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Customize Your View continued

» Resize/Reposition the Chat, Participant and Audio & Video panels by “detaching” and using your mouse to reposition or “stretch/shrink”. Each panel may be detached using the icon in the upper right corner of each panel.

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  - Select “Edit” from the tool bar at the top of your screen
  - From the drop down menu select “Preferences”
  - Scroll down to “General”
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2. **By Email** webinars@ada-audio.org; or

3. **Call** 877-232-1990 (V/TTY)
Title II Administrative Requirements

1. Designate a responsible employee (Entities w/50+ employees)
2. Notice to the public (All public entities)
3. Grievance procedure (Entities w/50+ employees)
4. Self-Evaluation (All public entities)
5. Transition Plan (Entities w/50+ employees)

These documents (Self-Evaluation & Transition Plan) evidence a public entity’s good faith efforts to comply with Title II's requirements.

-DOJ Title II Technical Assistance Manual
Self Evaluation
- Polices, Practices & Procedures
- Reasonable Modifications

Transition Plan
- Structural & Communication Barriers to Programs Services and Activities
- Schedule for Barrier Removal

Responsible Employee
- ADA Coordinator vs CEO
- Purpose: public liaison
- Decision-making authority
- Role
  - Planning & coordinating compliance activities
  - Overseeing the 5 administrative requirements
  - Receiving & investigating complaints
- Originating department?
  - Human Resources
  - Planning
  - Safety / Risk Management
  - Community Engagement
ADA/ACCESSIBILITY COORDINATOR

Disability Advocate

Compliance Manager

ADA COMPLIANCE IS EVERYONE'S RESPONSIBILITY

ACCESSIBILITY MANAGEMENT

Source: Staski, J. (2017) Implementing an Accessibility Management Program
Implementing an Accessibility Management Program

The process is evaluated to determine "How can we make this work better?"

Consensus is built.

Implementation of accessibility improvements.

Regular meetings scheduled to prioritize projects with input from access team and visitors.

Access Team formed with representatives from various departments/units.

Accessibility assessments conducted for facilities and programs.

Information is gathered.

Responsibilities are delegated.

Shared values are clarified.

Business purpose and mission are defined.

Leadership Team presents commitment to inclusion and provides direction to staff.

Access Team assigned to oversee accessibility management program.

Evaluation of accessibility improvements and report to Leadership Team and stakeholders.


Designated Responsible Employee / CEO

ADA Compliance / Accessibility Management Team

ADA Coordinator
- Manage daily ADA compliance

Engineering / Planning / Design
- Prioritize and implement accessibility improvements identified in ADA Transition Plan

Operations / Public Works
- Make ADA improvements through routine maintenance, ensure daily facility access

Programs / Services
- Provide reasonable modifications, auxiliary aids & services in the most integrated setting

Marketing / Communications
- Ensure effective communication for all programs, services and activities

Purchasing
- Ensure new products, services and contracts include ADA compliance

Information Technology
- Ensure new technologies for the public, employees and volunteers are accessible

Human Resources
- Facilitate reasonable accommodations for applicants, employees and volunteers

Legal & Finance
- Serve as an agency resource to compliance

Risk Management
- Assess safety concerns related to ADA compliance

Source: Skubik, J. (2017) Implementing an Accessibility Management Program

ADA Audio Conference Series
Parsley or Cilantro? Making Sure Your ADA Self Evaluation and Transition Plan are Seasoned with the Right Ingredients

October 17, 2017
ADA Compliance / Accessibility Management Team

- Meet a minimum of quarterly at start of project implementation
- Provide updates on ADA implementation in each unit / department
- Guide ADA policy development
- Liaison with disability advocacy groups in the community

THE ADA/504 SELF EVALUATION
Self - Evaluation

- Comprehensive review of policies and practices
- The public entity must
  - Identify non-compliance policies and practices
  - Modify policies and practices to bring them into compliance
- Opportunity for people with disabilities and interested parties to review and comment
- On file for public inspection for 3-years (for entities w/50+ employees)
  - List of interested persons consulted
  - Description of areas examined and identified problems
  - Description of modifications

**RESOURCES FOR ADA SELF-EVALUATIONS**
Review of Policies, Practices & Procedures

- Does the policy, practice or procedure screen out or prohibit individuals with disabilities from participating in and enjoying the benefits of the program, service or activity?

☐ No Action Required
☐ Action Required for ADA Compliance
☐ Action Recommended as a Best Practice of Access for People with Disabilities

DOCUMENTS

- Organizational and departmental procedure manuals
- Brochures on city programs, services and activities
- Rules and/or regulations specific to the services of the department or unit
- Employment applications
- Employee handbook
- Emergency preparedness plans
- Licensing criteria and applications
- Special use permits
- Waivers and release forms
- Sample meeting and other public notices
- Complaint form
- Specific departmental/unit procedures for serving people with disabilities through provisions of auxiliary aids, service or modification of policies.
Interviews

- Interviews with key personnel across all departments/units
- What is the function of the department/unit?
- How does the department/unit interface with the public?
- What policies or procedures may affect how a resident or visitor receives services?

