equality of opportunity, and quality of life for all blind and visually impaired people. They have multiple chapters within the state and their special interest affiliates cover a wide range of professions, hobbies, and aspects of life. <https://acb-indiana.org/>
- *Deaf Link*: Provides accessible hazard alert system (AHAS), video remote interpreting (VRI), pre-recorded interpreting (PRI), and Shelter Link (an internet-based interpreting service for sheltering and mass care agencies) to provide the highest standard of inclusion for persons who are Deaf, Blind, Hard-of Hearing and Deaf-Blind. [www.deaflink.com/](http://www.deaflink.com/).

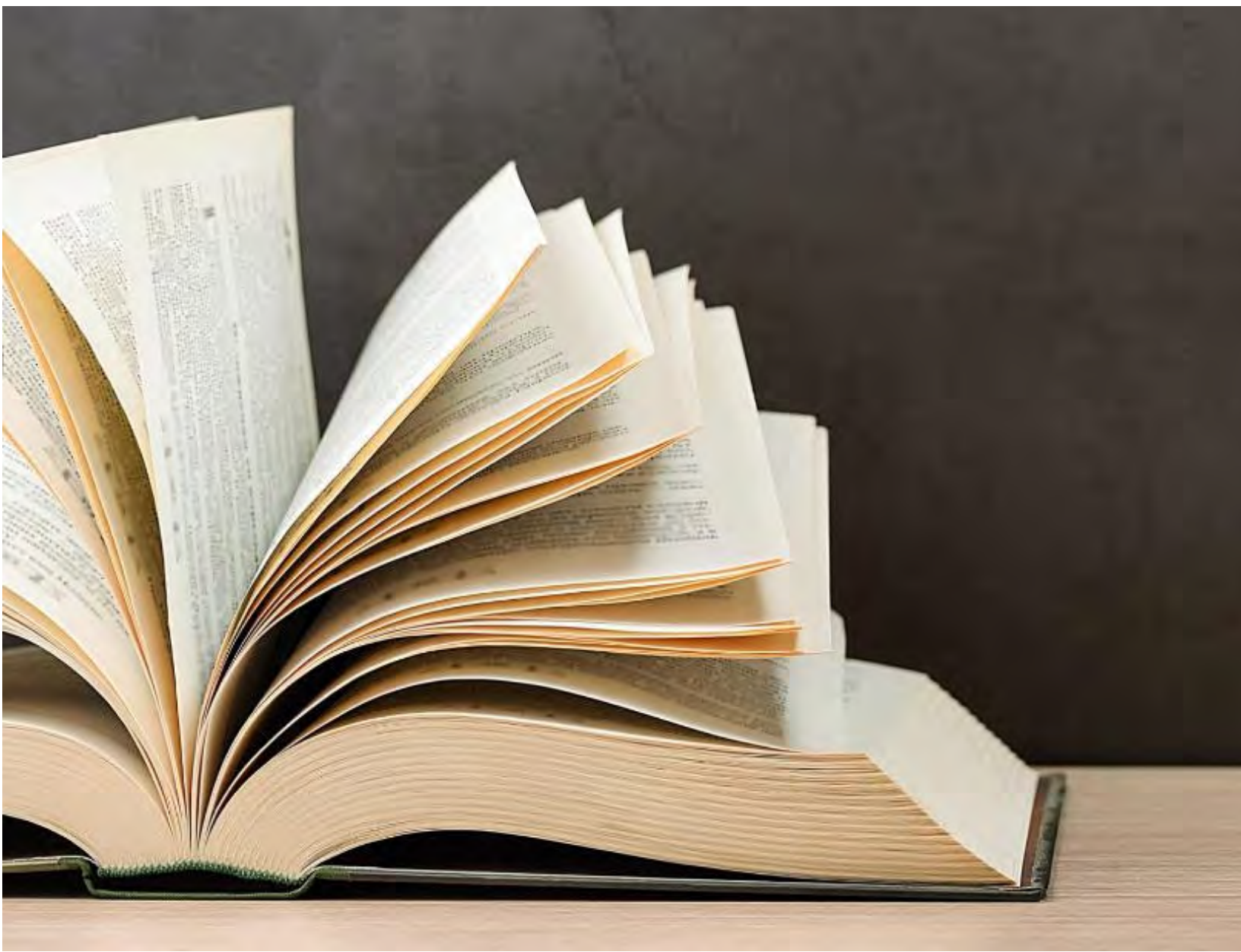
### Potential Funding Opportunities

Grants may be available from a wide variety of sources from state and federal agencies to private agencies and non-profits. Some common potential programs are listed below. The list is not intended to be complete by any means and not all grants are funded at all times.

- **Indiana Department of Natural Resources (IDNR)** offers a number of grants for parks and recreation facilities. Refer to their website for a matrix of grant programs and eligibility (<https://www.in.gov/dnr/state-parks/recreation/>).
- **Indiana Department of Transportation** administers several grant programs for transportation-related projects, including Community Crossing Grants (<https://www.in.gov/indot/doing-business-with-indot/local-public-agency-programs/community-crossing-matching-grant-program/>).
- **Indiana Office of Community and Rural Affairs (OCRA)** offers the Community Connections for People with Disabilities (CCPWD) grant, in partnership with the Indiana Division of Disability and Rehabilitative Services (DDRS). The CCPWD grant opportunity is a Community Development Block Grant (CDBG) made available due to supplemental CDBG Coronavirus funds authorized under the CARES Act. OCRA has made \$4.9 million in CDBG-CV funds available for this grant opportunity. CCPWD grant applications are reserved for applicants proposing public services activities; public facilities activities are not eligible for consideration under the CCPWD grant opportunity. Proposed public service activities must provide collective benefit to the target population by enhancing municipal and/or provider capacities and programming. <https://www.in.gov/ocra/cdbg/community-connections-for-people-with-disabilities/>

# 6

## Definitions





## 6.0 Definitions

The words, phrases and definitions summarized below are included in the ADA. Refer to the ADA 28 CFR 35.104 for full definitions. A list of common terms and definitions are included below.

**2010 Standards:** the 2010 Standards for Accessible Design (SAD), which consist of the 2004 ADA Accessibility Guidelines (ADAAG) and requirements contained in 35.151.

**Access Board:** an independent Federal agency devoted to accessibility for people with disabilities. The [Access Board](#) developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines.

**Accessible:** refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

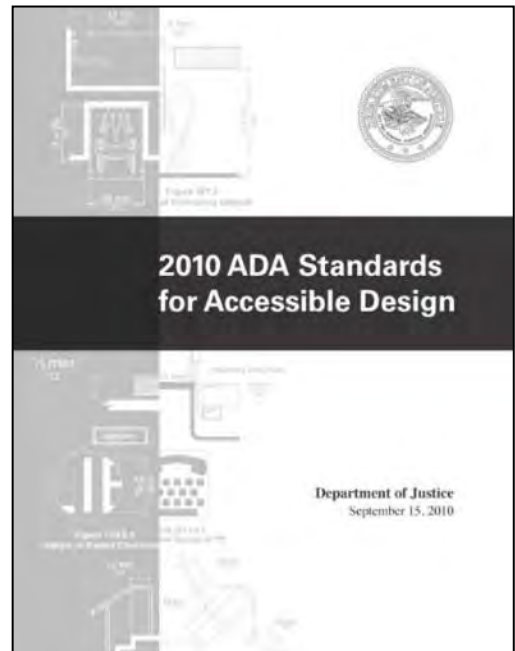
**Affirmative Action (AA):** a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds, including persons with disabilities. Affirmative action means inclusion, not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

**Alteration:** a change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

**Americans with Disabilities Act (ADA):** a comprehensive, Federal civil rights law that prohibits discrimination against people with disabilities in employment, state and local government programs and activities, public accommodations, transportation, and telecommunications.

**ADA Standards for Accessible Design (ADASAD):** consist of the 2004 ADAAG and requirements contained in 35.151 with scoping and technical requirements (dated September 15, 2010) to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the Department of Transportation (DOT).

**Auxiliary Aids and Services:** under Titles II and III of the ADA, includes a wide range of services and devices that promote effective communication or allows access to goods and services. Examples of auxiliary aids and services for individuals who are deaf or hard of hearing include qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, and exchange of written notes. Examples for individuals with vision impairments include qualified readers, taped texts, audio recordings, Braille materials, large print materials, and assistance in locating items. Examples for individuals with speech impairments include TDDs, computer terminals, speech synthesizers, and communication boards.



**Civil Rights Act of 1991:** Federal law that capped compensatory and punitive damages under Title I of the ADA for intentional job discrimination. The law also amended the ADA's definition of an employee, adding "with respect to employment in a foreign country, such term includes an individual who is a citizen of the United States."

**Complaint:** a written statement, alleging violation of the ADA, which contains the complainant's name and address and describes the City's alleged discriminatory action in sufficient detail to inform them of the nature and date of the alleged violation. It shall be signed by the complainant or by someone authorized to do so on his or her behalf. Complaints filed on behalf of classes or third parties shall describe or identify (by name, if possible) the alleged victims of discrimination.

**Covered Entity:** under the ADA, "covered entity" is an entity that must comply with the law. Under Title I, covered entities include employers, employment agencies, labor organizations, or joint labor-management committees. Under Title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities, and public transportation systems. Under Title III, covered entities include public accommodations such as restaurants, hotels, grocery stores, retail stores, etc., as well as privately owned transportation systems.

**Cross Slope:** the grade that is perpendicular to the direction of pedestrian travel.

**Curb Ramp:** a ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

**Direct Threat:** a significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.

**Disability:** with respect to an individual, means: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment. Discrimination on the basis of disability: means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

**Employer:** a person engaged in an industry affecting commerce who has 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year, and any agent of such person, except that, for two years following the effective date of this subchapter, an employer means a person engaged in an industry affecting commerce who has 25 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding year, and any agent of such

person. Exceptions: The term "employer" does not include the United States, a corporation wholly owned by the government of the United States, or an Indian tribe; or a bona fide private membership club (other than a labor organization) that is exempt from taxation under section 501(c) of Title 26 [the Internal Revenue Code of 1986].

**Equal Employment Opportunity Commission (EEOC):** the Federal agency charged with enforcing Title I of the ADA.

**Essential Job Functions:** the fundamental job duties of the employment position that the individual with a disability holds or desires. The term "essential functions" does not include marginal functions of the position.

**Equal Employment Opportunity:** an opportunity to attain the same level of performance or to enjoy equal benefits and privileges of employment as are available to an average similarly situated employee without a disability.

**Existing Facility:** refers to buildings that were constructed before the ADA went into effect. A public building constructed before the effective date of Title II does not have to be fully accessible unless the removal of barriers, including structural ones, is readily achievable.

**Facility:** all or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

**Grade Break:** the line where two surface planes with different grades meet.

**Historic Properties:** those properties that are listed or eligible for listing in the National Register of Historic Places or properties designated as historic under State or local law.

**Job Analysis:** a formal process in which information about a specific job or occupation is collected and analyzed.

**Job Description:** a detailed summary, usually written, of the major components of a job. A typical job description consists of six major components: essential job functions, knowledge and critical skills, physical demands, environmental factors, the roles of the ADA and other Federal laws such as the Occupational Safety Health Act, and any explanatory information that may be necessary to clarify job duties or responsibilities.

**Job Related and Consistent with Business Necessity:** standard used to determine whether a qualification standard or employment policy concerns an essential aspect of the job and is required to meet the needs of the business.

**Light Duty:** generally, "light duty" refers to temporary or permanent work that is physically or mentally less demanding than normal job duties. Some employers use the term "light duty" to mean simply excusing an employee from performing those job functions that s/he is unable to perform because of an impairment. "Light duty" also may consist of particular positions with duties that are less physically or mentally demanding created specifically for the purpose of providing alternative work for employees who are unable to perform some or all of their normal duties. Further, an employer may refer to any position that is sedentary or is less physically or mentally demanding as "light duty". The term is often associated with workers compensation programs.

**Major Life Activity:** term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working. These are examples only. Other activities such as sitting, standing, lifting, or reading are also major life activities.

**Marginal Job Functions:** functions that are not considered essential to a job. Employers must consider removing marginal job functions as an accommodation under the ADA, but do not have to remove essential functions as an accommodation.

**Medical Examination:** a procedure or test that seeks information about an individual's physical or mental impairments or health. The following factors should be considered to determine whether a test (or procedure) is a medical examination: (1) whether the test is administered by a health care professional; (2) whether the test is interpreted by a health care professional; (3) whether the test is designed to reveal an impairment or physical or mental health; (4) whether the test is invasive; (5) whether the test measures an employee's performance of a task or measures his/her physiological responses to performing the task ; (6) whether the test normally is given in a medical setting; and, (7) whether medical equipment is used. In many cases, a combination of factors will be relevant in determining whether a test or procedure is a medical examination. In other cases, one factor may be enough to determine that a test or procedure is medical.

**Mitigating Measures:** medical treatment or devices that lessen the effects of an impairment, such as medication, a prosthesis, or a hearing aid. When determining whether a person has a disability under the ADA, the effect of mitigating measures is to be considered.

**Other Power-Driven Mobility Devices (OPDMD):** any mobility device powered by batteries, fuel, or other engines that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility device (such as the Segway® PT), or any mobility device designed to operate in areas without defined pedestrian routes, but which is not a wheelchair.

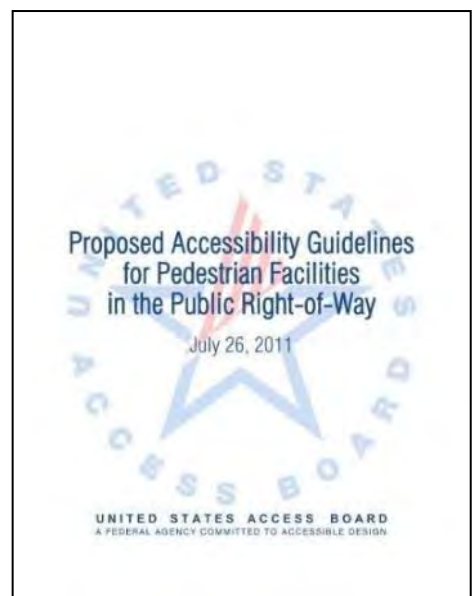
**Pedestrian Access Route (PAR):** a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

**Pedestrian Circulation Path:** a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

**Physical or Mental Impairment:** a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

- The following conditions are not physical or mental impairments: tranvestism, illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

**PROWAG:** Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way. These proposed guidelines (dated July 26, 2011) provide design criteria for public streets and sidewalks, including pedestrian access routes, street crossings, curb ramps and blended transitions, on-street parking, street furniture, and other elements. The specifications comprehensively address access that accommodates all types of disabilities, including



mobility and vision impairments, while taking into account conditions and constraints that may impact compliance, such as space limitations and terrain. The U.S. Access Board has completed rulemaking effective September 7, 2023, and PROWAG will become the enforceable standard once a Federal agency completes their rulemaking and adopts PROWAG.

