

# Town of Nashville

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



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Prepared by:



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## List of Abbreviations/Acronyms

AA – Affirmative Action  
AASHTO – American Association of State Highway and Transportation Officials  
ABA – Architectural Barriers Act of 1968  
ADA – Americans with Disabilities Act of 1990  
ADASAD – Americans with Disabilities Act Standards for Accessible Design  
CDBG – Community Development Block Grant  
CEMP – Comprehensive Emergency Management Plan  
CFR – Code of Federal Regulations  
D.A.R.E. – Drug Abuse Resistance Education  
DDRS – Indiana Division of Disability & Rehabilitative Services  
DHHS – Deaf & Hard of Hearing Services, Indiana Division of Disability & Rehabilitative Services  
DOJ – U.S. Department of Justice  
DOT – U.S. Department of Transportation  
EEOC – Equal Employment Opportunity Commission  
EMS – Emergency Medical Services  
FHWA – U.S. DOT Federal Highway Administration  
FTA – U.S. DOT Federal Transit Administration  
G.E.D. – General Educational Development  
GIS – Geographic Information System  
HR – Human Resources Department  
HTML - Hyper Text Markup Language  
INDOT – Indiana Department of Transportation  
ISA – International Symbol of Accessibility  
IT – Information Technology Department  
NCA – National Center on Accessibility  
OTRB – Over-the-Road Buses  
PDF – Portable Document Format  
PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way  
RA – Rehabilitation Act of 1973  
ROW – Right-of-Way  
RTF – Rich Text Format  
SETP – Self-Evaluation and Transition Plan  
TDD – Telecommunications Devices for Deaf Persons  
TTY – Teletypewriter  
UFAS – Uniform Federal Accessibility Standards

## Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure. In 2018, the Town contracted with DLZ to develop a self-evaluation and transition plan.

The Town of Nashville (Town) has completed a self-evaluation of all Town facilities, including the public right-of-way (ROW), programs, and procedures and prepared a Transition Plan that outlines the necessary steps to be fully compliant with the requirements of Title II of the ADA. The Town will strive to ensure that all residents and visitors are able to access all services, programs and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the Town will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be provided, alternate means to provide the same opportunities to persons with disabilities will be provided.

In performing this self-evaluation, only areas open to the public as well as limited employee-only common use areas, including restrooms, entrances, and break rooms and exterior spaces such as parking lots and sidewalks were assessed. The decision to exclude some areas restricted to employees does not obviate the need of the City to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA. Reasonable accommodation requests from employees should be evaluated on a case-by-case basis to allow employees with disabilities to perform their essential job functions. The following Town facilities that were identified by the Town as having programs/services provided:

- Town Hall (200 Commercial Street)
- Police Department (25 Artist Dr.)
- Public Restroom 1 (Old School Way)
- Public Restroom 2 (Mound Street)
- Public Restroom 3 (Village Green)
- Waste Water Treatment Building (S. Van Buren Street/Treatment Plant Road)
- Public Parking Lots (O’Reilly and Jefferson, Pittman House, Sycamore and Washington, Old School Way Restrooms)
- Village Green

In addition to Town facilities, the self-evaluation reviewed existing Town policies and procedures within each department. The focus of this review began with distribution of a questionnaire to each department, followed by interviews or other data gathering if needed to better understand the responses or the operation of each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced

by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department.

It is the goal of the Town to make facilities for all services, programs and activities fully accessible within 20 years, though this will be largely dependent on a number of economic factors and future changes to the ADA Standards for Accessible Design (ADASAD) or other unforeseen requirements that would necessitate additional improvements to Town facilities. The Town has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the Town is fully compliant with ADASAD standards.

The results of the self-evaluation identified a number of architectural barriers at Town facilities. The estimated cost to correct these deficiencies is over **\$222,740**. In addition, approximately **\$383,020** in pedestrian Right-of-Way facility deficiencies was identified during the evaluation as well and are addressed with an ongoing yearly goal of \$20,000 rather than total cost to correct due to the nature of these improvements. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The improvements will be categorized into a 20-year phasing program to spread the cost for implementation out and address the most serious deficiencies at the most used Town facilities. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances, there are procedural or other modifications that can be made to provide equal access to Town programs and some modifications are not required until renovations are completed. These modifications are noted within this report.

The statements and findings contained in this Transition Plan and supporting information are the opinion of DLZ based on our knowledge and interpretation of ADA requirements. Nothing in this document should be considered as legal advice. Clients are urged to seek appropriate legal assistance as needed on ADA issues.



## 1.0 Introduction and Overview

### 1.1 Introduction

The [Americans with Disabilities Act of 1990 \(ADA\)](#), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by [Section 504 of the Rehabilitation Act of 1973](#). The ADA was signed into law by President George Bush on July 26, 1990, extending civil rights protections to individuals with physical or mental disabilities in the following areas:

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



Figure 1 – Town of Nashville Location Map

The Town of Nashville is located in south central Indiana (Figures 1 and 2) with a population of approximately 1,080 and is the county seat for Brown County. It is classified as a “public entity” pursuant to Title II of the ADA. The Town is also required to comply with Title I, which requires state and local government entities to practice nondiscrimination in all parts of the employment process.

The DOJ is the lead agency that oversees the ADA. The ADA in itself is not enforceable by any state or local governmental unit code official.

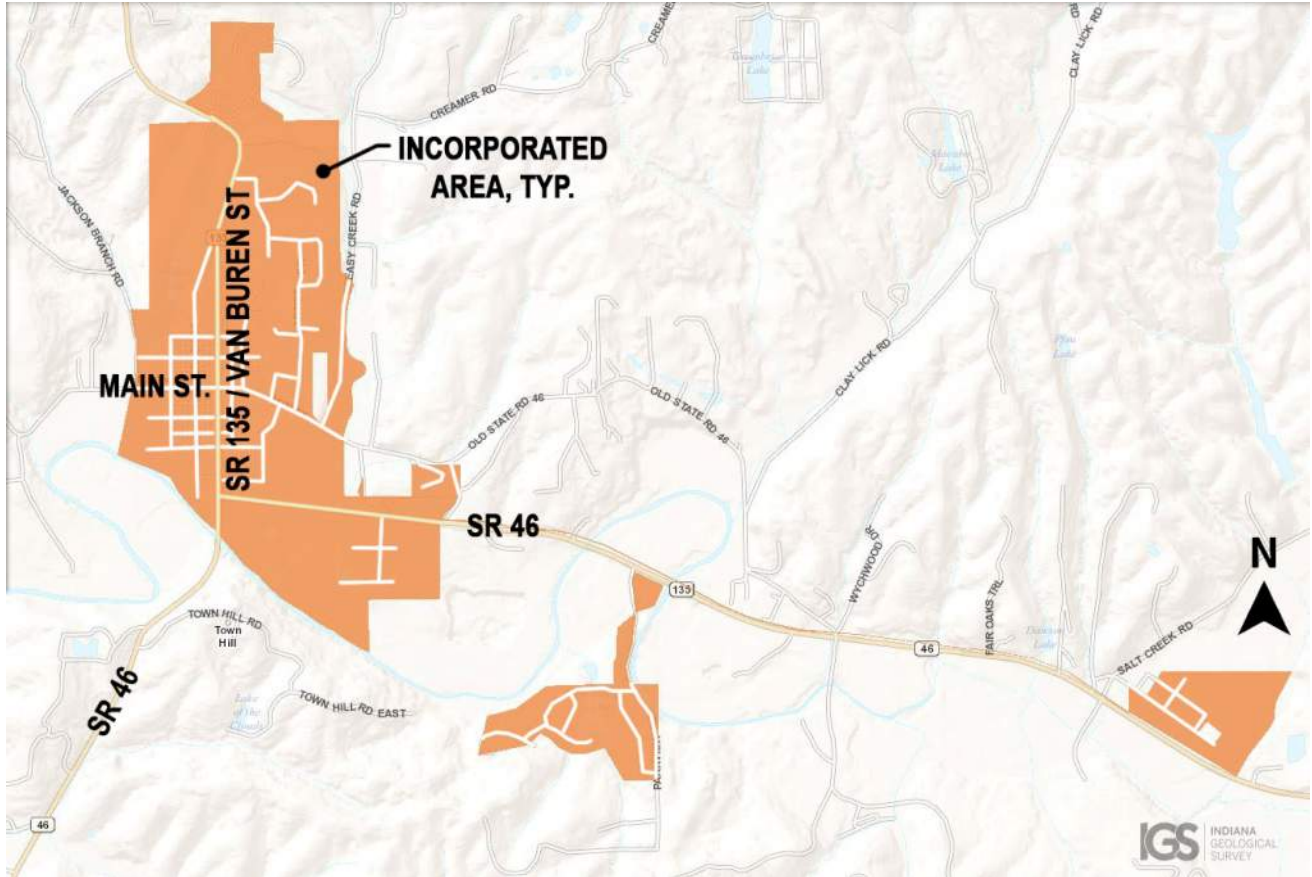


Figure 2 – Town of Nashville Incorporated Limits

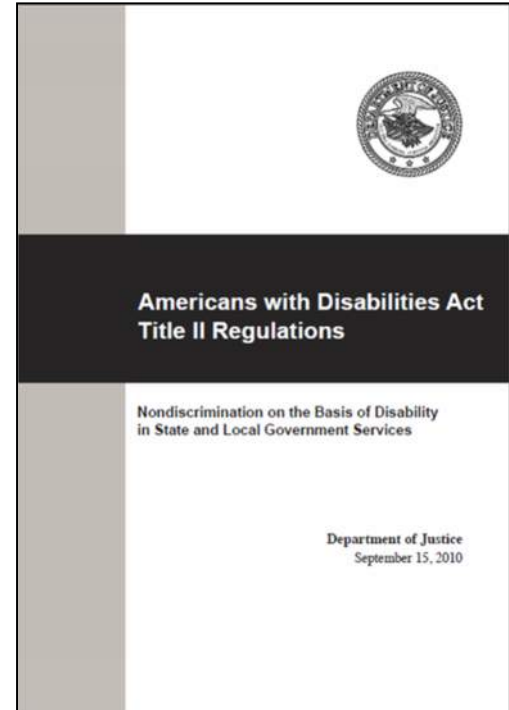
## 1.2 Purpose

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

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

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

1. Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance [28 CFR 35.107 (a)]
2. Administer and write a self-evaluation of the programmatic barriers in services offered by the local government and provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments [28 CFR 35.105]
3. Publicize and inform applicants, participants, and beneficiaries of the Town's policy of nondiscrimination on the basis of disability related to Town services, programs, and activities [28 CFR 35.106]
4. Establish a complaint/grievance procedure to respond to complaints of noncompliance from the public [28 CFR 35.107 (b)]
5. Develop a transition plan if structural changes are necessary for achieving program accessibility [28 CFR 35.150 (a) and (d)]
6. Retain the self-evaluation and provide it for public inspection for three years [28 CFR 35.105 (c)]



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

### **1.3 Transition Plan Overview**

In recent years, the Town of Nashville was made aware of issues related to non-compliance with certain requirements of the ADA by the Federal Highway Administration (FHWA) and Indiana Department of Transportation (INDOT). The Town responded by contracting with DLZ Indiana, LLC to assist in preparing a complete SETP in 2018.

A work plan to assess Town-owned and operated facilities, programs, policies, services, and activities for compliance with ADA was initiated to complete the ADA SETP. This work plan included:

- Facility audit (interior and exterior and public ROW)
- Self-evaluation of Town programs, services and activities
- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Outreach to advocacy groups and the general public
- Prioritize facilities improvements for accessibility
- Develop written transition plan
- Adoption of the transition plan

Facility audits were performed only in those areas open to the public and employee common areas for this project. Areas within Town-owned facilities that are not accessible to the public must also be accessible for employees with disabilities as a requirement of Title I. Accessibility in employee work areas will be assessed

on a case-by-case basis based on the needs of the individual and nature of their disability. The Town is committed to ensuring that all workspaces are accessible pursuant to the requirements of each job and making the necessary modifications when needed. In addition, the Town-owned pedestrian facilities within the public right-of-way (ROW) were evaluated. Other ROW within Town limits but falling under INDOT's jurisdiction (SR 46 and SR 135) was not included as part of the Town's ROW facility evaluation.

A public involvement process was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for structural or programmatic solutions to facilitate the opportunity of access to all individuals are subject to review, revision, and approval of the Board of Public Works and/or Town Council and appropriation of funding to implement the improvements.

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

- Designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA.
- Implementation activities will be part of the Town's annual Capital Improvement Plan.

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

For more than 40 years, the Town of Nashville has been subject to many of the non-discrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the [Architectural Barriers Act of 1968](#) (ABA) and [Section 504 of the Rehabilitation Act of 1973](#) (RA).

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

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

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

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by the public.
- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.

- Outdoor recreation standards as they relate to ADA for a variety of facilities were included in the 2010 ADA Standards for Accessible Design (ADASAD). Standards for amusement rides, boating and fishing facilities, exercise machines and equipment, golf and miniature golf facilities, play areas, and swimming/wading pools and spas went into effect on March 15, 2012 for all new or altered facilities.

The primary focus of this report is to assess the compliance of Town of Nashville facilities, programs, policies, services, and activities related to Title II of the ADA. Title II of the ADA was effective on January 26, 1992.

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

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

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

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

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

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access. The Town is required to provide program access, which means that programs, services, and activities when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

When choosing a method of providing program access, the Town will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the Town is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community. [[28 CFR 35.130\(a\)-\(b\)\(1\) \(vii\)](#)]
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity. [[28 CFR 35.130\(b\)\(2\); \(d\)](#)]
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters. [[28 CFR 35.130\(f\)](#)]
- Allow a person with a disability to participate in a program, service or activity regardless of disability. [[28 CFR 35.130\(g\)](#)]
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity. [[28 CFR 35.130\(b\)\(8\)](#)]
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities [[28 CFR 35.130\(b\)\(7\)](#)]
- Furnish auxiliary aids and services when necessary to ensure effective communication. [[28 CFR 35.160\(b\)\(1\)-\(2\)](#)]
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities. [[28 CFR 35.163](#)]
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location. [[28 CFR 35.150\(b\)\(1\)](#)]
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities. [[28 CFR 35.151](#)]

## **1.6 Undue Burden**

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

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

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

The purpose of this ADA SETP is to document the Town's review of access to facilities, programs, services, and activities by individuals with disabilities in order to determine if there are any discriminatory or potentially discriminatory practices, policies, or procedures.

In accordance with the Title II requirements for self-evaluation, the Town of Nashville:

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

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

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

## **1.8 Facility Audit**

In 2018, audits of building interiors and exterior site features were performed. These audits included only in those areas of each facility that are open to the public and employee common use areas. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements.

Photographs of architectural and site conditions at the time of the inspection for all building amenities were taken for the record. The specific site and architectural improvements recommended to remove barriers and improve accessibility are listed in the appendices.

The locations of Town facilities and parks (by number) are shown in Figure 3 overlaid on map provided via IndianaMAP on the following page.

**Town Facilities (Owned or Leased)**

1. Town Hall
2. Police Department
3. Public Restroom 1 and Public Parking Lot (Old School Way)
4. Public Restroom 2 (Mound Street)
5. Public Restroom 3 (Village Green)
6. Waste Water Treatment Building
7. Public Parking Lot - O'Reilly and Jefferson
8. Public Parking Lot - Pittman House
9. Public Parking Lot - Sycamore and Washington

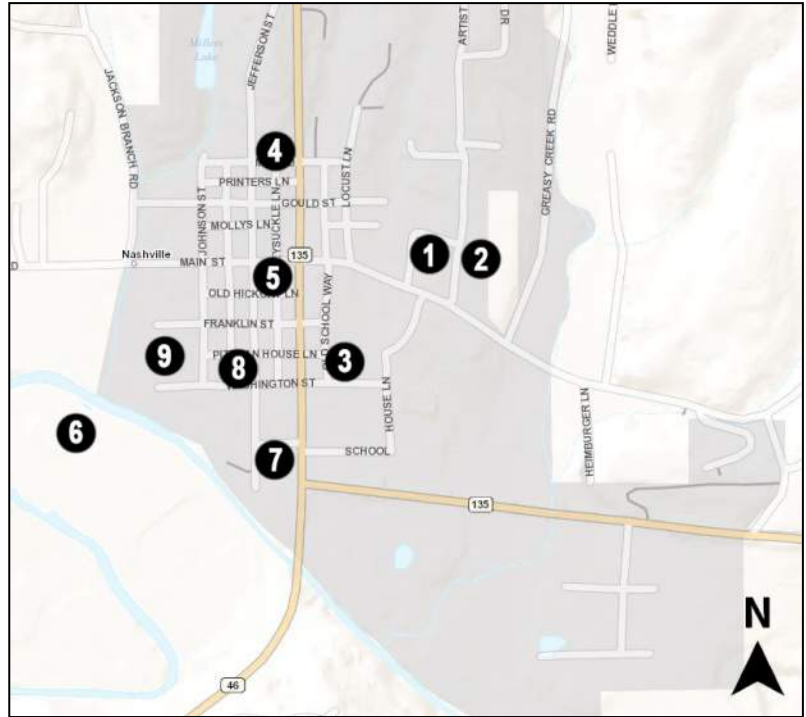


Figure 3 – Facilities Location Map

**1.9 Town Administration and Departments**

There are several distinct departments that provide Town services, programs, and activities that are accessible to the public. The level of interaction of each Department is classified as extensive (high numbers daily), regular (variable but generally low numbers daily to weekly), limited (generally weekly or less), or none. These Departments and descriptions of their functions and types and regularity of interaction with the public are:

**Clerk Treasurer (200 Commercial Drive)** The Clerk Treasurer is an elected position that is in control of creating a balanced budget, running local elections, and making sure appropriate paperwork is filed with State and Federal Government for the Town to be compliant. This office is also in charge of all billing for the water/sewer department. They deal with accounts payable as well as receivables. An IT person handles all postings, minutes, and upkeep of the Town’s website. Interaction with the public is extensive.

**Administration (200 Commercial Drive)** The Administration is responsible for scheduling, purchasing, and business needs for utilities and direct management of the utility employees. They work with outside contractors needed in conjunction with employees. They are in charge of any major Town projects and oversee these projects to finish. Interaction with the public is regular.

**Nashville Municipal Utilities (200 Commercial Drive and 10 Treatment Plant Road)** This department handles tasks related to water, waste water, sewer and streets. The utilities department is responsible for distribution of water to over 1,300 customers. The waste water treatment plant is responsible for processing and breakdown of sewer waste from over 700 customers. The street department cleans and maintain the streets in the town limits. The Town also maintains storm sewer and works with the county’s sewer district as needed to facilitate potential future expansion. This department also provides enforcement of the Town’s local ordinances. Interaction with the public is typically limited.



**Town Council (200 Commercial Drive)** The Town Council is an elected board of five people that oversee the making of new ordinances for the Town, approve the Town budget, and appoint the appropriate people needed to conduct Town business and public services. Interaction with the public is regular.

**Nashville Metropolitan Police Department (25 Artist Drive)** The police department provides law enforcement services to the Town of Nashville, its residents and visitors. They also provide information on firearm licensing. Interaction with the public is regular.

### **1.10 Department Self-Evaluation**

As part of this self-evaluation, DLZ provided a questionnaire to the ADA Coordinator in order to better understand the operation and services offered by various Town departments regarding ADA compliance. The sample questionnaire is located in Appendix C and answers were used to compile the information in this SETP. Policies, programs, activities, and services were evaluated and where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Section 2.18 Department Self-Evaluation - Findings & Recommendations.

### **1.11 Public Outreach**

Public outreach began by publishing a notice in the local newspaper (The Brown County Democrat) to solicit input from the public about barriers or perceived barriers that might exist to access or use of Town facilities. Notices were also sent by U.S. mail to several local and regional disability advocacy groups (see *Appendix D*). The public comment period was open from October 3 through October 17, 2018. No public comments were received.

Following completion of the draft SETP, it was made available for public review. It was placed at the following locations in Nashville:

- Town Hall - 200 Commercial Street, Nashville
- Brown County Public Library (Circulation Desk) – 205 Locust Lane, Nashville

The report was available from July 6 to July 20, 2020. A meeting to receive public comments on the draft ADA SETP was held on July 16, 2020 and comments were accepted until July 20, 2020. During the public meeting, it was noted that the Town had moved into a new facility for the Police Department since the initial facility evaluations. The new facility was evaluated following the meeting and included in the final plan. Attendees noted that grant information available to help make facility and right-of-way improvements would be helpful. Suggested grant information as available is included in Section 7.0 ADA Tool Kit. Lastly, it was requested that the Town's newly formed Bicycle & Pedestrian Advisory Board be involved in implementation of any ROW improvements. Information presented at the public meeting can be found in Appendix D.

Outside of the public meeting, the following public comments were received:

- Suggested the Town have some type of motorized cart or other type of pick up/drop off available to shoppers who have a hard time walking long distances.
- Consider issues with the pay parking lots not allowing people to park in their lots to run in & pick something up.
- Some sidewalks could be improved on.



## 2.0 Self-Evaluation of Town Policies, Services, Activities, and Programs - Findings & Recommendations

This section of the self-evaluation summarizes the review of current Town-wide policies, services, activities, and programs based on meetings with Town staff and responses to the program accessibility questionnaire received from Town departments and divisions. The findings and recommendations contained in this section will provide the basis for the implementation of specific improvements for providing access to Town programs.

### 2.1 Program Evaluation Interdepartmental Memo

The self-evaluation of the Town's services, programs, and activities required and involved the participation of every Town department. Town of Nashville evaluated its policies, procedures, and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. DLZ distributed questionnaires to the Town ADA Coordinator as one measure to determine the level of ADA compliance (see *Appendix C*).

The primary purpose of this questionnaire was to allow DLZ staff to better understand how each department operates and the programs provided by each so that an accurate assessment can be made of architectural and procedural barriers and how each can be corrected to provide access. The level of investigation into the operations of the various departments was generally consistent with the amount of interaction with the public and the extent of the public programs offered by each.

### 2.2 Overall Findings – General Policies and Practices

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

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on Town Property
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Employment

The findings and recommendations in the following subsections apply to all departments.

### **2.3 Public Information**

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

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

- A poster entitled “Equal Opportunity is the Law”, defining the requirements of Title VII, is located at Town Hall in the front office.
- Grievance procedure is not available on the Town website.
- Non-discrimination notice/request for accommodations is not included on printed public meeting notices.
- Signage is not present for directing visitors to the accessible entrances where multiple entrances are present and not all are accessible. The International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances.

#### **Recommended Action:**

- Standard language for a Notice of Nondiscrimination needs to be used by all departments for all Town publications and printed materials. This statement should include, at a minimum, the following language: *“The Town of Nashville acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Nashville, should contact the ADA Coordinator at (812) 988-5526 or scassiday@townofnashville.org as soon as possible but no later than three business days before the scheduled event.”*
- As standard practice, the Town public notices and agendas need to include a statement regarding requests for accommodations for compliance with ADA as noted above. The statement should list a TDD/TTY (TeleTypewriter) number. Public notification should always identify a contact person for individuals with disabilities who may request program modifications, or information on how a hearing or speech impaired person could communicate by telephone.
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other Town activities. The Town should endeavor to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- Include the following notice on all materials printed by the Town that are made available to the public: *This publication can be made available in alternative formats, such as Braille, large print, audiotape, or .pdf. Requests can be made by calling (812) 988-5526. Please allow three business days for your request to be processed.*
- List Town departments, and specialized services that offer TDD/TTY in printed Town directories. (See also section 2.11 and 2.12).
- Signage directing visitors to Town buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.

## **2.4 Designation of ADA Coordinator**

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

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

- The Town of Nashville appointed the Town Superintendent as ADA Coordinator at their regular meeting on December 20, 2012. The current position being utilized as ADA Coordinator is the Utilities Manager.

**Phyllis Carr, ADA Coordinator**

**Phone: (812) 988-5526 Email: [pcarr@townofnashville.org](mailto:pcarr@townofnashville.org)**

### **Recommendations:**

- Contact information should be consistent for all inquiries directed to the ADA coordinator.
- Activities related to ADA compliance should be directed to the Coordinator, and each Town department should designate a liaison for ADA issues and publicize the identity of this person.
- Information regarding the identity of the Town's ADA Coordinator should continue to be provided to staff, posted at all Town facility locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the Town website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the Town.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.

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

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

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

- Upon initial review, the Town of Nashville records indicated that grievance procedure that provided for resolution of complaints was in place but this document could not be located. After learning of this deficiency, the Town developed and adopted a new documented grievance procedure which indicates how the grievance shall be initiated with the Town, how the complaint should be filed, contact information, description of the timeline for filing, resolution, and appeal of said complaint. This was officially discussed and approved at the Town meetings on September 17 and October 15, 2020. The full procedure can be found in Appendix E.

### **Recommendations:**

- Centralized record keeping of complaints and tracking of complaint resolution will help the Town to regularly update its compliance efforts, and plan for additional compliance implementation. The ADA Coordinator should ensure that records are kept of all ADA-related complaints, including informal items brought to their attention.
- Information regarding complaint procedures should be available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.

- The Town should review its current administrative policy and be able to provide the ADA Complaint Form in an alternate accessible format, i.e. Braille, audio-tape, e-text, large print, etc.
- Administrative policies and procedures should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.
- The new grievance procedure should be made available on the Town website and at the Town offices to be readily accessible to the public.

## **2.6 Public Meetings**

Public meetings are routinely held by various Town departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.150 \(a\)\(1\); \(b\)\(1\)](#)).

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

- The following boards/commissions meet at various times on Town business and would be considered open meetings that can be attended by members of the general public. These meetings are typically held at Town Hall unless otherwise noted below. Other groups may meet, but do not have regular published schedules.
  - Arts and Entertainment Commission
  - Development Review Commission
  - Main Street Committee
  - Nashville Tree Board
  - Nashville Park Commission
  - Parking and Public Facilities/Food and Beverage Commission
  - Redevelopment Commission
  - Nashville Metropolitan Police Merit Commission (Police Department meeting room)
- The Council Chambers has an audio system and the Town indicated it is equipped with assistive listening devices. These devices are Telex Sound Mate AAR-10 for use with headphones. No hearing aid compatible receivers are provided.
- Police Department meeting room is not typically open to the public and is not equipped with any audio equipment. When meetings are held, the agenda is posted at the PD front door and at Town Hall.
- Most Town departments have not been requested to provide accommodation at meetings in the past.
- There is no statement regarding request for accommodation on meeting agendas.
- All meetings are advertised in the local paper (The Brown County Democrat), on the Town website, and at Town Hall.
- The Town generates audio recordings of Council meetings and are made available following processing of meeting minutes.

### **Recommendations:**

- The Town should continue to schedule and hold public meetings in the most accessible locations whenever possible. Meetings which the public regularly attends should be made the highest priority.
- Standard language on all Town meeting agendas regarding availability of and request for accommodations should



*International Symbol of Hearing Loss on ALS Signage*

be provided to departments. This could include language similar to the following: *“Individuals with disabilities who require accommodations for participation in meetings must request accommodations at least 3 business days ahead of the scheduled meeting. Contact NAME, ADDRESS, PHONE, EMAIL as soon as possible but no later than 3 business days before the scheduled event.”*

- The Town should develop procedures for obtaining and providing auxiliary aids such as sign language interpreters, readers, descriptive services, and other assistive technologies. It is typically recommended that Assistive Listening Systems and Devices be made available at public meeting rooms even if not required by the standards. (See also section 2.11.) Compliant signage that includes the International Symbol of Access for Hearing Loss should be installed where assistive listening devices are available.
- The Town should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings. (See also section 2.11.)
- Consider purchase of a hearing-aid compatible assistive listening device.
- Provide meeting agendas and minutes in alternative formats when requested.
- The Town should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all Town departments for their programs and events.

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

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

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

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to Town programs, services, or activities.
- Public meetings are generally held in locations that are thought to be accessible to persons with mobility impairments and staff had no recollection of any previous complaints of issues.

### **Recommended Action:**

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas.
- Front line staff such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities.
- The Town should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services, and activities.
- The ADA Coordinator should continue to monitor programmatic access and make necessary changes to ensure access.

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

The Town could provide opportunities for private organizations to utilize Town facilities for special or private events. Contained within the ADA are two titles that pertain to public and private entities. Public entities are not subject to Title III of the ADA. Conversely, private entities are not subject to Title II. In many situations,

however, public entities have close relationships with private entities that are covered by Title III (Public Accommodations), with the result that certain activities may be at least indirectly affected by both Titles. This is the case with certain special events or private organizations that may use Town facilities.

**Self-Evaluation Findings:**

- The Town accommodates requests to utilize Town facilities such as the Village Green. The rental forms (Village Green Usage Permit and Village Green Pavilion Rental Agreement) do not address any accessibility requirements by the end user nor do they specify whether facilities available for use are accessible.
- The Town hosts a limited number of special events throughout the year. These include the Nashville Police department's carnival "Nashville Night Out", three parades, and associated carnivals. Typically, parade/carnival events are run by local organizations and the Town assists by blocking streets as needed.

**Recommended Action:**

- Guidelines or policies should be in place for ensuring that any Town sponsored special events, such as the parades and carnivals, are accessible including items such as accessible parking, designated wheelchair seating, and accessible restroom facilities.
- In situations where private organizations sponsor events in Town facilities, the Town should encourage private organizations to comply with applicable ADA requirements. The Town may want to provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA, if applicable.
- The Town should thoroughly review the current accessibility conditions of the facilities available for public use and indicate availability of accessible facilities on the rental request form and any other locations where the Town may list these facilities as available for public use.
- The Town should consult the Town attorney for any appropriate language in the Usage Permit about accessibility needs.
- If any Town employees participate in speaking engagements on the Town's behalf, they should coordinate with the host group regarding presence of any assistive listening devices or other available accommodation.

## **2.9 Contracted Services and Contractors**

Public entities cannot use contract procurement criteria that discriminates against persons with disabilities ([28 CFR 35.130 \(b\)\(5\)](#)). In addition, selected contractors should be held to the same nondiscrimination rules as the Town.

**Self-Evaluation Findings:**

- No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.
- Engineering services are contracted mainly via Requests for Qualifications.
- The Town does not currently act as leasee or lessor for any premises.

**Recommended Action:**

- All Town contracts should be reviewed to ensure that they include specific, detailed ADA language to ensure that contractors that provide Town services to the public comply with the ADA.
- It is recommended that the Town consider means to maintain compliance when contracting for services by including ADA compliance requirements in new requests for proposals and reviewing ADA requirements when contracts are negotiated, revised, or renewed.



## 2.10 Customer Service, Satisfaction, and Input

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

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

- Public notices of this SETP process were advertised in the local newspaper (The Brown County Democrat) and invitations extended to local advocacy groups via US mail.
- No complaints or grievances were reported related to inability to accommodate customers with disabilities or inability of persons with disabilities to access Town programs or facilities.

### **Recommended Action:**

- Conduct periodic customer satisfaction surveys or gather input from recipients of Town services using an alternate method, such as public hearings or focus groups. An additional emphasis should be made to survey individuals with disabilities and organizations representing individuals with disabilities.
- Partner with persons with disabilities, their caregivers, and advocates for the disabled to identify concerns and gather comments on capital improvement projects to improve accessibility to people with disabilities during design.

