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City of Winchester

ADA Self-Evaluation & Transition Plan

July 2019

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Abbreviation

ADA – Americans with Disabilities Act

CFR – Code of Federal Regulations

CIP – Capital Improvement Projects

DOJ – United States Department of Justice

EITA – Electronic and Information Technology Accessibility

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices

PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Program, Services, and Activities

WAVE – Web Accessibility Evaluation Tool

1.0 Introduction

1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Winchester has undertaken a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Winchester is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Winchester's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 30 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.

1.3 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

1.3.1 Physical Barriers

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.3.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

1.3.3 Ongoing Accessibility Improvements

City PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

1.3.4 City of Winchester Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Winchester programs, services, and activities within a reasonable timeframe. The City 's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Gallatin residents seek to enjoy, and guides future improvements. This Plan has been prepared after careful study of all the City's programs, services, activities, and evaluation of a select number of City facilities.

The City of Winchester should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Winchester will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

2.0 Self-Evaluation and Summary of Findings

The City of Winchester's Americans with Disabilities Act (ADA) Transition Plan reflects the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The review identifies programmatic barriers to individuals with disabilities interested in accessing the programs, services, and activities offered by the City.

2.0 Programs, Procedures, and Policies Review

Under the ADA, the City is required to complete a Self-Evaluation of the City's facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City's programs, services, and activities, as well as the policies and practices the City uses to implement its various programs and services.

To comply with requirements of the plan, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

- (1) Relocation of programs to accessible facilities;
- (2) Modifications to existing programs so they are offered in an accessible manner;
- (3) Structural methods such as altering an existing facility;
- (4) Policy modifications to ensure nondiscrimination; and
- (5) Auxiliary aids needed to provide effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

Programs, services, and activities offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator or an authorized designee of the City, such as the Mayor or her designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.

2.1.1 Departmental Surveys and Interviews

The interactive survey process was conducted following the review of the City's website. Program, services, and activities surveys were submitted to each City department. The surveys were tailored to the PSAs offered by each department and used to finalize the determination of ADA compliance for each department's PSA. The responses were reviewed and possible solutions for issues identified have been integrated throughout the ADA Transition Plan. See **Appendix A** for copies of the completed Departmental Survey and Interview Findings Summaries in their entirety.

Survey of All Departments: Self-Evaluation Findings

- Most department contacts are aware that ADA obligations exist. However, staff was not aware of the specific requirements.
- Department contacts were unaware of a City-wide ADA grievance policy and procedure. However, all City staff were aware of the City's general grievance policy and procedure, which does not specifically address ADA Title I or Title II.
- Most department contacts were unsure if the City has a reasonable accommodation policy and procedure.
- Most department contacts were unsure if the City has a process on how to obtain alternate formats of City documents or the types of formats available.
- Most department contacts were unsure if the City has a public notice under the ADA. This notice is required by all Title II entities regardless of their size and is required to be publicized on an ongoing basis.
- ADA-specific training is not a common practice throughout the City.
- All departments have an ADA Liaison; however, no specific training has been conducted to ensure all Liaisons are aware of their roles and responsibilities.
- Department contacts were unaware of policies and procedures or guidelines in place regarding ADA compliant purchasing and procurement.
- Most department contacts indicated they do not use ADA checklists to ensure ADA compliance.
- Most department contacts were unaware of City-wide non-discrimination statements that are required to be included in all information distributed by the City.

Survey of All Departments: Possible Solutions

The possible solutions associated with each of the departmental surveys and interviews have been incorporated into **Sections 2.1.2 - 2.2.5** of this document, as applicable for all City programs, policies, and procedures.

2.1.1 Department-Specific Information

During the departmental survey and interview process, additional information was gathered for each department. A discussion of additional programmatic elements identified during the research and evaluation process for each department is included in the following section.

City Attorney's Office

City Attorney's Office: Self-Evaluation Findings

- The City Attorney's Office reviews City contracts and agreements for ADA language. However, there are no guidelines in place on how to conduct the reviews.

City Attorney's Office: Possible Solutions

- The City Attorney's Office should develop guidelines regarding the reviewing of City contracts for ADA language. See **Section 2.2.4, Non-Discrimination Language for Contracts, Agreements, and Waivers**.

Mayor & City Council

Mayor & City Council: Self-Evaluation Findings

- Training regarding the ADA shall be conducted for the Mayor and executive staff.
- The Mayor's Office is responsible for the ADA compliance of the City website, but the Office does not provide annual training to City staff regarding website ADA accessibility.

Mayor & City Council: Possible Solutions

- Winchester City Council should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding City training programs, see **Section 2.1.17, Employment Practices Review**.
- The Mayor's Office should provide annual training to all applicable City staff regarding ADA accessible websites. This training should establish guidelines for developing and maintaining ADA compliant Department webpages. While training is not a specific requirement of the ADA, the City is obligated to provide equal access to programs, services, and activities. This training will provide guidance to employees regarding the ADA and Section 508 of the Rehabilitation Act, as well as the tools needed to ensure ADA compliance.

Finance Department

Finance Department: Self-Evaluation Findings

The Department does not use a procurement policy and procedure or guidance for reviewing information and technology purchases for ADA compliance before purchase.

Finance Department: Possible Solutions

The Department (in conjunction with the IT at Winchester Utilities) should develop a policy and procedure or

guidelines for City staff to use that reviews information and technology purchases for ADA compliance before purchase. While this policy and procedure is not a specific ADA requirement, the City should develop policies and procedures to ensure ADA compliance with Section 508 of the Rehabilitation Act.

Fire Department

Fire Department: Self-Evaluation Findings

- The Department offers facility tours but does not use checklists to ensure that all tours are ADA compliant.
- The Department does not have guidance in place for Department staff to use to ensure that the Department is providing ADA accessible community programs, services, and activities.

Fire Department: Possible Solutions

- The Department should develop and use specific ADA checklists or guidance to ensure that all tours are ADA compliant. These checklists or guidance should include information regarding tour operations and facility compliance. While this is not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities and this guidance will provide Department staff with the necessary tools to ensure ADA compliance.
- The Department should use policies and procedures (identified for development in this Transition Plan) to develop specific ADA guidance for Department staff to use to ensure that the Department is providing ADA accessible programs, services, and activities. This may include providing alternate formats, providing equal access to Department services or events, etc. While this is not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities and this guidance will provide Department staff with the necessary tools to ensure ADA compliance.

Human Resources

Human Resources : Self-Evaluation Findings

- The Department provides new employee orientation upon hire. During the orientation process, new employees are not provided ADA-specific training, information regarding their rights and obligations under the ADA, or contact information for the City ADA/504 Coordinator for Title I or Title II. For Self-Evaluation findings regarding the employment practices, see **Section 2.1.17, Employment Practices Review**.
- HR does not provide annual ADA training for employees regarding Title I and Title II. It has been provided every few years, but not annually.

Human Resources: Possible Solutions

- HR should integrate ADA-specific training within the new employee orientation program. This training should include information regarding employee's rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the City is obligated to provide equal access to programs, services, and activities. This training will provide guidance to employees regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. The new employee orientation program should also include policies and procedures (identified for development in this Transition Plan) with respect to the City of Winchester Employee Handbook. For possible solutions regarding personnel rules, see **Section 2.1.17, Employment Practices Review**.

- HR - in conjunction with City ADA/504 Coordinators for Title I and Title II - should administer annual ADA training for employees. While training is not a specific ADA requirement, as a Title II entity, the City is obligated to provide equal access to programs, services, and activities. This training will provide guidance to employees regarding their rights under the ADA and the tools needed to ensure ADA compliance.