**Public Accommodations:** entities that must comply with Title III. The term includes facilities whose operations affect commerce and fall within at least one of the following 12 categories: places of lodging (e.g., inns, hotels, motels) (except for owner-occupied establishments renting fewer than six rooms); establishments serving food or drink (e.g., restaurants and bars); places of exhibition or entertainment (e.g., motion picture houses, theaters, concert halls, stadiums); places of public gathering (e.g., auditoriums, convention centers, lecture halls); sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers); service establishments (e.g., laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals); public transportation terminals, depots, or stations (not including facilities relating to air transportation); places of public display or collection (e.g., museums, libraries, galleries); places of recreation (e.g., parks, zoos, amusement parks); places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools); social service center establishments (e.g., day care centers, senior citizen centers, homeless shelters, food banks, adoption agencies); and places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

**Public Entity:** entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as Amtrak. It does not include the Federal government.

**Qualified Individual with a Disability:** an individual with a disability who, with or without reasonable modification to rules, policies, or practices, removal of architectural, communication, or transportation barriers, or the provision of auxiliary services or aids, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

**Readily Achievable:** easily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include nature and cost of the action, overall financial resources and the effect on expenses and resources, legitimate safety requirements, impact on the operation of a site, and, if applicable, overall financial resources, size, and type of operation of any parent corporation or entity. Under Title III, public accommodations must remove barriers in existing facilities if it is readily achievable to do so.

**Reasonable Accommodation:** under Title I, a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. Reasonable accommodation is a key non-discrimination requirement of the ADA.

**Reasonable Program Modifications:** if an individual's disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

Reasonable program modification is any change in a program or activity, or in the way things are customarily done, that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;



- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities. Modification applies to known disabilities only. Modification is not required if it changes the essential nature of a program or activity for the person with a disability, it creates a hazardous situation, adjustments or modifications requested are primarily for the personal benefit of the individual with a disability, or it poses an undue burden on the City.

**Record of an Impairment:** an individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity or has been diagnosed, correctly or incorrectly, as having such an impairment. An example: a man, who is in line for a promotion, has a history of cancer treatment, although he is now free of cancer. He is not given the promotion because his bosses are worried that, if his cancer returns, he won't be able to do the job. He does not, at this point, meet the first part of the definition of disability because he does not have a physical or mental impairment that substantially limits one or more major life activities. However, based on his "record of" an impairment, he is being discriminated against.

**Regarded as Having a Disability:** an individual is disabled if he or she is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists. An example: a woman applies for a job as a customer service representative at a department store. Her face is badly scarred from an automobile accident. The interviewer doesn't want to give her the job, in spite of her skills and experience, because he thinks customers will be uncomfortable looking at her. She is not substantially limited in any major life activity, but the interviewer is "regarding her as" if she has a disability.

**Running Slope:** the grade that is parallel to the direction of pedestrian travel.

**Safe Harbor:** elements of existing facilities that already comply with either the 1991 ADA Standards or UFAS are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012 and elements comprising a path of travel to an altered primary function area are not required to comply with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

**Service Animal:** any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. See the 2010 revised requirements at [https://www.ada.gov/service\\_animals\\_2010.htm](https://www.ada.gov/service_animals_2010.htm).

**Substantial Limitation on Major Life Activities:** an individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long term impact (or expected impact) of, or resulting from, the impairment.

**Title V of the Rehabilitation Act of 1973:** title of the law that prohibits discrimination on the basis of a disability by the Federal government, Federal contractors, by recipients of Federal financial assistance, and in Federally conducted programs and activities.

**Transition Plan:** refers to a requirement that state and local governments employing 50 or more people develop plans detailing structural changes necessary to achieve facility and program accessibility.

**Undue Burden:** means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the City. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to New Haven City, the City shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the City must consider whether funding for the modification is available from an outside source. If no such funding is available, the City must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden.

**Undue Hardship:** with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relationship to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

**Uniform Federal Accessibility Standards (UFAS):** one of two standards that state and local governments can use to comply with Title II's accessibility requirement for new construction and alterations that took place before March 15, 2012. The other standard is the ADA Accessibility Guidelines, which is the enforceable standard for new construction or alterations done after March 15, 2012.

**U.S. Department of Justice:** Federal agency that is responsible for enforcing Titles II and III of the ADA.

**U.S. Department of Transportation:** Federal agency that enforces non-discrimination in public and private transportation. Non-discrimination includes access to public bus, train and paratransit, as well as privately operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

**Video Remote Interpretation (VRI):** Video remote interpreting (VRI) is a video telecommunication service that uses web cameras, videophones, or other devices to provide sign language or spoken language interpreting services via a remote or offsite interpreter. VRI facilitated communication with persons with hearing loss and cannot utilize voice communication systems.

# Appendix A

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## *Building Facilities and Parking Physical Barrier Summaries*

**NEW HAVEN ADA SELF EVALUATION STUDY AND TRANSITION PLAN**  
**NON-ROW FACILITY SUMMARY**

<b>Name &amp; Location</b>	<b>Ownership Status</b>	<b>Low Priority</b>	<b>Medium Priority</b>	<b>High Priority</b>	<b>Total Probable Cost</b>
<b>City Hall/Police</b> 815 Lincoln Highway E	City Owned	\$91,565	\$14,700	\$1,000	\$107,265
<b>Public Works</b> 2201 Summit Street	City Owned	\$15,415	\$2,600	\$500	\$18,515
<b>Public Parking Lots (2)</b> Location Varies	City Owned	\$4,450	\$0	\$0	\$4,450
<b>TOTALS</b>		<b>\$111,430</b>	<b>\$17,300</b>	<b>\$1,500</b>	<b>\$130,230</b>

**General Notes:** All cost estimates for City facilities are based on a estimated 2022 probable costs from various sources. Bidding in different manners or different time periods will likely require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical, or structural concerns. Costs for TBD items are not included above and many corrective action alteration costs cannot be determined within the scope of this review. In most cases, those costs have had an order of magnitude placeholder included, which is likely to vary especially where multiple options are available and/or there are undiscovered issues that will impact costs (e.g., hidden items within walls, etc.). Soft costs are not included in costs provided, which may include survey, design, construction observation, etc.

# City Hall/Police

815 Lincoln Highway E, New Haven

Data collected July 2022



## General Facility Notes:

*This facility includes 2 segregated areas (City Hall and Police) that have limited connections between them at different locations. The Police Department occupies the west portion of the main level. City Hall associated spaces occupy the east portion of the main level and the entire upper level. Parking is interconnected and considered a single facility, with public entrance on the front (door 1) accessing City Hall and Police main lobbies via a shared vestibule, rear entrance for public meetings/employees (door 9), side east for employees (door 10), police employee entrance (door 8), and several emergency exit doors and doors to the police sallyport in the rear (doors 2-6). Connections between City Hall and Police areas are at the shared elevator in the main lobby, between the meeting room of City Hall and Code Enforcement Conference Room of the Police Station.*