## 2.11 Equally Effective Communication

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

### **Auxiliary Aids and Services**

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

- The meeting room at Town Hall has a sound system and ALD. See Section 2.6 for additional information on ALDs provided.
- No departments have hired/utilized transcription services and readers.

#### **Recommended Action:**

- The Town should provide staff training and information regarding auxiliary aids and effective communication. Encourage staff to offer



*Sign Language Interpretation*



*Volume Control Telephone*



*Telephone Typewriter (TTY)*



*Assistive Listening Systems*

alternate means to complete transactions and assistance to complete Town forms if possible.

- ALDs should be provided in the meeting room at Town Hall to provide better access for persons with hearing impairment attending Council meetings and other public offerings.
- Compliant signage that includes the International Symbol of Access for Hearing Loss should be provided outside of all rooms that provide ALDs and staff should be trained on operation.
- The Town should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc. This list should be made available to the public to inform them of services available and how they can be accessed by persons needed accommodation.

### **Interpreter Services**

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

- No departments indicated use of or request for interpreters.

#### **Recommended Action:**

- The Town should consider a Town-wide contract for qualified sign interpreter services that departments could utilize as needed. At a minimum, a list of qualified individuals should be maintained for all potential services that might be required on short notice. The Town could also explore the viability of providing qualified sign interpreters from a remote location and transmitting the disabled participant's response to the interpreter in accordance with [28 CFR 35.160\(d\)](#). Interpreters should be provided upon request for accommodations or in situations where an interpreter is known to be required.

### **Telecommunications Devices for the Deaf**

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

- The Contact page on the Town's website does not identify numbers capable of use with TDD/TTY.
- The Contact page does not include a listing for the ADA Coordinator.
- The Brown County 911 system is equipped with TTY/TDD.
- The Police department utilizes text messaging through dispatch as needed and field officers use notes when needed to communicate with members of the public.

#### **Recommended Action:**

- Where 911 is publicized, it should identify the method of communicating with hearing impaired persons.
- Where the Town uses an automated answering system for receiving and directing incoming telephone calls, the Town should enable this system to provide real-time communication with individuals using auxiliary aids and services, including TTY and telecommunications relay systems ([28 CFR 35.161\(b\)](#)).
- The Town should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.

### **Website**

Currently there are no adopted standards for websites that apply to Title II or Title III entities. However, numerous lawsuits have been filed recently, alleging discrimination due to websites not meeting the Web

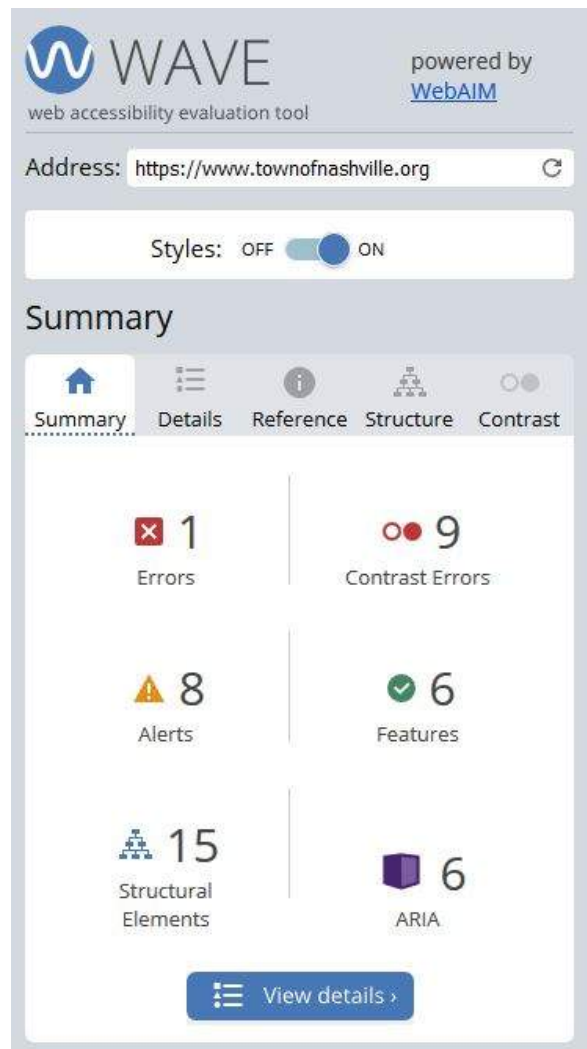
Content Accessibility Guidelines (WCAG), which apply to federal websites. Some decisions that make it to Federal Appeals Courts may be binding to all similar entities in that court jurisdiction. It is very likely that the WCAG will be the enforceable standard for all websites at some point in the future. It is highly recommended that all Title II and Title III entities work towards modifications to websites to meet WCAG sooner rather than later.

**Self-Evaluation Findings:**

- The main Town website is [www.townofnashville.org](http://www.townofnashville.org)
- Online bill pay is available via the PayGov.US website linked from the Administration and Utilities page.
- An interactive calendar featuring Town meetings and events is provided.
- The Town Council page includes information on the Council, meeting minutes (including audio recordings) and agendas, ordinances, resolutions, and proclamations.
- Each board and commission has a separate page indicating purpose and meeting schedules, and providing various applications, forms and documents.
- A Links tab offers links to other websites for Brown County government, tourism, and local services.
- The Contact page provides telephone and email contact information for Administration, Clerk-Treasurer’s Office staff, Town Council Members, and the Municipal Operations Consultant, as well as a general contact form.
- Numerous forms are provided via the website. Most documents are provided in a pdf format appearing to allow use of a reader.
- The website is updated on a daily basis by the website developer.
- Running an accessibility check with the Web Accessibility Evaluation Tool (WAVE - <http://wave.webaim.org/>) generated the following information on the main page as an example. The Town website included accessible features such as alternative text (content or function of an image to screen reader users or in other situations where images cannot be seen), headers, lists, and ARIA tabindex (all of which help organize information and provide additional information and navigation for screen reader users.) Errors included missing form labels and low contrast of the tab text, along with alerts including redundant links and insufficient alternative text and link text. Most PDFs, where used, appear to allow use of a reader.

**Recommended Action:**

- Continue to provide PDF documents that are directly converted to PDF and not a scan of the original document. Scans are not compatible with reader programs. If that is not possible, documents could be posted in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF.



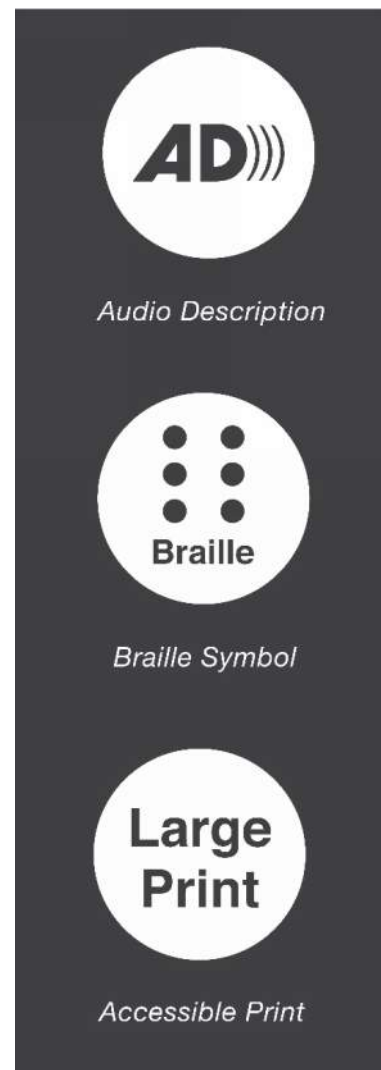
- Consider adding a general disclaimer on Town website “The Town of Nashville cannot confirm the accessibility of third party websites”.
- Consider adding a dedicated page for ADA and Title VI information that appears on the main page of the Town website. ADA-related website content should include publicity of the statement of ADA compliance, contact information for the Town ADA Coordinator, grievance and complaint procedures and form, publication of the self-evaluation and transition plan when completed, an annual list of ADA projects, and a list of the departments that offer TDD/TTY and the phone numbers.
- The Town’s website should be periodically reviewed by the developer to maintain, update, and monitor website accessibility. The following may provide useful information:
  - Utilize an accessibility checklist similar to that published by the Access Board.
  - The University of Wisconsin Trace Center (<http://trace.wisc.edu/world/web/>) provides resources and on-line information that might assist the Town in development and implementation of an accessible website.
  - The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible ([www.w3.org/WAI/](http://www.w3.org/WAI/)).
  - The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility ([www.icdri.org/section508/index.htm](http://www.icdri.org/section508/index.htm)).
  - The DOJ provides a number of resources on their website as well.

**2.12 Alternate Communication Formats**

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

**Self-Evaluation Findings:**

- The ADA Coordinator will be the main point of contact for requesting and providing information in alternate formats on a request for accommodation basis and will communicate with other departments as needed.
- Most Town departments and offices produce printed information that is distributed and available to the public.
- The Town has not been asked to provide written materials and publications in Braille or large print text.
- The majority of the departments do not have a standard procedure to communicate and produce accessible alternate formats for people with disabilities.



**Recommended Action:**

- The Town should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner.
- The Town should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings.

**2.13 Fees and Surcharges**

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

**Self-Evaluation Findings:**

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

**Recommended Action:**

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

**2.14 Information and Signage**

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



**Self-Evaluation Findings:**

- Inaccessible entrances at Town Hall do not provide signage directing users to accessible entrances. Consider adding signage to clarify main entrance location. Most other Town facilities do not have more than one entrance.
- Signage within Town buildings varies. Most do not provide compliant signage and generally are lacking raised text and braille or are mounted in the wrong location. Some do not provide signage at all.

**Recommended Action:**

- An accessible signing strategy for Town facilities should be developed for interior and exterior directional, informational, and permanent room signs.
- Design standards for accessible signs or use of a qualified design professional should be created to guide the production and installation of the accessible signs.
- Signage replacement projects should include replacement or installation of accessible signs as required.

## 2.15 Staff Training

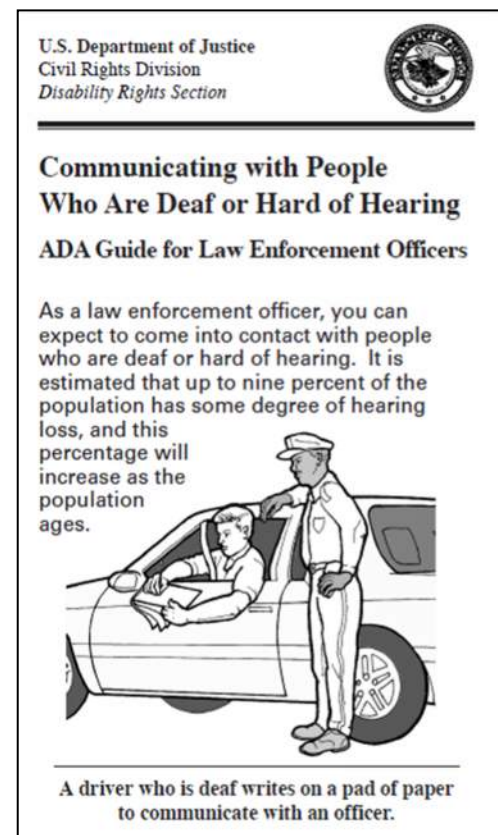
On-going compliance with the ADA can only be achieved if Town staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although training is not required by the ADA, training regarding the requirements of the ADA is recommended.

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

- Phyllis Carr attended ADA specific training in 2017.
- Police Department officers are trained yearly on how to interact with people with mental illnesses, addictive disorders, mental retardation, autism and developmental disabilities.

### **Recommended Action:**

- The Town should provide training regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:
  - Requirements of the ADA for Town of Nashville
  - Consequences of Non-Compliance
  - Disability Etiquette – a good resource is [http://transition.fcc.gov/cgb/dro/504/disability\\_primer\\_4.html](http://transition.fcc.gov/cgb/dro/504/disability_primer_4.html)
  - Acceptable Terminology and Phrases
  - Grievance/Complaint Procedures
  - Reasonable Accommodations
  - Awareness and Sensitivity
  - Accessible Locations for Meetings
  - Consequences of Non-Compliance
  - Barriers to Access – Programmatic and Physical
  - Auxiliary Aids and Services
  - TDD/TTY
  - Building Evacuation Procedures to Assist Persons with Disabilities, especially in multi-story buildings with public access to upper floors
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should coordinate additional ADA training to all Department managers and staff who have regular contact with the public.
- It is recommended that the Police Department continue to receive training on ADA accessibility issues related to their activities. In particular, training on communicating with people who are deaf or hard of hearing (reference [www.ada.gov/lawenfcomm.pdf](http://www.ada.gov/lawenfcomm.pdf)) and developing a policy on the topic as well (refer to [www.ada.gov/lawenfmodpolicy.pdf](http://www.ada.gov/lawenfmodpolicy.pdf)). Review of other guidance should be done as well, including the publication “Commonly Asked Questions About the Americans with Disabilities Act and Law Enforcement” ([www.ada.gov/q%26a\\_law.pdf](http://www.ada.gov/q%26a_law.pdf)).



- Additional training materials may be made available to officers on “Disabilities and Law Enforcement”, which is available on the U.S. Department of Justice web site ([www.ada.gov/policeinfo.htm](http://www.ada.gov/policeinfo.htm)).
- Staff responsible for enforcement and inspection of local building facilities and inspection/plan review for right-of-way facilities should receive relevant training on both the State adopted Indiana Accessibility Code and the more stringent ADA. For right-of-way improvements, this would help ensure new Town facilities are being designed and constructed per current best practices.

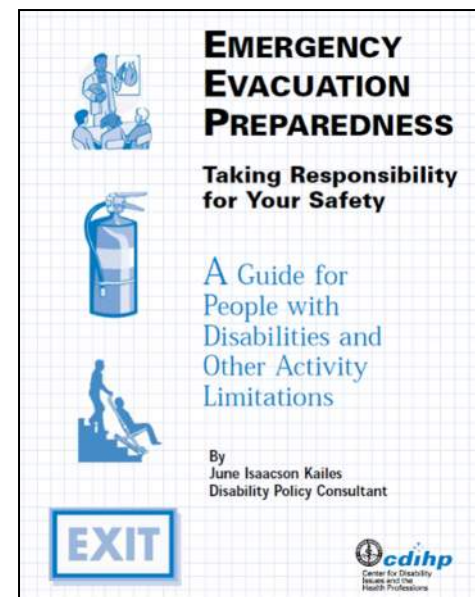
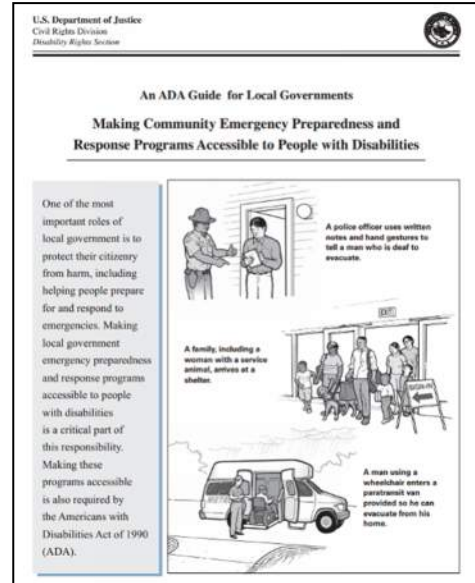
## 2.16 Emergency Evacuation Procedures

The Town is required to establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. These plans and procedures should include identification of assembly locations for persons with disabilities in each facility, staff assigned to ensure that assembly areas are checked prior to leaving buildings during an emergency, identification of assembly locations for pickup and transport of persons with disabilities, and location of accessible shelters to be used for various types of emergencies. Depending on the nature of the emergency, some shelters may not be appropriate.

### Self-Evaluation Findings:

- Nashville is located within Brown County and as such is within the jurisdiction of the Brown County EMA.
- The Brown County EMA works in conjunction with the Indiana Department of Homeland Security (IDHS), United States Department of Homeland Security, and the Office for Domestic Preparedness, and many other State and Federal agencies. They also work with town, city and county response agencies of all types, ensuring preparedness and response capabilities for any manmade or natural disaster that may occur anywhere within Brown County. The EMA is responsible for writing, updating, and disseminating the Brown County Comprehensive Emergency Management Plan (CEMP), Strategic Preparedness Plan, Standard Operating Procedures, Memoranda of Understanding (MOU), and Mutual Aid Agreements. They receive new and updated requirements from IDHS and relay them to County agencies. Brown County is part of IDHS District 8.
- EMA coordinates public and private services in order to assist with public needs during a disaster. Following an event their role is to conduct a county-wide damage assessment in order to qualify for Federal or state disaster recovery funds that may become available.
- The Brown County Local Emergency Planning Committee (LEPC) is responsible for the development of a hazardous materials plan for the county and its municipalities (the Emergency Operations Plan, Hazardous Materials Annex, also known as the LEPC Plan).
- The CEMP was last updated in March 2015.
- The CEMP includes a letter of agreement between Brown County EMA and LEPC, Health, Highway, Sheriff, and Auditor departments, the County 911 Coordinator, **the Town of Nashville (including the police department)**, Brown County School Corporation, Brown County, Fruitdale, Hamblen Twp., Jackson Twp., Van Buren Twp., and Cordry Sweetwater Volunteer Fire Departments, Brown County EMT Association, and the Bartholomew/Brown County American Red Cross.
- The CEMP indicates that a Planning Support Annex for ‘Special Needs Population’ is under development.
  - The Support Annex Summary defines this per the National Response Framework (NRF) as *‘Populations whose members may have additional needs before, during and after an incident in functional areas, including but not limited to maintaining independence, communication, transportation, supervision and medical care. This includes Individuals in need of additional response assistance may include those who have disabilities; who live in institutionalized settings; who are elderly; who are children; who are from diverse cultures; who have limited English proficiency; or who are non-English speaking; or who are transportation disadvantaged. These*

- populations may also include young children not able to identify themselves, older adults with dementia, Alzheimer’s or other psychiatric conditions, deaf, blind, homeless, and minority populations.’*
- The Support Annex Summary also indicates that ‘*the Special Needs Steering Committee comprised of public health and safety agencies and organizations, local first responders, and the County Emergency Management Agency have collaborated to provide guidance for the sheltering and care of special needs populations during a disaster or emergency event. The Special Needs Population Annex provides checklists on the necessary tasks and resources to manage and provide appropriate care to those persons with special needs sheltered within Brown County. The Annex also considers the challenge of evacuating and transporting special needs populations to suitable shelters or to potential locations outside of the county, should the need arise.’*
  - The CEMP include a listing of emergency support functions and the agencies providing those services. These are formalized through written agreements with voluntary organizations and mutual aid agreements between responding organizations and other local, state, federal, and private organizations.
    - The CEMP indicates an existing agreement with Brown County Community Schools Corporation Transportation Department to utilize school bus transportation and bus drivers for use in evacuation from affected areas and/or transportation to clinic sites or shelters.
    - Brown County has established some emergency agreements with local private sector companies and businesses for heavy equipment, generators, food, bottled water, and other key commodities and resources.
    - During disaster operations, numerous private sector and private non-profit organizations provide resources. Included among these are the American Red Cross, Salvation Army, various church-related groups, etc.
    - EMA works with the American Red Cross, who maintains a list of shelters to be used in the event of an evacuation or emergency and assists in coordinating transportation for the public to these locations depending on the nature of the emergency. Shelters in Brown County include several churches, schools, YMCA, and other suitable facilities. Hotel sheltering is used to accommodate special needs per Red Cross guidelines.
    - **The Town of Nashville is listed as a Primary Agency for Public Works and Engineering ESF, and a Support Agency for Transportation, Public Safety and Security, Long Term Recovery, and External Affairs (via elected officials).**
    - CEMP addresses care of animals, but does not indicate any provisions specific to service animals. Per the director of EMA, service animals would need to be accommodated in hotel sheltering.





- The Brown County website includes a link on the Emergency Management to sign up for the Nixle Emergency Alert Program. This voluntary program offers alerts about emergencies and other important community news such as severe weather, unexpected road closures, missing persons and evacuations. This system would allow the County to communicate with large numbers of residents in a wide variety of formats.
- Neither the Town nor County maintain a list of homebound clients and group homes, but handles them as requests are made.
- Emergency evacuation plans are not formalized for any Town facilities. Not all departments have established emergency evacuation procedures to safely evacuate persons with disabilities. The Police department staff is familiar with evacuation routes and emergency procedures for their building.

**Recommended Action:**

- The CEMP should review and address the specific needs for evacuation of persons with disabilities or other special needs. The County should review and update, if necessary, response procedures to include evacuation procedures to evacuate people with disabilities from all buildings, as well as from the community, to suitable shelters depending on the nature of the emergency. Excellent resources can be found at:
  - [FEMA](#)
  - [www.ada.gov/emergencyprepguide.htm](http://www.ada.gov/emergencyprepguide.htm)
  - [www.cdihp.org/evacuation/emergency\\_evacuation.pdf](http://www.cdihp.org/evacuation/emergency_evacuation.pdf)
  - [onlinepubs.trb.org/onlinepubs/tcrp/tcrp\\_rpt\\_150.pdf](http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_150.pdf)
  - [www.nod.org/assets/downloads/Guide-Emergency-Planners.html](http://www.nod.org/assets/downloads/Guide-Emergency-Planners.html)
  - [www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm](http://www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm)
- The EMA should clearly identify and publicize in their CEMP evacuation routes and shelters to be used for various types of emergencies and ensure that vehicles used to evacuate residents are accessible, as are all of the emergency shelters. This would facilitate persons in the community knowing the closest emergency shelter prior to an emergency and allow them to get there sooner, without having to contact the County or other agency to find out where they should go. This is especially important for caregivers of persons with disabilities and group homes that are able to transport their clients.
- Ensure that accommodation can be made for service animals at shelters and that persons with allergies can be provided shelter and accommodation away from them.
- The County should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities, to all employees and volunteers charged with assisting in evacuations.
- The EMA should identify potential sources of equipment that can be made available for persons with disabilities in the event of an emergency. This equipment could include wheelchairs, walkers, etc. that might be left behind at homes or damaged during an evacuation.
- Stress the importance of ensuring that non-profit agencies that coordinate and maintain the list of shelters identify and communicate which are accessible for various disabilities. Work closely with advocacy groups to update lists of homebound individuals and others needing assistance in the event of evacuation.
- Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in the community who may require special assistance in the event of an emergency or natural disaster and encourage residents with special needs to register with the County to ensure that proper assistance can be provided if needed.
- All County staff should be made aware of the location of the posted evacuation routes within their facilities. These routes should be conspicuously posted for the public within each facility.

- Include within evacuation plans for each building guidelines for the evacuation of persons with disabilities for various emergency situations. Each Department should use these guidelines to create their own emergency evacuation plans, which should:
  - Address what to do when an alarm is triggered;
  - Establish meeting places for assistance and evacuation at staircases;
  - Establish floor captains who will ensure that each floor is vacated prior to leaving themselves and ensuring that persons that need assistance are removed to safety.

## 2.17 Employment

Title I of the ADA requires public entities not to discriminate against persons with disabilities in all parts of the recruitment and employment process ([28 CFR 35.140](#) and [29 CFR 1630.4](#)).

### Self-Evaluation Findings:

- The Clerk Treasurer’s Office perform various aspects of human resources by providing services to job applicants, Town employees, and retirees.
- The Town of Nashville Employee Handbook Policies and Procedures is currently undergoing revision and has not yet been adopted. Suggestions were provided to the Town for their consideration in finalizing this document.
- The general Town of Nashville Application for Employment was reviewed with the following findings:
  - The application states that the “Town of Nashville is an equal opportunity employer. This application will not be used for limiting or excluding any applicant from consideration for employment on a basis prohibited by local, state, or federal law. Should an applicant need reasonable accommodation in the application process, he or she should contact a company representative.”
  - It also states ‘Note: Town of Nashville complies with the ADA and considers reasonable accommodation measures that may be necessary for eligible applicants/employees to perform essential functions.’
  - The pdf is a fillable form and appears to be compatible with reader programs.
- The Law Enforcement Employment Application includes the following statements:
  - ‘AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER COMPLYING WITH ALL PROVISION OF THE AMERICANS WITH DISABILITIES ACT’ on the first page.
  - ‘The background investigation phase of the hiring process shall be based upon objective factual findings and any required subjective determination shall be in accordance with the aforementioned policy and conducted in such a manner so as not to discriminate on the basis of race, creed, color, national origin, sex, age or disability.’
  - ‘The Nashville Police Department is an equal opportunity employer and does not discriminate in hiring or employment practices on the basis of race, color, sex, religion, creed, national origin, ancestry, disability as defined by law, political affiliation, or on the basis of age against individuals whose age is between 36 and 70, except when age, sex or physical requirement constitute a bona fide occupation



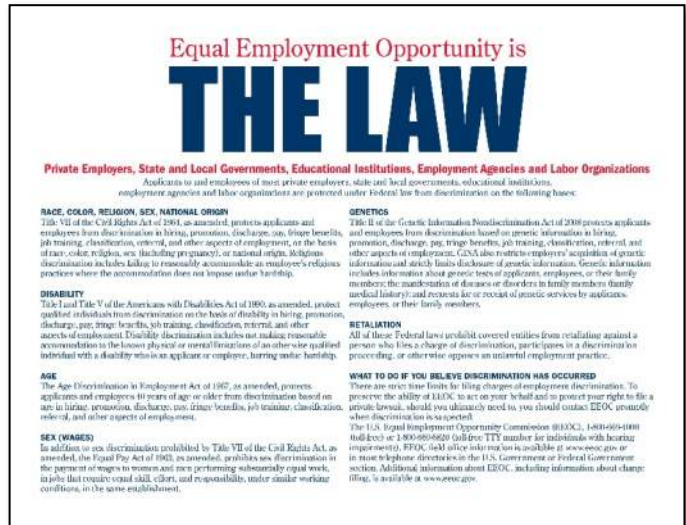
*Reasonable accommodation tailoring workspace for wheelchair user*

*qualification necessary to proper and efficient administration or as provided by law. No question on this application is intended to secure information to be used for such discrimination.'*

- Application does include eligibility requirements related to health such as 'of sound mental and physical health' and eye sight 'correctable to 20/50 and may require agility testing.

**Recommended Action:**

- The Town should continue to practice the Town policies of non-discrimination as required by ADA and other applicable laws.
- Review and incorporate suggested changes to the draft of the Employee Handbook Policies and Procedures. Additionally, updates to Personnel Policy Manual to reflect recent changes to ADA, employment law, and case law should be regularly undertaken.



**2.18 Department Self-Evaluation Findings and Recommendations**

DLZ distributed a questionnaire to the ADA Coordinator that included a request for information about various departments, policies, and procedures of the Town. This information included specific items that the departments were requested to provide information to help DLZ better understand the policies and procedures of each related to ADA understanding, training, and accommodation (see Appendix C). DLZ reviewed responses and coordinated clarifications and questions with the ADA Coordinator. A secondary benefit of the questionnaire is allowing DLZ to gain an understanding of how well the person completing the questionnaire understands the obligation to ensure their programs are accessible and their general understanding of how to provide accommodations. Additional inquiries were also made during the facility evaluations. A general summary follows.

**Self-Evaluation Findings:**

- The Town has departments with daily public interaction that is both in person and over the telephone.
- No departments responded that the programs offered for persons with disabilities were different in any way.
- Many departments have publications, documents, and forms that are available to the public.
- Department liaisons to the ADA Coordinator have not yet been identified.
- The Police Department both works with, and takes action against, numerous people with disabilities. Each incident is handled differently to accommodate the specific needs of the individual. For example, they might need to provide a special transport to the hospital if the person (or their mobility device) is unable to fit into a police car or personal vehicle or the type of charging for a person might be filed differently because a person may not be able to be placed into the jail. They work with mentally disabled people on daily patrols and provide specific accommodation to meet each person's needs. No special accommodations have been requested for printed materials.

**Recommended Action:**

- Public interactions with persons needing special accommodation due to a disability is likely to occur for all departments at some point. Training should be provided to all departments to review how to accommodate various disabilities and provide the same level of service.

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

## 2.19 Ordinances, Design Standards, and Other Documents

Title II entities typically have a number of documents that specify requirements, design standards, and other requirements for construction of various facilities. Often, these documents reference pertinent guidance, such as state DOT, International/State Building Codes, etc. A review of documents that contain, or should contain, provisions related to accessibility was done by searching key words where possible.

### Self-Evaluation Findings:

- Review of the Nashville Code of Ordinances noted the following references related to persons with disabilities:
  - Chapter 71: Parking regulations include the following:
    - *'No parking zones are hereby defined as those areas of town, streets, and alleys that are marked with yellow curb and/or no parking signs, residential parking permit zones that are marked, and handicapped parking zones that are marked for all vehicles except those bearing handicapped license plates or handicapped parking permits issued by the Indiana Bureau of Motor Vehicles.'*
    - *Penalties are also addressed in this chapter.*
  - Chapter 90: Animals does not include any specific provisions for service animals.
  - Chapter 91: Fair Housing defines as follows: **HANDICAP.** *With respect to a person:*
    - *(1) A physical or mental impairment which substantially limits 1 or more of the person's major life activities;*
    - *(2) A record of having such an impairment; or (3) Being regarded as having such an impairment.*
    - *(4) An impairment described or defined pursuant to the federal Americans with Disabilities Act of 1990.*
    - *(5) Any other impairment defined under I.C. 22-9.5-2-10.*
    - *(6) The term HANDICAP shall not include current illegal use of or addictions to a controlled substance as defined in 21 U.S.C. § 802 (see I.C.22-9.5-2-10(b)); nor does the term HANDICAP include an individual solely because that individual is a transvestite (see I.C. 22-9.5-2-10(c)).*

- Chapter 92: Noise Control exempts *'(I) Noises associated with equipment or animals lawfully utilized by persons with disabilities to accommodate their disability'* from the provisions of the chapter.
- Chapter 93: Streets and Sidewalks contains a number of key provisions for establishment of clear, accessible pedestrian routes.
  - 93.001 prevents obstruction of free use of any sidewalk area and parking vehicles within any sidewalk areas.
  - 93.003 requires property owners to keep their sidewalks in repair, outlines process for addressing neglect of this requirement, including town repair of the issue, providing that *'making of these repairs shall in no manner be construed as relieving the property owner from his absolute and total liability for any and all claims that may result from the sidewalk being out of repair.'*
  - 93.004 prevents downspout discharges over sidewalk. This provision helps prevent ice accumulation and other slip hazards.
  - 93.007 addresses snow removal in that *'it shall be the duty of every owner of any premises abutting a sidewalk in the town to remove, or cause to be removed, all snow and ice from the sidewalk to its full paved width within 24 hours after snow or ice has ceased to fall or in any way accumulate.'* Maintaining clear sidewalks is a key component of providing accessible pedestrian right-of-way facilities.
  - 93.040 sets a 5' width concrete walk as the standard for future sidewalks and states it *'must comply with construction requirements mandated by the Town Superintendent or Planning and Zoning Commission, the construction being specifically of concrete, 5 feet in width unless otherwise required or waived by the Town Superintendent or the Planning and Zoning Commission, and meeting all other requirements conforming with the State Building Handbook or other official reference manuals.'* No reference is made to current PROWAG guidelines as best practice.
- Chapter 113: Offenses Against Public Peace and Safety contains a provision for regulated uses of public streets, sidewalks and rights-of-way. *'No person shall ride or otherwise operate a skateboard, roller skate, scooter or roller blade on the public streets, public sidewalks or public rights-of-way of the town in the areas shown on the attachment, labeled Exhibit 1, of Ordinance 2002-01.'* Other motorized devices are not specifically addressed.
- Chapter 119: Newsracks and Newsstands requires submitting a proposed location for said features to the Town Manager for approval to, among other reasons, avoid impeding the path of ROW users including persons with disabilities.
- Chapter 150: Building Regulations adopts rules by reference including Indiana Building Code and Indiana Handicapped Accessibility Code. No standard or guideline is adopted within the Code of Ordinances to address right-of-way facilities.
- Schedule VIII. Handicap Parking provides a table of zones designated as handicap parking.