Parks and Recreation Department

Parks and Recreation Department: Self-Evaluation Findings

- The Department defers to the City for reasonable accommodation policy, procedure, and form for Title I. However, the Department does not have a reasonable modification policy, procedure, or form in place for Title II.
- The Department does not have an out-of-order policy and procedure or guidelines in place.
- The Department does not have a maintenance policy and procedure or guidelines in place.
- The Department does not have guidelines in place to address ADA compliance at special events.

Parks and Recreation Department: Possible Solutions

- For the Department reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 2.1.6, Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form.**
- The Department should develop an out-of-order policy and procedure or guidelines to assist City staff in ensuring that ADA elements are repaired and in working condition in a timely manner. While the development of this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the City is obligated to ensure all ADA elements are in working order and are readily accessible. This policy and procedure or guidelines will provide guidance to employees and the tools needed to ensure ADA compliance.
- The Department should develop a maintenance policy and procedure or guidelines to assist City staff in maintaining ADA elements in ADA compliance. While the development of this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the City is obligated to ensure all ADA elements are maintained in an accessible manner and are readily accessible. This policy and procedure or guidelines will provide guidance to employees and the tools needed to ensure ADA compliance.
- The Department should develop ADA-specific guidelines for special events. While the development of these guidelines is not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities. These guidelines will provide guidance to employees and provide the tools needed to ensure ADA compliance.

Police Department

Police Department: Self-Evaluation Findings

- Department General Orders were reviewed. However, no specific ADA information was included.
- The Department defers to the City for ADA grievance policy, procedure, and form for Title I and Title II.
- The Department defers to the City for reasonable accommodation and modification policy, procedure, and form.
- The Department does not have an alternate format policy and procedure in place.

- The Department does not have guidelines in place to address ADA compliance at special events.

Police Department: Possible Solutions

- The Department should update the existing Department General Orders to include all adopted ADA policies and procedures identified for development in this Transition Plan. While updating the Department General Orders is not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities. The updated Department General Orders will provide guidance to employees regarding their rights under the ADA and the tools needed to ensure ADA compliance.
- For the Department ADA grievance policy, procedure, and form with appeals process for Title I and II, see **Section 2.1.5, ADA Grievance Policy, Procedure, and Form with Appeal Process.**
- The Department should develop a department-specific reasonable accommodation and modification policy, procedure, and form for Title II. See **Section 2.1.6, Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form.**
- The Department should defer to the adopted City-wide alternate format policy, procedure, and request form. See **Section 2.1.13, Alternate Format Policy, Procedure, and Request Form.**

Police Department: Possible Solutions (cont.)

- The Department should develop ADA-specific guidelines for special events. While developing these guidelines is not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities. These guidelines will provide guidance to employees and provide the tools needed to ensure ADA compliance.

Public Works Department

Public Works Department: Self-Evaluation Findings

- The Department has not formally adopted the Proposed Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG).
- The Department does not use ADA-specific guidance when designing projects or reviewing plans with accessible elements.
- The City does not have ADA-specific requirements for design consultants.
- Municipal Code assigns the responsibility of snow removal from sidewalks to the property owner. However, the Department generally maintains sidewalks for snow removal but snow removal on roadways take priority. The Department does not use specific policies and procedures or guidance for public rights-of-way maintenance.

Public Works Department: Possible Solutions

- While the PROWAG has not yet been finalized, it is recommended that the City formally adopted the PROWAG as a City standard practice and also develop ADA-specific guidance about PROWAG. This guidance should be used Department-wide and throughout the City, as needed. While City adoption of PROWAG is not specifically an ADA requirement, it is strongly recommended to ensure ADA compliance.

- The City should develop ADA-specific requirements for design consultants to follow when working on a project that include ADA elements. These requirements should include training on PROWAG requirement and City expectations. While this is not an ADA-specific requirement, this is recommended to ensure that consultants take responsibility and are designing ADA elements within the City in ADA compliance.
- The Department should develop policies and procedures or guidance for Department staff to use regarding maintenance of accessible elements within the public rights-of-way (e.g., snow and ice removal and removal of obstructions from the pedestrian path). While developing these policies and procedures or guidelines are not a specific ADA requirement, it is strongly recommended to ensure clarity of responsibility and ensure ADA compliance.

2.1.2 ADA/504 Coordinator (Title I / Title II)

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

ADA/504 Coordinator: Self-Evaluation Findings

The City has appointed Yvonne Stewart as the ADA/504 Coordinator. See below for contact information. However, this information is not published on the City website or in other City documents:

Yvonne Stewart, ADA Coordinator
Winchester City Hall,
7 S. High St,
Winchester, TN 37398

ADA/504 Coordinator: Possible Solutions

The ADA Coordinators information should be prominently displayed in common areas that are accessible to all employees and areas open to the public.

Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA Coordinators that are recommended by U.S. Department of Justice:

- Familiarity with the entities' structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

Roles and Responsibilities of the ADA Coordinator: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA Coordinator is provided on the City's website or in City documents.

Roles and Responsibilities of the ADA/504 Coordinator: Possible Solutions

The City should document the roles and responsibilities of the ADA Coordinator. These roles and responsibilities should be consistent with the U.S. Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

Roles and Responsibilities of the ADA/504 Coordinator: Completed Actions

The roles and responsibilities of the City's ADA/504 Coordinator was documented in July 2018 (see **Appendix B**).

2.1.3 ADA Grievance Policy, Procedure and Form with Appeals Process for the Americans with Disabilities Act

Title I

Title I of the ADA prohibits private employers, state and local governments, employment agencies, and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees based on an entity-wide employee total count, including state and local governments.

The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level.

ADA Grievance Policy, Procedure, and Form with Appeals Process (Title I): Self-Evaluation Findings

- A general grievance policy and procedure is provided in the City of Winchester Personnel Rules and Regulations. However, the City does not have an ADA-specific grievance policy, procedure, and form with appeals process for Title I.
- No Title I ADA grievance form exists.
- No Title I ADA complaint log exists.

ADA Grievance Policy, Procedure, and Form with Appeals Process (Title I): Possible Solutions

- The recently developed ADA grievance policy, procedure, and form with appeals process for Title I should be adopted City-wide, posted on the City's website, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix B** for a copy of the policy, procedure and form.
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and specifics regarding the resolution.

ADA Grievance Policy, Procedure, and Form with Appeals Process (Title I): Completed Actions

An ADA grievance policy, procedure, and form with appeals process for Title I was developed in July 2019 (see **Appendix B**).

Title II

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA.

ADA Grievance Policy, Procedure, and Form with Appeals Process (Title II): Self-Evaluation Findings

- A Title II ADA grievance policy and procedure with appeals process is provided on the City's website. The policy and procedure are consistent with the U.S. Department of Justice's recommended grievance policy, procedure, and appeals process.
- The City's Title II ADA grievance form does not:
 - Specify whether the form is for Title I or Title II or both;
 - Have a non-discrimination statement;
 - Provide enough space on the form for the grievant to provide adequate information; or
 - Provide an option for the grievant to suggest a detailed plan for a remedy of the complaint.

□ No Title II ADA complaint log exists.

ADA Grievance Policy, Procedure, and Form with Appeals Process (Title II): Possible Solutions

- The existing Title II ADA grievance form should be revised to include a specific title for Title II, include a City-wide non-discrimination statement, provide additional space for the grievant to provide adequate information, and provide an option for the grievant to suggest a detailed plan for a remedy to the complaint. The recently developed ADA grievance form for Title I may be used as an example (see **Appendix B**).
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.