Exterior						
Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Public and Employee Parking						
	NOTE: There are a total of 127 spaces, including 5 accessible and 3 marked as van-accessible. Two spaces are provided in the rear (0 van) and three spaces (3 van) are in the front. A total of 5 accessible spaces (including 1 van) are required. No spaces provided at east employee entrance. Proper dispersal of spaces should include providing 1 van space in the rear as noted below, no spaces at the east employee entrance required but could also be a consideration given it would be the shortest route from this entrance to many work areas.					
Van Parking Dimensions	Van accessible spaces and access aisles dimensions.	502.1, 502.2	96"/96" or 132"/60"	109" space, 0" aisle, 120" space, 60" aisle, 120" space	Medium	\$500
	Comment: Front spaces are all marked with signage as van but none have compliant dimensions and/or compliant access aisle dimensions. Van spaces/access aisle must be either 96"/96" or 132"/60". None of the existing spaces meet these requirement. Least costly option would be to restripe existing van spaces at the access aisle to provide compliant width of aisle and 2 adjacent van spaces. Existing 3rd space should also be restriped to provide 96" width with 60" access aisle adjacent.					
Sign Height	Minimum height to bottom of accessible and van parking signage from ground surface.	502.6	60"	38-1/2" to 39"	Low	\$100
	Comment: Raise both existing signs at the front accessible parking spaces to min. 60".					
Accessible Parking Slope	All accessible spaces and access aisles slopes.	502.4	2.08% max.	3.7% to 4.0%	Medium	\$5,000
	Comment: Rear spaces at door near Meeting Room. Mill and overlay to correct, cost is estimated and likely to vary based on extent of work required to correct slope issues for space and access aisle.					
Sign Height	Minimum height to bottom of accessible and van parking signage from ground surface.	502.6	60"	48-1/2"	Low	\$150
	Comment: Raise both existing signs at the rear accessible parking spaces to min. 60".					
Accessible Parking Dispersal	If more than 1 public entrance, accessible parking dispersed to serve all entrances. (EXCEPTION: van parking in parking structures can be grouped on 1 level in garages).	206.4, 208.3, 502	YES	NO	Low	Incl. Above
	Comment: All van spaces are in the front of the facility. Spaces in the rear provide compliant dimensions but have excessive slopes. Provide min. 1 van accessible space at each building entrance.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Accessible Routes						
	NOTE: There are 2 public entrances, both requiring a compliant accessible route from parking. There is also a side employee entrance but does not have compliant slopes. The limit of accessible routes on the site are from the parking on each side to their respective entrances, no route on the east or connecting the front and rear are included. It is recommended that the disabled employees be directed to the rear entrance, which is much more accessible.					
Curb Ramp at East Entrance	Running slopes.	403.3	1:12 (8.33%) max.	8.7%	Low	N/A
	Comment: The curb ramp at the parking access aisle is excessive and provides no turning space. The slope of the top landing at the door entry is 2.7% (2% max.). No action required but consider making these compliant when the sidewalks are reconstructed by installing a parallel curb ramp.					
City Hall Side Walk Slopes	Cross slopes.	403.3	1:48 (2.08%) max.	up to 6.6%	Low	N/A
	Comment: At the side of the building in the transition to the curb ramp. No action required but consider making these compliant when the sidewalks are reconstructed by installing a parallel curb ramp.					
City Hall						
Interior						
Common Elements						
Elevators						
	NOTE: There is 1 elevator that provides access to all building levels and also connects the lobbies of City Hall and Police, which are identified on controls within the car as "F" for front (City Hall) and "R" for rear (Police). Braille on in-car buttons use abbreviations in many cases. Consider whole words.					
Car Controls	Door open is raised "triangles" pointing opposite each other with a vertical "line" between the base of the triangles and includes Braille Message.	407.4.7	YES	NO	Low	\$200
	Comment: The door open button for both "R" and "F" is a triangle with a single line to one side only. Provide compliant controls with corresponding Braille.					
Car Controls	Door close button is 2 raised "triangles" pointing toward the middle of a vertical "line" between the 2 triangles and includes Braille Message.	407.4.7	YES	NO	Low	\$200
	Comment: The door close button for both "R" and "F" is a triangle with a single line to one side only. Provide compliant controls with corresponding Braille.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Stairs						
	NOTE: There are 2 stairs within the facility, one in the public lobby and the other in the employee area in the northeast area of the building. The lobby stairs provides the public with access to the upper offices and is an open stairway. The employee stair provides access from the lower level near the employee restrooms to the upper level employee area via an enclosed stairwell.					
Public Stairs						
Treads and Risers	Treads and risers are uniform width and height and do not have open risers.	210, 504.2, 504.3	YES	NO	Medium	\$1,000
	Comment: The bottom flight of these stairs has open risers. Explore options to close risers, cost assumes tread cover with riser is provided and will vary based on option selected.					
Handrails	Handrail (non-circular) perimeter dimension and cross-section	505.7.2	4" min. to 6-1/4" max. 2-1/4" max. x-section	8-1/2" perimeter	Low	TBD
	Comment: Handrails are not compliant but elevator is provided and is the accessible route. Providing compliant handrails can assist in the event of an emergency that shuts down the elevator and also assist all stair users at all times. Explore options to provide compliant handrails, priority is low. Cost is TBD given unknowns regarding how to replace and likelihood of having to replace at least portions of the railings as well.					
Handrails	Top extension length.	505.10.2	12" and parallel to floor	0"	Low	TBD
	Comment: One side at top landing has no extension.					
Handrails	Bottom extension length.	505.10.3	Min. 1 tread depth, 11" min.	0"	Low	TBD
	Comment: One side at bottom landing has no extension.					
Employee Stairwell						
Handrails	Top extension length.	505.10.2	12" and parallel to floor	0"	Low	\$500
	Comment: One side at top landing has no extension.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
<b>Main Level</b>						
Public Hallways/Corridors						
	<i>NOTE: The main front entry doors have power-assisted openers that fully comply. The presence of openers does not eliminate other compliance needs as noted below in the event of a power outage.</i>					
Door 1	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all exterior doors, only a visual (illuminated) sign present.					
Door 1	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$220
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					
Door 1 Inner Vestibule Doors	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust inner door closer, cost assumes replacement.					
Door 1 Inner Vestibule Doors	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$220
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					
Call Buttons for Secured Doors	Call button height.	309.4	15" min. - 48" max.	50"	Low	\$50
	Comment: Planning and Utility service counter call button near rear doors/Meeting Room. Lower button if window is going to be used (did not appear to be used at the time of the evaluation).					
Call Buttons for Secured Doors	Call button signage height.	703.4	48" min. - 60" max.	60-1/8" highest	Low	\$50
	Comment: Planning and Utility service counter call button sign. Lower sign if button is going to be used (did not appear to be used at the time of the evaluation).					
Fountain at Restrooms	Drinking fountain unit is wall-mounted or post-mounted within an alcove and cantilevered.	602.1	YES	NO	Medium	\$200
	Comment: Protect leading edges of fountain with cane detectable object adjacent on both sides.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Knee Space Height	Clear Knee Space height beneath fountain.	211.2, 306.3.5, 602.2	27" min.	26-3/4"	Low	\$600
	Comment: Remount low fountain for wheelchair users to provide min. 27" knee space below.					
Door 9	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 9	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer to entry door from above, cost assumes replacement.					
Door 9	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$220
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					
Door 9 Interior Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$110
	Comment: Provide kick plate at bevel and cap cavity on push side of door.					
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer to interior entry vestibule door from above, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer to interior entry vestibule door from above, cost assumes replacement.					
	139 Men's Public Restroom					
	NOTE: The restroom is located off the main hallway between the front and rear doors. The room provides 2 sinks, 2 urinals, and 2 toilet compartments.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	15-1/2"	Low	\$1,600
	Comment: Clear space obstructed by privacy wall. Explore options. Cost provided assumes alteration to provide outswinging door with left pull from outside. Other options with variable costs exist.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height OR mirror not above countertop/sink.	603.3	40" max. or 35" max.	42-1/24"	Low	\$50
	Comment: Reposition mirror at sink.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Urinals	A clear, level space in front of the urinal for front approach is provided.	305.5, 605.3	30" wide x 48" deep	43" deep	Low	\$400
	Comment: HVAC unit partially obstructs clear space depth. Explore options, which include lowering left urinal to compliant height. Cost assumes adjustment to urinal.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Stall Door	Door opening distance from side wall furthest from toilet (NOTE: if stall width exceeds 60", distance can be increased same amount).	604.8.1.2	4" max.	4-1/4"	Low	\$400
	Comment: Reconfigure front partition wall.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	55"	Low	\$50
	Comment: Reposition or provide additional hook.					
Stall Width	Stall width from side wall to side wall.	604.8.1.1	60" min.	58"	Low	\$400
	Comment: Reconfigure side partition.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	12-5/8"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	5-1/2"/30-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	51-3/4"	Low	\$250
	Comment: Reposition grab bar.					
141 Women's Public Restroom						
	NOTE: The restroom is located off the main hallway between the front and rear doors. The room provides 2 sinks and 3 toilet compartments.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	15"	Low	\$1,600
	Comment: Clear space obstructed by privacy wall. Explore options. Cost provided assumes alteration to provide outswinging door with left pull from outside. Other options with variable costs exist.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Mirror	Height of reflective surface for mirror above lavatories/countertops height OR mirror not above countertop/sink.	603.3	40" max. or 35" max.	42-1/24"	Low	\$50
	Comment: Reposition mirror at sink.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Stall Door	Door opening distance from side wall furthest from toilet (NOTE: if stall width exceeds 60", distance can be increased same amount).	604.8.1.2	4" max.	6"	Low	\$600
	Comment: Stall width exceeds minimum by 1-3/4", requires 1/4" adjustment minimum to door position. Reconfigure front partition wall.					
Stall Door Hardware	Stall door is self-closing.	213.3, 604.8.1.2	YES	NO	Low	Incl. Above
	Comment: Adjust door with gravity hinge.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	55"	Low	\$50
	Comment: Reposition or provide additional hook.					
Toilet Seat	Toilet seat height and seat does not rise when unoccupied.	604.4	17" min. - 19" max.	19-3/8"	Low	\$100
	Comment: Cost assumes lower profile toilet seat. May require adjustment to wall mounting height of toilet at added cost.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	11-1/8"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	5-1/2"/30-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52"	Low	\$250
	Comment: Reposition grab bar.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Room 135 Council Chambers/Conference Room						
	<p><i>NOTE: This room is the location for most City public board/commission meetings and has a divider wall to allow for separation into 2 rooms, with a smaller conference area in the rear. At the time of the evaluation the center divider wall was retracted and the room is treated as 1 space. There are multiple access points, including 1 at floor level to both rooms (135A and 135B), a staff entry behind the raised board/commission member seating that also has a raised 5" step in the hallway (135C), and a connecting door to the Police area on the far wall from the entry doors. The raised area provides a ramp within the room for access to the upper area from the main floor level. The existing ramp and handrails are not compliant and cannot be made to comply with the existing configuration due to the desk and wall placement. Explore options to provide a compliant ramp.</i></p>					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$50
	Comment: Sign at 135A is too high, reposition to compliant height.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 135A has a hold-open device at bottom. Remove device.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	48"	Low	\$800
	Comment: Modify vision panel at 135A.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$50
	Comment: Sign at 135B is too high, reposition to compliant height.					
Hall Entry Door	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust closer at 135B, cost assumes replacement.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47-1/4"	Low	\$800
	Comment: Modify vision panel at 135B.					
Entry Door Clearance	Pull side maneuvering space parallel to latch for recessed door.	404.2.4.3	18" min.	13-1/8"	Medium	TBD
	Comment: Clear space presents barrier, door likely typically open at the beginning of meetings. Explore options to provide min. of 1 compliant entry (132A or B) and provide directional signage at non-compliant doors.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$50
	Comment: Sign at 135C is too high, reposition to compliant height.					
Tactile Signs	Signs have a clear floor space 18" x 18" centered on the sign located outside of the door swing.	703.4.2	18" x 18" min.	triangular, <18" deep	Low	Incl. Above
	Comment: Clear space at the sign is not compliant, no good option for repositioning for better access.					
Hall Entry Door	Changes in level.	403.4	1/2" max. beveled	5"	N/A	N/A
	Comment: Door 135C has a 5" step on the exterior, door has signage identifying it as an emergency exit only and directs persons to 135A.					
Hall Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust closer at 135C, cost assumes replacement.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47-1/4"	Low	\$800
	Comment: Modify vision panel at 135C.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	triangular	N/A	N/A
	Comment: Clear space at 135C, door not accessible.					
Entry Door Clearance	Pull side maneuvering space perpendicular to latch.	404.2.4.1 A, C/D, F	60" min.	36-3/4" max.	N/A	N/A
	Comment: Clear space at 135C, door not accessible.					
Signage	Signs at permanent spaces have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$300
	Comment: No signage provided at door 136 or 137, overhead visual text above the doors. Provide signage at doors on latch side wall at compliant height.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in Conference Room area where visible when divider wall is closed.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in Council Chambers area where visible when divider wall is closed.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	4-1/2" at 53-1/2"	Low	\$50
	Comment: Reposition hand sanitizer dispenser at door 135B interior wall.					
Assistive Listening System	A permanent assistive listening system is provided as required in every courtroom.	219.2	YES	NO	Medium	\$2,500
	Comment: Provide compliant Assistive Listening System (ALS).					
Assistive Listening Receivers	An adequate number of receivers is provided. Refer to Table 219.3 to determine the number and type of receivers required.	219.3	4 total receivers/2 hearing aid compatible	0/0	Medium	Incl. Above
	Comment: Provide total of 4 receivers, 2 of which must be hearing aid compatible.					
ALS Signage	A sign is provided at each assembly area that includes International Symbol of Access for Hearing Loss to notify citizens of the availability of the assistive listening system.	703.5, 216.10, 703.7.2.4	YES	NO	Medium	\$100
	Comment: Provide sign.					
Ramp Landing	Landing clear width.	405.7.2	full ramp width	obstructed	Low	\$15,000
	Comment: Clear width of top landing obstructed by chairs. Explore options, cost is placeholder for all work required below including new ramp, handrails, and flooring and likely to vary based on option selected.					
Ramp Landing	Landing clear depth.	405.7.3	60" min.	obstructed	Low	Incl. Above
	Comment: Clear depth of top landing obstructed by chairs. Explore options.					
Ramp Landing	Landing clear depth.	405.7.3	60" min.	51-1/2" bottom	Low	Incl. Above
	Comment: Depth of bottom landing insufficient. Explore options.					
Ramp Handrails	Top extension extends past ramp and is parallel with landing.	505.10.1	YES	NO	Low	Incl. Above
	Comment: Top extensions not compliant on outside and lacking on inside due to desk obstruction. Explore option.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Ramp Handrails	Top extension length.	505.10.1	12" min.	0"	Low	Incl. Above
	Comment: Top extensions not compliant on outside and lacking on inside due to desk obstruction. Explore options.					
Ramp Handrails	Bottom extension extends past ramp and is parallel with landing	505.10.1	YES	NO	Low	Incl. Above
	Comment: Bottom extensions not compliant on outside and lacking on inside. Explore options.					
Ramp Handrails	Bottom extension length.	505.10.1	12" min.	6" on only 1 side	Low	Incl. Above
	Comment: Bottom extensions not compliant on outside and lacking on inside. Explore options.					
Edge Protection	Rail or other barrier provided at ramp edges	405.9.2	4" max. to rail bottom	no barrier	Low	Incl. Above
	Comment: No edge protection provided. Explore options.					
Lectern Height	Lectern work surface height. Adjustable top is desirable.	226.1, 902.3	28-34"	42"	Low	\$1,200
	Comment: Provide compliant height working surface for lectern that provides direct sight lines to speaker from raised area.					
Employee Hallways/Corridors						
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust door closer to employee corridor entry door near 135, cost assumes replacement.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47-1/4"	Low	\$800
	Comment: Modify vision panel at door to employee corridor near 135.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.3	18" min.	16-1/2"	Low	TBD
	Comment: Clear space at recessed door to employee hallway near 135.					
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer to employee corridor entry door near front public lobby, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	Incl. Above
	Comment: Adjust door closer to employee corridor entry door near front public lobby, cost assumes replacement.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47-1/4"	Low	\$800
	Comment: Modify vision panel at door to employee corridor entry door near front public lobby.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.3	18" min.	17-1/2"	Low	TBD
	Comment: Clear space at recessed door to employee corridor near front public lobby.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$750
	Comment: Signs at 10 offices, 5 storage/work rooms, and 1 electrical room are too high, reposition to compliant height.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$750
	Comment: No compliant signage at several rooms, which provide only visual text on door frame over the door (105, 140, 103A, 104, 109.). Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-3/4" at 49-1/2" high	Low	\$50
	Comment: Wall mounted shelf and hand sanitizer dispenser near entry door at 135. Provide permanent cane-detectable object below or reposition items.					
Employee Hall Stair Door	Braille is separated from tactile letters, raised sign border, and sign decorative elements.	703.3.2	3/8" min.	1/4"	Low	\$100
	Comment: Tactile letters only 1/4" above Braille. Provide compliant sign at compliant location.					
Employee Stair Door	Signs have a clear floor space 18" x 18" centered on the sign located outside of the door swing.	703.4.2	YES	NO	Low	Incl. Above
	Comment: Existing sign is located on side wall within area of door swing. Reposition new sign to compliant location.					
Employee Stair Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Employee Stair Door	Operating force to open.	404.2.9	5 lbs. max.	9 lbs.	Low	Incl. Above
Employee Stair Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	46-1/2"	Low	\$800
	Comment: Modify vision panel at stair door.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Employee Stair Door	Pull side maneuvering space parallel to latch for recessed door.	404.2.4.3	18" min.	5-1/4"	Medium	TBD
	Comment: Clear space presents barrier to mobility device users on both sides. Explore options.					
Entry Door Clearance	Push side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	12" min.	5-1/4"	Low	TBD
	Comment: Clearance for door with closer and latch not compliant. Explore options.					
Door 10	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 10	Automatic closer sweep time.	404.2.8.1	5 sec. min.	2 sec.	Low	\$450
	Comment: Adjust door closer to exterior entry vestibule door from above, cost assumes replacement.					
Door 10	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$110
	Comment: Provide kick plate at bevel and cap cavity on push side of exterior door.					
Door 10	Pull side maneuvering space parallel to latch for recessed door.	404.2.4.3	18" min.	12-1/2"	Medium	TBD
	Comment: Clear space presents barrier to mobility device users on both sides. Explore options.					
Door 10	Push side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	12" min.	5"	Low	TBD
	Comment: Clearance for door with closer and latch not compliant, obstructed by heater. Explore options.					
Door 10	Pull side maneuvering space is level.	302, 404.2.4.4	2% max.	3.10%	Low	N/A
	Comment: Clearance for door with closer and latch not compliant. Explore options.					
Door 10 Inner Door	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust door closer to interior entry vestibule door from above, cost assumes replacement.					
Door 10	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	14-3/4"	Low	TBD
	Comment: Clearance for door not compliant, obstructed by heater. Explore options.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Door 10	Pull side maneuvering space perpendicular to door.	404.2.4.1 A, C/D, F	60" min.	33-1/4"	Low	TBD
	Comment: Clearance for door with closer and latch not compliant, obstructed by heater. Explore options.					
Stairwell Door	Signs at egress routes have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.4, 703.1- 2, 703.5	Tactile required	No sign at stair door	Low	\$150
	Comment: Only visual, illuminated "EXIT" signs are provided outside of stairwell access door. Provide tactile signage and consider including stairway pictogram on signs.					
115 Employee Break Room						
Hall Entry Door Signage	Signs at permanent spaces have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$150
	Comment: Visual signage provided above door, no tactile.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	6 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door has a hold-open device at bottom. Remove device.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47"	Low	\$800
	Comment: Modify vision panel.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	36-1/2"	Low	\$1,675
	Comment: Replace cabinet style sink.					
Sink	Height of knee space below sink.	606.2, 306.3.1	27" min.	0"	Low	Incl. Above
	Comment: Replace cabinet style sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	51-1/2"	Low	\$50
	Comment: Reposition.					
Dining Surface	Height of knee space below the work/dining surface.	306.3.1, 606.2	27" min.	24-1/2"	Low	\$200
	Comment: Provide min. of 1 compliant dining surface.					
Stove/Oven Controls Location	Controls for stovetops and ovens shall be on front panels, do not require reaching over burners to access.	804.6.4, 804.6.5.3	YES	NO	Low	\$1,000
	Comment: Controls are on rear panel.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Microwave Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	60"	Low	\$200
	Comment: Least costly option is to provide 2nd microwave on the countertop.					
Misc. Items Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	51" & 65"	Low	\$50
	Comment: Height of latches on first aid kit too high, lower first aid kit.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-1/4" at 37-1/4"	Low	\$100
	Comment: Fire extinguisher at entry. Provide cane detectable object below or reposition.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in employee break room common area.					
130 Conference Room						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" highest	Low	\$50
	Comment: Sign is too high, reposition to compliant height.					
Employee Stair Door	Pull side maneuvering space parallel to latch for recessed door.	404.2.4.3	18" min.	16"	Low	TBD
	Comment: Explore options.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in employee common areas.					
118 Men's Employee Restroom						
	NOTE: The restroom is located off the employee hallway. The room provides 1 sink, 1 urinal, and 1 toilet compartment.					
Restroom Sign	Braille is separated from tactile letters, raised sign border, and sign decorative elements.	703.3.2	3/8" min.	1/4"	Low	\$200
	Comment: Tactile letters only 1/4" above Braille. Provide compliant sign at compliant location.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	10 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	34-1/2"	Low	\$400
	Comment: Reposition sink.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	41-1/2"	Low	\$50
	Comment: Reposition mirror at sink.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 37-1/4"	Low	\$100
	Comment: Paper towel dispenser at entry. Provide cane detectable object below or reposition.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48" max.	53-1/2"	Low	Incl. Above
	Comment: Reposition.					
Dispenser	Toilet seat cover dispenser operable parts height.	308, 604.7	15" min. - 48" max.	53"	Low	\$50
	Comment: Located within stall. Reposition.					
Urinals	Urinals lip depth from wall.	605.2	13-1/2" min.	12-1/2"	Low	N/A
	Comment: OPTIONAL. Only 1 urinal present, compliance is optional. Existing model cannot be made to comply.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	55"	Low	\$50
	Comment: Reposition or provide additional hook.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	11"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	7"/29"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52"	Low	\$250
	Comment: Reposition grab bar.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
117 Women's Employee Restroom						
	<i>NOTE: The restroom is located off the employee hallway. The room provides 1 sink and 2 toilet compartments.</i>					
Restroom Sign	Braille is separated from tactile letters, raised sign border, and sign decorative elements.	703.3.2	3/8" min.	1/4"	Low	\$200
	Comment: Tactile letters only 1/4" above Braille. Provide compliant sign at compliant location.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	15-1/4"	Low	\$1,600
	Comment: Clear space obstructed by sink countertop. Explore options. Cost provided assumes alteration to provide wall-hung sink.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	25-1/4" at 30-3/4" high	Low	Incl. Above
	Comment: Countertop at entry.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	34-1/2"	Low	Incl. Above
	Comment: Reposition sink.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	42"	Low	\$50
	Comment: Reposition mirror at sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48" max.	50"	Low	\$50
	Comment: Reposition.					
Dispenser	Toilet seat cover dispenser operable parts height.	308, 604.7	15" min. - 48" max.	53"	Low	\$50
	Comment: Located within stall. Reposition.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	55"	Low	\$50
	Comment: Reposition or provide additional hook.					
Toilet Seat	Toilet seat height and seat does not rise when unoccupied.	604.4	17" min. - 19" max.	19-3/8"	Low	\$100
	Comment: Cost assumes lower profile toilet seat. May require adjustment to wall mounting height of toilet at added cost.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	13-1/2"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	5-1/2"/30-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52-3/4"	Low	\$250
	Comment: Reposition grab bar.					
Upper Level						
	NOTE: The upper level provides a small upper mezzanine area at the open stairs from the main floor lobby, with access to a reception waiting area via a door. The west employee hall includes offices of the HR Director and Mayor. Engineering and Planning offices are in the east employee corridor, with restrooms and break room.					
Public Hallways/Corridors						
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer to door from elevator lobby to waiting area, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer to door from elevator lobby to waiting area, cost assumes replacement.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	46-1/2"	Low	\$800
	Comment: Modify vision panel at door from elevator lobby to waiting room.					