**Recommended Action**

- Continue to utilize known standards (IBD, Indiana Handicapped Accessibility Code) for consistency. It is also suggested that the Town incorporate the ADASAD and PROWAG by reference.
- For all documents, ensure updates reflect current nomenclature. For example, remove “handicap” and replace with “accessible” or “disability”.
- Ensure that ordinances or Town policies that apply are consistent with the ADA requirements of Other Power-Driven Mobility Devices (OPDMD). OPDMD is defined in the new rules as “any mobility device powered by batteries, fuel, or other engines . . . that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices... such as the

Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair”. See guidance on OPDMDs at the USDOJ website at [www.ada.gov/opdmd.pdf](http://www.ada.gov/opdmd.pdf).

- Provide training for plan reviewers and field inspectors on the requirements of ADA facilities and ensure that design plans meet the standards and construction meets the design plans.
- Provide references to the various ADA standards and guidelines in all documents that reference design and construction.
- Address all the other items noted above to ensure Town documents properly and adequately address ADA requirements for all properties in the Town.
- Consider an educational campaign regarding the barriers presented, and the prohibition by ordinance, to persons with mobility impairments of blocking sidewalks with parked vehicles (even when those vehicles are within driveways), sidewalk signs, bistro tables, etc.

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

DLZ performed a self-evaluation of the following Town facilities. A comprehensive review of accessibility at all public areas of these facilities was performed consistent with ADASAD.

- Town Hall (200 Commercial Street)
- Police Department (25 Artist Drive)
- Public Restroom 1 (Old School Way)
- Public Restroom 2 (Mound Street)
- Public Restroom 3 (Village Green)
- Waste Water Treatment Building (S. Van Buren Street/Treatment Plant Road)
- Public Parking Lots (O’Reilly and Jefferson, Pittman House, Sycamore and Washington, Old School Way Restrooms)

**Specific information by facility can be found in Appendix A.**

### **Recommended General Actions:**

- There are many interim fixes that can be implemented immediately to address various deficiencies and provide equal access to all users in many cases until permanent solutions are implemented. Other improvements are relatively low cost and should also be considered for implementation in early phases of the Transition Plan. These include:
  - Restripe parking lots to provide compliant spaces, with proper signage, at locations closest to accessible entrances at all facilities. When a facility has multiple parking lots, precedence should be given to the lots that have the most use by the public and are closest to facility entrances or amenities.
  - Develop a master signage plan for all facilities that includes directional signage to accessible entrances outside of facilities and required signage within each facility. Ensure that one entrance at all facilities is fully accessible and that non-accessible entrances are adequately signed to direct the public to the accessible entrance(s). As renovations are made at facilities, upgrade non-accessible entrances until 60% minimum are accessible as required.
  - For objects that protrude inside buildings, either move these items closer to the floor where they are cane detectable, move them outside the pedestrian circulation route in buildings, or place a permanent object that is cane detectable below them. Ensure that vegetation is trimmed so it does not protrude into the path of circulation outside of facilities.
  - As an interim fix, provide a cup dispenser at all drinking fountains below 48” height at a level location that can be used by anyone at functional drinking fountains, along with a waste container.

- Develop a lockset replacement plan for all doors that have knobs that require grasping and turning to open. Ensure that staff inside of rooms with doors that have knobs can see into the hallway in the event someone on the outside cannot open the door or consider a policy that doors with non-compliant hardware are left open at all times during business hours.
- In rooms with light switches above 48" that are operated by the public, consider installation of occupancy sensors and timer controls for lighting control.
- In areas that have all electrical outlets below 15" and/or above 48", consider mounting a power strip or extension cord to the wall that is accessible within the required height range.
- Ensure that compliant pedestrian routes exist from parking to the accessible entrances for all buildings. This may entail new construction or reconstruction of existing sidewalks.
- Determine if adjustments can be made to interior door closers to reduce the opening pressure to 5 pounds or less and/or slow the closing time to at least 5 seconds from 90 degrees open to 12 degrees from closure. If this cannot be attained, a new closer will need to be purchased.
- Review corrective actions needed for at least one restroom for each facility and provide signage to direct persons from non-accessible restrooms to the accessible one.
- Ensure that all public assembly areas (meeting rooms and courtrooms) have the proper number and types of assistive listening devices available and signage is installed alerting people where they are available.
- Consider automatic door openers at facilities with inadequate space in alcoves, excessive opening force requirements, or closing speeds that are too fast for exterior doors. Automatic door closers can also be options for other situations with non-compliant doors.
- Ensure that all departments that have public contact have compliant work surfaces available for persons to complete paperwork or review documents. Also be certain to provide a clipboard that can be used for this purpose as well.
- Move furniture or other obstructions that could be in the way of required clear spaces for persons using wheelchairs.
- Lower or install an additional coat hook in each restroom stall and room where coats may be hung on the wall.
- Consider installation of kick plates on the push side of all doors with glass below 10" above the floor to prevent glass breakage by wheelchair users.
- Reposition items in restrooms that are too high, including soap dispensers, mirrors, paper towel dispensers, etc. In some instances, it may be less costly to provide an additional amenity within compliant height (e.g., add a second mirror on different wall, install a second soap dispenser, etc.).





## 3.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Project Approach

This segment of the self-evaluation plan summarizes the review of current right-of-way (ROW) facilities. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for pedestrian access within the Public Right-Of-Way.

Title II of the ADA ([28 CFR Section 35.150 \(d\)](#)) requires that state and local governmental entities develop a Transition Plan specific to curb ramps or other sloped areas at locations where walkways cross curbs. A curb ramp (or sometimes referred to as a curb cut) is a short sidewalk ramp cutting through a curb or built up to it.



Curb ramps are a relatively small but important part of making sidewalks, crossings at intersections, and other pedestrian routes accessible to people with disabilities. The ADA requires state and local governments to make pedestrian crossings accessible to people with disabilities by providing curb ramps ([28 CFR 35.150 \(d\)\(2\)](#); [35.151\(a\), \(b\), and \(i\)](#)). There is no requirement under Title II of the ADA or proposed PROWAG that sidewalks be made accessible or be provided where they are not currently provided. The law stipulates that the public entity provide curb ramps, or other sloped areas where pedestrian walks cross curbs, that are accessible. New construction or alterations would require that non-compliant sidewalks be improved to the extent possible.

### 3.1 Data Collection and Methodology

The self-evaluation of the Town's public right-of-way pedestrian facilities began with identification of the locations of all sidewalks and curb ramps within the Town limits. These pedestrian facilities were then inventoried and assessed using the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), dated July 26, 2011, as published by United States Access Board. Data collection was completed using Apple iPads and software to record the location of each data collection point, the numerical data, and to correlate the data with a photo of the facility inventoried. The GeoJot+ application by GeoSpatial Experts was used for data collection. The GeoJot+ application provided a platform for the creation of ADA specific attribute lists to track inventory data. Data collection was completed for facilities in place prior to the 2019 construction season. Facilities added after this date should be monitored for compliance by the Town at time of construction.

Some streets within the Town either do not have pedestrian facilities or have pedestrian facilities but are under the control of the Indiana Department of Transportation (INDOT) or Federal Highway Administration (FHWA), such as portions of State Road 46 and 135. These two types of right-of-way areas were not evaluated for compliance.

### 3.2 Database Analysis

Upon completion of the Inventory and Assessment, the data collected was compiled into a summary for each data collection point or location. Throughout the SETP, 'location' refers to a single data collection point. This may be a block, a portion thereof with logical stopping point, such as an alley or area with no sidewalk present, curb ramp, intersection or non-roadway related portion of public ROW. Each location was reviewed for compliance with each criterion required within the PROWAG (or ADAAG as applicable). A barrier ranking (High, Medium, or Low priority) was assigned to the location. Each location was then assigned a cost parameter based on the amount of modification or reconstruction required to achieve accessibility.

### 3.3 Barrier Ranking

The self-evaluation of the public right-of-way takes into account factors such as level of use, degree of danger posed, complaints or requests for repair received, and other factors. These factors can be grouped into two categories. **Contributing contextual factors** account for use patterns and distribution in relation to Town services, residential zones, and other public services. **Physical Impedance factors** include the actual physical characteristics of the specific right-of-way feature and the severity of the barrier to use.

#### ***Contributing Contextual Factors:***

- **Areas of High Pedestrian Activity** – High priority areas include areas with high levels of pedestrian traffic. These included, but are not limited to, those areas adjacent to downtown, schools, community centers, churches, public transportation hubs, retail centers, and parks.
- **Areas with a Higher Concentration of persons with disabilities** – High priority areas include senior centers, assisted living communities, and areas adjacent to medical facilities.
- **Areas of High Volume Streets** – High priority areas include the pedestrian facilities along major arterial streets. These are frequently the connectors between residential areas and destinations such as shopping centers, employment, and medical centers.
- **Areas accessing Places of Public Accommodation** – High priority areas include those pedestrian facilities serving local government offices and facilities, such as municipal office buildings, public libraries, and community centers.

#### ***Physical Impedance Factors:***

- **High priority** - High priority areas include areas with conditions that make travel difficult or impossible for the independent pedestrian and affect the ability of persons with disabilities to access or use a facility or program, or are generally hazardous for any pedestrian. These include, but are not limited to, missing curb ramps, steep slopes, particularly cross slopes impacting lateral balance, changes in level over 1", and fixed obstructions limiting vertical and horizontal clearance, trip hazards, and major protrusions.
- **Medium priority** – Medium priority areas include areas with conditions that make travel moderately difficult, but passable and affect the quality of usage for persons with disabilities to a greater extent than that afforded the non-disabled. These include, but are not limited to, moderate deviations in running and cross slopes, changes in level ½" to 1", obstructions that allow tight passage, landing and PAR width deviations.
- **Low priority** – Low priority areas include areas with conditions that deviate from codes and standards but alternative means of use may be available to provide equal access or opportunities. In low priority areas, conditions may be an inconvenience, but neither travel nor safety is greatly impacted. These areas allow significant usability and independent travel is possible in most cases. These included, but are not

limited to, minor deviations in running and cross slopes, changes in level, landings and PAR width deviations, and presence of standard elements such as detectable warnings not in compliance with guidelines.

### **3.4 Additional Right-Of-Way Elements**

Additional elements that may be encountered during right-of-way evaluation include site furnishings, accessible pedestrian signals, roundabouts, marked or metered on-street parking and rail crossings. These were not encountered during the evaluation of the Town, with the exception of marked on-street parking (see more this section).

If provided in the future, site furnishings should be located on an accessible route, provide clear level ground space for approaches and wheelchair parking adjacent to benches, and meet reach range requirements for any operable parts, such as trash receptacle flaps.

According to the Public Rights-Of-Way Accessibility Guidelines, *‘An accessible pedestrian signal and pedestrian push button is an integrated device that communicates information about the WALK and DON’T WALK intervals at signalized intersections in non-visual formats (i.e., audible tones and vibro-tactile surfaces) to pedestrians who are blind and have low vision.’* Per R209, *‘where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals (APS) and pedestrian push buttons complying with sections 4E.08 through 4E.13 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD)’*. At such time as the Town plans infrastructure improvement projects where new signal construction is included, accessible pedestrian signals should be considered for inclusion. At this time, all signaled intersections within the Town are under INDOT jurisdiction.

#### **On-Street Parking**

##### **Requirements:**

Per R214 of the PROWAG, *‘where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces shall be provided. Accessible parking spaces should be located where the street has the least crown and grade and close to key destinations (R309.1).*

*Where width of sidewalk or available ROW exceeds 14’, an access aisle shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. Access aisle shall comply with R302.7 and shall not encroach on vehicular travel lane. An access aisle is not required where width of adjacent ROW is less than or equal to 14’. Where an access aisle is not provided, the parking spaces shall be located at the end of the block face (R309.2). Where perpendicular or angled parking is provided, an access aisle 8’ wide minimum shall be provided at street level the full length of the parking space and shall connect to a PAR. (309.3)’*. Where accessible parking is provided at angled parking, it is also recommended that the access aisle be located on the passenger side to facilitate deployment of a lift from the vehicle.

Parking space identification signage is required per the ADAAG. Signs shall include the International Symbol of Accessibility. Signs should be located 60” minimum to bottom of sign if not located on pedestrian circulation route, with 80” minimum from finish grade provided if along pedestrian circulation route to avoid protruding objects. For parallel parking, they should be located at the head or foot of the parking space per R211.4.

On-Street Parking Self-Evaluation Findings:

Marked on-street parking within Nashville is located in the highest traffic areas of the downtown. In some adjacent residential areas, on-street parking is allowed but not marked, and therefore not required to include designated accessible spaces.

Marked parking within the Town consists mainly of parallel parking. Counts were taken on each block face where marked parking is provided to determine the number of parking spaces required. Currently, 10 spaces are designated as accessible. Per the parking counts, the Town needs to provide a total of 17 accessible spaces for compliance. Parking requirements are calculated on and to be provided on a per block face basis. See the On-Street Parking Spaces exhibit in Appendix B for specific counts and locations.

Detailed evaluations were completed for only those areas where existing accessible spaces were provided.

In general, these observations were made:

- Accessible signage was missing at 3 locations.
- Slopes exceeded 2% maximum at 5 locations.
- Not located adjacent to accessible route or ramp and/or ramp was not compliant at 8 locations.
- No accessible parking provided or provided insufficient quantity on 7 blocks.

Addressing the Issue of On-Street Parking:

Providing spaces may be as simple as providing pavement markings and signage. Other areas may require regrading and repaving of the parking space to meet slope requirements, and/or installation of accessible curb ramps where none is provided adjacent to the proposed space.

Each block face surveyed should be analyzed to determine the most logical placement of the required parking spaces. Priority should be given to those areas serving local government offices and facilities and highly used retail and placed to offer the shortest accessible route to such services. In some cases it may be beneficial to relocate required spaces to nearer higher use facilities rather than distribute the spaces throughout the block.

Probable costs to correct (2020 dollars) are included on the next page. Further description of detailed evaluation is included in Appendix B - On-Street Parking Self-Evaluation Inventory.



*Accessible signage is provided at several designated parking spaces, but not all are located at correct heights or relative to the parking space.*



*Accessible parking was frequently not located adjacent to a compliant curb ramp.*

Table 3.1. Summary of On-Street Parking Probable Cost To Correct

<b>On – Street Parking Summary</b>	
Low Priority	\$600
Medium Priority	\$2,400
High Priority	\$900
<b>Total Estimated On-Street Parking Improvement Costs</b>	<b>\$3,900</b>

### 3.5 Future Improvements

While the Americans with Disabilities Act does not require pedestrian facilities in the absence of a pedestrian route, it does require that pedestrian facilities, when newly constructed or altered, be accessible. Pedestrian facilities would include, but not be limited to, sidewalks, curb ramps, pedestrian signals, and sign furnishings. The previous sections of this SETP addressed those facilities already existing. The focus of this section is on future construction and connection of existing corridors.

While Town construction projects do typically include pedestrian facilities, not all project areas are suitable for pedestrian use and should be evaluated on a case by case basis for user safety and need to determine the appropriateness of pedestrian facilities in any given corridor.

Additionally, when planning for maintenance of existing roadways and pedestrian facilities, it is important to understand what roadway work triggers curb ramp work. Projects that include alteration to a street or roadway require installation or upgrade of curb ramps at the time of improvements. Maintenance applications do not require curb ramps at time of improvement. Joint technical assistance is available from DOJ, DOT and FHWA and may be helpful in understanding ADA requirements where roads are resurfaced and what work is considered alteration vs. maintenance. This can be found at the following web addresses:

- [https://www.fhwa.dot.gov/civilrights/programs/doj\\_fhwa\\_ta.cfm](https://www.fhwa.dot.gov/civilrights/programs/doj_fhwa_ta.cfm)
- [https://www.fhwa.dot.gov/civilrights/programs/ada\\_resurfacing\\_webinar.pdf](https://www.fhwa.dot.gov/civilrights/programs/ada_resurfacing_webinar.pdf)

*‘The challenge for transportation planners, highway engineers and bicycle and pedestrian user groups, therefore, is to balance their competing interest in a limited amount of right-of-way, and to develop a transportation infrastructure that provides access for all, a real choice of modes, and safety in equal measure for each mode of travel.’*

(Excerpt from FHWA’s *Accommodating Bicycle and Pedestrian Travel: A Recommended Approach*)

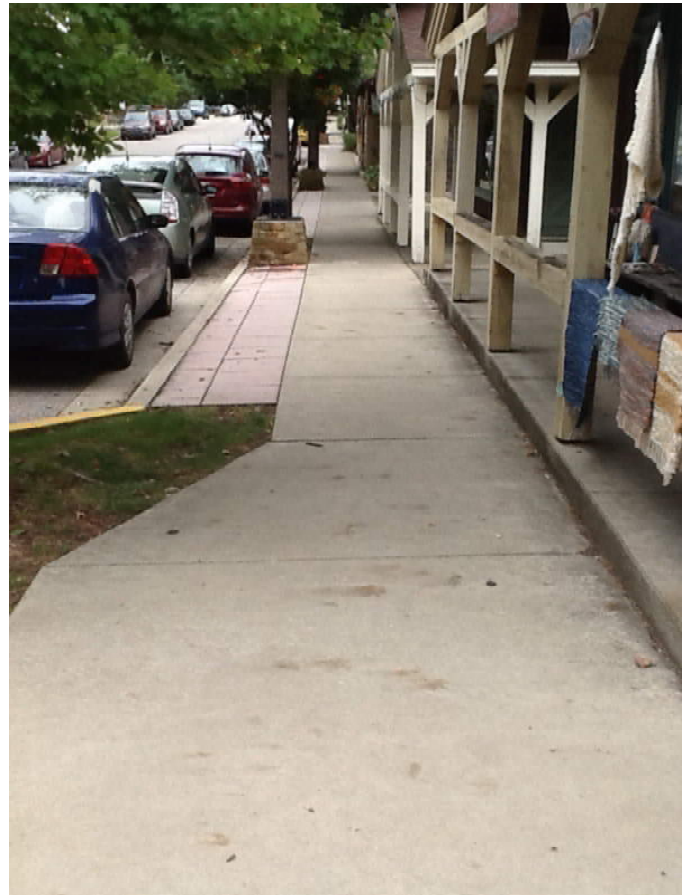


## 4.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Sidewalk Inventory

This segment of the self-evaluation plan summarizes the review of current sidewalks within the public ROW. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility on Town sidewalks.

### 4.1 Pedestrian Access Route

Per R204 of the PROWAG, *'a pedestrian access route (PAR) is a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path in the public Right of Way. Pedestrian Access Routes in the public Right of Way ensure that the transportation network used by pedestrians is accessible to pedestrians with disabilities...Pedestrian access routes must be provided within sidewalks, and other pedestrian circulation paths located in the public right-of-way; pedestrian street crossings, and at-grade rail crossings, including median and refuge islands; and overpasses, underpasses, bridges and similar structures that contain pedestrian circulation paths.'* In addition to defining the Pedestrian Access Route (PAR), this definition also provides guidance on determining the scope of areas to be evaluated for compliance.



Per the Technical provisions of the PROWAG, the sidewalk pedestrian access route must meet the following general criteria:

- R302.3 Continuous Width
- R302.4 Passing Spaces
- R302.5 Grade (Running Slope)
- R302.6 Cross Slope
- R302.7 Surfaces

Within the following text, 'location' refers to a single data collection point. This may be a single block, a portion thereof with logical stopping point, such as an alley or area with no sidewalk present, or non-roadway related portion of public ROW. Percentages and numbers shown should not be interpreted as a quantity of infrastructure. Likewise, compliance for one criterion does not indicate compliance in for all criteria. Approximately 55 blocks of sidewalk were evaluated.

## 4.2 Width

### Requirements:

Per R302.3, the continuous clear width shall be 4' minimum exclusive of the width of curb, with 5' width required at all medians and pedestrian refuge islands. Five feet of width is preferred, as when the clear width is less than 5', passing spaces must be provided every 200' maximum. This provides greater flexibility to the pedestrian to accommodate changes in direction, passing movements, and turning space.

Over 98% of sidewalks within the Town were 4' or greater. In many instances, walks were 5' in width, meeting the Town standard.

### Addressing the Issue in Future:

- A common issue with sidewalks at the 48" minimum is turf overgrowth. Maintenance via edging the turf at the sidewalk edge can prevent this issue from impacting accessibility as facilities age.
- Five feet should be considered for all new sidewalk construction.



*Example of +5% running slope and roadway grade*

## 4.3 Grade (Running Slope)

### Requirements:

Per R302.5, the grade (running slope) of the sidewalk PAR shall not exceed 5% or the grade of the adjacent street if the street is over 5%.

Within the Town, approximately 60% of locations had a portion of the sidewalk that was over the 5% maximum running slope. Frequently, this occurred at driveway cuts within a run of sidewalk and were less than the acceptable 8.33% to function as an informal curb ramp. Over half of the locations over 5% did not exceed the roadway grade, making them compliant with the requirements.

### Addressing the Issue:

For running slopes of over 5% (**where not adjacent to roadways exceeding that or in a ramp situation at drive cut**), potential solutions may include:

- Lowering grade.
- Removing and regrading adjacent shallowly sloped panels to spread the slope over a greater run and achieve a more even, compliant slope throughout.

## 4.4 Cross Slope

### Requirements:

Per R302.6, the cross slope of the sidewalk PAR shall be 2% maximum. Exceptions to this rule occur only at pedestrian street crossings without yield or stop control or midblock crossings.



During evaluation, it was noted that nearly 77% of blocks exhibited some level of non-compliance for cross slope. This included many minor deviations that may not be compliant, but are ultimately highly useable. Approximately 15% of the non-compliant locations were in excess of 5% cross slopes, which create a significant difficulty in use for pedestrians with mobility devices.

**Addressing the Issue:**

For cross slopes of over 2%, potential solutions may include:

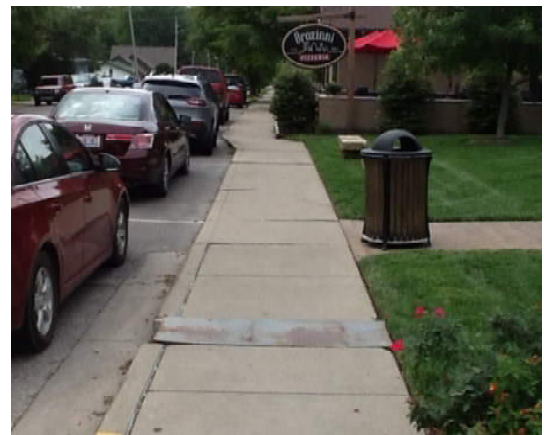
- Lowering grade.
- Removing and regrading adjacent tree lawn to achieve a compliant slope throughout.

**4.5 Changes in Level / Surface Condition**

**Requirements:**

Per R302.7, the surface of the PAR shall be firm, stable, and slip-resistant. Grade breaks shall be flush. Vertical surface discontinuities (changes in level) shall be 1/2" maximum with those between 1/4" and 1/2" being beveled at a slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed 1/2". Elongated openings should be placed perpendicular to the dominant direction of travel. During the evaluation, surface condition was evaluated for damage from cracking and spalling.

In general, sidewalks are in relatively good condition, free of cracks, spalling, and displacements. Approximately 36% of locations noted displacement or cracking. Approximately one-third of these were limited to very small number of panels within that segment, displacements of 1/4" to 1/2", and may not be representative of the location as a whole. The other two-thirds exhibited displacements greater than 1/2" and are noted as medium or high priority when they occurred at a high frequency or presented a safety concern.



*Metal panel in walk creates potential slip hazard and is a vertical displacement where meeting concrete.*

**Addressing the Issue:**

Changes in level and surface condition are a common problem as infrastructure ages. Temporary fixes of high hazard areas can be implemented to promote the safety of all users while long-term solutions are set into action. Public input is particularly important in locating hazardous areas as they occur. In general, the following solutions can address changes in level and surface condition. It may be helpful to set up a protocol for public reporting of such areas.

Level Changes

- Temporary placement of concrete or asphalt to ramp from adjacent panel
- Grinding edge at surface changes of up to 1/2" to achieve allowable bevel
- Replacement of concrete sidewalk panel



*Non-compliant inlet and trench drain castings are located within a sidewalk and accessible parking space*

- Where right-of-way is available, route sidewalk around large trees to avoid further heaving

#### Surface Condition

- Replacement of damaged concrete sidewalk panel
- Maintenance to keep free of vegetation and debris

### 4.6 Obstructions, Protrusions and Utility Considerations

#### **Requirements:**

Per R402.2, protruding objects are those objects with leading edges more than 27" and not more than 80" above the finish surface which protrude more than 4" horizontally into pedestrian circulation paths.

Per R210, street furniture and other objects may not reduce the minimum clear width of the PAR. These items would be considered an obstruction of the continuous clear width provided.

Obstructions may include light and utility poles, newspaper and mail boxes, vegetation protrusions, signs, hydrants, and site furnishings. Other barriers include, but are not limited to, manholes, valve covers, open grate castings, and access boxes. These conflicts are generally classified as vertical displacements and slip hazards.

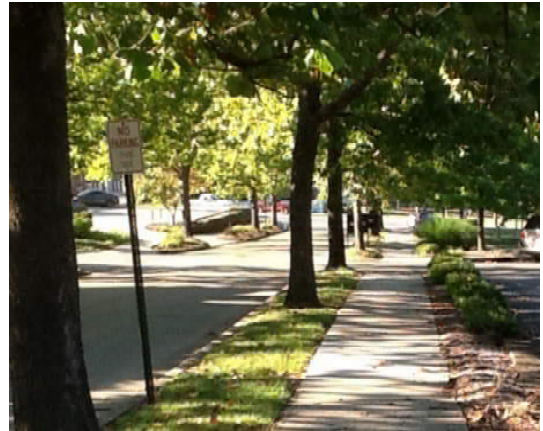
Approximately 61% of the locations exhibited protrusions and most were due to vegetative overgrowth. Obstructions were noted at 41% of locations.

#### **Addressing the Issue:**

Moveable obstructions may include furniture, signage, parked cars, and even trash collection bins. These items may be addressed by enactment and/or enforcement of ordinances regarding their placement. Implementation of an ordinance restricting parking within public sidewalks may help prevent parking obstructions, particularly in residential areas.

Vegetative obstructions (as well as protrusions) can be managed with routine maintenance and by encouraging homeowner participation in maintaining a clear right-of-way.

Fixed obstructions may be costly to address as they generally occur with utilities and may require relocation or purchase of right-of-way from adjacent landowners. For these items, a work-around solution is often



*Tree branches hanging below 80" create a vegetative protrusion*



*Use of parking blocks help prevent obstruction of sidewalk by overhanging vehicles.*



*Vegetation overhanging from adjacent properties can obstruct required clear width.*

preferred. These may include widening a small portion of sidewalk where possible or providing an equivalent alternate route.

#### **4.7 Overall Compliance**

The statistics above are useful in identifying trends in the deficiencies as a means to prevent them from occurring in new construction. However, the goal of this transition plan is to list the physical barriers in the Town’s pedestrian right-of-way facilities that limit the accessibility and, therefore, it is necessary to look at each location as a whole to determine overall compliance in order to provide a detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. All solutions offered address only the criteria indicated. Complete reconstruction may be required where multiple compliance issues are involved. *See Appendix B* for data reports.

#### **4.8 Sidewalk Barrier Ranking Analysis**

The Town’s self-evaluation of the Public Right-of-Way takes into account factors such as level of use, degree of danger posed, complaints or requests for repair received, and other factors and are grouped into two categories – Contributing Contextual Factors and Physical Impedance Factors. These categories are further defined in Section 3 of this report.

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

Based on the data collected, a percentage of replacement required was calculated for each data location. This percentage was then applied to the linear footage of that data collection area and multiplied by the approximate cost of sidewalk replacement (in 2020 dollars). Based upon these calculations, the following table illustrates the estimated value of improvements required to make all sidewalk facilities accessible.

A percentage of the Low Priority items are due to minor cross slope deviations, but are otherwise in excellent condition. The Town should closely evaluate the cost implications vs. increase in accessibility in regards to corrections to these highly usable areas.

Note that the costs provided do not include costs for right-of-way purchase, easements, appraisals, etc. and it is very likely that exact costs of the program will vary based on a number of factors. *See Appendix B* for data reports.

*Table 4.1. Summary of Sidewalk Probable Cost to Correct*

<b>Sidewalk Summary</b>	
Low Priority Sidewalk	\$23,680
Medium Priority Sidewalk	\$137,280
High Priority Sidewalk	\$78,360
<b>Total Estimated Sidewalk Improvement Costs</b>	<b>\$239,230</b>



## 5.0 Self-Evaluation of Pedestrian Facilities with the Public Right-Of-Way – Curb Ramp Inventory

This segment of the self-evaluation plan summarizes the review of current curb ramps within the public ROW. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility on Town curb ramps.

Approximately 82 data collection locations were evaluated. Of these locations, approximately 6% did not provide a curb ramp or blended transition but did provide a crossing point. These are considered non-compliant locations and will require complete reconstruction.

### 5.1 Curb Ramp Types

Curb ramps types are classified based on the orientation of the ramp to the adjacent curb. As stated in Advisory R304.1 of the PROWAG, the following types of curb ramps exist:

#### Perpendicular Curb Ramp

Perpendicular curb ramps have a running slope that cuts through or is built up to the curb at right angles or meets the gutter break at right angles where the curb is curved.