Reasonable Accommodation Request Policy, Procedure, and Request Form

Title I

The reasonable accommodation request process plays a very important role when ensuring that the City of Winchester does not discriminate based on a disability. A reasonable accommodation is any modification to a job, the work environment, or the way things are usually done that allows an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits available to other individuals in the workplace.

Reasonable Accommodation Request Policy, Procedure, and Form (Title I): Self-Evaluation Findings

Several references to a reasonable accommodation policy and procedure were identified. However, no reasonable accommodation request policy, procedure, and form is provided on the City's website or in City documents.

Reasonable Accommodation Request Policy, Procedure, and Form (Title I): Possible Solutions

The City should develop a reasonable accommodation request policy, procedure, and form. This policy and procedure should provide a description regarding reasonable accommodation, provide details on how to file a request and participate in the interactive process. The request form should include the requestor's contact information, type of accommodation being requested, and specific details regarding the need for a reasonable accommodation. The Equal Employment Opportunity Commission provides enforcement guidance for reasonable accommodation and undue hardship under the ADA here: <https://www.eeoc.gov/policy/docs/accommodation.html>.

Title II

The reasonable modification request process allows an individual from the public to request a modification that will provide equal access to any City program, service, and/or activity. A public entity must reasonably modify its policies, practices, or procedures to avoid discrimination unless the modification will fundamentally alter the nature of its program, services, or activity.

Reasonable Modification Request Policy, Procedure, and Form (Title II): Self-Evaluation Findings

No information regarding a reasonable modification request policy, procedure, and form is provided on the City's website or in City documents.

Reasonable Modification Request Policy, Procedure, and Form (Title II): Possible Solutions

The City should develop a reasonable modification request policy, procedure, and request form. This policy and procedure should provide a description regarding reasonable modifications, provide details on how to file a request and participation in the interactive process. The request form should include the requestor's contact information, type of modification being requested, specific details regarding the specific City program, services, or activity needing a reasonable modification. The U.S. Department of Justice provides guidance for reasonable modifications here: <https://www.ada.gov/taman2.html>.

2.1.4 Service Animal Guidance

A reasonable accommodation is any modification or adjustment to a job or the work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. Reasonable accommodations also include any modification or adjustment to a provided program, service, or activity that the entity provides to ensure accessibility for the public. Reasonable accommodations may also include the use of a service animal. Service animals are used for a variety of reasons, so each accommodation request and modification may be different.

Service Animal Guidance: Self-Evaluation Findings

Guidance related to requests for reasonable accommodations or modifications from qualified applicants, employees, or the public with respect to service animals does not exist.

Service Animal Guidance: Possible Solutions

The City should develop City-wide guidance for staff to reference when dealing with service animals as reasonable accommodations or modifications for applicants, employees, and the public. Each City department should integrate this guidance into their department-specific standard operating procedures. In doing so, this policy and procedure should be customized to fit each department's situations and provide guidance as to when a service animal is an effective reasonable accommodation or modification.

- The U.S. Equal Employment Opportunity Commission created enforcement guidance for Reasonable Accommodations and undue hardship under the ADA (<https://www.eeoc.gov/policy/docs/accommodation.html>).
- The U.S. Department of Justice created a publication providing guidance on service animals and the ADA: U.S. Department of Justice Service Animal Guidance (https://www.ada.gov/service_animals_2010.htm).

2.1.5 ADA Grievance Policy, Procedure and Form with Appeals Process for Section 508 of the Rehabilitation Act

Section 508 of the Rehabilitation Act of 1973 requires that all electronic and information technologies developed and used by any federal government agency must be accessible to individuals with disabilities. This includes websites, video and audio tapes, electronic books, televised programs, and other such media. Individuals with disabilities may

still have to use special hardware and software to access the resources. This law pertains to the federal government. However, the State of Tennessee has adopted these technology requirements; therefore, City of Winchester should comply.

ADA Grievance Policy, Procedure, and Form with Appeals Process: Self-Evaluation Findings

No information regarding the Rehabilitation Act policy, procedure, and form with appeals process exists.

ADA Grievance Policy, Procedure, and Form with Appeals Process: Possible Solutions

- The City should develop an ADA grievance policy, procedure, and form with appeals process for Section 508 of the Rehabilitation Act. The form should include the complainant's contact information, description of the electronic and information technology in question, and specific details regarding the non-conforming aspects and remedy that is being requested. Details regarding the Tennessee Electronic and Information Technology Accessibility (EITA) law, along with accessibility tools, training, and related resources are located here: <https://www.tn.gov/web-policies/accessibility.html>
- The policy, procedure, and form with appeals process should be adopted City-wide, posted on the City's website, and publicized in common areas that are accessible to all employees and to the public.
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.

2.1.6 Retaliation or Coercion Policy

Individuals who exercise their rights under the ADA, or assist others in exercising their rights, are protected from retaliation. The prohibition against retaliation or coercion applies broadly to any individual or entity that seeks to prevent an individual from exercising their rights or to retaliate against individuals for having exercised their rights.

Retaliation or Coercion Policy: Self-Evaluation Findings

No information regarding a retaliation and coercion policy is provided on the City's website or in City-provided documents.

Retaliation or Coercion Policy: Possible Solutions

The City should draft and adopt a City-wide retaliation and coercion policy that is accessible to all employees and the public. U.S. Equal Employment Opportunity Commission guidance on retaliation and related issues are located here: <https://www.eeoc.gov/laws/guidance/retaliation-guidance.cfm>.

2.1.7 Non-Discrimination Language

All public entities must ensure that no qualified individuals with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

To do so, public entities must develop two (2) separate policies:

1. Non-Discrimination Statement Policy, which documents the requirement to include a non-discrimination statement in any City publication or document distributed to employees or to the public.
2. Non-Discrimination Clause Policy, which documents the requirement to include a non-discrimination statement in all funding agreements that the City employs to pass federal funds to other agencies, entities, or municipalities but not contractors.

Non-Discrimination Statement Policy

Non-Discrimination Statement Policy: Self-Evaluation Findings

The City has several variations of a non-discrimination statement. However, none of the statements are consistent or used City-wide.

Non-Discrimination Statement Policy: Possible Solutions

- The City should develop consistent City-wide non-discrimination statements for Title I (employment activities) and Title II (programs, services and activities administered by the City). These statements should include language that provides contact information for the ADA/504 Coordinator regarding an accommodation, modification, or alternate formats. While these statements are not a specific ADA requirement, the U.S. Department of Justice (DOJ) requires that all Title II entities adopt and distribute a public notice about the relevant provisions of the ADA to all people who may be interested in its programs, services, and activities. It is recommended that a non-discrimination statement be included in all information distributed by the City to comply with 28 CFR 35.106 (https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35106).
- The City should incorporate both non-discrimination statements into a stand-alone policy that provides guidance to City staff on the application of non-discrimination statements for Title I and Title II. This policy should be accessible to all employees and used in City materials that are distributed by the City. The City's recently developed Title I ADA Grievance Form includes the City's Title I Non-Discrimination Statement (see **Appendix B**).

Non-Discrimination Contract Clause

Non-Discrimination Contract Clause: Self-Evaluation Findings

A non-discrimination contract clause is not provided on the City's website or in City documents.