Entry Door Clearance	Pull side maneuvering space parallel to latch for recessed door.	404.2.4.3	18" min.	16-3/8"	Low	TBD
	Comment: Explore options.					
Service Counter	Height of service counter or service window - PARALLEL APPROACH	904.4.1	36"	39-1/2"	Medium	\$600
	Comment: Provide accessible service counter min. 36" width and 36" max. height.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$150
	Comment: No signage at elevator equipment room door. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Call Buttons for Secured Doors	Call button height.	309.4	15" min. - 48" max.	>48"	Low	\$50
	Comment: Service counter call button too high. Lower button and consider larger text font size on sign.					
East Employee Hallways/Corridors						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$1,050
	Comment: Signs at 6 offices and 1 mechanical room are too high, reposition to compliant height.					
Tactile Signs	Signs are located on the wall on the latch side of the door OR on the door which must open in and have closer but no hold-open device.	703.4.2	YES	NO	Low	\$50
	Comment: Sign 212 located on hinge side wall, reposition sign to latch side wall.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-1/4" at 56-1/4" high	Low	\$100
	Comment: Wall mounted TV in 221 open office area. Provide permanent cane-detectable object below both sides.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-1/2" at 51-3/4" high	Low	\$50
	Comment: Wall mounted shelf near rear stairs. Provide permanent cane-detectable object below or reposition.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	4-1/2" at 57" high	Low	\$50
	Comment: Hand sanitizer dispenser. Provide permanent cane-detectable object below or reposition item.					
Stairwell Door	Signs at egress routes have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.4, 703.1-2, 703.5	Tactile required	No sign at stair door	Low	\$150
	Comment: Only visual, illuminated "EXIT" signs are provided outside of stairwell access door. Provide tactile signage and consider including stairway pictogram on signs.					
Stairwell Door	Operating force to open.	404.2.9	5 lbs. max.	9 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Stairwell Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	48"	Low	\$800
	Comment: Modify vision panel at door to rear stairwell.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Stairwell Door	Pull side maneuvering space parallel to latch.	404.2.4.3	18" min.	6-1/2"	Low	TBD
	Comment: Clear space at door is located within stairwell landing, explore options.					
Public Lobby Door to Employee Area	Operating force to open.	404.2.9	5 lbs. max.	13 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	17"	Low	TBD
	Comment: Minor impact on accessibility. Explore options.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door at public lobby has a hold-open device at bottom. Remove device.					
Fountain at Restrooms	Drinking fountain unit is wall-mounted or post-mounted within an alcove and cantilevered.	602.1	YES	NO	Low	\$200
	Comment: Protect leading edges of fountain with cane detectable object adjacent on both sides.					
Fountain at Restrooms	Clear Knee Space height beneath fountain.	211.2, 306.3.5, 602.2	27" min.	26-3/4"	Low	\$400
	Comment: Wheelchair (low) fountain does not provide required knee space below. Reposition low fountain.					
217 Employee Break Room						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-5/8" lowest	Low	\$50
	Comment: Sign is too high, reposition to compliant height.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door has a hold-open device at bottom. Remove device.					
Hall Entry Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Hall Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	36"	Low	\$1,675
	Comment: Provide compliant height sink rim, explore options to lower sink area of cabinets.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	50-3/4"	Low	\$50
	Comment: Reposition.					
Dining Surface	Work or dining surface top height above the floor.	226.1, 902	28" min. to 34" max.	36"	Low	\$200
	Comment: Only hightop tables present. Provide min. of 1 compliant dining surface with 27" min. knee space also.					
Microwave Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	66"	Low	\$200
	Comment: Cost assumes providing a 2nd microwave on the countertop.					
Misc. Items Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	53" min.	Low	\$50
	Comment: Height of wall telephone operable parts too high, lower phone.					
Misc. Items Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	48-1/2" min.	Low	\$50
	Comment: Height of latches on first aid kit too high, lower first aid kit.					
216 Men's Employee Restroom						
Restroom Sign	Signs have a clear floor space 18" x 18" centered on the sign located outside of the door swing.	703.4.2	18" x 18" min.	<18"	Low	\$50
	Comment: Clear space is obstructed by the drinking fountain. Consider moving sign to the door, which is permitted since door opens in and has a closer.					
Hall Entry Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Hall Entry Door	Operating force to open.	404.2.9	5 lbs. max.	12 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Coat Hook	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	54-3/8"	Low	\$50
	Comment: Coat hook on back of door too high. Reposition or provide additional hook.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 50"	Low	\$100
	Comment: Paper towel dispenser, protected by movable trash can. Provide cane detectable object below or reposition.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	49-1/2"	Low	\$50
	Comment: Reposition mirror at sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	51"	Low	\$50
	Comment: Reposition.					
Clear Space	Clearance from side wall to beyond open side of toilet.	604.3.1	60" min.	44"	Low	TBD
	Comment: Space from wall to sink insufficient, does not provide wheelchair clearance. Explore options, limited space.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	15"/21"	Low	\$250
	Comment: Reposition grab bar.					
215 Women's Employee Restroom						
Restroom Sign	Signs have a clear floor space 18" x 18" centered on the sign located outside of the door swing.	703.4.2	18" x 18" min.	<18"	Low	\$50
	Comment: Clear space is obstructed by the drinking fountain. Consider moving sign to the door, which is permitted since door opens in and has a closer.					
Hall Entry Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Hall Entry Door	Operating force to open.	404.2.9	5 lbs. max.	13 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Hall Entry Door	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	11"	Low	N/A
	Comment: Clearance for door not compliant, obstructed by small table and storage rack. Move these items.					
Hall Entry Door	Push side maneuvering space parallel to latch.	404.2.4.1 B, E, G	12" min.	8"	Low	N/A
	Comment: Clearance for door with closer and latch not compliant, obstructed by drinking fountain.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Coat Hook	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	54-1/4"	Low	\$50
	Comment: Coat hook on back of door too high. Reposition or provide additional hook.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 48"	Low	\$100
	Comment: Paper towel dispenser at entry, protected by movable objects. Provide cane detectable object below or reposition.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	48-3/4"	Low	\$50
	Comment: Reposition mirror at sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	48-3/4"	Low	\$50
	Comment: Reposition.					
Clear Space	Clearance from side wall to beyond open side of toilet.	604.3.1	60" min.	44"	Low	TBD
	Comment: Space from wall to sink insufficient, does not provide wheelchair clearance. Explore options, limited space.					
Grab Bars	Bars mounted height above the floor measured to the top of the gripping surface.	609.4	33" min.- 36" max	36-1/2" side	Low	\$250
	Comment: Reposition side grab bar to compliant height.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	15"/21"	Low	\$250
	Comment: Reposition grab bar.					
West Employee Hallways/Corridors						
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer to employee corridor entry door at public lobby, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	10 lbs.	Low	Incl. Above
	Comment: Adjust door closer to employee corridor entry door at public lobby, cost assumes replacement.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$50
	Comment: Signs at 1 Mayor's office is too high, reposition to compliant height.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$600
	Comment: No compliant signage at storage, mechanical, and communications rooms and 1 office. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Police						
	NOTE: The Police side of this building is a single story, with an elevator within the public lobby that connects to the upper level of City Hall near the Mayor's and Planning/Engineering offices. There are no stairs on the Police side. All exterior features (parking, etc.) are shared with City Hall and deficiencies noted above.					
Interior						
Public Entry/Lobby						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$50
	Comment: Sign at lobby entry door in shared vestibule is too high, reposition to compliant height.					
Lobby Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7-1/2"	Low	\$220
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer to public entry door from shared vestibule, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	10 lbs.	Low	Incl. Above
	Comment: Adjust door closer to public entry door from shared vestibule, cost assumes replacement.					
Service Counter	Height of service counter or service window - PARALLEL APPROACH	904.4.1	36"	39-1/4"	Medium	\$600
	Comment: Provide accessible main service counter min. 36" width and 36" max. height.					
Service Counter	Height of service counter or service window - PARALLEL APPROACH	904.4.1	36"	39-1/4"	Medium	\$600
	Comment: Provide accessible police records service counter min. 36" width and 36" max. height.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in public lobby area.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" highest	Low	\$50
	Comment: Sign for Police Chief in public lobby is too high, reposition to compliant height.					
144 Unisex Restroom						
Entry Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 53"	Low	\$50
	Comment: Paper towel dispenser, protected by movable trash can. Provide cane detectable object below or reposition.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	42"	Low	\$50
	Comment: Reposition mirror at sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	54"	Low	\$50
	Comment: Reposition.					
Toilet Seat	Toilet seat height and seat does not rise when unoccupied.	604.4	17" min. - 19" max.	19-1/4"	Low	\$100
	Comment: Cost assumes lower profile toilet seat. May require adjustment to wall mounting height of toilet at added cost.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min.- 9" max.	10-7/8"	Low	\$50
	Comment: Reposition.					
Clear Space	Clearance from side wall to beyond open side of toilet.	604.3.1	60" min.	55-1/4"	Low	\$400
	Comment: Space from wall to sink insufficient, does not provide wheelchair clearance. Explore options, limited space.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	6-1/2"/ 29-1/2"	Low	\$250
	Comment: Reposition grab bar.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Employee Main Hallway/Corridor						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-3/4" min. highest	Low	\$500
	Comment: Signs at 8 offices and 2 misc. spaces are too high, reposition to compliant height.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$300
	Comment: No compliant signage at 2 mechanical rooms. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Drinking Fountains	Where provided on an exterior site, floor, or secured area there are 2 fountains minimum, with one each for wheelchairs and standing user.	211.1, 211.2	YES	NO	Low	\$2,500
	Comment: No standing user fountain provided within the facility. Provide additional fountain compliant for standing user.					
Fountain at 189	Drinking fountain unit is wall-mounted or post-mounted within an alcove and cantilevered.	602.1	YES	NO	Low	\$100
	Comment: Protect leading edges of fountain with cane detectable object adjacent on open side.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	6-1/4" at 46-3/4" high	Low	\$100
	Comment: Wall mounted AED at 150. Provide permanent cane-detectable object below or reposition.					
Door 4	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 8 Outer Door	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 8 Outer Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	2 sec.	Low	\$450
	Comment: Adjust door closer to entry door, cost assumes replacement.					
Door 8 Outer Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	7"	Low	\$110
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					
Door 8 Outer Door	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	5"	Low	\$400
	Comment: Clearance for door not compliant, lawn area outside clear space. Explore options, cost assumes larger stoop.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Door 8 Outer Door	Push side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	12" min.	6"	Low	TBD
	Comment: Clearance for door with closer and latch not compliant, obstructed by heater. Explore options.					
Door 8 Inner Door	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 8 Inner Door	Automatic closer sweep time.	404.2.8.1	5 sec. min.	2 sec.	Low	\$450
	Comment: Adjust door closer to entry door, cost assumes replacement.					
Door 8 Inner Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Door 8 Inner Door	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	15-3/4"	Low	TBD
	Comment: Clearance for door not compliant. Explore options.					
151 Employee Unisex Restroom						
	NOTE: The restroom is located off the employee hallway. The restroom is not deemed to be the accessible restroom, those would be at the locker rooms. Items below are for reference only unless cost and priority provided.					
Restroom Sign	Signs outside restroom have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$200
	Comment: No sign provided, only visual room number over the door. Provide compliant sign at compliant location.					
Restroom Sign	Directional sign provided at non-accessible restrooms.	216.8, 703.5	YES	NO	Low	\$100
	Comment: Provide sign identifying the locker rooms as the accessible restrooms with arrow towards them.					
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 53"	Low	\$50
	Comment: Paper towel dispenser, protected by movable trash can. Provide cane detectable object below or reposition.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	34-3/4"	N/A	N/A
	Comment: Reposition sink.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	43-1/4"	N/A	N/A
	Comment: Reposition mirror at sink.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	54-1/4"	N/A	N/A
	Comment: Reposition.					
Clear Space	Clearance from side wall to beyond open side of toilet.	604.3.1	60" min.	43-1/2"	N/A	N/A
	Comment: Space from wall to urinal insufficient. Explore options, if this restroom is to be made accessible urinal should be removed.					
Toilet Location	Space on side of toilet from side wall/partition to the centerline of the toilet.	604.2	16" min.-18" max.	19-5/8"	N/A	N/A
	Comment: Cost assumes lower profile toilet seat. May require adjustment to wall mounting height of toilet at added cost.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min.- 9" max.	11-5/8"	N/A	N/A
	Comment: Reposition.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52-1/2"	N/A	N/A
	Comment: Reposition grab bar.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	15"/ 21"	N/A	N/A
	Comment: Reposition grab bar.					
Urinals	Height of top lip of lowest urinal from the floor.	605.2	17" max.	17-1/4"	N/A	N/A
	Comment: OPTIONAL. Only 1 urinal present, compliance is optional. Existing model cannot be made to comply.					
Urinals	Urinal lip depth from wall.	605.2	13-1/2" min.	12"	N/A	N/A
	Comment: OPTIONAL. Only 1 urinal present, compliance is optional. Existing model cannot be made to comply.					
Misc. Items Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	>48"	Low	\$50
	Comment: Height of latches on first aid kit too high, reposition first aid kit to different wall.					
157 Conference Room/Code Enforcement						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/4" min.	Low	\$50
	Comment: Sign too high, reposition to compliant height.					
Hall Entry Door	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	15"	Low	N/A
	Comment: Clearance for door not compliant, obstructed by file cabinet. Move item.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in common use areas.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$300
	Comment: No signage at 2 room doors to records and City Hall Council Chambers. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
189 Break Room						
Entry Door Signage	Signs at permanent spaces have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$150
	Comment: Visual signage provided above door 189A, no tactile.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 189A has a hold-open device at bottom. Remove device.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	12 lbs.	Low	\$450
	Comment: Adjust door closer to door 189A, cost assumes replacement.					
Entry Door Clearance	Push side maneuvering space parallel to latch.	404.2.4.1 B, E, G	12" min.	5"	Low	TBD
	Comment: Clearance for door with latch and closer. Minor impact on accessibility. Explore options.					
Entry Door Signage	Signs at permanent spaces have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$150
	Comment: Visual signage provided above door 189B, no tactile.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	12 lbs.	Low	\$450
	Comment: Adjust door closer to door 189B, cost assumes replacement.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 189B has a hold-open device at bottom. Remove device.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47"	Low	\$800
	Comment: Modify vision panel at door 189B.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	37-1/8"	Low	\$1,675
	Comment: Provide compliant height sink rim, explore options to lower sink area of cabinets.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48"max.	53"	Low	\$50
	Comment: Reposition.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 52-1/4"	Low	Incl. Above
	Comment: Paper towel dispenser. Provide cane detectable object below or reposition.					
Microwave Height	Unobstructed reach height above the floor level.	308.2.1	15" min. - 48"max.	66"	Low	\$200
	Comment: Cost assumes providing a 2nd microwave on the countertop.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in common use area.					
Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$100
	Comment: Provide compliant sign, only visual text over door to 190 Storage.					
Employee Locker Room Hallway/Corridor						
Door 185B Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Door 185B Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Hall Entry Door 185B	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 185B has a hold-open device at bottom. Remove device.					
Hall Entry Door 185B	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47"	Low	\$800
	Comment: Modify vision panel at door 185B.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	>60"	Low	\$100
	Comment: Signs at 2 rooms are too high, reposition to compliant height.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$150
	Comment: No signage at 1 room door. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Door 2	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door 2 Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer to public entry door from shared vestibule, cost assumes replacement.					
Door 2 Closer	Operating force to open.	404.2.9	15 lbs. max.	>15 lbs.	Low	\$150
	Comment: Door sticks at threshold, requires excessive force to open. Explore options.					
179 Men's Locker Room/Restroom						
	NOTE: The Men's locker room/restroom is accessed from the main hallway. There are 2 separate rooms, with the restroom fixtures in the main entry room and a rear space with lockers and showers. The restroom provides 2 sinks, 2 urinals, and 2 toilet compartment. There is also 2 shower compartments. Since not all restrooms are accessible (151), provide ISA on signage.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" lowest	Low	\$50
	Comment: Sign at entry door is too high, reposition to compliant height.					
Entry Door Signage	Signs outside restroom have pictogram with gender symbol and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$200
	Comment: Provide compliant sign, existing sign lacks pictogram and ISA. Consider including sign with shower pictogram.					
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door Clearance	Pull side maneuvering space perpendicular to latch.	404.2.4.1 A, C/D, F	54" min.	52-1/2"	Low	TBD
	Comment: Clear space obstructed by wall. Explore options. Minimal impact on accessibility.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	41-3/4"	Low	\$50
	Comment: Reposition mirror at sink.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48" max.	49-1/2"	Low	\$50
	Comment: Reposition.					
Dispenser	Soap dispenser operable parts height.	308, 604.7	15" min. - 48" max.	52-3/4"	Low	\$50
	Comment: Reposition.					
Urinals	Urinals lip depth from wall.	605.2	13-1/2" min.	12"	Low	\$800
	Comment: Existing model cannot be made to comply. Purchase compliant model urinal and install to correct height.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Stall Width	Stall width from side wall to side wall.	604.8.1.1	60" min.	59-1/2"	Low	\$400
	Comment: Adjust partition between stalls.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	54-3/4"	Low	\$50
	Comment: Reposition or provide additional hook.					
Toilet Location	Space on side of toilet from side wall/partition to the centerline of the toilet.	604.2	16-18"	18-3/4"	Low	\$765
	Comment: Reposition the toilet.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	12-3/4"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	6"/30"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Locker Room Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$100
	Comment: Provide compliant sign, no sign at door. Consider including sign with shower pictogram.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Locker Room Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in locker/shower area.					
Shower Seat	All seats distance from rear wall	610.3	1-1/2" max.	2"	Low	\$150
	Comment: Adjust location of seat.					
Transfer Shower Grab Bars	Grab bar provided full depth of control wall.	608.3.1	YES	NO	Low	\$600
	Comment: No grab bar provided as required.					
Lockers	Where lockers are provided at least 5%, but no fewer than 1 are accessible and on an accessible route.	222.1, 403.5.1, 811	3 min.	0	Low	\$1,800
	Comment: There are no accessible lockers.					
Locker Hardware	Opening latches/locks are operable without grasping and twisting	309.4	YES	NO	Low	Incl. Above
	Comment: There are no accessible lockers, existing lockers have grasp and lift latches.					
Clothing Hooks	Clothing hooks height above the floor.	308, 803.5	15" min - 48" max	55"	Low	\$50
	Comment: Provide additional hook within reach range at showers.					
Clear Space	Is clear space provided at the end (side) of the bench seat parallel to the short axis.	803.4, 903	YES	NO	Low	TBD
	Comment: No clear space provided at non-compliant benches.					
Bench Size	Bench seat depth.	903.3	20" min-24" max.	9-1/2"	Low	\$2,400
	Comment: No compliant benches.					
Benches	Does bench provide back support (can be seat back or wall).	903.4	YES	NO	Low	Incl. Above
	Comment: No compliant benches.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
180 Women's Locker Room/Restroom						
	<i>NOTE: The Women's locker room/restroom is accessed from the main hallway. The restroom provides 1 sink and 1 toilet compartment. There is also 1 shower compartment. Since not all restrooms are accessible (151), provide ISA on signage.</i>					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" min. lowest	Low	\$50
	Comment: Sign at entry door is too high, reposition to compliant height.					
Entry Door Signage	Signs outside restroom have pictogram with gender symbol and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$200
	Comment: Provide compliant sign, existing sign lacks pictogram and ISA. Consider including sign with shower pictogram.					
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Mirror	Height of reflective surface for mirror above lavatories/countertops height.	603.3	40" max.	42-1/4"	Low	\$50
	Comment: Reposition mirror at sink.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48" max.	55"	Low	\$50
	Comment: Reposition.					
Stall Door Hardware	Stall has handle on the outside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Stall Door Hardware	Stall door is self-closing.	213.3, 404.7, 604.8.1.2	YES	NO	Low	\$100
	Comment: Gravity hinge holds door open, adjust angle of partition to allow hinge to close door.					
Stall Door	Door opening distance from side wall furthest from toilet (NOTE: if stall width exceeds 60", distance can be increased same amount).	604.8.1.2	4" max.	5-1/2"	Low	\$400
	Comment: Reconfigure front partition wall.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	54-3/4"	Low	\$50
	Comment: Reposition or provide additional hook.					
Toilet Location	Space on side of toilet from side wall/partition to the centerline of the toilet.	604.2	16-18"	18-3/4"	Low	\$765
	Comment: Reposition the toilet.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	11-1/2"	Low	\$50
	Comment: Reposition.					
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	5-1/2"/30-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	52-1/2"	Low	\$250
	Comment: Reposition grab bar.					
Shower Seat	All seats distance from rear wall	610.3	1-1/2" max.	1-7/8"	Low	\$150
	Comment: Adjust location of seat.					
Transfer Shower Grab Bars	Grab bar provided full depth of control wall.	608.3.1	YES	NO	Low	\$600
	Comment: No grab bar provided as required.					
Lockers	Where lockers are provided at least 5%, but no fewer than 1 are accessible and on an accessible route.	222.1, 403.5.1, 811	1 min.	0	Low	\$600
	Comment: There are no accessible lockers.					
Locker Hardware	Opening latches/locks are operable without grasping and twisting	309.4	YES	NO	Low	TBD
	Comment: There are no accessible lockers, existing lockers have grasp and lift latches.					
Clothing Hooks	Clothing hooks height above the floor.	308, 803.5	15" min - 48" max	55"	Low	\$50
	Comment: Provide additional hook within reach range at showers.					
Clear Space	Is clear space provided at the end (side) of the bench seat parallel to the short axis.	803.4, 903	YES	NO	Low	TBD
	Comment: No clear space provided at non-compliant benches.					
Bench Size	Bench seat depth.	903.3	20" min-24" max.	9-1/2"	Low	\$800
	Comment: No compliant benches.					
Benches	Does bench provide back support (can be seat back or wall).	903.4	YES	NO	Low	Incl. Above
	Comment: No compliant benches. Remove existing bench and replace with new one that complies.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
181 Training Room						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" low, 60-3/4" min. high	Low	\$50
	Comment: Reposition to compliant height.					
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	7 lbs.	Low	Incl. Above
	Comment: Adjust door closer, cost assumes replacement.					
Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47"	Low	\$800
	Comment: Modify vision panel at door.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A, C/D, F	18" min.	17-1/2"	Low	TBD
	Comment: Minor impact on accessibility. Explore options.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door has a hold-open device at bottom. Remove device.					
Visual Fire Alarms	Visual fire alarms (white strobe lights) must be located to be visible from all locations if system is upgraded, replaced, or a new system is installed.	215.1, 702.1, NFPA 72	YES	NO	Medium	\$400
	Comment: Provide in common use area.					
Door 3	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" low, 60-3/4" min. high	Low	\$50
	Comment: Reposition 182 Firing Range sign to compliant height.					
Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$100
	Comment: Provide compliant sign, no sign at door to 183 Storage.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Employee Interview-Detectives Hallway/Corridor						
Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	4 sec.	Low	\$450
	Comment: Adjust door closer to hallway from main hallway, cost assumes replacement.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	Incl. Above
	Comment: Adjust door closer to hallway from main hallway, cost assumes replacement.					
Hall Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door from main hallway has a hold-open device at bottom. Remove device.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	47"	Low	\$800
	Comment: Modify vision panel at door from main hallway.					
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	>60" min.	Low	\$150
	Comment: Signs at 2 offices and 1 sallyport are too high, reposition to compliant height.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	Visual only	Low	\$150
	Comment: No compliant signage at 1 room door. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Hold Cells (3)						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" min.	Low	\$150
	Comment: Signs at all 3 rooms are too high, reposition to compliant height.					
170 Interview #1						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" min.	Low	\$50
	Comment: Sign is too high, reposition to compliant height.					
171 Interview #2						
Tactile Signs	Signage height above the finished floor to the bottom of tactile characters (including Braille). (Min. is to lowest character; max. is to highest character)	703.4.1	48" min. - 60" max.	60-1/8" min.	Low	\$50
	Comment: Sign is too high, reposition to compliant height.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
	<b>Facility Total:</b>					\$107,265