#### Parallel Curb Ramp

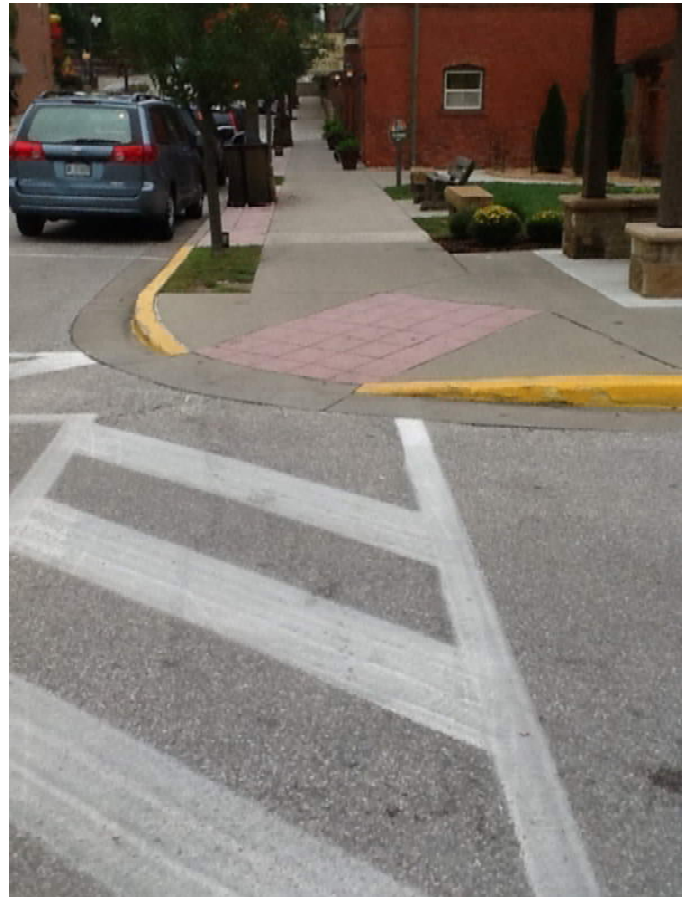
Parallel curb ramps have a running slope that is in-line with the direction of sidewalk travel (parallel to the curb) and lower the sidewalk to a level turning space where a turn is made to enter the pedestrian street crossing. Parallel ramps can be useful where right-of-way is limited to get a pedestrian from street level to the sidewalk in a shorter depth space.

#### Combination Curb Ramp

Parallel and perpendicular curb ramps can be combined. A parallel curb ramp is used to lower the sidewalk to a mid-landing and a short perpendicular curb ramp connects the landing to the street. Combination curb ramps can be provided where the sidewalk is at least 6.0 feet wide and can provide access in situations where the sidewalk is much higher than 6" above the street elevation.

#### Blended Transition

Blended transitions are raised pedestrian street crossings, depressed corners, or similar connections between pedestrian access routes at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less. Blended transitions are suitable for a range of sidewalk conditions



### Diagonal Curb Ramp

Per R207.2, where existing physical constraints prevent compliance with R207.1, a single diagonal curb ramp shall be permitted to serve both pedestrian street crossings. Typically, under the current guidelines, two ramps are required at each corner.

Diagonal curb ramps are not the preferred method of construction due to lack of directional cues for pedestrians using the crossing and safety concerns created by vehicles misconstruing pedestrian intentions.

### 5.2 Ramp Width

#### Requirements:

Per R304.5.1, the clear width of curb ramp runs (excluding any flared sides), blended transitions, and turning spaces shall be 4.0 feet minimum.

Per the evaluation findings, all ramps evaluated were compliant for width.

### 5.3 Ramp Slopes

#### Requirements:

Per R304.2.2, the running slope of the curb ramp shall cut through or shall be built up to the curb at right angles or shall meet the gutter grade break at right angles where the curb is curved. The running slope of the curb ramp is 5% minimum and 8.3% maximum but shall not require the ramp length to exceed 15 feet. If less than 5%, it is considered a blended transition instead of a ramp. Additionally, the counter slope of the gutter or street at the foot of curb ramp runs, blended transitions, and turning spaces shall be 5 percent maximum.

Per R304.5.3, the cross slope of curb ramps, blended transitions, and turning spaces shall be 2 percent maximum. At pedestrian street crossings without yield or stop control and at midblock pedestrian street crossings, the cross slope shall be permitted to equal the street or highway grade.

Per 304.5.2, grade breaks at the top and bottom of curb ramp runs shall be perpendicular to the direction of the ramp run. Grade breaks shall not be permitted on the surface of ramp runs and turning spaces. Surface slopes that meet at grade breaks shall be flush.

Within the Town, the following slope data was collected:

- Ramp running slopes of greater than 10% (treated as higher priority condition)
- Ramp running slopes of greater than the maximum allowable slope of 8.3%, but less than 10%.
- Ramp running slopes within the acceptable range of 5% to 8.3%.



*Cross slope of a ramp may be impacted by the grade found where it meets the roadway.*



*Running slope measurement is taken parallel to the direction of travel on a ramp.*

- Blended transitions with running slope of less than 5%.
- Cross slopes over 2%.

During the self-evaluation, it was found that 76% of locations were compliant for running slope as a curb ramp or blended transition. The other 24% were over 8.33% and nearly all of those were in excess of 10% running slope. Approximately 57% of locations exceeded the allowable cross slope.

**Addressing the Issue:**

Non-compliant ramp slopes can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, steep roadway grades, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Extending the rise of the ramp over a longer run
- Creating a combination ramp
- Increasing slope of adjacent sidewalk panels past the top landing
- Incorporating returned curbs or retaining wall to avoid adjacent obstructions or limited ROW



*The pedestrian circulation area around both sides of this ramp necessitate use of a flare.*

**5.4 Flares**

**Requirements:**

Per R304.2.3, *where a pedestrian circulation path crosses the curb ramp, flared sides shall be sloped 10 percent maximum, measured parallel to the curb line.*

During the self-evaluation, it was found that:

- Most locations did not require a flared side. These locations were blended transitions or were adjacent to tree lawns on both sides.
- 50% of locations had walkable sidewalk adjacent, creating a need for compliant flares.
- 26% of locations did not provide the required flare or were over the 10% maximum slope.



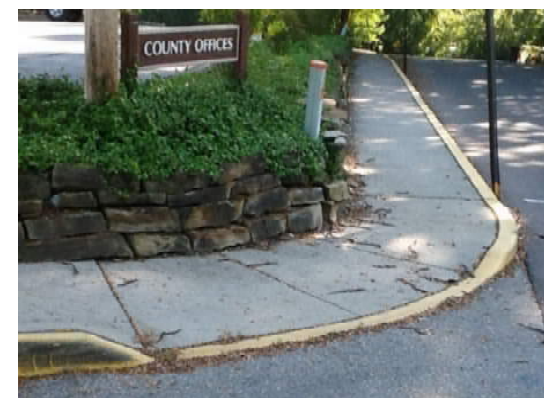
*Flares are not required where lawn is provided on both sides of a ramp.*

**Addressing the Issue:**

Non-compliant flare slopes or configurations can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Extending the rise of the flare over an appropriate run



*Corner lacks turning space/ landing.*

- Replacing flare and removing curb as necessary to accommodate corrected flare.

## 5.5 Landings/Turning Spaces

### Requirements:

Per R304.2 and R304.3, a turning space of 4.0 feet minimum by 4.0 feet minimum shall be provided at the top of the curb ramp and shall be permitted to overlap other turning spaces and clear spaces. Where the turning space is constrained at the back-of-sidewalk, the turning space shall be 4.0 feet minimum by 5.0 feet minimum. The 5.0 feet dimension shall be provided in the direction of the ramp run.

Additionally, per R304.5.5, beyond the bottom grade break, a clear space 4.0 feet minimum by 4.0 feet minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. For parallel ramps (R304.3), this means at the bottom of the ramp behind the curb line. Diagonal ramps must also accommodate this turning space within the crosswalk and wholly outside the vehicle travel lanes.

Per R304.5.3, the cross slope of curb ramps, blended transitions, and turning spaces shall be 2 percent maximum.

Within the Town, characteristics included:

- Approximately 13% of ramps did not provide a landing when required.
- Locations met landing size requirement, but lacked the appropriate landing slopes. Approximately 27% of landings required exceeded 2% maximum slope.
- All landings provided were compliant for size.

### Addressing the Issue:

Non-compliant landings can be caused by a number of factors including but not limited to, construction tolerances, design inconsistencies, construction prior to current standards, adjacent buildings or obstructions, or limited ROW.

Possible solutions may include:

- Constructing new landing and turning space adjacent to top of ramp
- Creating a combination ramp to accommodate misaligned landing
- Increasing slope of adjacent sidewalk panels past the top landing



*Room appears to be available for turning space/landing at top of ramp. Adequate space for bottom turning space at diagonal ramp may not wholly fit within cross walk.*



*Ramp does not provide bottom turning space. Turning on steep slopes can create an unstable condition for persons with mobility devices.*



*Example of detectable warning that does not extend full width of curb ramp*



- Replacing blended transition with curb ramp to increase available space for landing
- Incorporating returned curbs or retaining wall to avoid adjacent obstructions or limited ROW

### 5.6 Detectable Warnings

#### Requirements:

Per R208, detectable warnings surfaces indicate the boundary between pedestrian and vehicular routes where there is a flush rather than curbed connection.

Detectable warning surfaces shall be provided at the following locations:

- Curb ramps and blended transitions at pedestrian street crossings
- Pedestrian Refuge Islands (unless at street level AND less than 6' in length; None exist within the Town of Nashville right-of-way.)
- Pedestrian at-grade rail crossings not located within a street or highway and transit stops (None exist within the Town of Nashville right-of-way.)

Detectable warnings should not be provided at crossings of residential and low traffic commercial driveways as the pedestrian access route continues across driveway aprons. They should be provided at high traffic commercial driveways provided with yield or stop control since these function similarly to roadways.

Per R305.1, Detectable warning surfaces shall extend 2.0 feet minimum in the direction of pedestrian travel. At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the ramp run (excluding any flared sides), blended transition, or turning space.

Additionally, per Advisory R305.2, some detectable warning products require a concrete border for proper installation. The concrete border should not exceed 2 inches. See Figure R305.1.4 above from the PROWAG regarding placement and dimensions.

Evaluation of the detectable warnings produced the following characteristics:

- Where present, 29% were not compliant for full width, 11% were less than the minimum depth, and 36% were deficient in relation to contrast or domes.

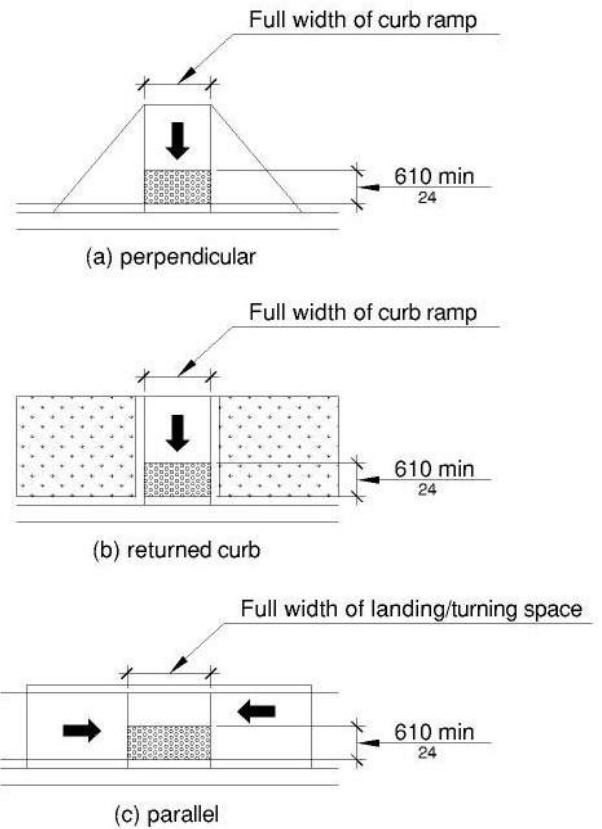
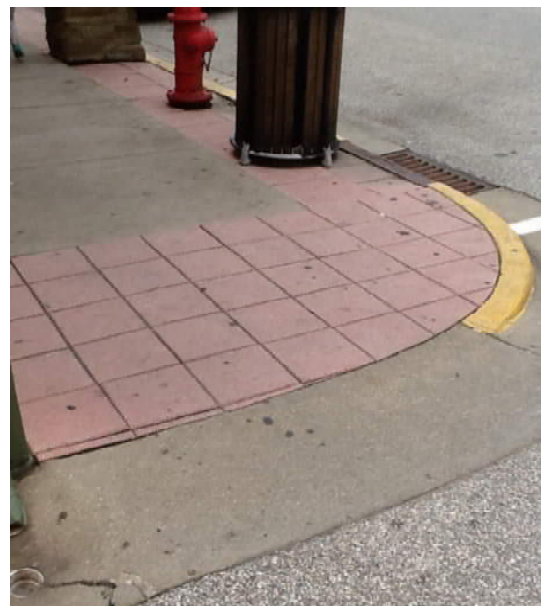


Figure R305.1.4  
 Size



Example of detectable warning with visual contrast but no tactile domes

- 42% of locations did not provide any detectable warning.

**Addressing the Issue:**

Retrofit detectable warning kits are available for use on ramps where all other criteria are compliant.

If a detectable warning plate does not extend full width or depth, they can be removed and replaced along with any concrete damaged by the operation.

Steel, HDPE, or cast iron products provide greater durability for the truncated domes. Using these products in lieu of a brick or cast concrete panel may minimize plow damage and wear of truncated domes.

**5.7 Drainage**

**Requirements:**

According to the FHWA publication “Designing Sidewalks and Trails for Access”, ‘poor drainage at the bottom of a curb ramp is inconvenient to all pedestrians. It is a particular nuisance for people who rely on the curb ramp for access and who will, therefore, not be able to avoid the area. When the water eventually dries up, debris, which further impedes access, is usually left at the base of the ramp. In cold-weather locations, water that does not drain away can turn into slush or ice, creating a more hazardous situation’.

The self-evaluation noted the following:

- Approximately 13% of crossing locations/curb ramps were located within 6’ of a drainage structure, indicating potential for a drainage problem during heavy rain events.
- 18% of locations exhibited evidence of ponding, including buildup of debris and sediment at the foot of the ramp.

**Addressing the Issue:**

Best practices for avoiding drainage issues include locating drainage structures on the uphill side of ramps, locating low points 6’ or more from the ramp, ‘tabling’ the intersection slightly where tying into ramps, designing gutter slopes with continuous flow to carry water past the foot of ramps, eliminating changes in level at the gutter line, and maintaining inlets and gutters to ensure adequate flow during rain events.



*Detectable warning does not extend full width of ramp nor does it meet the 2” max. border allowed in some circumstances for proper installation of products.*



*Ramp is adjacent to drainage structure which may create an issue with access during rain events.*



*Accumulation of dirt and debris may be evidence ponding is occurring at this ramp.*

## 5.8 Obstructions, Protrusions and Utility Considerations

### Requirements:

Per R402.2, protruding objects are those objects with leading edges more than 27" and not more than 80" above the finish surface which protrude more than 4" horizontally into pedestrian circulation paths.

Per R210, street furniture and other objects may not reduce the minimum clear width of the PAR. These items would be considered an obstruction of the continuous clear width provided.

Obstructions that might be observed include light and utility poles, traffic signs, fire hydrants, and utility cabinets. Ground plane utility conflicts, include, but are not limited to, manholes, valve covers, open grate castings, and access boxes. These conflicts were generally classified as vertical displacements and slip hazards.

The self-evaluation noted the following:

- Obstructions were noted at 8 locations and included signage, vegetation and ground plane utility conflicts.
- Protrusions were present at 8 locations and were all vegetative.

### Addressing the Issue for Future Construction:

Fixed obstructions may be costly to address as they generally occur with utilities and may require relocation or purchase of right-of-way from adjacent landowners. For these items, a work-around solution is often preferred. These may include widening a small portion of sidewalk where possible or providing an equivalent alternate route.



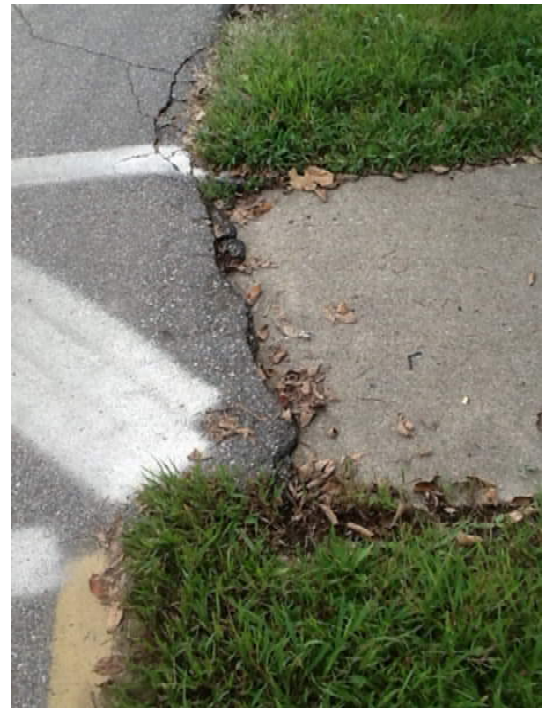
## 5.9 Changes in Level / Surface Condition

### Requirements:

Per R302.7, the surface of the PAR shall be firm, stable, and slip-resistant. Grade breaks shall be flush. Vertical surface discontinuities (changes in level) shall be 1/2" maximum with those between 1/4" and 1/2" being beveled at slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed 1/2". Elongated openings should be placed perpendicular to dominant direction of travel.

Displacements observed at the gutter line or other ramp joints included:

- Horizontal displacements
- Vertical displacements
- No displacements over the required threshold
- Lack of curb ramp entirely
- Exaggerated gutter line exceeding 1/2" bevel.



Examples of +1/2" displacement at gutter line

Approximately 52% of locations had displacements at the gutter line or top landing of either horizontal or vertical nature. The majority of displacements occur at the gutter line.

**Addressing the Issue:**

Changes in level and surface condition are a common problem as infrastructure ages. Where minor displacements (or constructed condition along the gutter line) exist and are unlikely to cause issues for the majority of users, conditions should be monitored and repaired if conditions worsen. Temporary fixes of high hazard areas can be implemented to promote the safety of all users while long-term solutions are set into action. Public input is particularly important in locating hazardous areas as they occur. In general, the following solutions can address changes in level and surface condition.

Level Changes

- Temporary placement of concrete or asphalt to ramp from adjacent surface
- Grinding edge at surface changes of up to ½” to achieve allowable bevel
- Replacement of ramp panel or gutter

Surface Condition

- Maintenance to keep free of vegetation and debris

**5.10 Crosswalk Considerations**

**Requirements:**

Per R302.5.1 Pedestrian Street Crossings, the running slope of the pedestrian access route shall be 5 percent maximum. In regards to cross slope. R302.6 indicates cross slope shall be 2% maximum, except at pedestrian street crossings without yield or stop control, where the cross slope may be up to 5%. Where midblock pedestrian street crossings are present, , the cross slope of the pedestrian access route shall be permitted to equal the street or highway grade.

36 crosswalks provided markings with 4 of those not meeting the minimum 6’ width. Approximately 14% of locations had a running slope exceeding 5%, and 11% had cross slopes exceeding 2%. 28% of locations exceeded both cross and running slopes.

**Addressing the Issue:**

Adjustment to cross walk running slope and cross slope can primarily be achieved through the use of mill and overlay of the roadway to correct minor deviations. Frequently, road overlays can exaggerate the roadway cross slope, creating a steep running slope for pedestrians utilizing the crossings. Larger deviations, particularly in the direction of vehicular travel (PAR cross slope) may require further study on the impact of the grade changes to the usability of the roadway by vehicles.

**5.11 Overall Compliance**

The statistics above are useful in identifying trends in the deficiencies as a means to prevent them from occurring in new construction. However, the goal of this transition plan is to list the physical barriers in the Town’s pedestrian right-of-way facilities that limit the accessibility and, therefore, it is necessary to look at each location as a whole to determine overall compliance in order to provide a detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. All solutions offered address only the criteria indicated. Complete reconstruction may be required where multiple compliance issues are involved.

The extent of reconstruction required for existing ramps and blended transitions varies widely. Some locations may require simple fixes such as replacing or installing tactile warnings or replacement of a non-compliant flare. Some locations will require complete reconstruction. Each location will require thorough examination in order to design the correct solution to its unique situation. Locations without a curb ramp provided constitute the greatest barrier to use and require full replacement.

**5.12 Curb Ramp Barrier Analysis**

The Town’s self-evaluation of the right-of-way takes into account factors such as level of use, degree of danger posed, complaints or requests for repair received, and other factors and can be grouped into two categories – Contributing Contextual Factors and Physical Impedance Factors. These categories are further defined in Section 4 of this report. Within Appendix B, the curb ramps are ranked as Compliant, Low Priority, Medium Priority, and High Priority after considering the physical impedance factors. See information regarding contextual factors in Section 3.

In addition, the methodology used for estimating costs of corrections included dividing all curb ramps into cost groups based on amount of rework required. Note that the costs provided below do not include costs for right-of-way purchase, easements, appraisals, etc. and it is very likely that exact costs of the program will vary based on a number of factors. See *Appendix B* for data summary by location.

*Table 5.1. Summary of Curb Ramp Probable Cost to Correct*

<b>Curb Ramp Summary</b>	
Low Priority Curb Ramps	\$37,000
Medium Priority Curb Ramps	\$31,600
High Priority Curb Ramps	\$71,200
<b>Total Estimated Curb Ramp Improvement Costs</b>	<b>\$139,800</b>



## 6.0 Transition Plan

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

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

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

The transition plan is a reaction to the findings of the facility audits, assessments of Town policies, services, programs, and activities, and input from advocacy groups and the public. Recommended actions for Town policies and programs can be found in Section 2.0.

The specific architectural and site improvement modifications required to make programs accessible are listed in the Town of Nashville Facility Reports (see *Appendix A*). Facility reports include buildings and their related grounds, owned, operated, or leased by the Town of Nashville. Each facility report contains a list of items that do not meet current ADASAD or PROWAG standards and barrier removal actions. Not all of these barriers must be removed by making renovations to the facilities in order to provide program compliance with the ADA. Removing barriers limiting access to programs or those which present a safety hazard should be the Town’s first priority.

### 6.1 Public Outreach

Public participation on the final contents of the Transition Plan, including setting of priorities and the phasing of improvements, is critical to the success of the endeavor and is required by law. A draft Transition Plan was made available at Town Hall and the Brown County Public Library for public review and comment from July 6 to July 20, 2020. Comments could also be provided via e-mail as advertised and posted. Summary of the comments received at the meeting and during the comment period can be found in Section 1.11 and the informational presentation is included in Appendix D. The final Transition Plan was then submitted to the Town Council for adoption.

### 6.2 Phasing of Corrections

A phased implementation of the required corrections to remove physical barriers at Town-owned facilities is required and recommended. The Town has limited funds and cannot immediately make all facilities fully compliant with ADA standards. The self-evaluation established baseline criteria needed to develop a starting point for ranking the deficient facilities identified.

The timing of the improvements by site will be determined by the Town based on their funding availability, other project needs, and the following criteria. Following evaluation of all facilities and programs, a prioritization was completed to identify a ranking system to utilize when determining which capital improvements need to be considered first and those that could be implemented in subsequent years. The Town should identify the most urgent access needs based on their experience, other capital projects, and the results of the self-evaluation. At the time of the development of this report, few public complaints had been received about Town-owned facilities. Complaints were not used as criteria to determine the phasing of improvements for any particular site, though future complaints could be the basis for funding improvements.

### 6.3 Priorities for Barrier Removal

In creating priorities, it is the Town’s intent to evaluate all areas of potential deficiency and to make structural changes where necessary and where equal accommodation cannot be made in another manner. The assignment of priorities is intended to facilitate public review and to address specific concerns of the local community. It must be emphasized that it is the Town’s intention that all individuals with all types of disabilities be reasonably accommodated to provide access to all programs offered at all facilities.

A review of facility utilization and programs provided at each location is critical to assisting in prioritizing which facilities should be given priority for improvements and order in which improvements should be completed. However, the facility prioritization should not be looked at in a vacuum, as improvements at lower use facilities may still warrant consideration for improvements in the near future if a barrier exists to program access.

Site priorities considered each site’s level of use, social need, civic function, and the general uniqueness of the site. Each of these criteria is assumed to have equal weight and no priority over another:

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

Facilities have been placed into three tiers based on their utilization by the public and programs provided at each. Note that some areas of facilities may fall within a lower or higher tier. Tier 1 facilities have the highest use and should be the first priority, with Tier 2 facilities to follow. Tier 3 facilities are relatively low use for the public or have only employee common-use areas that require corrective actions. The facilities in each tier are as follows:

Table 6.1. Facility tier listing for prioritization.

Tier 1	Tier 2	Tier 3
<ul style="list-style-type: none"> <li>• Town Hall</li> <li>• Public Restroom 1 (Old School Way) and Parking Lot</li> <li>• Public Restroom 3 (Village Green)</li> </ul>	<ul style="list-style-type: none"> <li>• Police Department</li> <li>• Public Restroom 2 (Mound Street)</li> <li>• O’Reilly and Jefferson Lot</li> <li>• Sycamore and Washington Lot</li> </ul>	<ul style="list-style-type: none"> <li>• Waste Water Treatment</li> <li>• Pittman House Lot</li> </ul>



Within each facility’s barrier summary in Appendix A, the non-compliances are prioritized generally based on the level of physical impedance. All barriers are not equal in the impact they have on persons with disabilities to have equal access to Town facilities or programs. **Physical Impedance factors** include the actual physical characteristics of the specific feature and the severity of the barrier to use.

- **High priority** – High priority areas typically prohibit access for disabled persons, make access extremely troublesome, or present safety hazards to all users. Likely there are no acceptable alternative routes or treatments to overcome the barrier. Typically, these barriers are significant obstacles located at entry walks and doors, interior corridors, curb ramps, restrooms, and service counters. Examples include lack of accessible parking, lack of elevator in a multi-level building, stairs where ramps or level surface are needed, no exterior accessible route, narrow doors, lack of wheelchair accessible restroom stalls (or extreme deviations from stall size), lack of grab bars, extreme slopes or displacements, missing handrails, missing curb ramps, extreme slopes, particularly cross slopes impacting lateral balance, changes in level over 1” (trip hazards), signage related to life safety, and fixed obstructions limiting vertical and horizontal clearance.
- **Medium priority** – Medium priority areas include areas with conditions that make travel moderately difficult, but passable and affect the quality of usage for persons with disabilities to a greater extent than that afforded the non-disabled. Typically, these barriers are obstacles to amenities such as secondary entry points, vending machines, and drinking fountains, non-compliant dimensional issues (vestibules, corridors, etc.), stairwell/stair issues, particularly where an elevator is not available, or include moderate deviations to dimensional requirements of primary use areas. Exterior examples include moderate deviations in running and cross slopes, changes in level ½” to 1”, obstructions that allow tight passage, along with landing and PAR width deviations.
- **Low priority** – Low priority areas include areas with conditions that deviate from codes and standards, but alternative means of use may be available to provide equal access or opportunities. In low priority areas, conditions may be an inconvenience, but neither travel nor safety is greatly impacted. These areas allow significant usability and independent travel is possible in most cases. These included, but are not limited to signage issues, electrical, exterior furnishings, and minor dimensional non-compliances.

The costs to remove barriers by priority for each site are shown in Table 6.2 and detailed for each facility in Appendix A. In addition, a time frame had to be identified to determine an average annual budget to consider. For the purposes of this report, a 20-year time frame was utilized. Using this, it is conceivable that at the end of 20 years, all non-compliant ADA issues would be addressed throughout all current Town-owned facilities. This assumes that standards and guidelines are not modified. This further assumes that funding is available each budget cycle to make the necessary improvements. It is highly unlikely given the economy that this is realistic, particularly when considering that there are also likely to be a large number of other improvements needed by the Town as part of regular maintenance, upkeep, and repairs.

In some instances, it may be advantageous to construct all improvements at a site at once rather than correct the high priority barriers first and come back at a later date to correct the medium or low priority barriers. For some sites, the total cost of construction for the corrections requires that they be spread out over two or more phases. The Town has the right to modify the priorities based on funding levels and changes in Town programs, activities, and services to have flexibility in accommodating community requests and complaints. Interim resolutions, such as assigning aids, temporary signing for alternate routes or sites, and modifications of programs, activities, and services may be implemented at the Town’s discretion to handle existing insufficiencies or access complaints received. All costs noted in *Appendix A* and Table 6.2 are 2020 cost opinions. These cost opinions are subject to change based on market conditions, economic conditions,

inflation, material selection, etc. Multiple phases of projects, multiple bidding packages, design parameters, etc. all have an impact on project costs that cannot be finitely identified in a study with this level of detail and uncertainty related to funding.

Based on the costs developed to address the architectural and engineering improvements required to fully comply with ADASAD standards, more than **\$222,740** (2020 costs) in improvements would be required to achieve ADA compliance at all of the Town facilities. It is important to note at this point that many of the noted deficiencies are not significant barriers to access and some improvements are not required until such time as a major building renovation is completed. This does not avoid the need for the Town to ensure all programs are accessible by some means. It must also be mentioned that the cost to correct significant non-compliant items cannot be determined based on the scope of the ADA self-evaluation. Additional investigation is needed to evaluate the various options and likely will include a review of other codes (plumbing, electrical, etc.) and possibly also review of the feasibility of removing walls (i.e., structural engineering review). Examples of these types of items would include:

- Conversion of multi-user restrooms to single user due to non-compliant space (may require analysis of plumbing code requirements for the number of fixtures required)
- Moving of walls to enlarge multi-user restrooms to enlarge an existing non-compliant stall to meet requirements (may require structural engineering review)
- Investigation required to determine how to best provide a level space at an entry door

Costs provided are estimated based on information available from the self-evaluation and may not account for hidden items not readily visible which may impact costs (e.g., lack of backer boards where toilet grab bars need to be relocated, would require drywall removal and replacement that is not included in noted costs). In some cases, the cost identified is for a specific solution and there are often multiple options with costs that can be quite variable. If the Town were to set a goal for implementing all of the recommended improvements within a 20-year time frame, it would require an annual budget of approximately \$11,140 (in 2020 dollars) to bring all of the facilities evaluated in Appendix A of this report up to current ADA standards (no inflation included). These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, etc.

The Town of Nashville should form a committee to identify the most urgent access needs based on their experiences. For the right-of-way improvements, the Town's Bicycle & Pedestrian Advisory Board will provide comment and guidance on prioritization. There may be grants available to make some of these improvements as suggested in Section 7.5 which could be investigated further to support implementation efforts.

Table 6.2. Facility Summary of Probable Costs to Correct

TOWN OF NASHVILLE ADA SELF EVALUATION AND TRANSITION PLAN					
FACILITY SUMMARY					
Name & Location	Ownership Status	Low Priority	Medium Priority	High Priority	Total Site Cost
<b>Town Hall</b> 200 Commercial Street	Town Owned	\$23,500	\$10,980	\$18,350	\$52,830
<b>Police Department</b> 25 Artist Drive	Town Owned	\$30,365	\$9,350	\$650	\$40,365
<b>Public Restroom 1</b> Old School Way	Town Owned	\$4,330	\$18,550	\$0	\$22,880
<b>Public Restroom 2</b> Mound Street	Town Owned	\$4,930	\$18,050	\$0	\$22,980
<b>Public Restroom 3 &amp; Village Green</b> Jefferson and Main	Town Owned	\$8,555	\$5,550	\$6,100	\$20,205
<b>Wastewater Treatment</b> S. Van Buren St./Treatment Plant Rd.	Town Owned	\$31,210	\$1,010	\$200	\$32,420
<b>Town Parking Lot</b> Old School Way Restrooms	Town Owned	\$4,330	\$18,550	\$0	\$22,880
<b>Town Parking Lot</b> O'Reilly and Jefferson	Town Owned	\$0	\$3,655	\$2,410	\$6,065
<b>Town Parking Lot</b> Pittman House	Town Owned	\$560	\$0	\$0	\$560
<b>Town Parking Lot</b> Sycamore and Washington	Town Owned	\$0	\$0	\$1,555	\$1,555
<b>TOTALS</b>		<b>Low Priority</b> <b>\$107,780</b>	<b>Medium Priority</b> <b>\$85,695</b>	<b>High Priority</b> <b>\$29,265</b>	<b>Total Cost</b> <b>\$222,740</b>

All cost estimates for Town facilities are based on a single unified bid with 2020 estimated costs. Bidding in a different manner or different time period will require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical or structural concerns.