Non-Discrimination Contract Clause: Possible Solutions

- The City should develop a consistent non-discrimination contract clause. This clause should include language - within applicable City contracts - that will ensure that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in all City programs, services, or activities. While this clause is not a specific ADA requirement, the U.S. Department of Justice (DOJ) requires that all Title II entities adopt and distribute a public notice about the relevant provisions of the ADA to all people who may be interested in its programs, services, and activities. It is recommended a non-discrimination statement be included in all information distributed by the City to comply with 28 CFR 35.106 (https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35106).
- The City should develop guidance regarding the application of a non-discrimination contract clause for City staff who may initiate federally funded contracts or any joint use agreements with other entities.

2.1.8 Public Notice Under the ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. Publishing and publicizing the ADA public notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary.

Public Notice Under the ADA: Self-Evaluation Findings

A public notice under the ADA is not provided on the City's website or in City documents.

Public Notice Under the ADA: Possible Solutions

The recently developed City of Winchester Public Notice Under the ADA (see **Appendix B**) should be adopted by the City, posted on the web, and publicized in common areas that are accessible to all employees and areas open to the public.

Public Notice Under the ADA: Completed Actions

A public notice under the ADA was developed in July 2019.

2.1.9 Title II/504 ADA Assurances

Every applicant for federal financial assistance shall provide a written assurance stating that all programs, services, and activities are being conducted or operated in compliance with all laws and regulations. As a recipient of federal funds, the City must include a written Title II ADA/504 Assurance in all funding agreements and joint use agreements to receive federal financial assistance. In turn, the City must require that any sub-recipient who receives federal financial assistance from the City provide an annual written Title II ADA/504 Assurance. This includes funding agreements and all joint use agreements with other agencies, entities, or municipalities.

ADA Assurances: Self-Evaluation Findings

Information regarding Title II/504 ADA Assurances are not provided on the City's website or in City documents.

ADA Assurances: Possible Solutions

The City should develop a Title II/504 ADA Assurance in accordance with 49 CFR 27.9 (https://www.ecfr.gov/cgi-bin/text-idx?SID=b9b8a3d54d526545fd69ad3de5742ec9&mc=true&tpl=/ecfrbrowse/Title49/49cfr27_main_02.tpl).

2.1.10 Alternate Format Policy, Procedure, and Request Form

Under the ADA, a public entity is responsible for providing ADA accessible communications. This includes any documents or information that is distributed by the City. If a request for an alternate format is received, the City must have an action plan to accommodate the request. For example, the U.S. Department of Justice does not expect entities to have Braille copies of all documents; however, Braille copies are expected to be readily available. Readily available means that once a request is received, a policy and procedure is in place to make a reasonable accommodation or modification to the document or information requested. This document must be provided to the requestor in a reasonable amount of time.

Alternate Format Request Policy, Procedure, and Form: Self-Evaluation Findings

Information regarding an alternate format request policy, procedure, and form is not provided on the City's website or in City documents.

Alternate Format Request Policy, Procedure, and Form: Possible Solutions

The City should develop an alternate format request policy, procedure, and form. This policy and procedure will guide staff through the process of obtaining an alternate format and using the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested.

2.1.11 Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos

Under the ADA, a public entity is responsible for providing ADA accessible alternate formats, including any documents or information that is distributed by the City obtained from another entity. For example, if there is a link to an external site on City's website that leads to additional information. However, it may not be feasible for the City to obtain the original document from the external source which may prevent the City's ability to create an alternate format. Therefore, the City should add a disclaimer when external sources are referenced stating that the City is not responsible for ADA compliance of external content and any requests for alternate formats of external content should be directed to the source entity.

Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos: Self-Evaluation Findings

An ADA-specific disclaimer is not provided on the City's website or in City documents.

Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos: Possible Solutions

The City should develop a disclaimer statement to communicate the City's perspective on ADA compliance regarding content on another entity's site, links, forms, documents, and videos that are represented on the City's website. This statement should be posted on the website and publicized in common areas that are accessible to all employees and areas open to the public.

2.1.12 Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I)

Tracking ADA Transition Plan updates and corrections for Title I is important in showing progress toward barrier removal and should be done so using a systematic approach to ensure all updates and corrections are documented.

Policies and Procedure for ADA Transition Plan Updates and Corrections (Title I): Self-Evaluation Findings

Policies and procedures for ADA Transition Plan updates and corrections for Title I are not provided on the City's website or in City documents.

Policies and Procedure for ADA Transition Plan Updates and Corrections (Title I): Possible Solutions

The City should develop customized policies and procedures for ADA Transition Plan updates and corrections for Title I. While this is not a specific ADA requirement, developing these policies and procedures will provide City staff guidance on the internal process for updating and correcting issues identified in the ADA Transition Plan.

2.1.13 ADA Liaison Committee

The ADA Liaison Committee is comprised of representatives from each City department. These individuals work closely with ADA/504 Coordinators to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinators work closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures.

ADA Liaison Committee: Self-Evaluation Findings

The City has established an ADA Liaison Committee (July 2019) and is comprised of a representative from each City department. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinators regarding all ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all Title I and Title II ADA inquiries within their department. This log shall be shared with ADA/504 Coordinators and shall be retained for at least three (3) years.

ADA Liaison Committee: Possible Solutions

The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and the public. This includes posting this information on the City website.

2.1.14 Employment Practices Review

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity, including employment. Public entities must provide an equal opportunity for employment.

The City of Winchester Personnel Rules and Regulations, City policies and procedures, employment, training and orientation processes, volunteer programs, forms, and documents were reviewed, in addition to the information obtained from the departmental survey process. This information was reviewed for consistency with current accessibility requirements and standards. (Summer 2019)

City of Winchester Personnel Rules and Regulations Review: Self-Evaluation Findings

- Disability (Separation, Disciplinary Action, and Suspension Pending Investigation and/or Hearing) – This section does not address an individual's rights to a reasonable accommodation or modification.
- Grievance Procedure – This section is a general grievance procedure and is not specific to an ADA grievance policy and procedure for Title I.
- Harassment (General Policies and Procedures) – This section covers harassment including a physical handicap. This language is outdated and not preferred.
- Service animal guidance does not exist.
- A retaliation or coercion policy does not exist.
- A consistent City-wide non-discrimination statement does not exist.
- Personal appearance is mentioned. However, a reasonable accommodation policy and procedure is not addressed.

City of Winchester Personnel Rules and Regulations Review: Possible Solutions

- The Personnel Rules and Regulations should be updated once the new ADA policies and procedures referenced in this ADA Transition Plan are developed and adopted by the City. (Summer/Fall 2019)
- Disability (Separation, Disciplinary Action, and Suspension Pending Investigation and/or Hearing) – This section should be revised to include individual's right to a reasonable accommodation or modification. See **Section 3.1.6, Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- Grievance Procedure – This section should also reference the ADA grievance policy, procedure, and form for Title I. See **Section 3.1.5, ADA Grievance Policy, Procedure, and Form with Appeal Process**.
- Harassment (General Policies and Procedures) – This section includes outdated language, such as "physical handicap". This language is outdated and should be revised in accordance with the U.S. Department of Justice and the U.S. Equal Employment Opportunity Commission. See guidance here:
 - <https://www.eeoc.gov/>
 - <https://www.ada.gov/>
- The City should develop guidance regarding service animals. See **Section 3.1.7, Service Animal Guidance**.

City of Gallatin Personnel Rules and Regulations Review: Possible Solutions (cont.)