ADA Self Evaluation Questions

Notice

- Does the Agency have a Notice to the Public?
- How is the Notice communicated?
- Is it available on more than just the web page?
Example

Notice to the Public

- Cleveland Metroparks
  - https://clevelandmetroparks.com/about/cleveland-metroparks-organization/accessibility-statement

- City of Milwaukee
  - http://city.milwaukee.gov/Information-and-Services/Accessibility.html#

- National Park Service Poster (image on next slide)

City of Eugene Oregon
Discrimination on the basis of disability in the Federally conducted programs or activities of the Department of the Interior is prohibited.

For more information on how to file a complaint of discrimination please contact:

DFR Program Manager
U.S. Department of the Interior
National Park Service
電話: 301-446-1446
email: visit.nps.gov

City of San Francisco Mayor’s Office on Disability

Would you like help with access to our services? Please let us know!

Would you like help with access to our services? Please let us know!

Questions? Need more help?
Contact the Mayor’s Office on Disability. Ph: 314-4796; TTY 314-4796

City of San Francisco Mayor’s Office on Disability

Would you like help with access to our services? Please let us know!

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ADA Self Evaluation Questions

**Designated Official**

- WHO is the designated official?
- How can the person be contacted?
- Is the designated official different from the ADA Coordinator?
- Should there be different contacts for different programs / services / activities?

**Grievance Procedure**

- How can an individual make an inquiry or file a complaint directly with the agency?
- When should the individual expect to receive a response?
- What timeframes are involved?
- What can the individual do if they do not agree with the response? What is the appeal process?
ADA Self Evaluation Questions

Input from People with Disabilities

- How is input sought from individuals with disabilities?
- Is this an ongoing process or a one-time deal?

ADA Self Evaluation Questions

Auxiliary Aids and Services

- How can individuals make requests for auxiliary aids and services?
- Is the process centralized or decentralized?
- Is the availability of auxiliary aids and services clearly communicated in marketing information?
- Is equipment in place and ready to go?
- Have service providers been identified and agreements / contracts put into place?
- Is there a post-program evaluation to assess the quality of the auxiliary aid or service?
ADA Self Evaluation Questions

Alternate Formats

- Is information available in alternate formats?
- How is the availability of alternate formats communicated to people with disabilities?
- Is the process to make the request centralized or decentralized?
- Are staff trained to intake and process the request?

ADA Self Evaluation Questions

Disability Inquiry

- Do registration forms ask for information on disability? Disabling conditions? Or other medical conditions?
- Are medical forms / emergency forms required of all participants?
- Are waivers consistent with safety assessments?
- Are waivers consistent with business necessity?
### ADA Self Evaluation Questions

#### Eligibility Criteria

- Do programs, services or activities have eligibility criteria?
- Is the eligibility criteria communicated in marketing materials, program guides, and service descriptions?
- Is the eligibility criteria consistent with skill sets?
- Is the eligibility criteria consistent with safety assessments?
- Is the eligibility criteria consistent with business necessity?

#### Service Animals

- Is the public informed of the agency’s service animal policy?
- Are there instances and/or places where service animals may be restricted?
- If so, what is the rationale? Is it consistent with business necessity or direct threat issues?
Other Power-Driven Mobility Devices

- Is the public informed of the agency’s policy on OPMD’s?
- Are there instances and/or places where OPMD’s may be restricted?
- If so, what is the rationale? Is it consistent with business necessity or direct threat issues?

ADA Self Evaluation Questions

Reasonable Modifications

- What process is in place to evaluate case by case instances to make reasonable modifications?
- Is the process centralized or decentralized?
- Are staff trained on disability and ADA compliance?
- Are modifications documented?
- Is there a post-program evaluation to assess the quality of the reasonable modification?
ADA Self Evaluation Questions

Contracts & Partnerships

- What requirements are made of contractors and partners to ensure their compliance with the ADA?
- Are roles and expectations clearly defined?

ADA Self Evaluation Questions

Safety

- How are safety concerns assessed?
- Is the Safety Coordinator / Risk Manager involved?
- Is the assessment documented?
**ADA Self Evaluation Questions**

**When you have to say “NO”**

- Is the designated official involved in the determination?
- Is the denied request documented with explanation of the assessment and rationale?