#### 6.4 Curb Ramps and Sidewalks

The Town's right-of-way facilities and policies related to them are described in Section 4, 5, 6, and Appendix B. The costs to remove barriers by priority are shown in Tables within Sections 4 and 5.

Approximately **\$383,020** in right-of-way improvements would be required (2020 costs) to achieve ADA compliance within the Town right-of-way as existing. The Town has set a goal of \$20,000 per year including sidewalk cost share, new sidewalks, and/or replacement of existing facilities as appropriate, though if additional funds are available, they may be utilized.

A key component to ensuring right-of-way facilities remain usable, whether they are fully compliant with PROWAG or not, is to perform required maintenance activities in a manner that does not reduce accessibility. This maintenance can be performed by adjacent property owners, contractors, or Town staff and should be ongoing. Examples of maintenance activities that may be required within the public right-of-way include:

- Vegetation – proper maintenance of grass, landscaping, shrubs, and trees adjacent to the PAR is vital to ensuring compliance with the standards. Over time, sod can grow over the sidewalk and not only reduce the width of the PAR to less than 48”, but also prevent proper drainage. Taller vegetation can grow into the PAR, creating an obstruction and/or protrusion
- Snow and Ice Removal – snow and ice accumulation along sidewalks, curb ramps, and on-street parking presents a barrier to many persons with disabilities and a potential safety hazard to all users. The prompt removal of snow for the full width of the sidewalk following a storm is vital to ensuring that pedestrians can use the sidewalk and not have to use the streets. Delays in removing the snow or not removing the full width of the sidewalk can significantly impact the ability of all users to utilize sidewalks. Not clearing accessible parking spaces and access aisles makes it extremely difficult for persons with disabilities to get from their vehicles to the PAR.

Another snow and ice removal concern is snow placement and plowing of streets. Particularly during large snow accumulations, multiple passes along the streets are required by snow plows to keep the streets clear for vehicles, with snow typically plowed to the curb. These accumulations of snow often block sidewalks and curb ramps to the point that they are unusable by persons with disabilities.

- Obstructions and Protrusions – when utility poles, signs, and other objects are replaced, it is important to make sure that they are moved out of the PAR to the greatest extent possible and obstructions and protrusions are eventually eliminated. Items such as utility poles, hydrants, street signs, mailboxes, etc. can all be relocated as part of regular maintenance activities.
- Level Changes – displacement of surfaces from an adjacent surface creates trips hazards to all users. The causes of these level changes vary and short term fixes can be considered until such time as a sidewalk project is completed. Minor level variances can either be beveled or grinded level. More severe elevation changes may require something more extreme, such as temporary patching material being placed to remove a vertical level change.
- Temporary Signage – consideration could be given to putting temporary signage at PARs that could present significant barriers to persons with disabilities. These signs should be located as close to an intersection as possible and identify an alternate route that does not have the same significant issues.

## **6.5 Transition Plan Phasing**

The ADA Coordinator should work closely with the Town Council to make funding available where possible to make the most urgent improvements to ensure all programs are accessible. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc. The Town is committed to becoming ADA compliant within the confines of preserving existing programs and services to all and budgetary limitations. Many of the items that are not compliant with current standards may be compliant with previous standards and are not required to be modified until a building renovation is completed.

Any changes to the ADA policy after the sites were surveyed are not reflected in these basic cost estimates. Additionally, it is the Town’s responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed improvements and facilities that are brought up to current ADA standards. Finally, the site surveys performed for this report are not to design level detail and are intended to be used to give a framework to

the Transition Plan. When the Transition Plan is approved and the planning stages are begun for implementation of the first improvements, a more detailed survey of each site should be performed and improvements should be designed by licensed professionals that are knowledgeable with ADA as well as all other applicable codes, including building and fire codes. At this time, costs are estimated but precise costs cannot be determined until final design and the Transition Plan should be adjusted to reflect this knowledge.

Complaints received may also help determine the priorities of the improvements. If the Town receives complaints about access at a particular site that is not slated for upgrades for several years, they should adjust the Transition Plan to accommodate the implementation of improvements to be sooner or as necessary.

## **6.6 Plan Updates and Enforcement**

Changes to the Town of Nashville's policies and programs should be drafted, implemented, and documented by the ADA Coordinator. Examples of some of these changes were provided in the Self-Evaluation. These changes should have little cost of implementation, mainly consisting of the time to develop the language of the policy and program changes, time to train Town staff, and administrative costs. Some of the suggested language for Town ADA documentation has been suggested in this report, but these suggestions are not exhaustive.



## 7.0 ADA Tool Kit

### 7.1 Introduction

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

**If you need any additional assistance, please contact:**

**Phyllis Carr, ADA Coordinator**

**Phone: (812) 988-5526 Email: [pcarr@townofnashville.org](mailto:pcarr@townofnashville.org)**

### 7.2 Federal Accessibility Standards and Regulations

#### **U.S. Department of Justice**

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

Unless noted, the ADA publications have not been updated to reflect the recent revisions to the ADA regulations that took effect on March 15, 2012.

- *ADA Regulation for Title II*. This publication describes Title II of the ADA ([http://www.ada.gov/regs2010/ADAREgs2010.htm#titleII\\_final\\_2010](http://www.ada.gov/regs2010/ADAREgs2010.htm#titleII_final_2010)), Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under Section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth Standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.
- *Title II Technical Assistance Manual (1993) and Supplements*. This 56-page manual ([www.ada.gov/taman2.html](http://www.ada.gov/taman2.html)) explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance.
- *Accessibility of State and Local Government Websites to People with Disabilities*. This is a 5-page publication providing guidance ([www.ada.gov/websites2.htm](http://www.ada.gov/websites2.htm)) on making state and local government websites accessible.

## U.S. Access Board

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

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

### Guidelines and Standards for Facilities

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

- *ADA Standards for Accessible Design (ADASAD)*. This document ([www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA, including special provisions where applicable for elements designed specifically for children ages 12 and under. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the DOT, under the ADA.
- *Accessibility Guidelines for Play Areas*. The Access Board has developed accessibility guidelines for newly constructed and altered play areas. This bulletin is designed to assist in using the play area accessibility guidelines and provides information regarding where the play area guidelines apply, what a play component is considered to be, how many play components must be an accessible route, and the requirements for accessible routes within play areas. ([www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas))
- *Accessibility Guidelines for Recreation Facilities*. The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADAAG. They cover the following facilities and elements: amusement rides, boating facilities, fishing piers and platforms, miniature golf courses, golf courses, exercise equipment, bowling lanes, shooting facilities, swimming pools, wading pools, and spas. These summaries were updated following issuance of ADASAD ([www.access-board.gov/guidelines-and-standards/recreation-facilities/guides](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides))
- *Accessibility Guidelines for Outdoor Developed Areas*. The Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas was established in June 1997. The accessibility guidelines proposed by the Committee include consideration of the latest information, design, and construction practices in existence. Proposed Section 16 of ADAAG requires all areas of newly designed or newly constructed and altered portions of existing trails connecting to designated trailheads or accessible trails to comply with this section. This proposed section also provides design guidelines for all newly constructed and altered camping facilities, picnic areas, and beach access routes. It is recognized that compliance with this section will not always result in facilities that will be accessible to all persons with disabilities. These guidelines recognize that often the natural environment will prevent full



compliance with certain technical provisions, which are outlined in this publication ([www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/draft-final-guidelines/text-of-theguidelines](http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/draft-final-guidelines/text-of-theguidelines)).

### Guidance Material and Advisory Reports for Facilities

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

- *Using ADAAG Technical Bulletin*. This bulletin was developed to serve the specific needs of architects and other design professionals who must apply the ADAAG to new construction and alterations projects covered by Titles II and III of the ADA. It is also intended to clarify accessibility regulations generally, including those that apply to existing facilities covered by the ADA.
- *Detectable Warnings Update (March 2008)*. Currently, the Access Board is in the process of developing guidelines on public rights-of-ways that, once finalized, will supplement the new ADAAG. This update is expected in 2013. While ADAAG covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public rights-of-way. Constraints posed by space limitations at sidewalks, roadway design practices, slope, and terrain raise valid questions on how and to what extent access can be achieved. Guidance on providing access for blind pedestrians at street crossings is also considered essential. This bulletin outlines the requirements of detectable warnings, a distinctive surface pattern of domes detectable by cane or underfoot, which are used to alert people with vision impairments of their approach to streets and hazardous drop-offs. The ADAAG require these warnings on the surface of curb ramps, which remove a tactile cue otherwise provided by curb faces, and at other areas where pedestrian ways blend with vehicular ways. They are also required along the edges of boarding platforms in transit facilities and the perimeter of reflecting pools. ([www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update](http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update))
- *Assistive Listening Systems Technical Bulletins*. Assistive listening systems are devices designed to help people with hearing loss improve their auditory access in difficult and large-area listening situations. Typically, these devices are used in such venues as movie houses, theaters, auditoriums, convention centers, and stadiums, where they are piggybacked on a public address system. They may also be used in smaller listening locations like courtrooms, museums, classrooms, and community centers. This web site provides information about the types of systems that are currently available and tips on choosing the appropriate systems for different types of applications.  
 ([www.michdhh.org/assistive\\_devices/hearing\\_assistive\\_tech.html](http://www.michdhh.org/assistive_devices/hearing_assistive_tech.html)).

## Guidelines for Transportation

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

## Guidance Material for Communication

- *Standards for Electronic and Information Technology*. The Access Board is issuing final accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 requires the Access Board to publish standards setting forth a definition of electronic and information technology and the technical and functional performance criteria necessary for such technology to comply with section 508. ([www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards](http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards))
- Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency. ([www.section508.gov/](http://www.section508.gov/))

- *Bulletin on the Telecommunications Act Accessibility Guidelines.* As technology continues to improve our means of telecommunication, it can pose challenges to accessibility on one hand, while on the other hold the key to innovative access solutions. Section 255 of the Telecommunications Act requires telecommunications products and services to be accessible to people with disabilities. This is required to the extent access is "readily achievable," meaning easily accomplishable, without much difficulty or expense. Telecommunications products covered include: wired and wireless telecommunication devices, such as telephones (including pay phones and cellular phones), pagers, and fax machines; other products that have a telecommunication service capability, such as computers with modems, and equipment that carriers use to provide services, such as a phone company's switching equipment. ([www.access-board.gov/the-board/laws/telecommunications-act](http://www.access-board.gov/the-board/laws/telecommunications-act))

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

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

- *ADA Document Portal:* This website ([www.adaportal.org](http://www.adaportal.org)) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- *DisabilityInfo.Gov:* A one-stop interagency portal for information on Federal programs, services, and resources for people with disabilities, their families, employers, service providers, and other community members.
- *National Center on Accessibility (NCA):* The Center (<http://ncaonline.org>) is a cooperative effort between the National Park Service (NPS) and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. Initiated in 2005, this longitudinal study is primarily the result of questions that the National Center on Accessibility has, for many years and continues to receive from organizations, agencies and individuals who desire to make their trails accessible; are interested in an unobtrusive surface that blends and is friendly to the environment; and provides a quality trail experience for people with and without disabilities.
- *National Center on Health, Physical Activity, and Disability:* The Center ([www.ncpad.org](http://www.ncpad.org)) provides information and resources on physical activity to help people with disabilities find ways to become more active and healthy. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps, and health and leisure services.
- *National Park Service:* NPS has many programs that address the issue of providing accessible recreation services to people with disabilities. These include Wilderness Accessibility for People with Disabilities ([www.ncd.gov/publications/1992/December1992#8-1a](http://www.ncd.gov/publications/1992/December1992#8-1a)) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program ([www.nps.gov/accessibility.htm](http://www.nps.gov/accessibility.htm)), lists applicable laws, standards, and authorities, implementation strategies, roles, and responsibilities. It also addresses NPS policies and provides links to additional information sources.

## 7.4 Technical Resources

The Town should utilize the many disability-related resources available through the internet. Begin at AbleData ([www.abledata.com](http://www.abledata.com)), maintained by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education. The site provides up-to-date links to assistive technologies and disability-related resources. AbleData's mission is to provide objective information on such assistive products as:

- *Architectural elements*: Products that make the built environment more accessible, including indoor and outdoor architectural elements, vertical lifts, lighting, and signs.
- *Blind and low vision*: Products for people with visual disabilities, including computers, educational aids, information storage, kitchen aids, labeling, magnification, office equipment, orientation and mobility, reading, recreation, sensors, telephones, tools, travel, typing, and writing (Braille).
- *Communication*: Products to help people with disabilities related to speech, writing and other methods of communication, including alternative and augmentative communication, signal systems, telephones, typing, and writing.
- *Computers*: Products to allow people with disabilities to use desktop and laptop computers and other kinds of information technology including software, hardware, and computer accessories.
- *Controls*: Products that provide people with disabilities with the ability to start, stop, or adjust electric or electronic devices including environmental controls and control switches.
- *Deaf and hard of hearing*: Products for people with hearing disabilities, including amplification, recreational electronics, signal switches, and telephones.
- *Deaf and blind*: Products for people who are both deaf and blind.
- *Education*: Products to provide people with disabilities with access to educational materials and instruction in school and in other learning environments including classroom and instructional materials.
- *Recreation*: Products to assist people with disabilities with their leisure and athletic activities including crafts, electronics, gardening, music, photography, and sports.
- *Seating*: Products that assist people to sit comfortably and safely including seating systems and therapeutic seats.
- *Transportation*: Products to enable people with disabilities to drive or ride in cars, vans, trucks and buses including mass transit vehicles and facilities and vehicle accessories.
- *Wheeled mobility*: Products and accessories that enable people with mobility disabilities to move freely indoors and outdoors including wheelchairs (manual, sport, and powered), wheelchair alternatives (scooters), wheelchair accessories, and carts.
- *Workplace*: Products to aid people with disabilities at work including agricultural equipment, office equipment, tools, and work stations.

### Assistive Technology Vendors and Service Providers

- **International Commission on Technology and Accessibility**  
Initiates, facilitates, and provides information regarding technology and accessibility through the internet. This information is available to people with disability, advocates, and professionals in the field of disability, researchers, legislative bodies, and the general community. ([www.ictaglobal.org](http://www.ictaglobal.org))
- **National Center for Accessible Media**  
A research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces, and communities. NCAM has developed an authoring tool to make web- and CD-ROM-based multimedia materials accessible to persons with

disabilities. Called Media Access Generator (MAGpie, versions 1.0 and 2.01) create captions and audio descriptions of rich media and can be downloaded on their website ([ncam.wgbh.org](http://ncam.wgbh.org)).

- **American Sign Language Interpreters**

A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a 24-hour basis to handle emergency procedures. The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, unique circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. Resources and contacts for qualified sign language interpreters and information for the deaf and hard of hearing are at the following locations:

- Deaf & Hard of Hearing Services (DHHS), Division of Disability & Rehabilitative Services (DDRS)  
 402 W. Washington St., Rm. W453  
 P.O. Box 7083  
 Indianapolis, IN 46207-7082  
 1-800-545-7763  
[DHSHelp@fssa.IN.gov](mailto:DHSHelp@fssa.IN.gov)  
[www.in.gov/fssa/ddrs/2637.htm](http://www.in.gov/fssa/ddrs/2637.htm)
- American Sign Language Interpreter Network - [www.aslnetwork.com/](http://www.aslnetwork.com/)
- Registry of Interpreters for the Deaf – [www.rid.org/](http://www.rid.org/)

- **Assistive Listening Systems and Devices**

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

- *Relay Indiana*: [Relay Indiana](#), a service of InTRAC, is a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired. This service allows users with special telecommunication devices to communicate with standard users through specially trained Relay Operators. InTRAC also provides free, loaned equipment to those who qualify.
- *Closed Caption Machine* - To the extent practical, Town Divisions should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- *Enlarging Printed Materials* - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- *Optical Readers* - Equipment that can translate printed information into an audio format should be available to Departments.
- *TDD* - To the extent necessary, Town Divisions should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.
- *TDI* – TDI’s (formerly known as Telecommunications for the Deaf, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI’s online resources ([www.tdiforaccess.org/index.aspx](http://www.tdiforaccess.org/index.aspx)) include information about telecommunications access such a TTY, pagers, telephony, VoIP, and more.

### Guide to Disabilities and Disability Etiquette

A summary guide to disabilities and disability etiquette has been included below. The guide will allow staff members to become familiar with a variety of types of disabilities, and help them to be more sensitive to the

abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

The National Organization on Disability reports that more than 59 million Americans have a disability. This section is for anyone — with or without a disability — who wants to interact more effectively with people who are disabled.

The ADA was conceived with the goal of integrating people with disabilities into all aspects of American life, particularly the workplace and the marketplace. Sensitivity toward people with disabilities is not only in the spirit of the ADA, it makes good business sense. It can help the Town expand its services to citizens, better serve its customers and improve relationships with its employees.

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

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

- **Ask Before You Help**

Just because someone has a disability, don't assume he/she needs your help. If the setting is accessible, people with disabilities can usually get around fine without assistance. Adults with disabilities want to be treated as independent people. Offer assistance only if the person appears to need it. If they do want help, ask what type of help they would like before you offer any assistance. What you think they may need may not be what they really need.

- **Do Not Touch!**

Some people with disabilities depend on their arms for balance. Grabbing them – even if you mean well – could knock them off balance and create an injury. This is especially true of a person using a cane, crutches, or walker.

When someone is in a wheelchair, never pat their head or touch their wheelchair (or scooter) without permission. This equipment is part of their personal space and touching it is considered rude.

- **Engage Your Mind Before Engaging Your Mouth**

Always speak directly to the person with the disability NOT to their companion, aide, or sign language interpreter. Making small talk with a person who has a disability is great; just talk to him/her like you would anyone else. Respect his/her privacy and don't ask questions about their disability unless they invite the discussion. If you are with a child who asks, don't make the situation awkward for everyone; let the person with the disability respond directly to the child. They are used to children's questions.

- **Make No Assumptions**

People with disabilities are the best judge of what they can or cannot do. Do not make any decisions for them about participating in any activity or what they may or may not be able to do. Simply respond to their questions and let them make their own decisions. Depending on the situation, it may be a violation of the ADA to exclude someone because of a wrong decision on what they're capable of doing.

- **Respond Graciously To Requests**

When people who have a disability ask for an accommodation at a Town-owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again

and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.

- **Terminology**

PUT THE PERSON FIRST! Always say “person with a disability” rather than “disabled person”. This recognizes that they are a person first, not a disability first. If someone has a specific disability, it would be a “person who is blind”, a “person who is deaf”, or a “person with dwarfism”. Each person may have their own preferred terminology, and if you’re not sure what to use, just ask them. Most, however, will recognize the effort when you just refer to them as “people”.

Avoid outdated, politically incorrect terms like “handicapped” or “crippled”. Be aware that many people with disabilities dislike jargon and euphemistic terms like “physically challenged” and “differently abled”. Say “wheelchair user” instead of “confined to a wheelchair” or “wheelchair bound”. The wheelchair is what enables the person to get around, but they are neither confined by it nor bound to it. The wheelchair is liberating, not confining.

With any disability, avoid negative, disempowering words like “victim” or “sufferer”. Say “person with AIDS” instead of “AIDS victim” or person who “suffers from AIDS”.

It’s okay to use idiomatic expressions when talking to people with disabilities. For example, saying “It was good to see you” and “See you later” to a person who is blind is completely acceptable. They will use the same terminology and it’s inappropriate to respond with questions like, “How are you going to see me later?”

People in wheelchairs will say things like, “Let’s go for a walk” and it’s okay for you to say it too. The situation will only become awkward if you make it so.

Many people who are Deaf communicate with sign language and consider themselves to be members of a cultural and linguistic minority group. They refer to themselves as Deaf (with a capital D) and may be offended by the term “hearing impaired.” Others may not object to the term, but in general it is safest to refer to people who have hearing loss but communicate through a spoken language as “people with hearing loss” and those who have a profound hearing loss as “people who are Deaf”.

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

There are a large number of groups nationally, regionally, and within each state that provide specialized services, information, and advocacy for persons with all disabilities. A sampling of available advocacy groups are listed below.

- *Ability Resources, Inc.:* Ability Resources Inc. ([www.ability-resources.org/home.org](http://www.ability-resources.org/home.org)) was founded in 1976. Their mission is to assist people with disabilities in attaining and maintaining their personal independence. One way this can be achieved is in the creation of an environment in which people with disabilities can exercise their rights to control and direct their own lives.
- *ADA National Network:* The ADA National Network (<http://adata.org/>) provides information, guidance and training on the Americans with Disabilities Act (ADA), tailored to meet the needs of business, government and individuals at local, regional and national levels. The ADA National Network consists of ten Regional ADA National Network Centers located throughout the United States that provide local assistance to ensure that the ADA is implemented wherever possible.
- *American Council of the Blind:* ACB ([www.acb.org](http://www.acb.org)) is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800.424.8666) or by e-mail at [info@acb.org](mailto:info@acb.org).

- *American Association of People with Disabilities*: The American Association of People with Disabilities ([www.aapd.com/](http://www.aapd.com/)) is the largest non-profit, non-partisan, cross-disability organization in the United States.
- *National Association of the Deaf*: NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website ([www.nad.org](http://www.nad.org)).
- *National Federation of the Blind*: NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided online resources ([www.nfb.org](http://www.nfb.org)) for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed circuit TV (CCTVs).
- *National Organization on Disability*: The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources ([www.nod.org](http://www.nod.org)).
- *Paralyzed Veterans of America*: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website ([www.pva.org/sports/sportsindex.htm](http://www.pva.org/sports/sportsindex.htm)) provides information on useful sports publications and a list of contacts.
- *United Spinal Association*: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website ([www.unitedspinal.org](http://www.unitedspinal.org)).
- *World Institute on Disability*: WID is an international public policy center dedicated to carrying out research on disability issues and overcoming obstacles to independent living. WID maintains an on-line information and resource directory on technology, research, universal design, and the ADA. ([www.wid.org/resources](http://www.wid.org/resources)).
- *State of Indiana Division of Disability & Rehabilitative Services (DDRS)*: [www.in.gov/fssa/ddrs/2637.htm](http://www.in.gov/fssa/ddrs/2637.htm)
- *State of Indiana Protection and Advocacy Services (IPAS)*: [www.in.gov/ipas/](http://www.in.gov/ipas/)
- *Disability Resources, Inc., Guide to Disability Resources on the Internet – IN*: Disability Resources, inc. is a nonprofit 501(c)(3) organization established to promote and improve awareness, availability and accessibility of information that can help people with disabilities live, learn, love, work and play independently. [www.disabilityresources.org/INDIANA.html](http://www.disabilityresources.org/INDIANA.html)
- *Indiana Resource Center for Families with Special Needs (IN\*SOURCE)*: The mission of IN\*SOURCE is to provide parents, families, and service providers in Indiana the information and training necessary to assure effective educational programs and appropriate services for children and young adults with disabilities. IN\*SOURCE employs nearly 13 staff at their central office in South Bend and 16 staff in other regional sites around the state. [insource.org/index.htm](http://insource.org/index.htm)
- *ADA-Indiana*: The mission of ADA-Indiana is to serve as a statewide resource for promoting the implementation of the Americans with Disabilities Act in Indiana. [www.adaindiana.org/](http://www.adaindiana.org/)
- *Great Lakes ADA Center*: The Great Lakes ADA Center provides information, materials, technical assistance and training on the ADA. Topics addressed includes the non-discrimination requirements in employment, the obligations of state and local governments and business to ensure that programs, services and activities are readily accessible to and useable by people with disabilities. This includes



access to the information technology used by these entities including but not limited to websites, software, kiosks, etc.

The Great Lakes ADA Center's Accessible Technology Initiative encourages incorporation of accessible information technology in K-12 and post secondary school settings. Accessible Information Technology incorporates the principles of universal design so that people with a wide range of abilities and disabilities can access information disseminated electronically. [www.adagreatlakes.org/](http://www.adagreatlakes.org/)

- *Indiana Council on Independent Living*: Their mission is to effectively lead a statewide Independent Living Movement that empowers people with disabilities. [www.icoil.org/index.html](http://www.icoil.org/index.html)
- *The Arc of Indiana*: The Arc of Indiana is committed to all people with developmental disabilities realizing their goals of learning, living, working and playing in the community. [www.arcind.org/](http://www.arcind.org/)
- *Deaf Link*: Provides video remote interpreting (VRI) to provide the highest standard of inclusion for persons who are Deaf, Blind, Hard-of Hearing and Deaf-Blind. [www.deaflink.com/index.aspx](http://www.deaflink.com/index.aspx).

### **7.5 Potential Funding Opportunities**

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

**Indiana Department of Transportation** offers a number of grants for construction of right-of-way facilities. Examples include the following:

- The **Community Crossings Matching Grant** is part of Indiana legislation for local road and bridge preservation type projects, road reconstructions, and small structure replacements, which may include ramp/sidewalk preventative maintenance and ADA related improvements. The program requires an online application, a current Asset Management Plan (AMP) – Road and Bridge, and compliance with Title VI & the ADA (including current SETP). There is typically a 50% match and the ADA sidewalk and curb ramp improvements are to be done in connection with road resurfacing and reconstruction projects.
- Various INDOT LPA programs are also available that may cover trails, ADA, sidewalks, and other roadway and safety projects.

**Indiana Office of Community and Rural Affairs (OCRA)** Also offers a number of grant opportunities that may be applicable to ADA-related improvements including the following:

- **Main Street Revitalization Program (MSRP) Program** requires a designated Indiana Main Street organization and a downtown revitalization plan within the past five years that meets OCRA's minimum technical requirements. Eligible projects may include updating streetscapes and downtown infrastructure rehabilitation. <https://www.in.gov/ocra/2583.htm>
- **Public Facilities** A maximum grant award of \$500,000 is awarded based on appropriateness of the project's scope, the level of demonstrated need and the financial resources of the applicant and requires a local match of 10% of the total project cost. Eligible projects include removal of architectural barriers for ADA accessibility. <https://www.in.gov/ocra/2699.htm>

Other grant opportunities include the Indiana Finance Authority (IFA)'s COVID-related program which may include restroom upgrades and building renovations, and Economic Development (EDA) grants that may cover potential streetscape and infrastructure work at 80/20 match. These programs may have limited funding and/or time frame of availability.

***Other local funding mechanisms*** that may be utilized include Tax Increment Financing districts (TIF), County Option Income Taxes (COIT), County Economic Development Tax (CEDIT), Motor Vehicle Highway (MVH), Wheel Tax (LOHUT), Local Road and Street (LRS), and other similar means.

## 8.0 Definitions

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

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

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

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

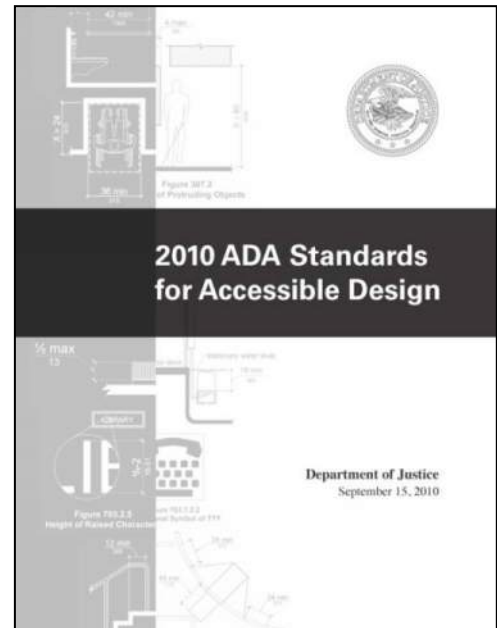
**Affirmative Action (AA):** a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance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

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

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

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

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



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

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

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

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

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

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

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

**Discrimination on the basis of disability:** means to:

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

**Employer:** a person engaged in an industry affecting commerce who has 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year, and any agent of such person, except that, for two years following the effective date of this subchapter, an employer means a person engaged in an industry affecting commerce who has 25 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding year, and any agent of such person. Exceptions: The term "employer" does not include the United States, a corporation wholly owned by the government of the United States, or an Indian tribe; or a bona fide private membership club (other than a labor organization) that is exempt from taxation under section 501(c) of Title 26 [the Internal Revenue Code of 1986].

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

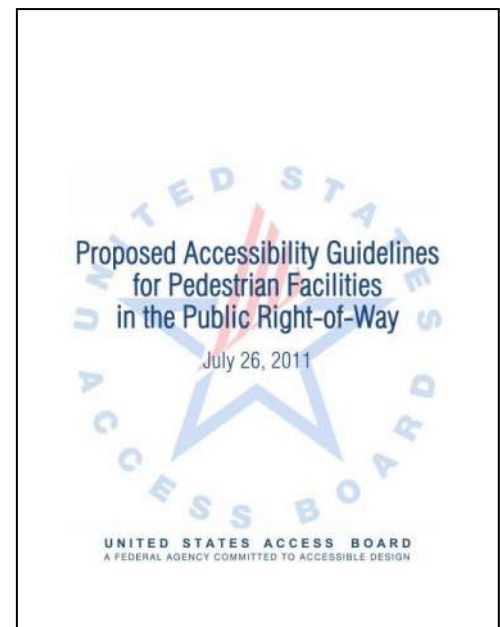
**Physical or Mental Impairment:** a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes;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

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

**PROWAG:** Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way. These proposed guidelines (dated July 26, 2011) provide design criteria for public streets and sidewalks, including pedestrian access routes, street crossings, curb ramps and blended transitions, on-street parking, street furniture, and other elements. The specifications comprehensively address access that accommodates all types of disabilities, including mobility and vision impairments, while taking into account conditions and constraints that may impact compliance, such as space limitations and terrain.

**Public Accommodations:** entities that must comply with Title III.

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



adoption agencies); and places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

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

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

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

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

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

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

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

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

**Record of an Impairment:** an individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity or has been diagnosed, correctly or incorrectly, as having such an impairment. An example: a man, who is in line for a promotion, has a history of cancer treatment, although he is now free of cancer. He is not given the promotion because his bosses are



worried that, if his cancer returns, he won't be able to do the job. He does not, at this point, meet the first part of the definition of disability because he does not have a physical or mental impairment that substantially limits one or more major life activities. However, based on his "record of" an impairment, he is being discriminated against.

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

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

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

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

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

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

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

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

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

**Undue Burden:** means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature

of operation of the business of the Town. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to Town of Nashville, the Town shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the Town must consider whether funding for the modification is available from an outside source. If no such funding is available, the Town must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden.