- The City should develop a reasonable accommodations policy, procedure, and request form. See **Section 3.1.6, Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form.**
- The City should develop a City-wide Non-Discrimination Statement Policy for Title I and Title II. See **Section 3.1.10, Non-Discrimination Language.**
- The City should develop a City-wide retaliation and coercion policy. See **Section 3.1.9, Retaliation or Coercion Policy.**
- An ADA Grievance Policy, Procedure, and Form with Appeals process for Title I was developed as a part of this project. See **Section 3.1.5, ADA Grievance Policy, Procedure, and Form with Appeals Process.**

City of Winchester's Hiring, Testing and Recruitment Information Review: Self-Evaluation Findings

- HR administers the hiring process for all departments. However, some departments, such as the Police & Fire Departments, may administer testing for the Department.
- HR does not provide alternate formats of applications for employment, nor does the website provide information on how to obtain alternate formats.
- The City's non-discrimination statements are not consistent City-wide and are not what is recommended.

City of Winchester's Hiring, Testing and Recruitment Information Review: Possible Solutions

- An Alternate Format Policy, Procedure, and Request Form should be adopted. See **Section 3.1.13, Alternate Format Policy, Procedure, and Request Form.**
- City's webpage should be revised to include information on how to obtain alternate formats for employment applications, job announcements, and other documents.
- The City should develop a City-wide Non-Discrimination Statement Policy for Title I and Title II. See **Section 3.1.10, Non-Discrimination Language.**
-
- HR should develop testing guidelines. These guidelines should include information on ADA-compliant testing in the hiring process and should be available to all departments who administer testing for their department. While these guidelines are not an ADA requirement, these guidelines will assist City staff in being consistent in the testing process to achieve ADA compliance. The U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice provides guidance here:
 - <https://www.eeoc.gov/>
 - <https://www.ada.gov/>

City of Winchester's New Employee Orientation: Self-Evaluation Findings

- HR provides new employee orientation. This orientation provides guidance on the City Personnel Rules only.
- The new employee orientation does not include specific City ADA policies and procedures or the ADA/504 Coordinators' names or contact information.
- The City's ADA Coordinator is not a part of the new employee orientation process.
- New employees are not provided information regarding their rights and obligations under the ADA.

City of Winchester's New Employee Orientation: Possible Solutions

- HR should develop new employee orientation guidelines. These guidelines should include a review of employees ADA rights and obligations, introduction to the ADA Coordinator, as well as typical employment functions and benefits.
- HR should provide new employees with the revised City of Winchester Personnel Rules and Regulations that includes adopted ADA policies and procedures, once available.

City of Winchester Training Program Review: Self-Evaluation Findings

No specific annual ADA training program is provided for City staff regarding Title I or Title II.

City of Winchester's Training Program Review: Possible Solutions

The City should provide annual ADA-specific training to all City staff, including executive staff, volunteers, and City Council, regarding Title I and Title II. This training should include policies and procedure identified for development in this Transition Plan, employee rights and obligations regarding employment-related training, as well as training for accessible elements within the public rights-of-way. While training is not a specific ADA requirement, as a Title II entity, the City is obligated to provide equal access to programs, services, and activities. Furthermore, this training will provide individuals the tools needed to ensure ADA compliance.

2.1.15 Emergency Management Plan Review

Emergency planning and management has become increasingly important today. All community emergency plans and emergency management teams must include the necessary information on how to properly assist citizens in the community who may have a disability. Identifying the citizens with disabilities is paramount to rescuing them. The City of Gallatin should have an Emergency Management Plan in place that details how to help the citizens with disabilities in the event of a local emergency.

Disabilities manifest themselves in varying degrees and the functional implications of the variations are important for emergency evacuation. A person may have multiple disabilities, while another may have a disability whose symptoms fluctuate. Everyone needs to have a plan to be able to evacuate a building, regardless of his or her physical condition.

While planning for every situation that may occur in every type of an emergency is impossible, being as prepared as

possible is important. One way to accomplish this is to consider the input of various people and entities, from executive management, human resources, and employees with disabilities to first responders and other businesses, occupants, and others nearby. Involving such people in the development of the City's Emergency Management Plan will help everyone understand the evacuation plans and the challenges that businesses, building owners and managers, and people with disabilities face. The Sumner County Multi-Jurisdiction Hazard Mitigation Plan is used by the City of Gallatin.

Emergency Management Plan Review: Self-Evaluation Findings

- The City of Winchester uses the County Emergency Plan, but a separate plan - authored by the City - about activating the Franklin County Plan does not exist. A plan or procedures must be in place that implements Franklin County's Plan at the City level.

Emergency Management Plan Review: Possible Solutions

- Develop an emergency plan team to encourage communication between the City of Winchester and Franklin County.
- Create an emergency plan that includes buildings and areas specific to the City of Winchester and how the City will respond and control emergencies in anticipation of Franklin County's involvement. The U.S. Department of Justice provides a checklist for guidance here: <https://www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm>
- Develop internal policies and procedures with assignments for emergency response to ensure that all emergency plan team members are provided guidance in the event of an emergency.

Emergency Management Plan Review: Possible Solutions (cont.)

- Training should be provided to emergency plan team members to ensure that the emergency plan is thoroughly planned and is effectively implemented in the event of an emergency.

2.1.16 City Ordinance Review

Ten (10) City Ordinances were reviewed for consistency with current accessibility requirements and standards.

City Ordinance Review: Self-Evaluation Findings

General Provisions

- Definitions and rules of construction do not include definitions related to the ADA.
- No guidance regarding accessibility for meetings or City-wide non-discrimination statement.
- No mention of City-wide ADA policies and procedures.
- No mention of the City's effective communication efforts and policies.

Administration

- No information is included regarding the City's ADA/504 Coordinators for Title I and Title II.

Animals

- No guidance or policy and procedure information regarding service animals.

Buildings and Building Regulations

- No mention of specific laws and regulations that apply to buildings adjacent public rights-of-way for ADA accessibility.
- No mention of maintenance of adjacent pedestrian elements in the public rights-of-way.

Municipal Court

- No information included regarding the Court's ADA policies and procedures.

Finance and Taxation

- ▯ No mention of ADA compliance for City procurement.

Personnel

- ▯ This chapter lists regulations, specific procedures, and policies in the personnel rules. However, no ADA policies and procedures are included.

City Ordinance Review: Self-Evaluation Findings (cont.)

Streets, Sidewalks, and Other Public Ways and Places

- ▯ This chapter does not reference specific ADA laws and regulations that have been adopted by the City.
- ▯ Information regarding maintenance of right-of-way is not provided and does not clarify who is responsible for maintenance of accessible elements.
- ▯ The City requires the occupants of property abutting a sidewalk to keep the sidewalk clean and remove all accumulated snow or ice from the sidewalk. However, it does not provide guidance as to timeframes and does not state that pedestrian paths must be maintained in an accessible manner at all times.
- ▯ This chapter does not provide information on what is considered to be new construction, maintenance, and alterations.
- ▯ This chapter states that sidewalk cannot build or repair sidewalk without a permit from the City Engineer. However, it does not mention curb ramps or the planning or inspection process.

City Ordinance Review: Possible Solutions

The below City ordinances should be updated as noted in the following section. While these updates are not specifically an ADA requirement, these updates provide information and clarification to the public to ensure ADA compliance.

General Provisions

- ▯ Definitions and rules of construction should be revised to include definitions related to the ADA. This section should be revised in accordance with guidance from the U.S. Department of Justice. See guidance here: <https://www.ada.gov/>
- ▯ Information regarding adopted City-wide ADA policies and procedures - identified for development in this Transition Plan - should be included.
- ▯ The City should include the developed City-wide non-discrimination statement policy for Title II. See **Section 3.1.10, Non-Discrimination Language**.