**Action Plan**

- What policies and procedures need to be modified?
- What person/department is responsible for each modification?
- Are there costs associated with the modification?
THE ADA/504 TRANSITION PLAN

ADA Title II Review
Program Access

§35.149
- No qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.
ADA Title II Review

Program Access

§35.150

- A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

Methods to Achieve Program Access

- Relocate a service to an accessible facility
- Provide benefits or services at an individual's home, or at an alternative accessible site
- Make structural changes to existing site giving priority to the methods that facilitate the most integrated setting
Transition Plan

- A plan/schedule to remove barriers to programs, services, and activities
- Originally required of entities with 50+ employees by July 26, 1992
- Barrier removal was to be completed by January 26, 1995 but in any event as expeditiously as possible
Transition Plan

- Where structural changes to existing facilities are necessary to achieve Program Access
- Transition Plan components
  - Identification of physical & communication barriers to programs, goods or services
  - Identification of solution for barrier removal
  - Prioritization and targeted timelines for barrier removal
  - Assigned responsibility
- On file for the public until completed

Assessing Your Facility

Program Spaces

- When viewed in its entirety*, can visitors participate and gain the benefits of the program?
Accessibility Assessment - Methodology

- Identification of physical and communication barriers to programs, services and activities ⇒ **SUPPORTING FACILITIES**

- Follow the sequence used by visitors
- Consider the needs of visitors with
  - Mobility impairments
  - Visual impairments
  - Hearing impairments
  - Cognitive impairments
- Snapshot in time
- 2010 ADA Standards for Accessible Design
- Other proposed standards and guidelines
- Principles of universal design
- Best practices
- Recommendations for barrier removal
A Note About Categorized Priorities

- Deficiencies are categorized into priorities to give decision-makers a better understanding of the magnitude by which the barrier prohibits a person with a disability from fully experiencing the program or activity.

- Categorized priorities DO NOT dictate the order for corrective actions.

- Discretion of administrators to determine the order by which corrective actions are made

⇒ ADA TRANSITION PLAN
## Assessment/Survey Report vs Transition Plan

<table>
<thead>
<tr>
<th></th>
<th>Assessment/Survey</th>
<th>Transition Plan</th>
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<tbody>
<tr>
<td>Identification of physical &amp;</td>
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<td>communication barriers to</td>
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<td>removal</td>
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<tr>
<td>Responsible Person/Unit</td>
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<td>Documentation of corrective</td>
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<td>action</td>
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## Sample Park Agency Accessibility Assessment

» 22 major parks & facilities

» Recorded approximately 1,000 work orders to remove deficiencies / barriers for people with disabilities
SAMPLE AGENCY
MOST FREQUENTLY CITED RECOMMENDATIONS

- Provide picnic units with mobility features (107)
- Adjust door opening force and/or evaluate for installation of automatic/power-assisted door system (104)
- Modify existing pathway (92)
- Install/remount restroom identification signage with braille and raised characters (77)
- Stripe accessible parking space and access aisle (68)
- Insulate exposed pipes at lavatory (68)
- Install coat hook within reach range (60)
- Add/replace existing drinking fountain with high-low unit (56)
- Adjust door opening force (50)
- Provide accessible fire ring/grill (50)

Sample Agency
Range of Costs for Corrective Actions

<table>
<thead>
<tr>
<th>Corrective Action</th>
<th>Estimated Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide picnic units with mobility features</td>
<td>Capital improvement est. $25,000+ per site</td>
</tr>
<tr>
<td>Adjust door opening force and/or evaluate for installation of automatic/power-assisted door system</td>
<td>$100 to $5,000</td>
</tr>
<tr>
<td>Modify existing pathway</td>
<td>Capital improvement $1,000 to $50,000+</td>
</tr>
<tr>
<td>Install/remount restroom identification signage with braille and raised characters</td>
<td>$50</td>
</tr>
<tr>
<td>Stripe accessible parking space and access aisle</td>
<td>$1,200</td>
</tr>
<tr>
<td>Insulate exposed pipes at lavatory</td>
<td>$60</td>
</tr>
<tr>
<td>Add/replace existing drinking fountain with high-low unit</td>
<td>$2,100</td>
</tr>
<tr>
<td>Restroom renovation for accessible toilet stall</td>
<td>$12,000+</td>
</tr>
</tbody>
</table>
Scheduling Barrier Removal

- Location
- Use – volume
- Master plan for facility
- Proximity to duplicative program/service

- Ongoing process

Ongoing – ADA Transition Planning

- Develop dynamic, working ADA Transition Plan for removal of communication and physical barriers.
- Make available for public inspections
- Engage people with disabilities throughout the process.
What can we do NOW?

- Convene an Accessibility Management Team
- Review Your Original ADA Self Evaluation OR......Develop an ADA Self Evaluation
- Determine what outstanding barriers remain from your original ADA Transition Plan OR .......Develop an ADA Transition Plan
- Community engagement and input from people with disabilities
- Commit to Inclusion & ADA Compliance

Questions

Jennifer Skulski
Skulski Consulting LLC
(317) 408-4424
jennifer@skulskiconsulting.com
www.accessibilitymanagementnews.com
Thank you for participating in today’s ADA-Audio Conference Session

The next scheduled session is:

“Service Animals and the ADA: Exploring Common Issues and Scenario’s”

November 21, 2017

Register at: www.ada-audio.org or call 877-232-1990 V/TTY