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

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

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

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

# Appendix A

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## *Building Facilities Physical Barrier Summary*

Town Hall  
Police Station  
Old School Way Public Restroom  
Mound Street Public Restroom  
Village Green Public Restroom  
Waste Water Treatment Building  
Public Parking Lots

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**TOWN OF NASHVILLE  
ADA SELF EVALUATION AND TRANSITION PLAN**

**FACILITY SUMMARY**

<b>Name &amp; Location</b>	<b>Ownership Status</b>	<b>Low Priority</b>	<b>Medium Priority</b>	<b>High Priority</b>	<b>Total Site Cost</b>
<b>Town Hall</b> 200 Commercial Street	Town Owned	\$23,500	\$10,980	\$18,350	\$52,830
<b>Police Department</b> 25 Artist Drive	Town Owned	\$30,365	\$9,350	\$650	\$40,365
<b>Public Restroom 1</b> Old School Way	Town Owned	\$4,330	\$18,550	\$0	\$22,880
<b>Public Restroom 2</b> Mound Street	Town Owned	\$4,930	\$18,050	\$0	\$22,980
<b>Public Restroom 3 &amp; Village Green</b> Jefferson and Main	Town Owned	\$8,555	\$5,550	\$6,100	\$20,205
<b>Wastewater Treatment</b> S. Van Buren St./Treatment Plant Rd.	Town Owned	\$31,210	\$1,010	\$200	\$32,420
<b>Town Parking Lot</b> Old School Way Restrooms	Town Owned	\$4,330	\$18,550	\$0	\$22,880
<b>Town Parking Lot</b> O'Reilly and Jefferson	Town Owned	\$0	\$3,655	\$2,410	\$6,065
<b>Town Parking Lot</b> Pittman House	Town Owned	\$560	\$0	\$0	\$560
<b>Town Parking Lot</b> Sycamore and Washington	Town Owned	\$0	\$0	\$1,555	\$1,555
<b>TOTALS</b>		<b>Low Priority</b> <b>\$107,780</b>	<b>Medium Priority</b> <b>\$85,695</b>	<b>High Priority</b> <b>\$29,265</b>	<b>Total Cost</b> <b>\$222,740</b>

All cost estimates for Town facilities are based on a single unified bid with 2020 estimated costs. Bidding in a different manner or different time period will require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical or structural concerns.



# Town Hall

200 Commercial Street



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
	27 spaces provided including 2 designated as accessible. 1 van space and 1 car space required.		
	Mill, Overlay and Restripe Spaces and Aisle.	Medium	\$800
	Notes: Spaces and access aisle exceed 2% max. ranging from 2.8%-4%. 2.2-3% running slope. Mill and overlay to correct minor slope deviation. Restripe with min. 8' wide van space with min. 8' wide access aisle (or 11' min. space with 5' min. aisle) and adjacent 8' min. car space. Federal Guideline: 302, 502.4		
	Provide Accessible Directional Signage	Medium	\$250
	Notes: Reposition existing signs to compliant height (60" min.) and indicate van accessible parking at van space. Federal Guideline: 502.6		
	Accessible Routes		
	Replace Curb Ramp	Low	\$1,500
	Notes: Cross slope of ramp and adjacent landing is 2.6% (2% max.) Federal Guideline: 303.2, 406.4		
	Replace Sidewalk at Curb Ramp	Low	Incl. above
	Notes: 10x10 panel at top of curb ramp exceeds 2% max. Federal Guideline: 403.3		
	Replace Sidewalk from Sidewalk in Right-Of-Way to Parking	Medium	\$2,400
	Notes: Running slope is 7% from ROW to stair landing area (5% max.) Cross slope is 4.7%-5.7% from ROW to stair landing and crosses curb ramp flare (2% max.) Level change of direction is not provided at lot corner near curb ramp. Grasses obstruct min. width. Federal Guideline: 403.3-4		
	Replace Bottom Landing at South Stairs	Low	Incl. above
	Notes: Cross slope at bottom of stairs is 5.7% (2% max.) Federal Guideline: 304.2		

Item #	Description	Priority	Estimated Cost
	<i>Replace Handrails at South Stairs</i>		
	Notes: 2"x6" handrail perimeter is above 6 1/4" max. Handrails are peeling which may create abrasive surface. Handrail extensions are non-compliant (12" beyond top stair and 1 tread depth beyond bottom stair required.)	Medium	\$1,080
	Federal Guideline: 505.7.2, 505.8, 505.10.2-3		
	<i>Replace Handrails at North Stairs to ROW</i>		
	Notes: Handrail is required on both sides of stair. 2"x6" handrail perimeter is above 6 1/4" max. Handrails are peeling which may create abrasive surface. Handrail extensions are non-compliant (12" beyond top stair and 1 tread depth beyond bottom stair required.)	Medium	\$1,800
	Federal Guideline: 505.7.2, 505.8, 505.10.2-3		
	<i>Replace Handrails at North Stairs to Parking Lot</i>		
	Notes: Handrail is required on both sides of stair. Handrail is mounted above 34"-38" allowable range. 2"x6" handrail perimeter is above 6 1/4" max. Handrails are peeling which may create abrasive surface. Handrail extensions are non-compliant (12" beyond top stair and 1 tread depth beyond bottom stair required.)	Medium	\$510
	Federal Guideline: 505.4, 505.7.2, 505.8, 505.10.2-3		
<b>Interior</b>			
Item #	Description	Priority	Estimated Cost
	South Entrance (Main)		
	<i>Provide Means of Egress Signage</i>	High	\$100
	Notes: None provided. Federal Guideline: 207, 216.4, 703		
	<i>Provide Higher Kick Plate on Push Side of Doors</i>	Low	\$220
	Notes: 9" to glazing (10" min. smooth req'd). Cap resulting gap between the top of plate and glass. Federal Guideline: 404.2.10		
	<i>Adjust Exterior Door Closer<sup>1</sup></i>	Low	\$450
	Notes: Closing speed is less than 5 sec. min. Federal Guideline: 404.2.8		
	<i>Adjust Interior Door Closer<sup>1</sup></i>	Medium	\$450
	Notes: Operating effort exceeds 5 lb max for interior doors. Federal Guideline: 404.2.9		
	<i>Replace Doors</i>	Low	\$5,000
	Notes: Height of clear door opening is 79.5" (80" req'd) Federal Guideline: 404.2.3		
	<i>Relocate Fire Alarm Activation Device In Vestibule</i>	Medium	\$220
	Notes: Operable part located at 59" ht. (48" max.) Federal Guideline: 308.2		



Item #	Description	Priority	Estimated Cost
	North Entrance		
	<i>Note: Entrance is not on an accessible route due to stair access. Entrance is generally not used by public. Consider providing signage to accessible main entrance.</i>	High	\$150
	<i>Provide Means of Egress Signage</i>	High	\$100
	Notes: None provided. Federal Guideline: 207, 216.4, 703		
	<i>Provide Higher Kick Plate on Push Side of Doors</i>	Low	\$220
	Notes: 9" to glazing (10" min. smooth req'd). Cap resulting gap between the top of plate and glass. Federal Guideline: 404.2.10		
	Common Area/Corridors		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 14" ht. Provide power strip mounted within reach range. Federal Guideline: 205.1, 308.2-3		
	<i>Relocate Fire Alarm Activation Devices in Corridor</i>	Low	\$220
	Notes: Operable part located at 59" ht. (48" max.) Federal Guideline: 308.2		
	Clerk-Treasurer's Office		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: Visual only provided on glazing. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Adjust Door Closer<sup>1</sup></i>	Medium	\$450
	Notes: Operating effort exceeds 5 lb max for interior doors. Federal Guideline: 404.2.9		
	<i>Protect Protruding Counter Edge</i>	Low	\$50
	Notes: Corner protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below. Federal Guideline: 307.2		
	<i>Provide Accessible Service Counter or Alternate Accommodation</i>	Low	\$600
	Notes: Counter height is 42" which exceeds allowable height and provides insufficient knee space (28" - 34" with knee space for work surface; 36" max verbal interaction) Federal Guideline: 226.1, 902.2		
	Council Chambers		
	<i>Provide Wall Signage at Both Entries</i>	Medium	\$200
	Notes: None provided. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Adjust Door Closers, Typ. Both Sets<sup>1</sup></i>	Low	\$900
	Notes: Operating effort exceeds 5 lb max for interior doors. Closing Federal Guideline: 404.2.8-9		

Item #	Description	Priority	Estimated Cost
	<i>Provide Higher Kick Plate at Push Side of Doors, Typ. Both Sets</i>	Low	\$220
	Notes: 9" to glazing (10" min. smooth req'd). Cap resulting gap between the top of plate and glass. Federal Guideline: 404.2.10		
	<i>Replace Doors, Typ. Both Sets</i>	Low	\$3,000
	Notes: Height of clear door opening is 79.5" (80" req'd) Federal Guideline: 404.2.3		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 50" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 14" ht. Provide power strip mounted within reach range. Federal Guideline: 205.1, 308.2-3		
	<i>Relocate Fire Alarm Activation Device</i>	Medium	\$220
	Notes: Operable part located at 58.5" ht. (48" max.) Federal Guideline: 308.2		
	<i>Note: Council Seating is 6" above room via stair. Provide alternate accommodation as needed or install ramp.</i>	N/A	N/A
	<i>Note: Entrance is not on an accessible route due to stair access. Entrance is generally not used by public. Consider providing signage to accessible main entrance.</i>	Low	\$150
	Hallway Kitchenette		
	<i>Provide Minimum Clearance in Kitchenette</i>	Low	TBD
	Notes: Space available is 58"X55". U-Shaped clearance between opposing cabinets, counter tops, appliances or walls shall be 60" min. Federal Guideline: 804.2.2		
	<i>Provide Accessible Kitchen Work Surface</i>	Low	\$360
	Notes: No knee space is provided and height exceeds 34" max. Federal Guideline: 205.1, 308.2, 308.3		
	<i>Provide Accessible Sink</i>	Low	\$1,300
	Notes: No knee space is provided and height exceeds 34" max. Federal Guideline: 212.3, 306.3, 309, 606.2		
	Staff Kitchenette/Copy Room		
	<i>Remove Trim at Doorway</i>	Low	\$50
	Notes: Trim narrows clear door width to 30.5 at bottom. Remove trim to achieve 32" min. clear. Federal Guideline: 404.2.3		
	<i>Provide Minimum Clearance in Kitchenette; Relocate Table</i>	Low	\$0
	Notes: Min. 60" U-Shaped clearance between opposing cabinets, counter tops, appliances or walls is available but obstructed by table. Federal Guideline: 804.2.2		

Item #	Description	Priority	Estimated Cost
	<i>Provide Accessible Sink</i>	Low	\$1,300
	Notes: Height exceeds 34" max. Federal Guideline: 212.3, 306.3, 309, 606.2		
	<i>Relocate Microwave</i>	Low	\$50
	Notes: Operable parts are located at 60-64" ht. (15"-48" reach range req'd) Federal Guideline: 307.2		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 46" ht. over 22" deep counter (44" max.) Provide power strip mounted within reach range. Federal Guideline: 205.1, 308.2-3		
	<b>Men's Restroom</b>		
	<i>Reposition Wall Signage</i>	Low	\$50
	Notes: Sign located 61.75" to lowest tactile character. (48" min. to 60" max.) Federal Guideline: 216.8, 703.6		
	<i>Adjust Door Closer<sup>1</sup></i>	Medium	\$450
	Notes: Closing speed is less than 5 sec. min. Operating effort is over 5lb max for interior doors. Federal Guideline: 404.2.8-9		
	<i>Provide Maneuvering Space on Pull Side of Door</i>	Low	\$3,250
	Notes: Wall obstructs pull side clearance at 41" (54" perpendicular with closer req'd for latch side approach) Cost assumes elimination of urinal and screen wall. Federal Guideline: 404.2.4		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 54.5" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Insulate Water Lines</i>	Medium	\$100
	Notes: Supply lines, valves, and exposed drain pipes are not insulated to protect against contact. Federal Guideline: 606.5		
	<i>Note: Urinal is not accessible, but since only one is provided, it is not required to comply per 213.3.3</i>		
	<i>Provide Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide outside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7, 309.4		

Item #	Description	Priority	Estimated Cost
	<i>Modify Stall Partitions</i>	High	\$9,000
	Notes: Stall width is 36" (60" min.) Block walls obstruct toe clearance on sides. (front and at least one side req'd 9" min. clear above finish floor and 6" deep beyond partitions). Cost assumes removal of block wall and one fixture in order to provide space for compliant stall. Federal Guideline: 604.3.1, 604.8.1.2-4		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser mounted inline with toilet (7"-9" to centerline req'd) and obstructs min. 12" clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Provide Rear Grab Bar</i>	Medium	\$500
	Notes: None provided. Federal Guideline: 609.4		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<b>Women's Restroom</b>		
	<i>Reposition Wall Signage</i>	Low	\$50
	Notes: Sign located 61" to lowest tactile character. (48" min. to 60" max.) Federal Guideline: 216.8. 703.6		
	<i>Adjust Door Closer<sup>1</sup></i>	Medium	\$450
	Notes: Operating effort is over 5lb max for interior doors. Federal Guideline: 404.2.9		
	<i>Provide Maneuvering Space on Pull Side of Door</i>	Low	\$3,250
	Notes: Wall obstructs pull side clearance at 40" (54" perpendicular with closer req'd for latch side approach) Federal Guideline: 404.2.4		
	<i>Provide Turning Area; Relocate Trash Can</i>	Low	\$0
	Notes: Trash can obstructs required 60" diameter turning area. Federal Guideline: 304.3, 306.3, 606.2		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 54.5" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Insulate Water Lines</i>	Medium	\$100
	Notes: Supply lines, valves, and exposed drain pipes are not insulated to protect against contact. Federal Guideline: 606.5		
	<i>Provide Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide inside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7, 309.4		

Item #	Description	Priority	Estimated Cost
	<i>Modify Stall Partitions</i>	High	\$9,000
	Notes: Stall width is 36" (60" min.) Block walls obstruct toe clearance on sides. (front and at least one side req'd 9" min. clear above finish floor and 6" deep beyond partitions). Cost assumes removal of block wall and one fixture in order to provide space for compliant stall. Federal Guideline: 604.3.1, 604.8.1.2-4		
	<i>Replace Flush Controls</i>	Medium	\$400
	Notes: Flush controls are not located on wide side of toilet. Replace with auto flush sensor. Federal Guideline: 604.6		
	<i>Reposition Toilet Paper Dispenser and Trash</i>	Low	\$50
	Notes: Dispenser mounted inline with toilet (7"-9" to centerline req'd). Dispenser and trash obstruct min. 12" clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Provide Rear Grab Bar</i>	Medium	\$500
	Notes: None provided. Federal Guideline: 609.4		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<b>Facility Total:</b>		\$52,830

**General Notes:** 1. For door closer adjustments, cost shown is to replace in case adjustment cannot alleviate the compliance issue (typical).



# Police Department

25 Artists Drive



Data collected 8/2020

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
	15 spaces provided including 1 designated as accessible. 1 van space required.		
	Provide Van Accessible Space and Signage	High	\$150
	Notes: None provided. Provide sign at 80" min. ht. indicating van accessible parking. Federal Guideline: 502.6		
	Mill and Overlay, Restripe Space	Low	\$685
	Notes: Slope varies over 2% (up to 3.3% within space and up to 4.5% in access aisle). Mill and overlay then restripe to provide 11' stall with 5' access aisle or 8' stall with 8' access aisle. Federal Guideline: 302, 502.4, 502.6		
	Accessible Routes		
	Eliminate Gap at Access Aisle	Low	Incl. Above
	Notes: Horizontal gap at interface of asphalt access aisle and concrete walk exceeds 1/2" max. Correct when repaving space. Federal Guideline: 302.3, 403.2		
Interior			
Item #	Description	Priority	Estimated Cost
	Provide Means of Egress Signage	High	\$500
	Notes: None provided. Federal Guideline: 207, 216.4, 703		
	Public Lobby		
	Replace Threshold at Public Exterior Door	Medium	\$350
	Notes: Threshold exceeds maximum height of 1/2" and exception for existing thresholds 3/4" high max. with beveled edges. Federal Guideline: 404.2.5		
	Provide Kick Plate on Public Exterior Door	Low	\$110
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		

Item #	Description	Priority	Estimated Cost
	<i>Provide Maneuvering Space on Pull Side of Exterior Door</i>	Medium	\$2,500
	Notes: Wall obstructs 18" min. req'd parallel to latch side on pull side of door at 5". Federal Guideline: 404.2.4.1		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 53.5" ht (48" max). Federal Guideline: 205.1, 308.2		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 9.75" ht. Provide power strip mounted within reach range (15" min. - 48" max. above floor level). Federal Guideline: 205.1, 308.2		
	<i>Provide Accessible Service Counter or Alternate Accommodation</i>	Low	\$600
	Notes: Counter height is 36 1/8" high which exceeds allowable height and provides insufficient knee space (28" - 34" with knee space for work surface; 36" max verbal interaction) Federal Guideline: 226.1, 902.2		
	<i>Protect Protruding Objects</i>	Low	Incl. Above
	Notes: Corner of counter protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reconfigure to eliminate. Federal Guideline: 307.2		
	<i>Provide Wall Signage at Interior Door to Staff Area</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace Door Hardware at Interior Door to Staff Area</i>	Low	\$300
	Notes: Twist lock requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate on Interior Door to Staff Area</i>	Low	\$110
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		
	<i>Provide Maneuvering Space on Pull Side of Door to Staff Area</i>	Low	\$600
	Notes: Counter obstructs 18" min. req'd parallel to latch side on pull side of door at 11". Reconfigure counter. Federal Guideline: 404.2.4.1		
	<b>Corridors</b>		
	<i>Provide Wall Signage at Interior Double Doors</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on right side of double doors. Federal Guideline: 216.2, 703.6, 407.4.3, 703.4.2		



Item #	Description	Priority	Estimated Cost
	<i>Provide Wall Signage at All Doors</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on latch side of door at all permanent spaces (offices, electrical/mechanical, storage, etc.) Federal Guideline: 703		
	<i>Replace Interior Double Doors</i>	Low	\$3,500
	Notes: At double-leaf doors, clear width is 28". One leaf must have 32" min clear width with only 1 open. 9" to glazing (10" min. smooth req'd on push side). Federal Guideline: 404.2.2, 404.2.10		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 51.75" ht (48" max). Federal Guideline: 205.1, 308.2		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 12" ht. Provide power strip mounted within reach range (15" min. - 48" max. above floor level). Federal Guideline: 205.1, 308.2		
	<i>Protect Protruding Objects</i>	Low	\$50
	Notes: Corner of counters at west work area protrude over 4" max. between 27" and 80" high. Provide cane detectable element below or reconfigure to eliminate. Federal Guideline: 307.2		
	<b>Interview Room</b>		
	<i>Provide Wall Signage</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace Door</i>	Low	\$1,500
	Notes: Door clear width is 29.5" (32" min.). Federal Guideline: 404.2.3		
	<i>Replace Door Hardware</i>	Low	\$300
	Notes: Twist lock requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate at Door</i>	Low	\$110
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 52" ht (48" max). Federal Guideline: 205.1, 308.2		
	<b>Kitchenette</b>		
	<i>Provide Wall Signage</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on latch side of doorway. Federal Guideline: 216.2, 703.6		

Item #	Description	Priority	Estimated Cost
	<i>Provide Accessible Sink</i>	Low	\$1,300
	Notes: Rim of sink height is 37.5" (34" max.) Federal Guideline: 212.3, 306.3		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located above and below reach range. Provide power strip mounted within reach range (15" min. - 48" max. above floor level for unobstructed reach, 44" max. for obstructed reach). Federal Guideline: 205.1, 308.2		
	<i>Reposition Paper Towel Dispenser</i>	Low	\$50
	Notes: Located at 56" ht. (48" max.) Federal Guideline: 308, 604.7		
	<b>Officers Entrances</b>		
	<i>Replace Threshold at Northeast Exterior Door</i>	Low	\$350
	Notes: Threshold exceeds maximum height of 1/2" and exception for existing thresholds 3/4" high max. with beveled edges. Federal Guideline: 404.2.5		
	<i>Replace Secure Door Hardware at Northeast Exterior Door</i>	Low	TBD
	Notes: Twist lock requires twisting and grasping. Punch code hardware is non-compliant. Investigate options for providing compliant secure access. Federal Guideline: 309.4, 402.2.7		
	<i>Replace Threshold at West Exterior Door; Replace Door</i>	Low	\$3,500
	Notes: Threshold exceeds maximum height of 1/2" and exception for existing thresholds 3/4" high max. with beveled edges. Height of clear door opening is 79.5" (80" min.). 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.5, 404.2.3, 404.2.10		
	<i>Replace Secure Door Hardware at West Exterior Door</i>	Low	TBD
	Notes: Twist lock requires twisting and grasping. Punch code hardware is non-compliant. Investigate options for providing compliant secure access. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Maneuvering Space on Pull Side of Door</i>	Low	\$2,500
	Notes: Wall obstructs 18" min. req'd parallel to latch side on pull side of door at 6.5". Federal Guideline: 404.2.4.1		
	<b>Training Room</b>		
	<i>Provide Wall Signage at Interior Double Doors</i>	Low	\$100
	Notes: None provided. Braille and raised text signage required on right side of double doors. Federal Guideline: 216.2, 703.6, 407.4.3, 703.4.2		

Item #	Description	Priority	Estimated Cost
	<i>Replace Interior Double Doors</i>	Low	\$3,500
	Notes: At double-leaf doors, clear width is 28". One leaf must have 32" min clear width with only 1 open. 9" to glazing (10" min. smooth req'd on push side). Federal Guideline: 404.2.2, 404.2.10		
	<i>Reposition Paper Towel Dispenser</i>	Low	\$50
	Notes: Located at 50" ht. (48" max.) Federal Guideline: 308, 604.7		
	<i>Protect Protruding Object</i>	Low	\$50
	Notes: Fire extinguisher protrudes over 4" max. between 27" and 80" high. Lower extinguisher in mounting so bottom is less than 27" high. Federal Guideline: 307.2		
	<i>Provide Accessible Sink</i>	Low	\$1,300
	Notes: Rim of sink height is 46" (34" max.) Federal Guideline: 212.3, 306.3		
	<i>Replace East Exterior Door</i>	Low	\$3,500
	Notes: Height of clear door opening is 79.75" (80" min.). Federal Guideline: 404.2.3		
	<i>Replace Door Hardware on East Exterior Door</i>	Low	\$300
	Notes: Deadbolt requires twisting and grasping. Operable parts of door hardware are at 33.5" (34" min. to 48" max. above the floor.) Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate on East Exterior Door</i>	Low	\$110
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		
	<i>Replace Threshold at South Exterior Door</i>	Low	\$350
	Notes: Threshold exceeds maximum height of 1/2" and exception for existing thresholds 3/4" high max. with beveled edges. Federal Guideline: 404.2.5		
	<i>Replace South Exterior Door</i>	Low	\$3,500
	Notes: Height of clear door opening is 79.5" (80" min.). Federal Guideline: 404.2.3		
	<i>Replace Door Hardware on South Exterior Door</i>	Low	\$300
	Notes: Deadbolt requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate on South Exterior Door</i>	Low	\$110
	Notes: 9" to bevel below glazing (10" min. smooth req'd on push side). Cap resulting gap between the top of plate and glass. Federal Guideline: 404.2.10		

Item #	Description	Priority	Estimated Cost
	Training Room Restroom		
	<i>Since both Training Room and West restrooms are single user unisex restrooms, recommend making one restroom compliant and designating it as Accessible. Alterations to the Training Room Restroom appear to be least impactful to adjacent spaces and are recommended for modifications. Non-compliances in other restroom shown for reference only and marked as N/A where no changes are recommended. it is unlikely restroom facilities would be utilized by the public except during infrequent use of training room.</i>		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None provided. Pictogram (including ISA), Braille and raised text signage required on latch side of door. Federal Guideline: 216.8, 703.6, 703.6.1		
	<i>Replace Door; Address Maneuvering Space</i>	Medium	\$3,650
	Notes: Door width is 30" wide (32" min. clear.) Door push side maneuvering space is limited by 36" wide hallway adjacent (42" min. req'd). Door pull side maneuvering space is obstructed by adjacent cabinet (60" min. perpendicular to door). To resolve both issues, suggest elimination of corridor and moving door to main corridor wall, or direct connection to training room. Federal Guideline: 404.2.4.1, 404.2.3		
	<i>Replace Door Hardware</i>	Low	Incl. Above
	Notes: Twist lock requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate at Door</i>	Low	Incl. Above
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		
	<i>Replace Sink</i>	Medium	\$1,300
	Notes: Clear space beneath sink is 6.5" deep to basin (8" min. depth at 27" min.) Sink obstructs 60" min. clear at toilet from side wall to beyond open side of toilet at 43". When replacing sink, relocate to provide all clearances. Federal Guideline: 606.2, 306.3.3, 604.3.1		
	<i>Reposition Mirror</i>	Low	N/A
	Notes: 43" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located below reach range. Provide power strip mounted within reach range (15" min. - 48" max. above floor level). Federal Guideline: 205.1, 308.2		
	<i>Replace Flush Controls</i>	Medium	\$400
	Notes: Flush controls are not located on wide side of toilet. Replace with auto flush sensor. Federal Guideline: 604.6		

Item #	Description	Priority	Estimated Cost
	<i>Provide Grab Bars</i>	Medium	\$1,000
	Notes: None provided. Side and rear grab bar required. Federal Guideline: 604.5		
	West Restroom		
	<i>Reposition Signage</i>	Medium	\$50
	Notes: Sign mounted on push side of door. Door must have closer for push side mounting. Sign located 63" high (48" min. above finish floor to the bottom of the lowest tactile character and 60" max. to the bottom of the highest tactile character.) Relocate sign to latch side wall at compliant height. Federal Guideline: 703.6		
	<i>Replace Door Hardware</i>	Low	N/A
	Notes: Twist lock requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Kick Plate at Door</i>	Low	N/A
	Notes: 9" to small bevel (10" min. smooth req'd on push side). Federal Guideline: 404.2.10		
	<i>Provide Turning Area</i>	Low	N/A
	Notes: A turning area of 60" min. diameter and unobstructed from the floor to a height of 27" min. is not provided. Federal Guideline: 304.3, 306.3, 606.2		
	<i>Reposition Sink &amp; Drawers</i>	Low	N/A
	Notes: Clear space beneath sink is 27" high but sink basin obstructs 8" min. depth at 27". Reposition such that top of sink does not exceed 34" max. Relocate drawers to avoid blocking clear space in front of and beneath sink. Federal Guideline: 606.2, 306.3.3		
	<i>Reposition Mirror</i>	Low	N/A
	Notes: 44" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 54" ht (48" max). Federal Guideline: 205.1, 308.2		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located below reach range. Provide power strip mounted within reach range (15" min. - 48" max. above floor level). Federal Guideline: 205.1, 308.2		
	<i>Reconfigure Fixture Layout</i>	Low	N/A
	Notes: Toilet located 18.5" from wall to centerline (16"-18" req'd). Sink obstructs required 60" clear width at toilet at 46.75". Unlikely fixtures can be relocated within existing space. Federal Guideline: 604.2, 604.3.1		

Item #	Description	Priority	Estimated Cost
	<i>Reposition Toilet Paper Dispenser</i>	Low	N/A
	Notes: Dispenser mounted 4" in front of toilet (7"-9" in front to centerline req'd). Federal Guideline: 604.7		
	<i>Replace and Reposition Side Grab Bar</i>	Low	N/A
	Notes: Side grab bar is not 42" min. long, is located more than 12" max. from rear wall, and does not extend at least 54" from rear wall of stall. Federal Guideline: 604.5.1		
	<i>Provide Rear Grab Bar</i>	Low	N/A
	Notes: None provided. Federal Guideline: 604.5		
	<b>Officers Restroom</b>		
	<i>No Change to Existing Restroom</i>	N/A	N/A
	Notes: Overall space within restroom is very narrow and does not provide compliant clearances at door, sink, or toilet. Compliant restroom is not possible within space available due to adjacent office and storage uses. Since other restrooms can better be made accessible and designated as such, no changes are recommended at this time. Federal Guideline: 404.2.10		
	<b>Facility Total:</b>		\$40,365

# Old School Way Public Restrooms

Old School Way and Washington Streets



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
	<i>See Parking Lot Evaluation</i>		
	Accessible Routes		
	<i>Replace Pavement Near Entry</i>	Medium	\$250
	Notes: Sidewalk at building is > 1/2" at connection to asphalt of parking area. Asphalt exceeds 2% max. cross slope. Replace pavement. Federal Guideline: 502.6		
	<i>Protect Protruding Objects</i>	Low	\$50
	Notes: Drinking fountain protrudes over 4" max. between 27" and 80" high. Provide cane detectable element. Federal Guideline: 307.2		
	<i>Provide Paper Cup Dispenser</i>	Low	\$50
	Notes: Only one drinking fountain is provided. Fountain is too high to serve wheelchair users. Provide dispenser within reach range to serve all persons. Federal Guideline: 211, 305.7.1, 602.2		
Interior			
Item #	Description	Priority	Estimated Cost
	Single User/Family Restroom		
	<i>Replace or Provide Additional Sign</i>	Medium	\$100
	Notes: Sign provided is decorative only. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Towel dispenser and hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		

Item #	Description	Priority	Estimated Cost
	<i>Reconfigure Fixture Layout</i>	Low	\$1,500
	Notes: Toilet located 21.5" from wall to centerline (16"-18" req'd). Sink obstructs required 60" clear width at toilet. Federal Guideline: 604.2, 604.3.1		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser mounted inline with toilet (7"-9" to centerline req'd) and obstructs 12" min. clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Reposition Rear Grab Bar</i>	Low	\$500
	Notes: Grab bar is located at 37" to top of gripping surface (36" max.) Federal Guideline: 609.4		
	<b>Mens Restroom</b>		
	<i>Replace or Provide Additional Sign</i>	Medium	\$100
	Notes: Sign provided is decorative only. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Replace Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide inside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 19" from wall to centerline (16"-18" req'd). Federal Guideline: 604.2		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser obstructs 12" min. clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<i>Modify Stall Partitions</i>	Medium	(Incl. Below)
	Notes: Block walls obstruct toe clearance on sides. (front and at least one side req'd 9" min. clear above finish floor and 6" deep beyond partitions). Federal Guideline: 604.8.1.2-4		



Item #	Description	Priority	Estimated Cost
	<i>Provide Ambulatory Stall</i>	Medium	\$9,000
	Notes: None provided. Existing stalls do not provide grab bars, do not meet stall and door width requirements, do not provide handles, and have in-swinging doors. Cost assumes modification of existing brick wall between accessible stall and adjacent stall in order to provide adequate stall width. Federal Guideline: 604.8.1.2-4		
	<b>Womens Restroom</b>		
	<i>Replace or Provide Additional Sign</i>	Medium	\$100
	Notes: Sign provided is decorative only. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Replace Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide inside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 19" from wall to centerline (16"-18" req'd). Federal Guideline: 604.2		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser obstructs 12" min. clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<i>Modify Stall Partitions</i>	Medium	(Incl. Below)
	Notes: Block walls obstruct toe clearance on sides. (front and at least one side req'd 9" min. clear above finish floor and 6" deep beyond partitions). Federal Guideline: 604.8.1.2-4		
	<i>Provide Ambulatory Stall</i>	Medium	\$9,000
	Notes: None provided. Existing stalls do not provide grab bars, do not meet stall and door width requirements, do not provide handles, and have in-swinging doors. Cost assumes modification of existing brick wall between accessible stall and adjacent stall in order to provide adequate stall width. Federal Guideline: 604.8.1.2-4		
	<b>Facility Total:</b>		\$22,880