Administration

- This chapter should be revised to include contact information for the City's ADA/504 Coordinator for Title I and Title II. See **Section 3.1.3, ADA/504 Coordinator (Title I / Title II)**

Animals

- Information should be included regarding the City's stance on service animals, as well as guidance for determining reasonable accommodations or modifications. See **Section 3.1.7, Service Animal Guidance**.

Buildings and Building Regulations

- ▯ Information should be included regarding specific laws and regulations that apply to buildings adjacent public rights-of-way for ADA accessibility.
- ▯ Information should be included regarding the maintenance of adjacent pedestrian elements in the public rights-of-way.

City Ordinance Review: Possible Solutions (cont.)

Municipal Court

- Information regarding the City's ADA policies and procedures - identified for development in this Transition Plan - should be included.

Finance and Taxation

- Information regarding ADA compliant City procurement should be included. See **Section 3.1.2, Department-Specific Information / Finance Department**.

Personnel

- Information regarding adopted City-wide ADA policies and procedures - identified for development in this Transition Plan - should be included.

Streets, Sidewalks, and Other Public Ways and Places

- Information regarding the prohibition of obstructions in accessible pedestrian paths should be included.
- Information clarifying responsibilities and timeframes for maintenance of ADA elements within the right-of-way should be included.
- Information regarding what the City considers to be new construction, maintenance, and alterations should be included.
- Information regarding the City adoption of PROWAG should be included. See **Section 5.4, Next Steps**.
- Information regarding ADA compliant curb ramps involving the planning and inspection process should be included.

2.1.17 Previous ADA Complaints (Title I & II) Review

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

Previous ADA Complaints Review (Title I & II): Self-Evaluation Findings

The City is not aware of any Title I or Title II ADA complaints that have been received in the past five (5) years.

Previous ADA Complaints Review (Title I & II): Possible Solutions

- The City should maintain confidential complaint/request files and ADA complaint/request logs. However, logs for both Title I and Title II should include detailed information.
 - Logs for Title I shall be confidential and should include an internal complaint number, extensive details about the complaint and process, as well as details regarding the resolution.
 - Logs for Title II shall be confidential and should include an internal complaint number, extensive details regarding the complaint and process, including locations and pictures, and details regarding the complaint resolution.

3.2 Programs, Services, and Activities Review

All programs, services, and activities (PSAs) were researched and evaluated for ADA compliance. All PSAs mentioned in **Section 3.1** were integrated into this section (**Section 3.2**). This review was based on what is accessible to the public on the City website, as well as department-specific questions that were submitted to the City.

3.2.1 Boards, Commissions, Committees, and Councils Review

The City website provides various information regarding the City's boards, commissions, committees, and councils. These groups are listed below:

- Beer Board
- Construction Board of Appeals
- Municipal Board of Zoning Appeals
- Municipal-Regional Planning Commission

Board, Commissions, Committees, and Councils Review: Self-Evaluation Findings

- Most meetings are open to the public and held in accessible facilities. However, ADA checklists are not always used to determine compliance.
- All agendas not are posted on the City's website
- The City does not have a City-wide non-discrimination statement and there is not a statement included on agendas or minutes.
- The disability community is not included in the member selection process.

Board, Commissions, Committees, and Councils Review: Possible Solutions

- The City should develop and use checklists to ensure ADA compliance for ADA compliant meeting locations. While this is not a specific ADA requirement, this checklist will benefit the City by ensuring that all meeting locations are accessible to the public.
- The City should develop an alternate format policy, procedure, and request form. See **Section 3.1.13, Alternate Format Policy, Procedure, and Request Form**.
- The City should develop a City-wide Non-Discrimination Statement Policy for Title II and include this statement in all meeting agenda and minutes. See **Section 3.1.10, Non-Discrimination Language**.
- The City should provide opportunities for the disability community to provide input regarding member selection process, when applicable. This may include advertising the need for input with local disability organizations. See **Section 2.0, Public Outreach**.
- The Winchester Zoning Code should be revised to provide guidance regarding alterations within historically significant facilities. The U.S. Department of Justice provides guidance regarding ADA compliance for Historically Significant Facilities here: <https://www.ada.gov/comprob.htm>.

3.2.2 Documents, Forms, and Videos Reviewed

The City website provides various documents, forms, and videos that are available to the public. For a complete listing of documents, forms, and videos reviewed, see **Appendix C**.

Documents, Forms, and Videos Reviewed: Self-Evaluation Findings

- The City does not have alternate formats on hand for every document, form, or video.
- The City does not have a policy or procedure in place to address alternate formats. Alternate formats are

auxiliary aids, services, or devices that enable effective communication for people with disabilities. See **Section 3.1.13, Alternate Format Policy, Procedure, and Request Form.**

- The City should develop a disclaimer statement to communicate the City's perspective on ADA compliance regarding content on another entity's site, links, forms, documents, videos, or podcasts that are represented on the City's website. See **Section 3.1.14, Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos.**
- The City should develop a City-wide Non-Discrimination Statement Policy for Title II and include this statement in information that is distributed by the City. See **Section 3.1.10, Non-Discrimination Language.**

Documents, Forms, and Videos Reviewed: Possible Solutions

- Each department liaison should develop a list of all documents and forms for their department. The list should include the document or form name, location(s) where the document can be found (e.g., office location, website link), what alternate formats are available, and how the formats can be obtained. This list should be updated continuously as documents and forms are created and revised. The forms should be reviewed for ADA compliance. Section 508 Compliant PDF Checklist is provided here:
<https://508compliantdocumentconversion.com/compliance-regulations/pdf-compliance-checklist/>
- The City should develop an alternate format policy, procedure, and request form. See **Section 3.1.13, Alternate Format Policy, Procedure, and Request Form.**
- The City should develop a disclaimer statement to communicate the City's perspective on ADA compliance regarding content on another entity's site, links, forms, documents, videos or podcasts that are represented on the City's website. See **Section 3.1.14, Responsibility / Acceptance Disclaimer for Other Entities' Links, Forms, Documents, Videos, and Podcasts.**
- The City should develop guidelines to assist staff in providing closed captioning or transcripts for videos that are available to all employees and the public. These guidelines shall include the process to add closed captioning or use the vendor database to purchase closed captioning or transcription services.
- The City should develop a consistent City-wide non-discrimination statement policy. See **Section 3.1.10, Non-Discrimination Policy.**

3.2.3 Cursory Website Review

A cursory review of the City website will be completed by Walked & Associates during fiscal year 2019-2020.. This review consist of evaluating various links located on the City website. See below for a listing of 10 key evaluation points that will be reviewed.

- Informational images for alternative text
- Decorative images for alternative text
- Video or audio content that does not have captioning
- Forms on website
- Text resizing
- Lynx Browser
- Navigating the website without the use of a mouse
- Site map
- Ensuring link text makes sense out of context
- Automated program
- Audio CAPTCHA Accessibility Criteria_

Cursory Website Review: Self-Evaluation Findings

- The City website does not have a site map.

Cursory Website Review: Possible Solutions

- The City of Winchester should create a site map for the website to ensure that individuals with disabilities can easily navigate through the website.
- The City should evaluate the entire website for ADA compliance
- A complete summary of possible solutions is provided in **Appendix C**.

3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity. In doing so, public entities should provide a statement in all agreements and contracts with the City to ensure non-discrimination for both parties and to clarify accessibility obligations.

A complete list of documents reviewed are provided in **Appendix C**.

Non-Discrimination Language for Contracts, Agreements, and Waivers: Self-Evaluation Findings

None of the contracts, agreements, and waivers contain ADA language that clarifies ADA responsibilities and obligations.