**General Notes:**

1. Spaces noted as van-accessible in the field evaluation results must provide a van-accessible sign. Spaces with van signage are deemed to be intended for use by vans and evaluated based on dimensional and other requirements for van spaces. Spaces that provide no van signage but include an accessible parking sign are evaluated as a non-van accessible parking space, even if the dimensions meet requirements for a van space. Spaces with pavement markings but without signs are noted but not included in parking counts.
2. Most tactile signs within the facility are mounted at the previous compliant height of 60" to the center of the sign. Current requirements for 48" min. to the bottom of the lowest tactile characters (including Braille) and 60" max. to the bottom of the highest tactile characters make these signs non-compliant since the tactile characters are typically above the center of the sign. Ensure all signs are re-mounted to correct heights, most are noted above but others may also need to be repositioned.
3. There are 3 holding cells in the Police area, with 164 Holding Cell #3 providing no accessible toilet. The other holding cells are simple rooms with a bench within. Per Police staff, these cells are for very short term holding. Ensure that detainees that require accessible facilities are transported directly to the County Jail or options for providing accessible amenities can be identified.

# Public Works

2201 Summit Street, New Haven



Data collected July 2022

## Exterior

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Parking						
	<i>NOTE: There are a total of 25 spaces for the public, including 2 accessible, with 0 van. A total of 1 accessible spaces (including 1 van) is required.</i>					
Public Accessible Parking	Total # Van Accessible Spaces Provided (NOTE: count only spaces with van signage, add note if only pavement markings provided)	208.2	1	0	Low	\$100
	Comment: Existing spaces provide no van sign, provide min. 1 van sign at compliant space.					
Van Parking Dimensions	Van accessible spaces and access aisles dimensions.	502.1, 502.2	96"/96" or 132"/60"	132" space, 59" aisle, 130" space	Low	\$500
	Comment: Van spaces/access aisle must be either 96"/96" or 132"/60". None of the existing spaces meet these requirement. Restripe access aisle to be min. 60" from center to center of markings and adjacent to 132" min. space with van sign from above. 2nd accessible space only required to be 96". Option also to capture space from adjacent parking (1-2") to provide 2 compliant van spaces, ensuring the access aisle is centered on the route to the building entry.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Accessible Parking Slope	All accessible spaces and access aisles slopes.	502.4	2.08% max.	2.2% to 2.8%	Medium	\$2,500
	Comment: Both existing spaces and shared access aisle have running slope exceeding maximum. Mill and overlay to correct, cost is estimated and likely to vary based on extent of work required to correct slope issues for space and access aisle.					
Sign Height	Minimum height to bottom of accessible and van parking signage from ground surface.	502.6	60"	58"	Low	\$50
	Comment: Raise existing sign on the accessible parking space to the right of the entry to min. 60".					
Accessible Routes						
	NOTE: The only accessible route on site evaluated was from the accessible parking to the main front entrance.					
Elevation Change	All accessible spaces and access aisles slopes.	303, 403.4	1/4" max., 1/2" max. if beveled	3/4"	Low	Incl. Above
	Comment: There is a raised lip at the asphalt:concrete walk interface. Will be corrected by milling and resurfacing of parking spaces.					
Interior						
Hallways/Corridors						
Door 1	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all exterior doors, no sign present.					
Door 1	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	5"	Low	\$110
	Comment: Provide kick plate at bevel and cap cavity on push side of door.					
Door 1 Inner Vestibule Doors	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all egress doors, only a visual (illuminated) sign present.					
Door Closer	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust inner door closer, cost assumes replacement.					
Door 1 Inner Vestibule Doors	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	5"	Low	\$110
	Comment: Provide kick plate at bevel and cap cavity on push side of doors.					



Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Door 3	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all exterior doors, no sign present.					
Door 18	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all exterior doors, no sign present.					
Door 18	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 18 has a hold-open device at bottom. Remove device.					
Door 18	Pull side maneuvering space parallel to latch.	404.2.4.3	18" min.	17-1/2"	Low	N/A
	Comment: Clear space at recessed door, Door 2 should be deemed the accessible employee entry.					
Light Switch	Unobstructed reach height above the floor level.	308.2.1	15" min - 48" max.	50-1/2"	Low	\$110
	Comment: Reposition or provide occupancy sensor.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	4-3/4" at 51-3/4"	Low	\$50
	Comment: Right-to-Know station at rear door 18. Reposition to compliant height outside circulation area or protect open end with a permanent cane-detectable object.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	9-1/2" at 46"	Low	\$50
	Comment: Mailboxes at locker room. Reposition to compliant height outside circulation area or protect open end with a permanent cane-detectable object.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-1/2" at 48"	Low	\$50
	Comment: Wall mounted shelf at time clock at Director's Office. Reposition to compliant height outside circulation area or protect open end with a permanent cane-detectable object.					
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	No tactile provided	Low	\$150
	Comment: No compliant signage at Sign Shop, existing sign is visual text only. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Tactile Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	Tactile required	No tactile provided	Low	\$600
	Comment: No compliant signage at doors to offices and garage. Provide signage with visual and tactile characters at doors to all permanent spaces adjacent to latch side of doors or on door push side.					
Drinking Fountains	Drinking fountain unit is wall-mounted or post-mounted within an alcove and cantilevered.	602.1	YES	NO	Medium	\$100
	Comment: Protect open of fountain with cane detectable object.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	11" at 35"	Low	Incl. Above
	Comment: Drinking fountain. Protect open end with a permanent cane-detectable object.					
Men's Locker Room/Restroom						
	NOTE: The Men's locker room/restroom is accessed from the main hallway, one repair garage, and exterior door #2. There are several separate rooms, with the restroom fixtures in the main entry room from the hallway, a rear space with lockers, and area with showers and laundry/mud rooms between the garage and door #2. The restroom provides 3 sinks, 2 urinals, and 3 toilet compartment. There are also 3 shower compartments (1 with accessible features) but they do not appear to be used since all were being used for storage of miscellaneous items. Information for reference only.					
Door 2	Door has both visual and tactile signage inside adjacent to the door for means of egress.	216.4, 703.1-2, 703.5	YES	NO	High	\$100
	Comment: Provide signs at all exterior doors, no sign present.					
Door 2	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door 2 has a hold-open device at bottom. Remove device.					
Entry Door Signage	Signs outside restroom have pictogram with gender symbol and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$400
	Comment: Provide compliant signs at both main hallway and garage entry doors, existing signs are visual only. Signs must be placed on side wall adjacent to latch side of door, door has magnetic hold open device. Consider including sign with shower pictogram.					
Entry Door Signage	Pictogram field size.	703.6	6" min.	5-1/2"	Low	Incl. Above
	Comment: Ensure new signs at both main hallway and garage entry doors are compliant.					
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	12 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Light Switch	Unobstructed reach height above the floor level.	308.2.1	15" min - 48" max.	50-1/2"	Low	\$440
	Comment: Reposition or provide occupancy sensor, several switches within this space.					
Coat Hooks not in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	>48"	Low	\$50
	Comment: Several hooks within this area above 48". Reposition or provide additional hook.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	5-3/4" at 49-3/4"	Low	\$50
	Comment: First aid kit at hallway entry. Reposition to compliant height outside circulation area or protect with a permanent cane-detectable object below.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	9" at 39-1/2"	Low	\$50
	Comment: Hand dryer between restroom and locker areas. Reposition to compliant height outside circulation area or protect bottom with a permanent cane-detectable object.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	15" min. - 48" max.	58"	Low	\$50
	Comment: Located on wall over sinks. Reposition min. of 1 to side wall at sinks at compliant height.					
Urinals	Urinals lip depth from wall.	605.2	13-1/2" min.	12"	Low	\$800
	Comment: Existing model cannot be made to comply. Purchase compliant model urinal and install to correct height.					
Stall Door Hardware	Stall has handle on the inside of the door.	213.3, 604.8.1.2	YES	NO	Low	\$100
	Comment: Provide handle.					
Stall Door Hardware	Stall door is self-closing.	213.3, 404.7, 604.8.1.2	YES	NO	Low	\$100
	Comment: Gravity hinge holds door open, adjust angle of partition to allow hinge to close door.					
Stall Depth	Stall depth with floor mounted toilet, from rear wall.	604.8.1.1	59" min.	58-3/4"	Low	\$400
	Comment: Adjust partition front wall to provide required depth for floor mount toilet.					
Coat Hook in Stall	Coat hooks height above the floor.	604.8.3, 308	15" min. - 48" max.	54"	Low	\$50
	Comment: Reposition or provide additional hook.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	On rear wall	Low	\$50
	Comment: Dispenser required to be on side wall. Reposition.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Grab Bars	Rear grab bar is positioned relative to the centerline of the toilet on both sides.	609.4	12" wall side/24" open side	11-1/4"/24-3/4"	Low	\$250
	Comment: Reposition grab bar.					
Grab Bars	Side grab bar extensions from the rear wall of the stall.	609.4	54" min.	48"	Low	\$250
	Comment: Reposition grab bar.					
Garage Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$150
	Comment: Provide compliant sign inside room, no sign at door to garage.					
Laundry/Mud Room Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$300
	Comment: Existing sign is visual only. Provide compliant sign on both sides of door between laundry/mud room and locker room.					
Laundry/Mud Room Door Signage	Signs at permanent spaces have visual and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$300
	Comment: Provide compliant sign on both sides of door between laundry/mud room and shower room.					
Locker Room Door Closer	Automatic closer sweep time.	404.2.8.1	5 sec. min.	3 sec.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Lockers	Where lockers are provided at least 5%, but no fewer than 1 are accessible and on an accessible route.	222.1, 403.5.1, 811	1 min.	0	Low	\$600
	Comment: There are no accessible lockers.					
Locker Hardware	Opening latches/locks are operable without grasping and twisting	309.4	YES	NO	Low	Incl. Above
	Comment: There are no accessible lockers, existing lockers have grasp and twist latches.					
Clothing Hooks	Clothing hooks height above the floor.	308, 803.5	15" min - 48" max	55"	Low	\$50
	Comment: Provide additional hook within reach range at showers.					
Clear Space	Is clear space provided at the end (side) of the bench seat parallel to the short axis.	803.4, 903	YES	NO	Low	TBD
	Comment: No clear space provided at non-compliant benches.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Bench Size	Bench seat depth.	903.3	20" min-24" max.	10-1/2"	Low	\$800
	Comment: No compliant benches. Existing bench is not secured to the floor and provides no back support.					
Benches	Does bench provide back support (can be seat back or wall).	903.4	YES	NO	Low	Incl. Above
	Comment: No compliant benches. Existing bench is not secured to the floor and provides no back support.					
Shower Clear Space	Clear space outside the shower compartment from the control wall.	608.2.1	36" x 48" min.	2"	N/A	N/A
	Comment: Shower is within a narrow 48" wide alcove that is 6'+ feet in depth, does not allow for wheelchair access. Explore options when showers are put into service.					
Transfer Shower Grab Bars	Grab bar provided full depth of control wall.	608.3.1	YES	NO	N/A	N/A
	Comment: No grab bar provided as required.					
Bench Size	Bench seat depth.	903.3	20" min-24" max.	10-1/2"	N/A	N/A
	Comment: No compliant benches in shower area, existing bench obstructs clear space.					
Women's Locker Room/Restroom						
	NOTE: The Women's locker room/restroom is accessed from the main hallway and is a single-user configuration. The restroom provides 1 sink and 1 toilet (not in a compartment) within the room entry area, with an adjacent space with lockers and 1 shower compartment. Shower does not appear to be used, confirm and make alterations as needed. Information for shower is for reference only.					
Entry Door Signage	Signs outside restroom have pictogram with gender symbol and raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$200
	Comment: Provide compliant signs at both main hallway and garage entry doors, existing signs are visual only. Signs must be placed on side wall adjacent to latch side of door, unless hold open device is removed from the door. Consider including sign with shower pictogram.					
Entry Door Signage	Pictogram field size.	703.6	6" min.	5-1/2"	Low	Incl. Above
	Comment: Ensure new signs at both main hallway and garage entry doors are compliant.					
Entry Door	Smooth distance of door from floor height to cavities or other non-smooth features	404.2.10	10" min.	2"	Low	\$50
	Comment: Door has a hold-open device at bottom. Remove device.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Entry Door	Operating force to open.	404.2.9	5 lbs. max.	8 lbs.	Low	\$450
	Comment: Adjust door closer, cost assumes replacement.					
Light Switch	Unobstructed reach height above the floor level.	308.2.1	15" min - 48" max.	50-1/2"	Low	\$110
	Comment: Reposition or provide occupancy sensor.					
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	6-1/2" at 40"	Low	\$50
	Comment: Hand dryer at sink. Reposition to compliant height outside circulation area or protect bottom with a permanent cane-detectable object.					
Toilet Clear Space	Clearance from side wall to beyond open side of toilet.	604.3.1	60" min.	48-1/2"	Low	\$800
	Comment: Existing sink encroaches, explore narrow profile sink in same area to provide clearances.					
Dispenser	Toilet paper dispenser centerline in front of toilet.	604.7	7" min. - 9" max.	3-1/4"	Low	\$50
	Comment: Reposition.					
Grab Bars	Grab bar clearance from objects above the grab bar.	609.3	12" min.	3-1/2"	Low	Incl. Above
	Comment: Toilet paper dispenser above grab bar within clear space. Relocate dispenser.					
Lockers	Where lockers are provided at least 5%, but no fewer than 1 are accessible and on an accessible route.	222.1, 403.5.1, 811	1 min.	0	Low	\$600
	Comment: There are no accessible lockers.					
Locker Hardware	Opening latches/locks are operable without grasping and twisting	309.4	YES	NO	Low	Incl. Above
	Comment: There are no accessible lockers, existing lockers have grasp and twist latches.					
Bench Size	Bench seat length.	903.3	42" min.	30"	Low	\$800
	Comment: No compliant benches within the space. Existing bench is not secured to the floor and provides no back support.					
Bench Size	Bench seat depth.	903.3	20" min-24" max.	14-1/2"	Low	\$800
	Comment: No compliant benches within the space. Existing bench is not secured to the floor and provides no back support.					
Benches	Does bench provide back support (can be seat back or wall).	903.4	YES	NO	Low	Incl. Above
	Comment: No compliant benches. Existing bench is not secured to the floor and provides no back support.					
Transfer Shower Seat Depth	Seat extends from back to point at compartment entry.	610.3	3" max.	6"	N/A	N/A
	Comment: No grab bar provided as required.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Transfer Shower Grab Bars	Grab bar provided full depth of control wall.	608.3.1	YES	NO	N/A	N/A
	Comment: No grab bar provided as required.					
Bench Size	Bench seat depth.	903.3	20" min-24" max.	10-1/2"	N/A	N/A
	Comment: No compliant benches in shower area, existing bench obstructs clear space.					
Break Room/Kitchen						
Entry Door Signage	Signs at permanent spaces have raised characters with Braille. All tactile characters are uppercase, sans serif font.	216.2, 703.2	YES	NO	Low	\$150
	Comment: No signage provided at door.					
Hall Entry Door	Vision panel height (if 66" or higher is exempt).	404.2.11	43" max.	48"	Low	\$800
	Comment: Modify vision panel at door.					
Entry Door Clearance	Pull side maneuvering space parallel to latch.	404.2.4.1 A,C/D,F	18" min.	3"	Low	\$50
	Comment: Clearance for door obstructed by shelf. Reposition the shelf.					
Light Switch	Unobstructed reach height above the floor level.	308.2.1	15" min - 48" max.	50-1/2"	Low	\$110
	Comment: Reposition or provide occupancy sensor.					
Sink	Height of sink rim above the floor.	212.3, 606.3	34" max.	36"	Low	\$1,675
	Comment: Provide compliant height sink rim, explore options to lower sink area of cabinets.					
Sink	Knee space beneath the sink.	212.3, 306.2.2, 602.2	27" min.	0"	Low	Incl. Above
	Comment: Provide knee space below sink in space with cooking device. Insulate piping below when exposed.					
Dispenser	Paper towel dispenser operable parts height.	308, 604.7	46" max. over 20-24"	47" over 23"	Low	\$50
	Comment: Reposition.					
Dispenser	Soap dispenser operable parts height.	308, 604.7	46" max. over 20-24"	47-3/4" over 24"	Low	\$50
	Comment: Reposition.					






Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Protruding Objects	Leading edges of wall or ceiling mounted objects do not protrude into circulation areas.	307.2	4" max. at 27" - 80"	8" at 52-1/4"	Low	\$50
	Comment: Shelf at entry. Reposition per above clear space issue and protect with permanent cane-detectable object below.					
	<b>Facility Total:</b>					\$18,515

**General Notes:**

1. This facility is a single story, with a centralized office area and larger vehicle storage/maintenance areas on each side. The areas outside of the office areas are work areas and not evaluated since they contain no common use areas.
2. The showers within the Men's locker room do not appear to be in use other than for storage.

# Public Parking Lots

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Main Street/Ann Street/Summit Street						
						
Data collected	July 2022					
Parking						
	NOTE: There are a total of 43 spaces for the public, including 2 accessible, with 0 van. A total of 2 accessible spaces (including 1 van) is required.					
Public Accessible Parking	Total # Van Accessible Spaces Provided (NOTE: count only spaces with van signage, add note if only pavement markings provided)	208.2	1	0	Low	\$350
	Comment: Existing spaces provide no van sign, provide min. 1 van sign at compliant space. Space to the right meets all dimensional requirements, space to left has total width of space and access aisle (16' min.) but space is only 125" wide (132" min.). Cost assumes van sign added to space on the left and space on the left be restriped to provide 2 van size spaces to provide passenger side access to aisle for angled parking.					

Feature	Description	Code Citation	Required	Actual	Priority	Estimated Cost to Correct
Main Street behind North Fire Station (west of Broadway)						
Data collected	July 2022					
Parking						
<p><i>NOTE: There are a total of 47 spaces for the public, including 3 accessible, with 0 van. There is one space with access aisle in the southwest corner at the PAR and 2 spaces without access aisles at the traffic island in the center of the lot adjacent to the PAR. A total of 2 accessible spaces (including 1 van) is required. Recommendations below assume that center spaces are moved to be side-by-side with shared access aisle and all 3 spaces remain in service.</i></p>						
Accessible Parking & Aisles	All accessible spaces and access aisles slopes.	502.4	2.08% max.	Varies 3.1% - 3.5%	Low	\$3,500
	Comment: Mill and overlay to correct. Assumes 3 existing spaces on building side of center aisle are altered to provide 2 accessible spaces with shared access aisle, including 1 van size space.					
Signs	All accessible spaces are identified with a sign that includes the ISA.	502.6	YES	NO	Low	\$600
	Comment: No signs provided at any of the 3 spaces. Provide signs at each, with min. 1 van sign at space with compliant dimensions for van accessible parking space.					
	Facility Total:					\$4,450
General Notes:						

# Appendix B

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## *Questionnaires*

Overall Programs  
Individual Departments

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



## New Haven, IN – Overall Authority Programs Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception. SOME ITEMS MAY BE DUPLICATED ON SPECIFIC DEPARTMENT QUESTIONNAIRES, DUPLICATED RESPONSES ARE PREFERRED TO NO RESPONSES.

- A. Provide a list of Departments, responsibilities, and address of each. In addition, provide a brief description of the primary duties of each department and copies of any payments, publications, applications, forms, etc. that are used for each (**electronic preferred**).