# Mound Street Public Restrooms

Mound Street



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking and Accessible Routes		
	<i>See ROW Evaluations for On-Street Parking and Sidewalks Serving Restroom.</i>		
	<i>Protect Protruding Objects</i>	Low	\$50
	Notes: Drinking fountain protrudes over 4" max. between 27" and 80" high. Provide cane detectable element. Federal Guideline: 307.2		
	<i>Provide Paper Cup Dispenser</i>	Low	\$50
	Notes: Only one drinking fountain is provided. Fountain is too high to serve wheelchair users. Provide dispenser within reach range to serve all persons. Federal Guideline: 211, 305.7.1, 602.2		
Interior			
Item #	Description	Priority	Estimated Cost
	Single User/Family Restroom		
	<i>Reposition Signage</i>	Medium	\$50
	Notes: Sign mounted on pull side of door; Sign to be located on latch side wall. Federal Guideline: 703.6		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Towel dispenser and hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Reconfigure Fixture Layout</i>	Low	\$1,500
	Notes: Toilet located 18.5" from wall to centerline (16"-18" req'd). Sink obstructs required 60" clear width at toilet. Federal Guideline: 604.2, 604.3.1		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser mounted inline with toilet (7"-9" to centerline req'd) and obstructs 12" min. clear above grab bar. Federal Guideline: 604.7, 609.3		

Item #	Description	Priority	Estimated Cost
	<b>Mens Restroom</b>		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 41.5" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Reposition Urinal</i>	Low	\$450
	Notes: 18" to top of lip (17" max.) Federal Guideline: 605.2		
	<i>Replace Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide inside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 19.5" from wall to centerline (16"-18" req'd) and is not located on side wall or partition farthest from stall door. Federal Guideline: 604.2, 604.8.1.2		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<i>Provide Ambulatory Stall</i>	Medium	\$9,000
	Notes: None provided. Existing stalls do not provide grab bars, do not meet stall and door width requirements, do not provide handles, and have in-swinging doors. Cost assumes modification of existing brick wall between accessible stall and adjacent stall in order to provide adequate stall width. Federal Guideline: 604.8.1.2-4		
	<b>Womens Restroom</b>		
	<i>Reposition Sink</i>	Low	\$600
	Notes: Rim of sink at 34 1/4". Reposition such that top of sink does not exceed 34" max. Federal Guideline: 606.2, 306.3		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Hand dryer protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 41.5" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		

Item #	Description	Priority	Estimated Cost
	<i>Replace Stall Door Hardware</i>	Low	\$150
	Notes: Door does not provide inside handle. Federal Guideline: 213.3, 604.8.1.2, 404.2.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 18.5" from wall to centerline (16"-18" req'd) and is not located on side wall or partition farthest from stall door. Federal Guideline: 604.2, 604.8.1.2		
	<i>Reposition Dispenser</i>	Low	\$50
	Notes: Seat cover dispenser obstructs 12" min. clear above grab bar. Federal Guideline: 604.7, 609.3		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<i>Provide Ambulatory Stall</i>	Medium	\$9,000
	Notes: None provided. Existing stalls do not provide grab bars, do not meet stall and door width requirements, do not provide handles, and have in-swinging doors. Cost assumes modification of existing brick wall between accessible stall and adjacent stall in order to provide adequate stall width. Federal Guideline: 604.8.1.2-4		
	<b>Facility Total:</b>		\$22,980



# Village Green & Public Restrooms



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking and Accessible Routes		
	<i>See ROW Evaluations Appendix B for On-Street Parking, Curb Ramps, and Sidewalks Serving Restrooms and NW Quadrant Shelter.</i>		
	Site Furnishings		
	<i>Replace Drinking Fountain at NW Quadrant of Village Green</i>	Medium	\$5,000
	Notes: "Hi-lo" fountain is not provided. Post mounted fountain provided does not meet dimensional requirements for wheelchair users. Federal Guideline: 211, 305.2, 306.3, 602		
	<i>Provide Accessible Benches</i>	Low	\$1,500
	Notes: Provided benches do not have adjacent wheelchair space. At least 20% are required to be accessible, including connection to accessible route. 10 provided; 2 Required. Federal Guideline: 206.2.2, 403, 1011.2, 902, 306.3		
Interior			
Item #	Description	Priority	Estimated Cost
	Lobby/Corridors		
	<i>Provide Means of Egress Signage</i>	High	\$100
	Notes: None provided. Federal Guideline: 207, 216.4, 703		
	<i>Replace Threshold at North Exterior Door</i>	Medium	\$250
	Notes: Threshold is 1" height (1/4" max., 1/2" if beveled). Federal Guideline: 404.2.5		
	<i>Provide Kick Plate at North Exterior Door</i>	Low	\$110
	Notes: 5" to glazing (10" min. smooth req'd). Cap resulting gap between the top of plate and glass. Federal Guideline: 404.2.10		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 7.5" ht. Provide power strip mounted within reach range. Federal Guideline: 205.1, 308.2-3		

Item #	Description	Priority	Estimated Cost
	<i>Provide Paper Cup Dispenser</i>	Low	\$50
	Notes: Cantilevered fountain to serve wheelchair users is located above 34" max. bubbler height. Provide dispenser within reach range to serve all persons. Federal Guideline: 602.4		
	North Single User/Family Restroom		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: None provided. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 41" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 18.5" from wall to centerline (16"-18" req'd). Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Grab bars mounted at 37" ht (33"-36" max req'd). Federal Guideline: 609.4		
	South Single User/Family Restroom		
	<i>Reposition Wall Signage</i>	Medium	\$100
	Notes: Sign located on push side of door with no closer. Relocate to wall on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 41" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 18.25" from wall to centerline (16"-18" req'd). Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Grab bars mounted at 37" ht (33"-36" max req'd). Federal Guideline: 609.4		
	Mens Restroom		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 40.5" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Modify Partitions at Urinal</i>	Low	\$150
	Notes: Clear space in front is 29 5/8" wide (30" wide req'd). Federal Guideline: 605.2		



Item #	Description	Priority	Estimated Cost
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser mounted 18" in front of toilet (7"-9" to centerline req'd). Federal Guideline: 604.7, 609.3		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Grab bars mounted at 37" ht (33"-36" max req'd). Federal Guideline: 609.4		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		
	<i>Provide Ambulatory Toilet Stall</i>	High	\$3,000
	Notes: Door opening width is 28.5" (32" min.) and door swings in. Stall depth is 59 1/2" (60" min.) and width is 40" (35" min.-37" max.) Space on site of toilet exceeds 17"-19" req'd. No stall door handles or self close provided. Grab bars are mounted at 37" (33"-36" req'd). Coat hooks exceed 48" max. Federal Guideline: 604.8.2.1-2, 604.2, 213.3, 604.8.1.2, 404.2.7, 604, 404.2.3, 609.3, 608.3		
	<b>Womens Restroom</b>		
	<i>Replace or Protect Protruding Objects</i>	Low	\$50
	Notes: Diaper table protrudes over 4" max. between 27" and 80" high. Provide cane detectable element below or reposition. Federal Guideline: 307.2		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 41" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Reposition Toilet</i>	Low	\$765
	Notes: Toilet located 18.5" from wall to centerline (16"-18" req'd) Federal Guideline: 604.2		
	<i>Reposition Grab Bars</i>	Low	\$1,000
	Notes: Grab bars mounted at 36.5" ht (33"-36" max req'd). Federal Guideline: 609.4		
	<i>Reposition Coat Hook</i>	Low	\$50
	Notes: Coat hook is above 48" max. Federal Guideline: 308, 603.4		

Item #	Description	Priority	Estimated Cost
	<i>Provide Ambulatory Toilet Stall</i>	High	\$3,000
	Notes: Door opening width is 28" (32" min.) and door swings in. Stall depth is 59" (60" min.) and width is 39.5" (35" min.-37" max.) No stall door handles or self close provided. Grab bars are mounted at 37" (33"-36" req'd). Coat hooks exceed 48" max. Federal Guideline: 604.8.2.1-2, 213.3, 604.8.1.2, 404.2.7, 604, 404.2.3, 609.3, 608.3		
	Nursing Room		
	<i>Provide Wall Signage</i>	Medium	\$100
	Notes: Visual only provided. Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<b>Facility Total:</b>		\$20,205

# Waste Water Treatment Facility

S. Van Buren St./Treatment Plan Dr.

Data collected 10/2018



Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
	<i>Parking is undesignated. Two buildings are generally accessed for employee work space and common use area.</i>		
	<i>Provide Accessible Parking</i>	Low	\$5,500
	Notes: Recommend providing paved, signed parking at two main buildings utilized by employees. Provide van space at each building (11' min. width with 5' min. access aisle or 8' min. space with 8' min. access aisle). Provide van accessible signage at min. height. Federal Guideline: 208.2, 216.5, 502		
	Accessible Routes		
	<i>Provide Accessible Route to Main Office</i>	Low	\$800
	Notes: Connect existing sidewalks to proposed parking space at Main building. Replace sidewalk near main entry to eliminate 2"-3" threshold. Angled sidewalk limits required clear, level door maneuvering space. Federal Guideline: 206.2.1		
	<i>Provide Accessible Route to Employee Common Areas in Lower Building</i>	Low	\$1,000
	Notes: Connect entry door to proposed parking space. Replace grating with gaps over 1/2" with ADA compliant grate. Meet flush with building finish floor to eliminate 1-2" threshold (1/4" max.; 1/2" if beveled). Federal Guideline: 206.2.1, 302.3, 403.2		
Interior			
Item #	Description	Priority	Estimated Cost
	Main Office		
	<i>Provide Means of Egress Signage</i>	High	\$100
	Notes: None provided. Federal Guideline: 207, 216.4, 703		

Item #	Description	Priority	Estimated Cost
	<i>Provide Manuevering Space on Push Side of Door</i>	Low	\$250
	Notes: Angled sidewalk limits required 48" perpendicular to push side of door. Replace sidewalk as needed. (See above 'Accessible Routes' for threshold non-compliance) Federal Guideline: 404.2.4.1		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 51" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Provide Accessible Lab Sink</i>	Low	\$1,300
	Notes: No knee space is provided and height exceeds 34" max. Federal Guideline: 212.3, 306.3, 309, 606.2		
<b>Main Office - Restroom</b>			
	<i>Provide Wall Signage</i>	Low	\$100
	Notes: None. Pictogram, Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace Door Hardware</i>	Medium	\$220
	Notes: Hardware requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 55" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Reposition Paper Towel Dispenser</i>	Low	\$50
	Notes: Located at 50" ht. (48" max). Federal Guideline: 308, 604.7		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 53" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 50" ht. Provide power strip mounted within reach range. Federal Guideline: 205.1, 308.2-3		
	<i>Replace Sink</i>	Low	(Incl. Below)
	Notes: Cabinet style does not provide knee space and obstructs toilet clear space. Insulate water lines. (See also 'Accessible Toilet Area' for coordination of fixture relocation.) Federal Guideline: 606.2, 306.3		
	<i>Provide Accessible Toilet Area</i>	Low	\$7,500
	Notes: Toilet is not located in area to accommodate correction in place. Relocate to provide compliant orientation to wall, clear spaces, and grab bars. Federal Guideline: 308, 603.4		

Item #	Description	Priority	Estimated Cost
	<i>Reposition Coat Hooks</i>	Low	\$50
	Notes: Coat hook is over 48" max. Federal Guideline: 308, 603.4		
	<i>Provide Accessible Shower</i>	Low	\$3,500
	Notes: No special access equipment provided and has 1"-2" lip at entry. Shower compartment does not provide wall on 3 sides or meet dimensional requirements. Federal Guideline: 608.3.2, 608.6, 609.2-609.8		
	Employee Common Area/Breakroom Building		
	<i>Provide Means of Egress Signage</i>	High	\$100
	Notes: None provided. Federal Guideline:		
	<i>Replace Door</i>	Low	\$1,500
	Notes: Door clear width is 27.5" (32" min. req'd). (See above 'Accessible Routes' for threshold non-compliance) Federal Guideline: 404.2.3		
	<i>Replace Door Hardware</i>	Medium	\$350
	Notes: Hardware requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Provide Accessible Sink</i>	Low	\$1,300
	Notes: No knee space is provided and height exceeds 34" max. Federal Guideline: 212.3, 306.3, 309, 606.2		
	<i>Provide Accessible Freezer Space</i>	Low	\$400
	Notes: 50% of freezer space is above 56"(54" max). Federal Guideline: 804.6.6		
	Employee Common Area/Breakroom Building - Restroom		
	<i>Replace Door Hardware</i>	Medium	\$220
	Notes: Hardware requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Replace Door; Eliminate Threshold</i>	Low	\$1,500
	Notes: Door clear width is 29" (32" min. req'd) with 2" threshold (1/4" max; 1/2" if beveled) Federal Guideline: 404.2.3		
	<i>Provide Wall Signage</i>	Low	\$100
	Notes: None. Pictogram, Braille and raised text signage required on latch side of door. Federal Guideline: 407.4.3, 703.3-4		
	<i>Replace Door Hardware</i>	Medium	\$220
	Notes: Hardware requires twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Replace Sink</i>	Low	\$1,450
	Notes: Cabinet style does not provide knee space and obstructs toilet clear space. Height of counter is 35" (34" max.) Insulate water lines. Federal Guideline: 606.2, 306.3		

Item #	Description	Priority	Estimated Cost
	<i>Replace Faucet Controls</i>	Medium	Incl. Above
	Notes: Controls require twisting and grasping. Federal Guideline: 309.4, 402.2.7		
	<i>Reposition Mirror</i>	Low	\$50
	Notes: 48" to bottom edge of reflecting surface (40" max over sink; 35" max if not). Federal Guideline: 308, 604.7		
	<i>Provide Occupancy Sensor or Reposition Switch</i>	Low	\$220
	Notes: Electrical switch is at 48.5" ht (48" max). Federal Guideline: 205.1, 308.2-3		
	<i>Provide Alternate Outlet Access</i>	Low	\$50
	Notes: Outlets located at 47" ht. Provide power strip mounted within reach range (44" max. over counter). Federal Guideline: 205.1, 308.2-3		
	<i>Provide Accessible Toilet Area</i>	Low	\$4,000
	Notes: Toilet is 23" from wall (16" min. - 18" max. from sidewall to centerline req'd). Sink obstructs clear depth. Toilet seat is 16" ht. (17" min. - 19" max.) Flush controls located on narrow side (wide side req'd). No grab bars are provided (side and rear req'd) Federal Guideline: 604.2, 604.3.1, 604.4, 604.6-7, 604.5, 609.2-8		
	<i>Reposition Toilet Paper Dispenser</i>	Low	\$50
	Notes: Dispenser mounted behind front of toilet (7"-9" in front to centerline req'd). Federal Guideline: 604.7		
	<b>Facility Total:</b>		\$32,420

# Town Parking Lot

Old School Way and Washington Street  
(Old School Way Public Restrooms)



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
1-1	26 spaces provided including 1 designated as accessible. 1 van space and 1 car space required.		
	Mill and Overlay Existing Space; Provide Additional Accessible Space	High	\$975
	Notes: Slope of existing van space exceeds 2% max. slope (varies 2.5-3.8%). Overlay to achieve compliant slopes. Restripe van stall (min. 8' wide stall with min. 8' wide access aisle or 11' min. space with 5' min. aisle). Place aisle on passenger side of van spaces for angled parking. Stripe additional accessible space of 8' min. width adjacent to van access aisle and provide sign with ISA. Reposition existing sign to compliant height and indicate van accessible parking. Federal Guideline: 502.6		
	<b>Facility Total:</b>		\$975

**General Notes:** 1. See Old School Way Restroom Form for adjacent accessible routes.

# Town Parking Lot

Pat O'Reilly and Jefferson Streets



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
1-1	85 spaces provided including 10 designated as accessible. 1 van space and 3 car spaces required.		
	Mill and Overlay West Accessible Parking Area; Restripe	Medium	\$3,655
	Notes: West parking bay exceeds 2% max. slope (5%+ run and 2.3%+ cross). Drainage grate (typ. one on each curb line) exceed 1/2" max. opening width. Replace grates when completing overlay. Federal Guideline: 302, 502.4		
	Provide Van Accessible Space and Signage	High	\$485
	Notes: Stripe one space with min. 8' wide stall with min. 8' wide access aisle (or 11' min. space with 5' min. aisle). Provide sign at 80" min. ht. indicating van accessible parking. Federal Guideline: 502.6		
	Provide Access Aisles and Signage	High	\$1,925
	Notes: Only 6 of 10 stalls are served by access aisle of 48" width. 60" wide aisle is required adjacent to each space (may shared). Provide signs with ISA centered on each space at 80" min. ht. parking. Federal Guideline: 502.6		
	<b>Facility Total:</b>		\$6,065

**General Notes:** 1. See Right-Of-Way Appendices for adjacent accessible routes.



# Town Parking Lot

## Pittman House

Data collected 10/2018



Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
1-1	19 spaces provided including 1 designated as accessible. 1 van space required.		
	Mill, Overlay and Restripe Space and Aisle. Verify Space Located Nearest to Accessible Route	Low	\$560
	Notes: Space provided is 10' with 5' access aisle with 2.2-3% running slope. Mill and overlay to correct minor slope deviation. Restripe with min. 8' wide stall with min. 8' wide access aisle (or 11' min. space with 5' min. aisle). Consider relocating depending on location of nearest accessible route. Federal Guideline: 208.3, 302, 502.1, 502.4, 502.6		
	<b>Facility Total:</b>		\$560

**General Notes:** 1. See Right-Of-Way Appendices for adjacent accessible routes.

# Town Parking Lot

## Sycamore and Washington Streets



Data collected 10/2018

Exterior			
Item #	Description	Priority	Estimated Cost
	Parking		
1-1	<i>111 spaces provided including 2 designated as accessible. 1 van space and 4 car spaces required.</i>		
	<i>Provide Van Accessible Space and Signage</i>	High	\$435
	Notes: Stripe one space with min. 8' wide stall with min. 8' wide access aisle (or 11' min. space with 5' min. aisle). Provide sign at 80" min. ht. indicating van accessible parking. Federal Guideline: 502.6		
	<i>Modify Existing Car Spaces and Provide 2 Additional Spaces with Signage</i>	High	\$1,120
	Notes: Existing spaces provide 48" wide access aisle (60" min. req'd). Stripe 4 spaces at 8' min. width and served by access aisle (may shared). Two existing signs are below 60" min. height (when not on PAR.) Raise existing signs and provide additional sign as needed at new spaces with ISA centered on each space at 60" min. ht. Federal Guideline: 502.6		
	<b>Facility Total:</b>		\$1,555

**General Notes:** 1. See Right-Of-Way Appendices for adjacent accessible routes.

## Appendix B

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### *Public Right-of-Way Facilities Summaries*

On-Street Parking  
Sidewalks  
Curb Ramps

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## Town of Nashville - On-Street Parking Self-Evaluation Inventory

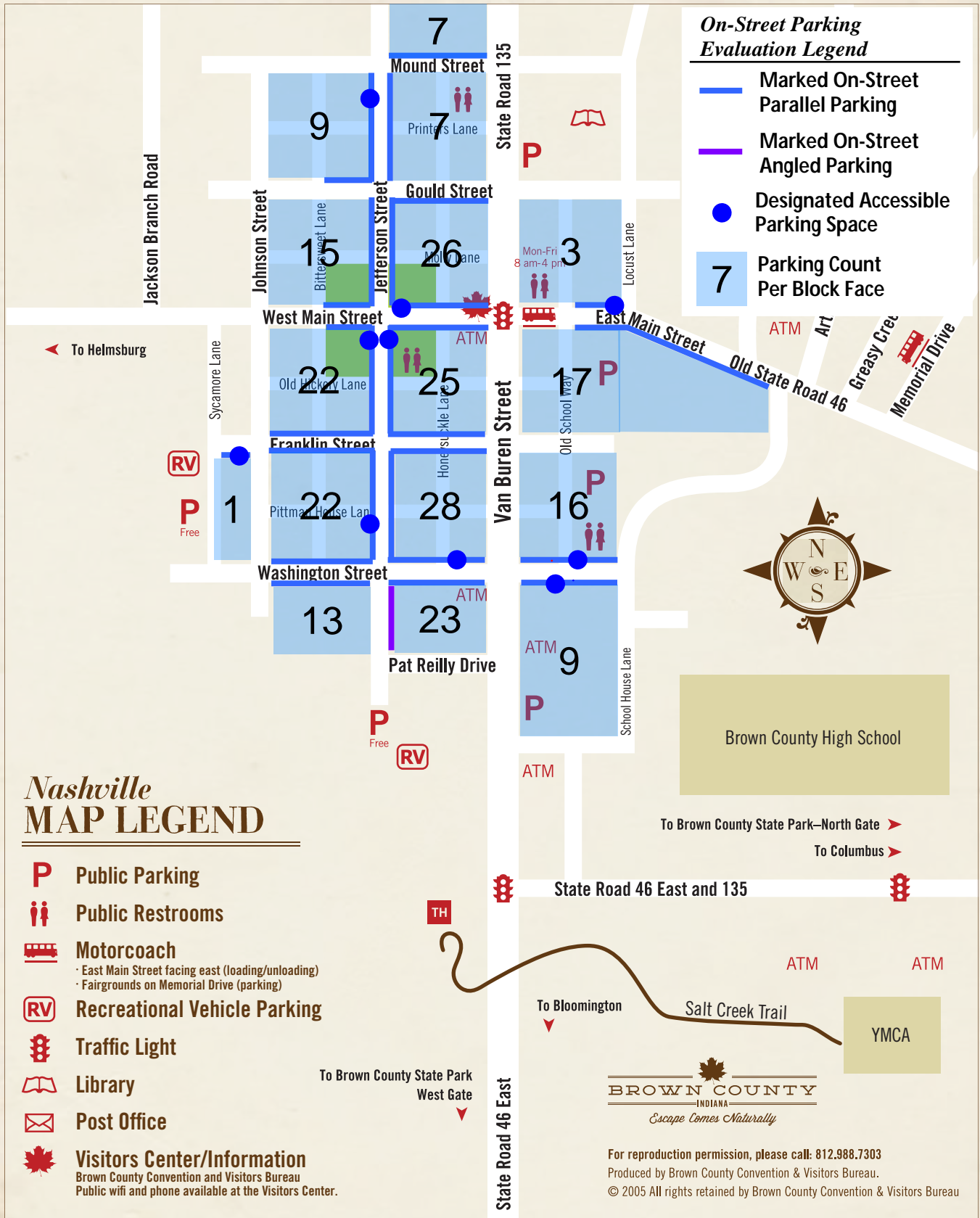
Date Collected: October 2018

Block Bounded By (North/East/South/West)	Parking Stall Location Description	Spaces Provided by Block Face	Accessible Spaces Provided	Priority	Est. Cost of Corrective Action
Washington/School House Lane/Van Buren	Washington, South side	9	1		
<p><i>Non-Compliance:</i> Slope is over 2% in 1 direction. Adjacent transition to sidewalk has non-compliant grate on trench drain.  <i>Recommended Corrective Action:</i> Since cross slope is up to 7%, consider relocating to flatter portion of block face or mill and overlay to provide compliant slope. Provide compliant grate.</p>					
Washington/Van Buren/Pat Reilly/Jefferson	N/A	23	0	Medium	\$ 900
<p><i>Non-Compliance:</i> No accessible spaces provided. One required.  <i>Recommended Corrective Action:</i> Identify location on block face with compliant slope that is near amenities and a compliant curb ramp. Provide accessible parking signage. (Note both angled and parallel parking provided<sup>1</sup>.)</p>					
Washington/Jefferson	N/A	13	0	High	\$ 150
<p><i>Non-Compliance:</i> No accessible spaces provided. One required.  <i>Recommended Corrective Action:</i> Identify location on block face with compliant slope that is near amenities and a compliant curb ramp<sup>2</sup>. Provide accessible parking signage.</p>					
Franklin/Johnson/Washington	207 Franklin Street	1	1	High	\$ 150
<p><i>Non-Compliance:</i> Slope is over 2% in 1 direction. Adjacent accessible route is less than 48" minimum.</p>					
<p><i>Recommended Corrective Action:</i> Mill and overlay space to achieve compliant slopes. Replace accessible route at 48" min. width<sup>2</sup>.</p>					
Franklin/Jefferson/Washington/Johnson	Jefferson St at Pittman House	22	1	Low	\$ 300
<p><i>Non-Compliance:</i> Slope is over 2% in 1 direction. Adjacent curb ramp is not compliant. No signage is provided.  <i>Recommended Corrective Action:</i> Mill and overlay space to achieve compliant slopes. Provide compliant curb ramp<sup>2</sup> and accessible parking signage.</p>					
Franklin/Van Buren/Washington/Jefferson	Washington St, North side	28	1	Medium	\$ 450
<p><i>Non-Compliance:</i> No signage is provided. Space is not located adjacent to a curb ramp to access sidewalk. One accessible space is provided; Two are required.  <i>Recommended Corrective Action:</i> Provide accessible parking signage and curb ramp at existing space. Identify location on block face with compliant slope that is near amenities and a compliant curb ramp for second required space.</p>					
Franklin/School House Ln/Washington/Van Buren	Washington St at Brown County Craft Gallery	16	1	High	\$ 300
<p><i>Non-Compliance:</i> No signage is provided.  <i>Recommended Corrective Action:</i> Provide accessible parking signage.</p>					
Main/Jefferson/Franklin/Johnson	Jefferson at Main, SW corner	22	1	Medium	\$ 150
<p><i>Non-Compliance:</i> Adjacent curb ramp is non-compliant.  <i>Recommended Corrective Action:</i> Provide compliant curb ramp<sup>2</sup>.</p>					
				Low	(Not Included)

Main/Van Buren/Franklin/Jefferson	Jefferson at Main, SE corner	25	1		
<p><i>Non-Compliance:</i> Adjacent curb ramp is non-compliant. Signage is located between 60" - 80" height on pedestrian access route.  <i>Recommended Corrective Action:</i> Provide compliant curb ramp<sup>2</sup>. Raise existing signage to 80" min. height.</p>					
Gould/Jefferson/Main/Johnson	N/A	15	0	Low	\$ 150
<p><i>Non-Compliance:</i> No accessible spaces provided. One required.  <i>Recommended Corrective Action:</i> Identify location on block face with compliant slope that is near amenities and a compliant curb ramp. Provide accessible parking signage.</p>					
Gould/Van Buren/Main/Jefferson	Main at Jefferson, NE corner	26	1	Medium	\$ 150
<p><i>Non-Compliance:</i> Slope is over 2% in both directions. Adjacent curb ramp is non-compliant. One accessible space is provided; Two are required.</p>					
<p><i>Recommended Corrective Action:</i> Mill and overlay space to achieve compliant slopes. Provide compliant curb ramp<sup>2</sup>. Identify location on block face with compliant slope that is near amenities and a compliant curb ramp for second required space.</p>					
Gould/Locust/Main/Van Buren	Main at Locust Lane, NW corner	3	1	Medium	\$ 450
<p><i>Non-Compliance:</i> Adjacent curb ramp is non-compliant. Signage is leaning and located between 60" - 80" height on pedestrian access route.</p>					
<p><i>Recommended Corrective Action:</i> Provide compliant curb ramp<sup>2</sup>. Raise existing signage to 80" min. height.</p>					
Mound/Jefferson/Gould/Johnson	Jefferson at Mound, west side	9	1	Low	\$ 150
<p><i>Non-Compliance:</i> Slope is over 2% in both directions. Adjacent curb ramp is non-compliant.  <i>Recommended Corrective Action:</i> Mill and overlay space to achieve compliant slopes. Provide compliant curb ramp<sup>2</sup>.</p>					
Mound/Van Buren/Gould/Jefferson	N/A	7	0	Medium	\$ 300
<p><i>Non-Compliance:</i> No accessible spaces provided. One required.  <i>Recommended Corrective Action:</i> Identify location on block face with compliant slope that is near amenities and a compliant curb ramp. Provide accessible parking signage.</p>					
Main/School House Ln/Franklin/Van Buren	N/A	17	0	High	\$ 150
<p><i>Non-Compliance:</i> No accessible spaces provided. One required.  <i>Recommended Corrective Action:</i> Identify location on block face with compliant slope that is near amenities and a compliant curb ramp. Provide accessible parking signage.</p>					
				Total Low Priority	\$ 600
				Total Medium Priority	\$ 2,400
				Total High Priority	\$ 900
				<b>Total On-Street Parking Improvement Costs</b>	<b>\$ 3,900</b>
<b>General Notes:</b>					
1. Unless otherwise noted, all locations provide parallel parking configurations with adjacent ROW of less than 14' depth.					
2. Cost of curb ramp and sidewalk replacements are not included in corrective action cost. See curb ramp and sidewalk inventories for applicable locations.					