Non-Discrimination Language for Contracts, Agreements, and Waivers: Possible Solutions

The City should develop guidelines to assist the appropriate staff in writing non-discrimination language to be included in all City contracts and agreements. This non-discrimination language should be assessed by legal counsel on a case-by-case basis. These guidelines shall include language that clarifies responsibilities regarding ADA maintenance, alterations, and construction.

3.2.5 Effective Communication Efforts and Policy

The ADA requires that all Title II entities communicate effectively with people who have communication disabilities by providing auxiliary aids and services. The goal is to ensure that communication with persons with disabilities is equally effective as communication with people without disabilities.

Auxiliary aids and services are ways to communication with persons with disabilities. The type of auxiliary aids and services are assessed on a case-by-case basis. Auxiliary aids and services must be provided free of charge and provided in accessible formats, in a timely manner, and must be provided in a way that ensures individual privacy and independence. Examples of common auxiliary aids and services include, but are not limited to:

- Sign Language Interpreters
- Written materials
- Closed Captioning
- Real-time captioning
- Audio recordings
- Materials and displays in braille
- Large print materials

- Accessible electronic and information technology
- Assistive listening devices and systems

Effective Communication Efforts and Policy: Self-Evaluation Findings

The City does not have City-wide specific guidelines or policies and procedures regarding effective communication.

Effective Communication Efforts and Policy: Possible Solutions

The City should develop guidelines regarding effective communication efforts to provide auxiliary aids and services to individuals who have communication disabilities. These guidelines should be consistent with the U.S. Department of Justice's guidance for "Effective Communication" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

3.2.7 Design Standard Review

The City of Winchester's "Handicap Ramp Locations" Drawing was reviewed for compliance with the 2010 Standards for Accessible Design and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).

Design Standard Review: Self-Evaluation Findings

A complete list of findings is provided in **Appendix**.

Design Standard Review: Possible Solutions

A complete list of possible solutions is provided in **Appendix**.

3.3 Facilities Review

3.3.1 Buildings

All City owned public buildings were evaluated. All buildings included in the evaluation are listed.

Winchester City Hall
Winchester City Annex
Winchester Fire Hall #1
Winchester Fire Hall #2
Parks & Recreation Maintenance
Swimplex
Citizens Pavilion
All Park Restroom facilities

Buildings: Self-Evaluation Findings

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of issues is provided in the building facility reports (see Appendix). Common issues identified included:

- Non-compliant accessible parking
- Non-compliant entrances
- Non-compliant interior routes to public areas
- Non-compliant room signs

- Non-compliant transaction counters
- Non-compliant drinking fountains
- Non-compliant restrooms

Buildings: Possible Solutions

A complete list of possible solutions is provided in the building facility reports (see Appendix).

3.3.2 Parks

Two parks within the City of Winchester were evaluated. All parks included in the evaluation are listed and shown on the map in **Appendix**.

Winchester City Park
Cowan Road Park

Parks: Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. A complete list of issues is provided in the facility reports (see **Appendix F**). Common issues identified included:

- Non-compliant accessible parking
- No accessible route to amenities
- Non-compliant restrooms
- Non-compliant drinking fountains

Parks: Possible Solutions

A complete list of possible solutions is provided in the park facility reports (see **Appendix F**).

3.3.4 Signalized Intersections

Seven traffic light intersections, 6 flashing light intersections; and 2 school zone flashing lights within the City of Winchester were evaluated. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear space.

Traffic light intersections

- S College St./Bypass Rd.
- Dinah Shore BLVD./Bypass Rd.
- Bypass Rd./Baxter Ln.
- Dinah Shore BLVD./Chamber way
- Dinah Shore BLVD./Porter St.
- 1st Ave NW/High St.
- 1st Ave NW/N. Vine St.

Flashing light intersections

- 1st Ave NW/N. Jefferson St.
- Sharp Springs Rd./Spring Hill Dr.
- Sharp Springs Rd./Chattin St.
- HWY 64/Liberty Rd.
- HWY 64/Holders Cove Rd.
- HWY 64/HWY 16

School Zone Flashing Lights

-2 N. Jefferson St. Clark Memorial

-2 Bypass Rd. Franklin County High School

Signalized Intersections: Self-Evaluation Findings

Common curb ramp issues included excessive flare cross slopes, no flush transition to the roadway, excessive curb ramp cross slopes and counter slopes, and missing or non-compliant texture contrast.

About twenty-five (25) percent of valid pedestrian crossing at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. These were typically locations where “No Pedestrian Crossing” signs were present, but the existing sidewalk, curb ramp, or crosswalk orientations created a valid pedestrian crossing. Pedestrian push buttons and signal heads were recommended to be installed at all valid signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included excessive clear space cross slopes, push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance, non-existent or inaccessible push button clear spaces, and push buttons not oriented parallel with the associated pedestrian intersection crossing.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7

Curb Ramp, which states, “curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.” For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New Construction and Alterations, which states, “newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways.”

Signalized Intersections: Possible Solutions

To meet the federal requirements for curb ramp installations, the following recommendations were made:

- Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, two (2) directional curb ramps were recommended to be installed where geometry permitted. The Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) requires two (2) directional curb ramps be installed during modifications unless there are existing physical constraints.
- Where diagonal curb ramps were installed with the intent to serve a side-street crossing only, receiving curb ramps are still required to be installed on the opposite side of the major street. However, an engineering study should be performed prior to the installation of the receiving curb ramps to determine if the major street crossing is safe to accommodate. If the engineering study determines the major street crossing is unsafe to accommodate, the existing diagonal curb ramps should be removed and replaced with directional curb ramps in addition to the other requirements noted in **Section 3.5 FHWA Guidance on Closing Pedestrian Crossings** being implemented.

A complete list of possible solutions is provided in the signalized intersection reports (see Appendix).

3.3.5 Unpaved Trails

2.3 miles of unpaved trails within City of Winchester were included to be evaluated as part of this project. Upon reviewing these locations, it was found that the trails are Therefore, there are no ADA compliance deficiencies.

3.4 Maintenance Versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification with regard to when curb ramp installation is required as part of a project be distributed to the appropriate City of Winchester staff.

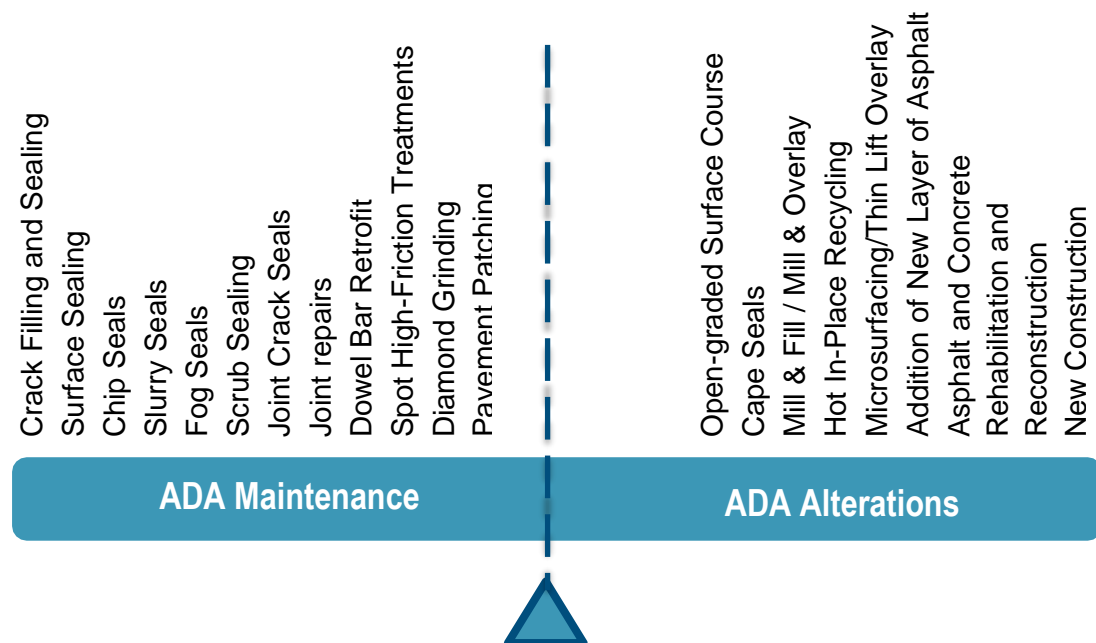
The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