Typical Programs/Policies/Documents Requested be Provided as Applicable	Applicable (yes or no)	Hard copy provided	Available on website
<b>Administrative Procedures</b>			
Do you have an ADA Coordinator? Provide info regarding appointment and contact info.			
Do you have a grievance procedure? Provide copy			
Do you have a grievance form? Provide copy			
Have you published an ADA Notice of Non-Discrimination? Provide copy.			
Do you have an internal ADA committee/team and/or a special appointed Commission for ADA?			
Do all board and commission agendas include an ADA accommodation notice? Provide copies of all board and commission agendas.			
Do you have a dedicated page on your website for ADA where related documents are posted?			
Have you provided any outreach to the public or advocacy groups on ADA topics? Provide info.			
Do documents provided to the public include information about how to obtain accessible copies?			
Do you have a centralized location for tracking of all civil rights related complaints? Is there a process for ensuring these complaints get to the coordinator for each?			
<b>Effective Communication</b>			
Please provide a detailed list of instances that your staff from different departments have interacted with people with disabilities. Include how often, general number per month/year, types of disabilities encountered, and how staff tried to accommodate their needs to assist them.			
Who is responsible for development and maintenance of your website? How often is it updated and when was the last update?			

Typical Programs/Policies/Documents Requested be Provided as Applicable	Applicable (yes or no)	Hard copy provided	Available on website
Do you and/or individual departments have social media pages? Please list by department and website.			
Have you used or been requested to provide any interpreters (sign language, foreign language)? Provide details.			
Do you have any on-call contracts with interpreters?			
Do any departments have TTY/TDD capability and training to use special equipment?			
Have any departments utilized the services of a relay service to assist communicating with the deaf?			
<b>Public Meetings</b>			
Provide a list of all locations where public meetings have been held, including facilities you do not own.			
Do any of your public meeting facilities include an audio amplification system?			
Do any of the above include required Assistive Listening System and Listening Devices? Provide detail on make, model, and number of receivers.			
Are any meetings broadcast live on either local television or internet? Specify.			
Are any meetings recorded and rebroadcast?			
Are live and/or recorded meetings provided with closed captioning?			
<b>Staff Training</b>			
Provide a list of staff that has received training specific to ADA, including webinars, conferences, etc. and the provider, date(s), and location.			
If you have plan reviewers or inspectors, have they received any training on ADA requirements? Provide details.			
<b>Special Events and Facility Use/Rental</b>			
Do you sponsor any special events on properties owned by you? Owned by others? Please provide details about event and your role.			
Do you allow outside organizations to use or rent your facilities? Provide details.			
<b>Emergency Planning and Evacuation</b>			
Do you have a published emergency management plan for your facility/community? Please provide.			
Do you have individual emergency evacuation and/or sheltering plans for any buildings? Please provide copies of all.			
Are any of your facilities used as an emergency shelter? Please list.			

Typical Programs/Policies/Documents Requested be Provided as Applicable	Applicable (yes or no)	Hard copy provided	Available on website
Do you have or subscribe to a community-wide emergency notification system (Nixle, Code Red, etc.)?			
Do you maintain a list of homebound clients and group homes that may need additional assistance during an emergency or evacuation?			
<b>Ordinances and Policies</b>			
Please provide a copy of your Code of Ordinances, if applicable.			
Do you prohibit pets at any facilities? If so, do you allow service animals as an exception? Do you have a policy for service animals at your facilities?			
If you have park or recreation facilities, do you have any rules pertaining to animals or motorized vehicles? Please provide.			
Do you have an ordinance/written policy on use of golf carts and other motorized vehicles on your properties or within the public ROW? Please provide.			
Do you have a pedestrian or non-motorized master plan? Please provide.			
Do you have a sidewalk replacement program? Is it a cost-shared system with homeowners? Provide copy.			
Do you have a system for residents to request an accessible parking space and sign be placed at their home?			
Do you have an ordinance prohibiting the obstruction of sidewalks by parked vehicles, trash/recycling containers, and similar objects? Please provide a copy.			
If applicable, do you have a snow removal policy for your properties and/or ordinance that requires sidewalks be cleared within a prescribe timeframe and which prohibits storage of snow in accessible parking? Provide a copy.			
<b>Recreation</b>			
Do you sponsor recreation programs at facilities you do not own (schools, etc.)? Provide details.			
Do you have online registration for recreation programs?			
Do you publish a recreation program guide? If so, does it provide information about requesting accommodations to allow residents with disabilities to participate? Provide copy.			
<b>Unusual &amp; Unique Services/Amenities/Facilities</b>			
Do you have any courtrooms or hearing rooms within your facilities?			
Do you have any responsibility related to voting and providing polling places for elections?			



Typical Programs/Policies/Documents Requested be Provided as Applicable	Applicable (yes or no)	Hard copy provided	Available on website
Are there any transit services provided by your organization or within your community? Provide details.			
Are there transit stops and/or shelters within your boundaries? If so, who is responsible for maintenance?			
Other – Client Specific			

- A. Requested Documents/Information to be Provided (if available, electronic preferred)
1. Personnel Policy Manuals for all departments, including job descriptions for all positions
  2. Applications for Employment for all departments
  3. All ADA Documents Adopted or in Use (designation of ADA Coordinator, grievance info, etc.)
  4. Publications provided to the public for all departments (various applications, etc.)
  5. Evacuation plans for all facilities
  6. List of all boards and commissions, meeting location, meeting schedule, and copies of most recent agenda and minutes for each
  7. List of all special public or private events on your properties and copy of rental or other agreements
  8. List of all ADA-specific or related training attended by staff, with dates, location, and details
  9. Any written department policies or procedures for ADA accommodation
  10. Any other documents or information you believe will be helpful
  11. Others as they are identified during the project

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



## New Haven, IN – Engineering/Public Works Department Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

**Department Contact:** \_\_\_\_\_

1. Are you aware of any instances where staff have interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Examples would include writing notes back-and-forth, scheduling appointments with a sign language interpreter, etc. Please describe/provide examples and be specific about the interaction(s) and how staff was able to communicate with the person with the disability.
2. Does your department sponsor public meetings for projects? If so, where are those meetings held and are any special accommodation statements made available on public notices for those meetings? Provide an example of a meeting notice for a project (i.e., road construction).
3. Does your state license/certification for design/plan review/inspection require special training related to accessibility standards/guidelines? If so, please provide what is required.
4. Does your state license/certification require annual continuing education related to accessibility standards/guidelines? If so, please provide what is required annually (hours, specific courses, etc.) and what staff are required to obtain CEUs.
5. Related to the above questions, how does your department obtain the necessary training (in-person, online, etc.). Please provide information about any in-house disability training provided (date, attendance, title/content).
6. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
7. Does your department have any formal policies related to the following:
  - a. Design of facilities within the public ROW, including sidewalks, curb ramps, pedestrian pushbuttons, on-street parking, transit stops and shelters, etc.
  - b. Do you perform designs internally, via consultants, or combination? If consultant, does your staff review the design specifically for compliance with ADA?
  - c. What standards/guidelines do you require for the design of ROW facilities (DOT, PROWAG, etc.). If you have your own internal guidelines and details, please provide copies.
  - d. Do you have any ordinances specific to maintenance of sidewalks and responsibility for ensuring they are maintained? Is there a cost-sharing program for that?

- e. Do you have a program for disabled residents to have a parking space sign provided in front of their home on the street if they do not have parking on their site in a garage or driveway? If so, provide information.
8. Anything else you can think might be helpful in understanding your department's ability to accommodate the disabled in all aspects of services provided to the public?

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire

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## New Haven, IN – Police Department Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

**Police Department Contact:** \_\_\_\_\_

1. Are you aware of any instances where officers have interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Examples would include hearing impaired drivers, persons with cognitive disabilities, etc. Please describe/provide examples and be specific about the interaction(s) and how the officer(s) were able to communicate with the person with the disability.
2. Does your state certification require special training related to disability awareness? If so, please provide what is required to be initially certified.
3. Does your state certification require annual continuing education related to disability awareness? If so, please provide what is required annually (hours, specific courses, etc.) for all officers.
4. Related to the above questions, how does your department obtain the necessary training (in-person, online, etc.). Please provide information about any in-house disability training provided to officers (date, attendance, title/content).
5. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
6. Does your department have any formal policies related to the following:
  - a. Providing a sign language interpreter at any official activity?
  - b. Special provisions for the transport of offenders that have a mobility device (wheelchair)? If so, how are these suspects and their devices transported?
  - c. Special provisions for the transport of offenders that have a service animal? If so, how are these suspects and their animals transported?
  - d. Expedited processing of suspects that have special needs for medicine or diet?
  - e. Do you house suspects in holding cells at your facility or are they transported to a County or other facility?
  - f. Under what conditions would you separate a disabled person in custody from their service dog, mobility device (walker, cane, wheelchair, etc.), or other disability-specific item (i.e., prosthetic limb, etc.)?
7. Anything else you can think might be helpful in understanding your department's ability to accommodate the disabled in all aspects of services provided to the public?

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



## New Haven, IN – Human Resources/Personnel Department Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

**Department Contact:** \_\_\_\_\_

1. Are you aware of any instances where staff have interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Examples would include writing notes back-and-forth, scheduling appointments with a sign language interpreter, etc. Please describe/provide examples and be specific about the interaction(s) and how staff was able to communicate with the person with the disability.
2. How does your department obtain the necessary training (in-person, online, etc.) related to the services you provide? Please provide information about any in-house disability training provided (date, attendance, title/content).
3. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
4. Are all employees at the City covered under 1 Personnel Policy Manual? Please provide copies of all.
5. Are job descriptions prepared in-house by your department or individual department heads or are they prepared by an outside labor consultant/attorney? Please provide 2-3 example job descriptions for entry level administrative, mid-level professional, public safety, laborers, managers, etc. If each department prepares their own, provide examples from each department.
6. Does the City have any forms related to employee accommodation requests? If so, please provide if not contained in policy manuals. Also provide any information on the procedure for review, decision making for approval/denial, and any appeal processes.
7. Has the City been requested to provide reasonable accommodations for employees in the past that would allow them to perform their "essential job functions"? If so, please provide details about the accommodation, including what was requested (if anything), what was provided, and how it accommodated the employee.
8. Provide examples of job postings and applications for employment if not on the website.
9. Anything else you can think might be helpful in understanding your department's ability to accommodate the disabled in all aspects of services provided to the public?

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



## New Haven, IN – Department Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

**Name of Department:** \_\_\_\_\_ **Contact Person:** \_\_\_\_\_

1. Provide a brief description of the primary duties and responsibilities of your department and blank copies of any publications, applications, forms, etc. that are provided to the public or internally to employees or prospective employees (electronic preferred). If some documents are typically provided by Human Resources, please provide only public documents and those not provided by HR.
2. Does your department sponsor Public Meetings? If no, please skip to #3: YES ☐ NO ☐
  - a. Please state the locations where your meetings are held.
3. Accommodations:
  - a. Are you aware of any instances where your staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.
  - b. Has your department ever been asked to provide special accommodation for printed materials? If so what was requested and provided?
  - c. Do you use Telecommunication Devices for the Deaf (TDD) or have access to a relay service to communicate to persons with hearing loss on the telephone?
4. Are emergency procedures in place in your department for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for your building? Please identify.
5. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
6. Are there any specific suggestions or thoughts anyone at the City has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful?

# Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



## New Haven, IN – Planning/Building Department Survey

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

**Department Contact:** \_\_\_\_\_

1. Are you aware of any instances where staff have interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Examples would include writing notes back-and-forth, scheduling appointments with a sign language interpreter, etc. Please describe/provide examples and be specific about the interaction(s) and how staff was able to communicate with the person with the disability.
2. Does your department sponsor public meetings for projects other than public boards/commissions? If so, where are those meetings held and are any special accommodation statements made available on public notices for those meetings? Provide an example of a meeting notice for a project (i.e., Comprehensive Plan, Master Sidewalk Plan, etc.).
3. Does your state license/certification for plan review/inspection require special training related to accessibility standards/guidelines? If so, please provide what is required.
4. Does your state license/certification require annual continuing education related to accessibility standards/guidelines? If so, please provide what is required annually (hours, specific courses, etc.) and what staff are required to obtain CEUs.
5. Related to the above questions, how does your department obtain the necessary training (in-person, online, etc.). Please provide information about any in-house disability training provided (date, attendance, title/content).
6. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
7. Does your department have any formal policies related to the following:
  - a. Ensuring compliance with scoping requirements for compliant access to private businesses that alter their facilities. For example, if a restaurant did a major alteration, do you ensure full compliance with ICC A117/ADA Standards?
  - b. Do you perform inspections internally, via consultants, or combination?
  - c. What standards/guidelines do you require for the design of facilities (year of applicable building, electrical, mechanical, etc. codes).
  - d. Do you have any ordinances specific to maintenance of sidewalks and parking lots with snow removal and penalties/procedures where they are not maintained per ordinance?



- e. Do you have any ordinances that prohibit the blocking of sidewalks by parked vehicles in driveways, trash/recycling containers, etc.? If so, how is this enforced?
  - f. Do you have a pedestrian or non-motorized master plan? If so, please provide (if not available on the website).
8. Anything else you can think might be helpful in understanding your department's ability to accommodate the disabled in all aspects of services provided to the public?

# Appendix C

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## *Public Outreach & Forms and Notices*

### 2012 ADA Transition Plan

- Non-Discrimination Notice
- Designation of ADA Coordinator
- Grievance Procedure

ADA Accommodation Request Form

Sample Grievance Form

City of New Haven

ADA Transition Plan  
2012



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## Statement/Mission

In 1990, the Federal Government enacted the Americans with Disabilities Act ("ADA"). The City of New Haven, Indiana recognizes its legal obligation to comply with Title II of the ADA and hereby establishes a transition plan to ensure compliance with this federal law, rules and regulations. Therefore the City of New Haven will identify barriers that exist and state how and when the barriers are to be removed by providing a means to address complaints of discrimination, by encouraging public input to assess, address and meet access needs, and by establishing periodic reviews of the plan to monitor progress and compliance. The purpose of the Plan is to ensure that the citizens are provided full access to programs, services and activities in a timely manner. The City of New Haven elected officials and staff believe the ability to accommodate disabled persons is essential to good customer service, the quality of life New Haven residents seek to enjoy and to effective governance. Title II of the ADA requires that each of the City of New Haven services, programs and activities, when viewed in their entirety, be readily accessible and usable by individuals with disabilities.

## Non-Discrimination Notice

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

**Employment:** The City of New Haven 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 ADA.

**Effective Communication:** The City of New Haven will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in city 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: The City of New Haven will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. For example, individuals with service animals are welcome in all city 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 program, service, or activity, should contact the City of New Haven ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of New Haven 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 program, service, or activity of the City of New Haven is not accessible to persons with disabilities should be directed to the City of New Haven ADA Coordinator.

The City of New Haven 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 items from locations that are open to the public but are not accessible to persons who use wheelchairs.