Figure 1. Maintenance versus Alteration Projects



3.5 FHWA Guidance on Closing Pedestrian Crossings

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed if an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb is acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The agency wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Gallatin should also develop and implement a policy on how to close those crossings that are accommodated based on the existing conditions at the crossing location (e.g. existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk serving the crossing) but should not be due to safety concerns.

3.6 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, signalized intersections, sidewalks, and un-signalized intersections. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.6.1 Prioritization Factors for Facilities

1. Cost
2. Number of people affected by issue (is the area open to the public or private for staff only)
3. Budget, amount of money appropriated for entire year and what repairs/updates will be most effective for the cost associated with it.
4. Can the update/repair be done by staff or will the work need to be bid and outsourced.

3.7 Conclusion

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the City of Winchester. In developing the Transition Plan, program, services, and activities were reviewed for compliance with ADA guidelines and a Self-Evaluation was conducted on the following facilities:

- 9 buildings;
- 2 parks; and
- Seven traffic light intersections, 6 flashing light intersections; and 2 school zone flashing lights.

The recommended improvements were prioritized and an implementation plan was developed to provide guidance for the City's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan through working with local citizens with disabilities.

The City is taking the actions referenced below and will continue to look for and remedy barriers to access to ensure that Winchester citizens who are disabled are given access to the City's programs, services, and activities.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the governing body of the City, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. See example of ADA Action Log provided in **Appendix**.

4.0 Staff Training

Training was provided to City staff to address some of the issues identified in the departmental surveys and interviews. The following training session was provided by Richard Stokes, Municipal Technical Advisory.

- Title VI, Title VII, and ADA

City Staff in Attendance: 53

ADA is discussed quarterly at department staff safety meetings, as well as toolbox meetings by supervisors with their employees.

5.0 Facility Costs

5.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from Tennessee Department of Transportation (TDOT) construction projects were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (15%) was added to the subtotal to account for increases in unit prices in the future in addition to an engineering design percentage (20%). All costs are in 2019 dollars. **Table 13** provides a summary of the estimated costs to bring each facility into compliance.

Table 13. Summary of Facility Costs

Facility Type				
	High			Total
Buildings	\$700,000	\$850,000	\$500,000	\$2,050,000
City Sidewalks	\$500,000	\$450,000	150,000	\$1,100,000
Campground	25,000	6,000	\$2,000	\$33,000
Parks	\$175,000	\$82,000	\$5,000	\$295,000
Park Sidewalk	\$45,000	\$20,000	\$4,000	\$69,000

5.2 Implementation Schedule

Table 14 details the barrier removal costs and proposed implementation schedule by facility type for all City-owned facilities evaluated. This 30-year plan will serve as the implementation schedule for the Transition Plan. The City of Winchester reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the City Administrator will coordinate the placement of the projects in the Capital Improvement Program to be addressed on a fiscal year basis.

Table 14. Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget *
Buildings	\$2,050,000	30	\$68,333
City Sidewalks	\$1,100,000	30	\$36,667
Campground	\$33,000	30	\$1,100
Parks	\$295,000	30	\$9,833
Park Sidewalk	\$69,000	30	\$2,300
Park Unsignalized Intersections	\$4,000	30	\$133
Park Pedestrian Bridges	\$50,000	30	\$1,667
Signalized Intersections	\$450,000	30	\$15,000
City Total	\$4,051,000		
Total Annual Budget			\$135,033

* Table values are rounded for simplification.

5.3 Funding Opportunities

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

5.3.1 Federal and State Funding

Table 15 depicts the various types of federal and state funding available for the City to apply for funding for various improvement. The following agencies and funding options are represented in the chart.

- BRI – Bridge - Highway Bridge Replacement and Rehabilitation (HBRRP)
- CMAQ – Congestion Mitigation/Air Quality
- FLH – Federal Lands Highways Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- RHC – Railway-Highway Crossing
- SRTS – Safe Routes to School (Moving Ahead for Progress in the 21st Century Act (MAP-21) now under TAP)
- STBG – Surface Transportation Block Grant

Most of these programs are competitive type grants; therefore, the City of Gallatin is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds.

Table 15. Funding Opportunities

ACTIVITY	BRI	CMAQ	FLH	HSIP	NHPP	RHC	SRTS	STBG	TAP
Pedestrian plan		X		X				X	
Paved shoulders	X	X	X	X	X	X		X	X
Shared-use path/trail	X	X	X	X	X		X	X	X
Recreational trail			X						X
Spot improvement program		X		X			X	X	X
Maps		X		X			X	X	
Trail/highway intersection		X	X	X	X		X	X	X
Sidewalks, new or retrofit	X	X	X	X	X	X	X	X	X
Crosswalks, new or retrofit		X	X	X	X	X	X	X	X
Signal improvements		X		X	X	X	X	X	X
Curb cuts and ramps		X		X	X	X	X	X	X
Traffic calming				X		X	X	X	X
Safety brochure/book		X		X			X	X	X
Training		X		X	X		X	X	X

5.3.2 Local Funding

There are several local funding options for the City to consider, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but

a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.

- Transportation Reinvestment Zone
- Transportation User Fee / Street Maintenance Fee

5.3.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

5.4 Next Steps

The City will begin internal coordination to address the programmatic barriers identified in the Transition Plan.

The City will develop a budget to include the next 30 fiscal years. Projects identified in the ADA Transition Plan will be programmed within the 30-year budget based prioritization provided (see **Section 3.6 Prioritization**) and other factors determined by the City, such as how barrier removal can be incorporated into existing City projects identified for capital improvements.

The City also intends to adopt the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) to enable City enforcement of these guidelines throughout the design and construction process of pedestrian facilities in the public rights-of-way.

Appendix

Appendix A: Departmental Survey and Interview Finding Summaries

Appendix B: Grievance Procedure

ADA Grievance Policy and Procedure with Appeals Process for Title I

ADA Grievance Form for Title I

Roles and Responsibilities of the ADA/504 Coordinator

Public Notice Under the ADA

Appendix C: Programs, Services, and Activities Review

Documents, Forms, and Videos Review

Cursory Website Review

Appendix D: Facility Reports

Employee Training

Public Works Self Evaluation

City Hall Self Evaluation

Police Department Self Evaluation

Fire Department Self Evaluation

Park and Recreation Self Evaluation

Building and Codes Self Evaluation

Public Works Priority 1 1 Self Evaluation

Public Works Priority 2 Self Evaluation

Public Works Priority 3 Self Evaluation

Public Works Priority 4 Self Evaluation

City Crosswalks Inventory

City Sidewalks Inventory/Self-Evaluation

City Sidewalk Compliance Plan

Signalization Self Evaluation

Appendix E: ADA Action Log