## Designation of an ADA Coordinator

Pursuant to Resolution R-12-9 adopted on the 11<sup>th</sup> day of December, 2012, by the City of New Haven City Council the position of ADA Coordinator for the City of New Haven was created. The following individual was appointed to serve in such capacity:

Brian Yoh

Brian Yoh holds such position concurrently with his appointment as the Director of Planning and Economic Development and is responsible for overseeing compliance with the ADA.

Brian Yoh  
815 Lincoln Highway East  
New Haven, Indiana 46774  
Phone: 260-748-7041  
Fax: 260-748-7075  
TTY: 260-748-7005  
Email: [brianyoh@newhavenin.org](mailto:brianyoh@newhavenin.org)



City of New Haven, Indiana  
Grievance Procedure under  
The Americans with Disabilities Act

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 New Haven. The City of New Haven 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:

Brian Yoh  
815 Lincoln Highway East  
New Haven, Indiana 46774  
Phone: 260-748-7041  
Fax: 260-748-7075  
TTY: 260-748-7005  
Email: [brianyoh@newhavenin.org](mailto:brianyoh@newhavenin.org)

Within 15 calendar days after receipt of the complaint, ADA Coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting ADA Coordinator or his/her designee 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 New Haven and offer options for substantive resolution of the complaint.

If the response by ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee

may appeal the decision within 15 calendar days after receipt of the response to the Mayor of the City of New Haven.

Within 15 calendar days after receipt of the appeal, the Mayor or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Mayor 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 the ADA Coordinator or his/her designee, appeals to the Mayor or his/her designee, and responses from these two offices will be retained by the City of New Haven for at least three years.

### Design Standards-Sidewalks

*Sidewalks:* Sidewalk curbs constructed as part of planned development, sidewalk curbs replaced by or for the City of New Haven, or sidewalk curbs replaced by or for a property owner through a city match funding program shall be constructed in accordance with the PROWAG (Public Right-of-Way Accessibility Guidelines) regulations and standards.

### Public Involvement Opportunities

The general public is encouraged to participate in identifying needs or barriers to accessibility. This may be done by contacting the ADA Coordinator.

Brian Yoh  
815 Lincoln Highway East  
New Haven, Indiana 46774  
Phone: 260-748-7041  
Fax: 260-748-7075  
TTY: 260-748-7005  
Email: [brianyoh@newhavenin.org](mailto:brianyoh@newhavenin.org)

A draft of the City of New Haven Transition Plan will be available on the website from December 15, 2012 to February 1, 2013 for the public comment period. The Transition Plan will also be available in the New Haven Planning office located at 815 Lincoln Highway East, New Haven, Indiana 46774. Anyone that would like to comment on the Transition Plan can submit their comments at this office or can contact the ADA Coordinator.

After the City of New Haven Transition Plan has been adopted it will be posted on the city website. It will also be available in the New Haven Planning office for viewing. A copy of the Transition Plan will also be available at the New Haven Public Library located at 648 Green Street, New Haven, IN.

## Inventory

In an effort to remove barriers to streets and sidewalks, the City of New Haven has inventoried all curbs and sidewalks within the city's jurisdiction. The inventory procedure is intended to identify a comprehensive list or inventory of all curbs and sidewalks in the city's jurisdiction that are not ADA compliant. This is composed of an effort to fully inventory the infrastructure that is present and then to identify those items in the system which are not compliant with ADA requirements.

The City of New Haven has developed its inventory of the existing system in five steps:

### Step 1: Aerial Maps

Aerial maps of city were used to map the locations on the system that include sidewalks and/or curbs. In addition, city staff assisted in this process to assure sidewalks and curbs were not missed.

### Step 2: Field Evaluation and Inventory

Once the system of sidewalks and curbs had been mapped, a field investigation of each was completed to measure and/or evaluate the following characteristics of each segment of sidewalk and curb.

The following attributes were to be collected for sidewalks and ramps.

- Measured width
- Cross slope observation (2% maximum)
- Heaving
- Continuity
- Joint condition
- Ramp width
- Ramp slope
- Ramp turning space
- Ramp clear space
- Detectable warnings

The above items were considered and a summary “Condition Rating” was given as follows:

- A – ADA Compliant, no concerns (green)
- B – Minor problem noted, but no immediate needs (orange)
- C – One major problem or multiple minor problems, needs some attention (yellow)
- D – Multiple major problems, possibly impassible for wheelchairs (pink)
- F – Broken, impassable by wheelchairs, difficult for pedestrians (red)

Examples of sidewalk and ramp ratings are provided on the following pages.

Currently there are 805 ramps in the city. The number of non-compliant ramps is 535. Of the non-compliant ramps, 14 are rated a B, 314 are rated a C, and 207 are rated an F.

Currently there is 315,291 linear feet of sidewalks in the city. There is 10,798 linear feet of non-compliant sidewalks. Of the non-compliant sidewalks, 1,654 are rated a B, 5,356 are rated a C, and 3,788 are rated a D.

### Step 3: Preparation of a Map of Compliant and Non-Compliant features

A map has been produced that identifies all the sidewalks and ramps and their rating. The map can sort by sidewalks or ramps.

### Step 4: Request for Review and Public Input

As part of the Transition Planning process, the map prepared in Step 3 will be made available for comment. The map will be posted on the city website

and on display at the New Haven City Hall located at 815 Lincoln Highway East, New Haven, Indiana 46774. The comment period will be from December 15, 2012 to February 1, 2013.

#### Step 5: Update of the Inventory

After receiving input from the public review and staff the inventory will be updated as needed. This will provide a comprehensive list of the needs that exist in the system.

### Assessment Procedures

The assessment procedure is intended to establish the relative importance or priority of the various obstacles that are identified in the Inventory Phase.

This procedure will use four different evaluation factors. Each factor will have a score, with higher values indicating greater importance. Scores are then to be totaled to assist in the identification of which facilities are highest in priority.

#### Condition of Sidewalk or Ramp

- 1 point = Rating of B
- 2 points = Rating of C
- 3 points = Rating of D or F

#### Vicinity of Pedestrian Destinations

Pedestrian Destination includes commercial businesses, schools, parks, government buildings/offices, libraries, churches

- 0 point = nothing nearby
- 1 point = within 1 block of pedestrian destination
- 2 points = within 1 block of multiple pedestrian destination
- 3 points = adjacent to a park, school, government building or library

#### Public Interest

- 0 point = no comments
- 1 point = multiple public comments received
- 2 points = subject of a formal ADA grievance filing

### Local Priority

This is intended to be a local decision-makers tool to provide emphasis to a specific need based on a special concern, especially one of public safety, anticipated heavy pedestrian traffic, or special site condition.

0 point = no special concerns noted at or near location

1 point = some special concern exists at or near location

2 points = special local emphasis exists at or near location

By totaling these factors, the highest score achievable would be 10, with the lowest being at least a 1. Each obstacle identified in the Inventory phase will be evaluated under this procedure. A total score for each need can thus be provided, with higher scores revealing higher priority repairs and improvements.

Appendix B contains the results of the evaluation of the sidewalks and ramps.

## Funding & Scheduling

The City of New Haven will use Motor Vehicle Highway (MVH), Local Road & Streets (LR&S) and County Economic Development Income Tax (CEDIT) funds to repair, modify or reconstruct sidewalk and ramps. The City of New Haven intends to spend \$25,000 annually to repair, modify or reconstruct sidewalk and ramps to meet current ADA standards.

## Review & Evaluation

In January of each year the Mayor will meet with the ADA Coordinator to review the City of New Haven's efforts put forth the previous year to comply with the ADA and the implementation of the Transition Plan. At this time an update to the Transition Plan will be done. This shall include any adjustment to the number of sidewalks and ramps that are non-compliant, any changes to funding sources and changes to the schedule, if needed. The Mayor and ADA Coordinator shall review the prioritization of repairs, modifications or replacement of sidewalks and curbs for the upcoming year. At this time they will also determine the number of sidewalks and curbs that can be brought into compliance with ADA standards (if different than previously stated in Transition Plan).

The review and evaluation will continue each January until all sidewalks and ramps are ADA compliant and the Transition Plan is completed.



### ADA Reasonable Accommodation Request Form

Date: \_\_\_\_\_

Employee's Name: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Job title: \_\_\_\_\_

Department: \_\_\_\_\_

Supervisor's name: \_\_\_\_\_

Describe the nature, extent and duration of your disability:

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Describe the accommodations you believe are needed to enable you to perform the essential functions of this job:

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Provide the name, address, telephone and fax numbers of your health care provider. The provider may receive a request from us for information regarding your impairment/disability and recommendations for accommodations.

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Attach any supporting documentation that may be helpful in evaluating this request for accommodation.





**CITY OF NEW HAVEN**  
HUMAN RESOURCE DEPARTMENT

(260) 748-7019

KSELKING@NEWHAVEN.IN.GOV

WWW.CITYOFNEWHAVEN.IN.GOV

I authorize the release of information regarding my disability to [Company name] management as deemed necessary by human resources to facilitate this request for accommodation.

**Employee signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_



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**A. Questions to help determine whether an employee has a disability.**

For reasonable accommodation under the ADA, an employee has a disability if he or she has an impairment that substantially limits one or more major life activities or a record of such an impairment. The following questions may help determine whether an employee has a disability:

Does the employee have a physical or mental impairment?

Yes ☐

No ☐

If yes, what is the impairment or the nature of the impairment?

**Note:** Some state laws may prohibit asking for a diagnosis.

Answer the following question based on what limitations the employee has when his or her condition is in an active state and what limitations the employee would have if no mitigating measures were used. Mitigating measures include things such as medication, medical supplies, equipment, hearing aids, mobility devices, the use of assistive technology, reasonable accommodations or auxiliary aids or services, prosthetics, learned behavioral or adaptive neurological modifications, psychotherapy, behavioral therapy, and physical therapy. Mitigating measures do not include ordinary eyeglasses or contact lenses.

Does the impairment substantially limit a major life activity as compared to most people in the general population?

Yes ☐

No ☐

**Note:** Does not need to significantly or severely restrict to meet this standard. It may be useful in appropriate cases to consider the condition under which the individual performs the major life activity; the manner in which the individual performs the major life activity; and/or the duration of time it takes the individual to perform the major life activity, or for which the individual can perform the major life activity.

OR

Describe the employee's limitations when the impairment is active.

If yes, what major life activity(s) (includes major bodily functions) is/are affected?

- |  |  |                                   |                                   |  |
|--|--|-----------------------------------|-----------------------------------|--|
| <input type="checkbox"/> Bending         | <input type="checkbox"/> Hearing                 | <input type="checkbox"/> Reaching | <input type="checkbox"/> Speaking | <input type="checkbox"/> Other: (describe) |
| <input type="checkbox"/> Breathing       | <input type="checkbox"/> Interacting With Others | <input type="checkbox"/> Reading  | <input type="checkbox"/> Standing |  |
| <input type="checkbox"/> Caring For Self | <input type="checkbox"/> Learning                | <input type="checkbox"/> Seeing   | <input type="checkbox"/> Thinking |  |
| <input type="checkbox"/> Concentrating   | <input type="checkbox"/> Lifting                 | <input type="checkbox"/> Sitting  | <input type="checkbox"/> Walking  |  |
| <input type="checkbox"/> Eating          | <input type="checkbox"/> Performing Manual Tasks | <input type="checkbox"/> Sleeping | <input type="checkbox"/> Working  |  |

Major bodily functions:



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HUMAN RESOURCE DEPARTMENT

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- |   |  |  |  |
|---|--|--|--|
| <input type="checkbox"/> Bladder        | <input type="checkbox"/> Digestive     | <input type="checkbox"/> Lymphatic             | <input type="checkbox"/> Reproductive                |
| <input type="checkbox"/> Bowel          | <input type="checkbox"/> Endocrine     | <input type="checkbox"/> Musculoskeletal       | <input type="checkbox"/> Respiratory                 |
| <input type="checkbox"/> Brain          | <input type="checkbox"/> Genitourinary | <input type="checkbox"/> Neurological          | <input type="checkbox"/> Special Sense Organs & Skin |
| <input type="checkbox"/> Cardiovascular | <input type="checkbox"/> Hemic         | <input type="checkbox"/> Normal Cell Growth    | <input type="checkbox"/> Other: (describe)           |
| <input type="checkbox"/> Circulatory    | <input type="checkbox"/> Immune        | <input type="checkbox"/> Operation of an Organ |  |

**B. Questions to help determine whether an accommodation is needed.**

An employee with a disability is entitled to an accommodation only when the accommodation is needed because of the disability. The following questions may help determine whether the requested accommodation is needed because of the disability:

What limitation(s) is interfering with job performance or accessing a benefit of employment?

What job function(s) or benefits of employment is the employee having trouble performing or accessing because of the limitation(s)?

How does the employee's limitation(s) interfere with his/her ability to perform the job function(s) or access a benefit of employment?

**C. Questions to help determine effective accommodation options.**



**CITY OF NEW HAVEN**  
HUMAN RESOURCE DEPARTMENT

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If an employee has a disability and needs an accommodation because of the disability, the employer must provide a reasonable accommodation, unless the accommodation poses an undue hardship. The following questions may help determine effective accommodations:

Do you have any suggestions regarding possible accommodations to improve job performance?

If so, what are they?

How would your suggestions improve the employee's job performance?

**D. Other questions or comments.**

Medical Professional's Signature

Date

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

This form is provided by [The Job Accommodation Network \(JAN\)](http://www.jobaccommodationnetwork.gov), a service of the U.S. DOL's Office of Disability Employment Policy.



**City of Huntington  
Complaint Form  
Americans with Disabilities Act (ADA)**

**Section 1**

Please fill in completely and legibly. If the information is incomplete or it cannot be read, 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.

Last Name

First Name

\_\_\_\_\_

\_\_\_\_\_

Street Address

City

State

Zip Code

\_\_\_\_\_

\_\_\_\_\_

Telephone Number (include area code)

Best time to call this number

\_\_\_\_\_

\_\_\_\_\_

Alternate Telephone Number (include area code)

Best time to call this number

\_\_\_\_\_

\_\_\_\_\_

Email address \_\_\_\_\_

**Section 2**

Please provide a complete description of the specific issue(s) you believe are inconsistent with Title II of the Americans with Disabilities Act (use additional pages as necessary and provide documentation supporting the allegation).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section 3**

Please provide the specific location(s) of the ADA issues prompting this complaint.

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**Section 4**

Please provide the date when the ADA non-compliance occurred/was noted.

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**Section 5**

Please state as specifically as possible what you think should be done to resolve the complaint.

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Please sign and date this form.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Mail completed complaint form to:

City of Huntington  
300 Cherry Street  
Huntington, IN 46750  
ATTN: ADA Coordinator

**For Office Use Only:**

\_\_\_\_\_  
Date Received

\_\_\_\_\_  
Date Investigated

Results (with supporting documentation or photographs):

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Date Complainant contacted \_\_\_\_\_

Method of Contact: Phone \_\_\_\_\_ Letter \_\_\_\_\_ Email \_\_\_\_\_

Complaint Resolved? Yes \_\_\_\_\_ No \_\_\_\_\_