EXHIBIT - ON-STREET PARKING EVALUATION MAP

# Nashville - Brown County, Indiana



# Town of Nashville - ADA Self-Evaluation Sidewalk Inventory

Date Collected: September 2018

Description	Side Of Street	Priority	Probable Cost
Artist Dr, Main St to Gould St	West side	Compliant	N/A
Commercial St, Gould St to Main St	West side	Medium Priority	\$ 3,480
Commercial St, Gould St to Main St	East side	Medium Priority	\$ 6,920
Franklin St, End to IN135/Van Buren St	North side	Medium Priority	\$ 3,320
Franklin St, End to IN135/Van Buren St	South side	Medium Priority	\$ 4,800
Franklin St, IN135/Van Buren St to Jefferson St	South side	Medium Priority	\$ 5,920
Franklin St, IN135/Van Buren St to Jefferson St	North side	High Priority	\$ 6,000
Franklin St, Bittersweet Ln to Jefferson St	South side	Medium Priority	\$ 5,520
Franklin St, Bittersweet Ln to Jefferson St	North side	Low Priority	\$ 2,800
Franklin St, Bittersweet Ln to Johnson St	South side	Low Priority	\$ 3,080
Gould St, Artist Dr to Commercial St	South side	High Priority	\$ 5,960
Gould St, Artist Dr to Commercial St	North side	Medium Priority	\$ 3,000
Gould St, Locust Ln to Robert Buck Stogsdill Way	North side	Medium Priority	\$ 4,400
Gould St, Locust Ln east to End	North side	Medium Priority	\$ 6,120
Jefferson St, Mound St to Printers Ln	West side	Medium Priority	\$ 2,560
Jefferson St, Gould St to Printers Ln	West side	Low Priority	\$ 520
Jefferson St, Gould St to Molly Ln	West side	Low Priority	\$ 400
Jefferson St, Gould St to Molly Ln	East side	Medium Priority	\$ 2,760
Jefferson St, Main St to Molly Ln	West side	Low Priority	\$ 2,280
Jefferson St, Main St to Molly Ln	East side	High Priority	\$ 6,680
Jefferson St, Main St to Old Hickory Ln	East side	Medium Priority	\$ 80
Jefferson St, Main St to Old Hickory Ln	West side	Medium Priority	\$ 1,920
Jefferson St, Franklin St to Old Hickory Ln	West side	Low Priority	\$ 400
Jefferson St, Franklin St to Old Hickory Ln	East side	Low Priority	\$ 400
Jefferson St, Franklin St to Washington St	West side	Medium Priority	\$ 3,240
Jefferson St, Franklin St to Washington St	East side	Low Priority	\$ 3,640
Jefferson St, Pat Reilly Dr to Washington St	East side	Medium Priority	\$ 5,240
Johnson St, Franklin St to Washington St	West side	Medium Priority	\$ 7,880
Johnson St, Franklin St to Old Hickory Ln	West side	Medium Priority	\$ 4,440
Locust Ln, Gould St to Mound St	West side	High Priority	\$ 7,920
Locust Ln, Mound St north to end	East side	High Priority	\$ 5,160
Main St, Artist Dr to Commercial St	North side	Medium Priority	\$ 11,680
Main St, Artist Dr to Greasy Creek Rd	South side	High Priority	\$ 10,800
Main St, Commercial St to Locust Ln	North side	High Priority	\$ 7,440
Main St, IN 135/Van Buren to Locust Ln	North side	Medium Priority	\$ 5,400
Main St, IN135/Van Buren St to School House Ln	South side	High Priority	\$ 14,960
Main St, Honeysuckle Ln to IN135/Van Buren St	North side	Medium Priority	\$ 2,800
Main St, Honeysuckle Ln to IN135/Van Buren St	South side	High Priority	\$ 5,560
Main St, Jefferson St to Honeysuckle Ln	North side	Low Priority	\$ 2,840
Main St, Jefferson St to Honeysuckle Ln	South side	Low Priority	\$ 1,760
Main St, Jefferson St to Johnson St	North side	Medium Priority	\$ 2,880
Main St, Jefferson St to Johnson St	South side	Medium Priority	\$ 6,440



<b>Description</b>	<b>Side Of Street</b>	<b>Priority</b>	<b>Probable Cost</b>
Main St, Johnson St to Sycamore Ln	North side	Medium Priority	\$ 800
Main St, Johnson St to Sycamore Ln	South side	Low Priority	\$ 3,240
Mound St, Honeysuckle Ln to IN 135/Van Buren St	South side	Medium Priority	\$ 4,320
Pat Reilly Dr, IN135/Van Buren St to Jefferson St	South side	Medium Priority	\$ 2,920
School House Ln, IN135/Van Buren St to Main St	South/east	Medium Priority	\$ 13,000
Washington St, IN135/Van Buren St to School House Ln	North side	Medium Priority	\$ 11,120
Washington St, IN135/Van Buren St to School House Ln	South side	High Priority	\$ 6,280
Washington St, IN135/Van Buren St to Jefferson St	South side	Low Priority	\$ 1,120
Washington St, IN135/Van Buren St to Honeysuckle Ln	North side	Compliant	N/A
Washington St, Honeysuckle Ln to Jefferson St	North side	Low Priority	\$ 600
Washington St, Bittersweet Ln to Jefferson St	North side	Low Priority	\$ 600
Washington St, Bittersweet Ln to Johnson St	North side	High Priority	\$ 1,600
Washington St, Johnson St to Sycamore Ln	North side	Medium Priority	\$ 4,320
		Total Low Priority	\$ 23,680
		Total Medium Priority	\$ 137,280
		Total High Priority	\$ 78,360
		<b>Total Sidewalk Improvements</b>	<b>\$ 239,320</b>

# Town of Nashville - ADA Curb Ramp Self-Evaluation Inventory

Date Collected: September 2018

Description	Quadrant	Priority	Probable Cost
Artist Dr and Main St	NW CORNER	Medium Priority	\$ 1,600
Artist Dr and Main St	SE CORNER	High Priority	\$ 1,600
Artist Dr and Gould St	SW CORNER	High Priority	\$ 4,100
Commercial St and Gould St	NW CORNER	High Priority	\$ 2,800
Commercial St and Gould St	SE CORNER	High Priority	\$ 1,100
Commercial St and Gould St	SW CORNER	High Priority	\$ 1,600
Commercial St and Main St	NW CORNER	High Priority	\$ 5,500
Commercial St and Main St	NE CORNER	High Priority	\$ 5,500
Commercial St and Main St	SE CORNER	High Priority	\$ 1,600
Franklin St and Bittersweet Ln	SW CORNER	Low Priority	\$ 500
Franklin St and Bittersweet Ln	SE CORNER	Low Priority	\$ 500
Franklin St and Honeysuckle Ln	NW CORNER	Low Priority	\$ 1,100
Franklin St and Honeysuckle Ln	NE CORNER	High Priority	\$ 4,100
Franklin St and Honeysuckle Ln	SE CORNER	Low Priority	\$ 1,100
Franklin St and Honeysuckle Ln	SW CORNER	Low Priority	\$ 500
Franklin St and Jefferson St - South Ramp	NW CORNER	Low Priority	\$ 4,100
Franklin St and Jefferson St - East Ramp	NW CORNER	Low Priority	\$ 1,100
Franklin St and Jefferson St - West Ramp	NE CORNER	Low Priority	\$ 1,100
Franklin St and Jefferson St - South Ramp	NE CORNER	Medium Priority	\$ 1,600
Franklin St and Jefferson St - North Ramp	SE CORNER	Medium Priority	\$ 2,800
Franklin St and Jefferson St - West Ramp	SE CORNER	Medium Priority	\$ 1,100
Franklin St and Jefferson St - East Ramp	SW CORNER	Compliant	N/A
Franklin St and Jefferson St - North Ramp	SW CORNER	Low Priority	\$ 1,100
Franklin St and Johnson St	NW CORNER	Medium Priority	\$ 1,600
Franklin St and Johnson St	SW CORNER	Medium Priority	\$ 1,100
Franklin St and Johnson St	SE CORNER	Medium Priority	\$ 1,600
Gould St and Locust Ln	NW CORNER	High Priority	\$ 1,600
Gould St and Locust Ln	NE CORNER	High Priority	\$ 4,100
Honeysuckle Ln and Main St	SW CORNER	Medium Priority	\$ 1,100
Honeysuckle Ln and Main St	SE CORNER	Low Priority	\$ 500
Honeysuckle Ln and Main St	NE CORNER	Low Priority	\$ 1,600
Honeysuckle Ln and Main St	NW CORNER	Low Priority	\$ 1,600
Honeysuckle Ln and Washington St	NE CORNER	Low Priority	\$ 4,100
Honeysuckle Ln and Washington St	NW CORNER	Medium Priority	\$ 500
Jefferson St and Gould St	NW CORNER	Low Priority	\$ 1,100
Jefferson St and Gould St	SE CORNER	High Priority	\$ 1,100
Jefferson St and Gould St	SW CORNER	Medium Priority	\$ 2,800
Jefferson St and Main St	NW CORNER	Medium Priority	\$ 1,100
Jefferson St and Main St	NE CORNER	Low Priority	\$ 1,600
Jefferson St and Main St	SW CORNER	Low Priority	\$ 1,100
Jefferson St and Main St	SE CORNER	Low Priority	\$ 1,100
Jefferson St and Molly Ln	NW CORNER	Low Priority	\$ 500
Jefferson St and Molly Ln	NE CORNER	Low Priority	\$ 500

Description	Quadrant	Priority	Probable Cost
Jefferson St and Molly Ln	SW CORNER	Medium Priority	\$ 1,100
Jefferson St and Molly Ln	SE CORNER	Medium Priority	\$ 1,100
Jefferson St and Mound St	SW CORNER	High Priority	\$ 1,600
Jefferson St and Old Hickory Ln	NE CORNER	Low Priority	\$ 500
Jefferson St and Old Hickory Ln	NW CORNER	High Priority	\$ 4,100
Jefferson St and Old Hickory Ln	SW CORNER	Low Priority	\$ 1,100
Jefferson St and Old Hickory Ln	SE CORNER	Low Priority	\$ 1,100
Jefferson St and Pat Reilly Dr	NE CORNER	Medium Priority	\$ 1,100
Jefferson St and Pat Reilly Dr	SE CORNER	Low Priority	\$ 1,600
Jefferson St and Pittman House Ln	NE CORNER	Low Priority	\$ 500
Jefferson St and Pittman House Ln	SE CORNER	Low Priority	\$ 1,600
Jefferson St and Pittman House Ln	NW CORNER	Medium Priority	\$ 1,100
Jefferson St and Pittman House Ln	SW CORNER	Medium Priority	\$ 1,100
Jefferson St and Printers Ln	NW CORNER	Low Priority	\$ 1,100
Jefferson St and Printers Ln	SW CORNER	Medium Priority	\$ 1,100
Jefferson St and Washington St - South Ramp	NE CORNER	Low Priority	\$ 500
Jefferson St and Washington St - West Ramp	NE CORNER	Low Priority	\$ 1,100
Jefferson St and Washington St	NW CORNER	Low Priority	\$ 500
Jefferson St and Washington St	SE CORNER	Medium Priority	\$ 1,600
Johnson St and Main St	NE CORNER	High Priority	\$ 1,600
Johnson St and Main St	NW CORNER	High Priority	\$ 1,100
Johnson St and Main St	SW CORNER	Low Priority	\$ 500
Johnson St and Main St	SE CORNER	Low Priority	\$ 500
Johnson St, near Old Hickory Ln	SW CORNER	Medium Priority	\$ 1,600
Johnson St and Washington St	NW CORNER	Medium Priority	\$ 1,600
Johnson St and Washington St	NE CORNER	High Priority	\$ 4,100
Locust Ln and Main St	SW CORNER	Medium Priority	\$ 1,100
Locust Ln and Main St	SE CORNER	Medium Priority	\$ 1,100
Locust Ln and Main St	NE CORNER	Medium Priority	\$ 1,100
Locust Ln and Main St	NW CORNER	High Priority	\$ 4,100
Locust Ln and Mound St	SW CORNER	High Priority	\$ 4,100
Locust Ln and Mound St	SE CORNER	High Priority	\$ 4,100
School House Ln and Washington St - West Ramp	NE CORNER	High Priority	\$ 4,100
School House Ln and Washington St - South ramp	NE CORNER	Low Priority	\$ 500
School House Ln and Washington St	NW CORNER	Low Priority	\$ 1,100
School house In and Washington St	SE CORNER	High Priority	\$ 2,800
School house In and Washington St - East ramp	SW CORNER	High Priority	\$ 1,600
School house In and Washington st - North ramp	SW CORNER	High Priority	\$ 1,600
Sycamore Ln and Washington St	NE CORNER	High Priority	\$ 1,600
		Total Low Priority	\$ 37,000
		Total Medium Priority	\$ 31,600
		Total High Priority	\$ 71,200
		<b>Total Curb Ramp Improvements</b>	<b>\$ 139,800</b>



# Appendix C

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## *Town Questionnaires*

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

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## Nashville, Indiana

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

- A. Provide a list of Town Departments, responsibilities, and address of each. In addition, provide a short description of the primary duties of each department and copies of any payments, publications, applications, forms, etc. that are used for each (electronic preferred).
  
- B. List all appointed boards and commissions and when and where they meet.
  
- C. Do all meeting rooms that hold public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type.
  
- D. Are meetings televised or provided in audio format? If so, what accommodations have been made for hearing impaired?
  
- E. Is there a poster for "Equal Opportunity is the Law" that describes the requirements of Title VII of the Civil Rights Act located somewhere in Town buildings? If so, where (include all locations).
  
- F. How are public meetings (especially Town Council) publicized? Are agendas posted in Town Hall and on the web site? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda for all public meetings.
  
- G. Please provide DLZ with a copy (electronic preferred) of the Town's Personnel Policy Manual and Application for Employment.

- H. Provide a copy of the resolutions or ordinances, or meeting minutes associated with establishment the ADA Coordinator, Non-Discrimination Notice, and Grievance Procedure.
- I. Are you aware of any formal training of non-police personnel related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
- J. Are you aware of any instances where Town staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.
- K. Do you allow any community groups, etc. to use Town facilities for meetings, picnics, etc.? If so, provide a copy of any lease agreements.
- L. Please list any special events that the Town sponsors or participates in some way (parades, carnivals, flea markets, etc.). Include location of events, duration, etc. and any documentation you can so we can understand what happens for each.
- M. Are emergency procedures in place at Town facilities for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for each building? Please identify.
- N. Has the Town ever been asked to provide special accommodation for printed materials? If so what was requested and provided?
- O. Do any Town facilities have Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?
- P. Websites: [www.townofnashville.org](http://www.townofnashville.org)  
  
Who is the website developer for the Town? How often is it updated? Who is the contact person to discuss the website with (name and phone number/e-mail)?
- Q. Who at the Town is the "Human Resources" person? Name and contact information is needed.



- R. Does the Town own all the buildings that provide services to the public? Does the Town lease any buildings to someone else for their use? If yes for either, provide detail about the address, owner, and functions provided there.
  
- S. If possible, please provide a copy of the County's CEMP. Provide name and contact info for person at EMA that can answer questions if needed in relation to the Town of Nashville's participation and/or services received.
  
- T. Indiana Code 5-2-1-9(g) requires all police officers to undergo annual training how to interact with people with mental illness, addictive disorders, mental retardation (intellectual disability), autism, and developmental disabilities. Have all officers completed this training? If so, when was the last training sessions held. Has anyone at the PD had any other formal training on interacting with persons with disabilities?
  
- U. Are there any specific suggestions or thoughts anyone at the Town has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful for anyone at the Town?



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



Nashville, Indiana

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

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

## A. Public Meetings:

- a. Do any meeting rooms where your department holds public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type.
- b. Are meetings televised or provided in audio format? If so, what accommodations have been made for hearing impaired?
- c. How are your department's public meetings publicized? Where and when are agendas posted? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda.

## B. Accommodations:

- a. Are you aware of any instances where your staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.
- b. Has your department ever been asked to provide special accommodation for printed materials? If so what was requested and provided?
- c. Do you use Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

C. Special Events:

- a. Do you allow any community groups, etc. to use your department's facilities for meetings, picnics, etc.? Are any special provisions made related to accessibility?
  - b. Please list any special events that your department sponsors or participates in some way (parades, carnivals, flea markets, etc.). Include location of events, duration, etc. and any documentation you can so we can understand what happens for each.
- D. Are emergency procedures in place in your department for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for your building? Please identify.
- E. Are you aware of any formal training of staff in your department related to ADA specifically? If so, note who has taken training and the date, location, and provider of the training.
- F. Are there any specific suggestions or thoughts anyone at the Town has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful?

# Appendix D

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## *Public Outreach*

Public Notices  
Advocacy Group Contacts  
Proofs of Publication

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## **NOTICE OF PUBLIC COMMENT PERIOD**

Notice is hereby given that the Town of Nashville is conducting a self-evaluation of all Town-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities.

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

Public comments may be dropped off in writing or mailed to Sean Cassiday, ADA Coordinator (200 Commercial Street, P.O. Box 446, Nashville, IN 47448) during normal business hours or provided via email ([scassiday@townofnashville.org](mailto:scassiday@townofnashville.org)). Comments will be accepted until 4pm Wednesday, October 17, 2018.

The Town of Nashville complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Requests including your name, mailing address, phone number and brief description of the requested accommodation may be submitted at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (812-988-5526).

BROWN COUNTY DEMOCRAT

AIM MEDIA INDIANA d/b/a BROWN COUNTY DEMOCRAT, P.O. BOX 3213, McALLEN, TX 78502-3213, FED I.D. #32-0472774

Prescribed by State Board of Accounts

General Form No 99P (Rev. 2009A)

DLZ

ATTN: SARA
NAME: DLZ INDIANA LLC
ADDRESS: 157 E MARYLAND ST
CITY/STATE: INDIANAPOLIS IN 46204

OCT - 5 2018

RECEIVED

(Government Unit) County: Brown Acct # B11167507 Ord. # 32067228

PUBLISHERS CLAIM

LINE COUNT Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set).

number of equivalent lines----- 50
Head -- number of lines -----
Body -- number of lines -----
Tail -- number of lines -----
Total number of lines in notice ----- 50

COMPUTATION OF CHARGES

50 lines, 1 columns wide equals 50 equivalent lines at 0.4954 cents per line

Additional charges for notices containing rule or tabular work

(50 percent of above amount)-----

Charges for extra proofs of publication (\$1.00 for each proof in excess of two)-----

TOTAL AMOUNT OF CLAIM ----- \$24.77

DATA FOR COMPUTING COST

Width of single column in picas 11 Size of type 7 point
Numer of insertions 1

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size, which was duly published in said paper 1 times. The dates of publication are as follows:

10/3/18

Additionally, the statement checked below is true and correct:

- Newspaper does not have a Web site.
X Newspaper has a Web site and this public notice was posted on the same day as it was published in the newspaper.
Newspaper has a Web site, but due to technical problem or error, public notice was posted on \_\_\_\_\_.
Newspaper has a Web site, but refuses to post the public notice.

Name: Vicki Fields
Title: Legal Advertising Clerk

Date: 10/3/2018



**Page** : 1 of 1 10/04/2018 10:27:40  
**Order Number** : 32067228  
**PO Number** : Sara  
**Customer** : B11167507 DLZ INDIANA LLC  
**Contact** : CHRIS BREINLING  
**Address1** : 157 E. MARYLAND ST.  
**Address2** :  
**City St Zip** : INDIANAPOLIS IN 46204  
**Phone** : (317) 663-4120  
**Fax** :  
**Credit Card** :  
**Printed By** : Vicki Fields  
**Entered By** : Keith Fleener  
  
**Keywords** : DLZ Project #: 1861-1567  
**Notes** :  
**Zones** :

**Ad Number** : 22338566  
**Ad Key** :  
**Salesperson** : 87 - Keith Fleener  
**Publication** : BC Democrat  
**Section** : Legal  
**Sub Section** : Legal  
**Category** : Legal  
**Dates Run** : 10/03/2018-10/03/2018  
**Days** : 1  
**Size** : 1 x 5.53, 50 lines  
**Words** : 251  
**Ad Rate** : Open  
**Ad Price** : 24.77  
**Amount Paid** : 0.00  
**Amount Due** : 24.77

**NOTICE OF PUBLIC COMMENT PERIOD**

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

Public comments may be dropped off in writing or mailed to Sean Cassidy, ADA Coordinator (200 Commercial Street, P.O. Box 446, Nashville, IN 47448) during normal business hours or provided via email (scassiday@townofnashville.org). Comments will be accepted until 4pm Wednesday, October 17, 2018.

The Town of Nashville complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Requests including your name, mailing address, phone number and brief description of the requested accommodation may be submitted at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (812-988-5526).

32067228 10/3, 2018 hspaxlp  
 18-181

## **NOTICE OF AVAILABILITY OF ADA SELF-EVALUATION AND TRANSITION PLAN**

Notice is hereby given that the Town of Nashville is conducting a self-evaluation of all Town-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities.

Copies of the draft Self-Evaluation and Transition Plan will be available for public review at the following locations during normal business hours between July 6 and July 20, 2020.

- Town Hall - 200 Commercial Street, Nashville
- Brown County Public Library (Circulation Desk) – 205 Locust Lane, Nashville

Public comments may be dropped off in writing or mailed to Phyllis Carr, ADA Coordinator (200 Commercial Street, P.O. Box 446, Nashville, IN 47448) during normal business hours or provided via email ([pcarr@townofnashville.org](mailto:pcarr@townofnashville.org)). Comments will be accepted until 4pm on July 20, 2020.

In addition, the Town has scheduled a meeting to solicit public input and comment on the Transition Plan. It will consist of a short presentation to provide information on the Transition Plan, followed by open discussion and interaction with attendees. This will be an opportunity for the community to ask questions as well as provide suggestions and comments on the draft Plan. All comments will be reviewed, considered and included in the appendix of the document. The meeting will be held at the regularly scheduled Council meeting at 6:30pm on July 16, 2020 in the Town Council Chambers at Town Hall (200 Commercial Street, Nashville, IN.)

The Town of Nashville complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Requests including your name, mailing address, phone number and brief description of the requested accommodation may be submitted at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (812-988-5526).

BROWN COUNTY DEMOCRAT

AIM MEDIA INDIANA d/b/a BROWN COUNTY DEMOCRAT, P.O. BOX 3213, McALLEN, TX 78502-3213, FED I.D. #32-0472774

Prescribed by State Board of Accounts

General Form No 99P (Rev. 2009A)

ATTN: SARA
NAME: DLZ INDIANA LLC
ADDRESS: 157 E MARYLAND ST
CITY/STATE: INDIANAPOLIS, IN 46204
(Government Unit) County: Brown Acct # B11167507 Ord. # 60055537

PUBLISHERS CLAIM

LINE COUNT Display Master (Must not exceed two actual lines, neither of which shall total more than four solid lines of the type in which the body of the advertisement is set).

number of equivalent lines 65
Head -- number of lines
Body -- number of lines
Tail -- number of lines
Total number of lines in notice 65

COMPUTATION OF CHARGES

65 lines, 1 columns wide equals 65 equivalent lines at 0.4645 cents per line
Additional charges for notices containing rule or tabular work (50 percent of above amount)
Charges for extra proofs of publication (\$1.00 for each proof in excess of two)
TOTAL AMOUNT OF CLAIM \$30.19

DATA FOR COMPUTING COST

Width of single column in picas 11 Size of type 7 point
Numer of insertions 1

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid. I also certify that the printed matter attached hereto is a true copy, of the same column width and type size, which was duly published in said paper 1 times. The dates of publication are as follows:

07/08/20

Additionally, the statement checked below is true and correct:

- Newspaper does not have a Web site.
[X] Newspaper has a Web site and this public notice was posted on the same day as it was published in the newspaper.
Newspaper has a Web site, but due to technical problem or error, public notice was posted on
Newspaper has a Web site, but refuses to post the public notice.

Name: Bill [Signature]
Title: Legal Advertising Clerk

Date: July 8, 2020

Order Number : 60055537  
PO Number : Sara\*\*  
Customer : B11167507 DLZ INDIANA LLC  
Contact : Sara  
Address1 : 157 E MARYLAND ST  
Address2 :  
City St Zip : INDIANAPOLIS IN 46204  
Phone : (317) 663-4120  
Fax :  
Credit Card :  
Printed By : Bill Kloote  
Entered By : Abigail Alderdice

Keywords : DLZ PROJECT #1861156790  
Notes : \*\*submit invoicing to AP@dlz.com  
Zones :

Ad Number : 50068700  
Ad Key : 60055537  
Salesperson : 87 - Abigail Alderdice  
Publication : BC Democrat  
Section : Legal  
Sub Section : Legal  
Category : Legal  
Dates Run : 07/08/2020-07/08/2020  
Days : 1  
Size : 1 x 7.18, 65 lines  
Words : 342  
Ad Rate : Open  
Ad Price : 30.19  
Amount Paid : 0.00  
Amount Due : 30.19

**NOTICE OF AVAILABILITY OF  
ADA SELF-EVALUATION AND  
TRANSITION PLAN**

Notice is hereby given that the Town of Nashville is conducting a self-evaluation of all Town-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities.

phone number and brief description of the requested accommodation may be submitted at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (812-988-5526).  
60055537, 7/8/2020, hspaxlp, 20-108

Copies of the draft Self-Evaluation and Transition Plan will be available for public review at the following locations during normal business hours between July 6 and July 20, 2020.

Town Hall - 200 Commercial Street, Nashville

Brown County Public Library (Circulation Desk) - 205 Locust Lane, Nashville

Public comments may be dropped off in writing or mailed to Phyllis Carr, ADA Coordinator (200 Commercial Street, P.O. Box 446, Nashville, IN 47448) during normal business hours or provided via email (pcarr@townofnashville.org). Comments will be accepted until 4pm on July 20, 2020.

In addition, the Town has scheduled a meeting to solicit public input and comment on the Transition Plan. It will consist of a short presentation to provide information on the Transition Plan, followed by open discussion and interaction with attendees. This will be an opportunity for the community to ask questions as well as provide suggestions and comments on the draft Plan. All comments will be reviewed, considered and included in the appendix of the document. The meeting will be held at the regularly scheduled Council meeting at 6:30pm on July 16, 2020 in the Town Council Chambers at Town Hall (200 Commercial Street, Nashville, IN.)

The Town of Nashville complies with the Americans with Disabilities Act. Upon request, the Town will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Requests including your name, mailing address,

**Information contained in public notice was also sent via US Mail to the following local, county, and state advocacy groups:**

**ADA-Indiana, c/o Indiana Institute on Disability and Community**  
2853 E. 10<sup>th</sup> Street  
Bloomington, IN 47409-2696

**Indiana Governor's Council for People with Disabilities**  
Indiana Government Center South, Room E145  
Indianapolis, Indiana 46204

**Indiana Council on Independent Living**  
402 W. Washington St. Room W453  
P.O. Box 7083  
Indianapolis, Indiana 46207-7083

**Southern Indiana Center for Independent Living**  
1490 W. Main St.  
Mitchell, Indiana 47446

**The Arc of Brown County**  
PO Box 1024  
Nashville, Indiana 47448





Town of Nashville

# ADA Self- Evaluation & Transition Plan Summary

July 2020



# The Americans with Disabilities Act (ADA)

- ▶ Enacted in 1990
  - Companion to Civil Rights Act of 1964 (Title VII) regulations (can't discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), or genetic information).
  - Companion to Section 504 of Rehabilitation Act of 1973
  - Provides disabled employees with additional protections beyond Title VII.
- ▶ Mandates that disabled individuals shall not be excluded from participation in, denied the benefit of, or be subject to discrimination under any program or activity.
- ▶ The Town of Nashville is a Title II (Public Services) entity.





# Self-Evaluation and Transition Plan: Title II State and Local Governments

**28 CFR 35.105**

## Self-Evaluation Report

- Data Collection
- Database Analysis
- Barrier Ranking

**28 CFR 35.150(d)(3)**

## ADA Transition Plan

- Corrective Measures
- Implementation Schedule
- Financing Plan

Disability Community Participation



# The Americans with Disabilities Act (ADA)

- Accessibility can be achieved several ways:
  - Relocate a program or activity to an accessible facility
  - Provide the activity, service, or benefit in another manner that meets ADA requirements
  - Make modifications to the building or facility to provide accessibility
- ADA does NOT require modifications to buildings or facilities if accessibility can be achieved in another manner.
- ADA standards do not apply if they would fundamentally alter the nature of a program, service or activity, or would impose an undue burden.



# Town Facilities

DLZ performed a self-evaluation of the following facilities:

## Town Facilities (Owned or Leased)

1. Town Hall
2. Police Station
3. Public Restroom 1 and Public Parking Lot (Old School Way)
4. Public Restroom 2 (Mound Street)
5. Public Restroom 3 (Village Green)
6. Waste Water Treatment Building
7. Public Parking Lot - O'Reilly and Jefferson
8. Public Parking Lot - Pittman House
9. Public Parking Lot - Sycamore and Washington

## Public Areas & Employee Common Use Areas

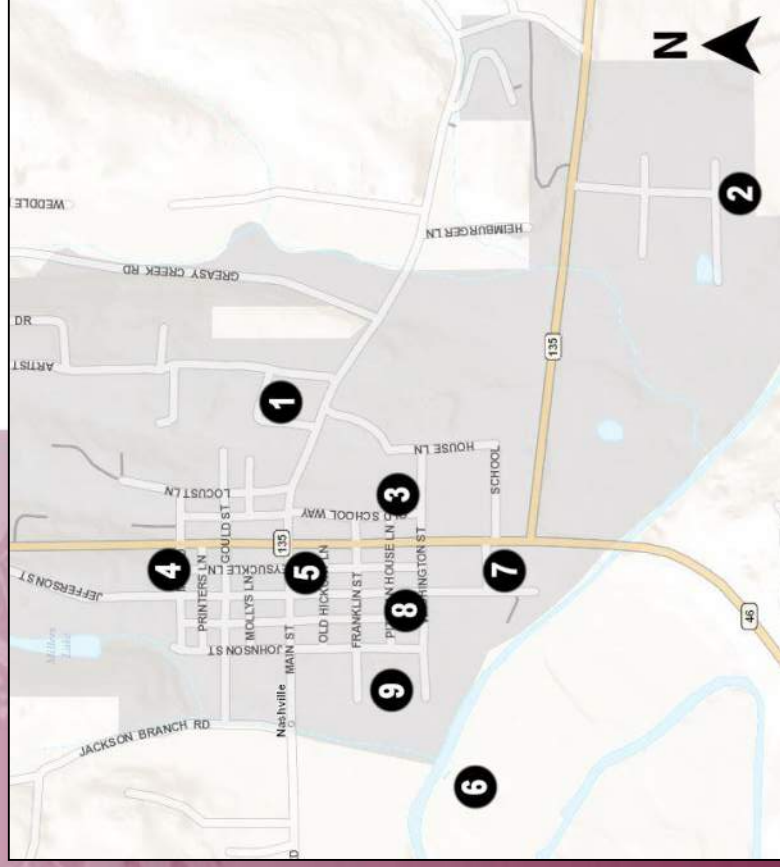
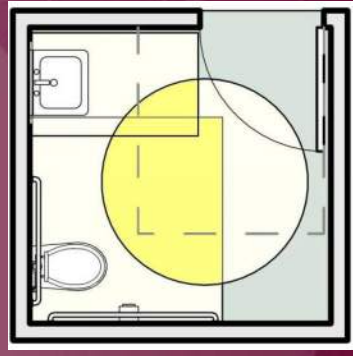
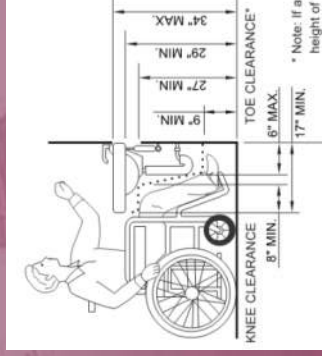
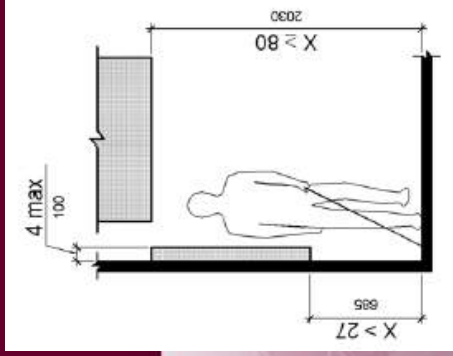


Figure 3 – Facilities Location Map



# Self-Evaluation

- **Review of Town Facilities**
  - Parking
  - Pedestrian Access Route (PAR) to building
  - Architectural features including, but not limited to:
    - Doors/Entries
    - Elevators and Stairs
    - Service counters & work surfaces
    - Signage
    - Fire Alarms
    - Drinking Fountains
    - Telephones
    - Maneuvering space
    - Protruding Objects
    - Reach ranges for light switches, outlets, shelving, etc.
    - Restroom stalls, sinks, showers, etc



# Findings: Town Facilities

- **Common Findings At Town Facilities**
  - Accessible parking exceeding slopes and lacking signage.
  - Accessible routes over cross slopes, displacements
  - Non-compliant curb ramps
  - Door non-compliances such as excessive operating effort and closing speed, door hardware, glazing height and maneuvering spaces
  - Inconsistent wall signage: not present or does not provide adequate raised text and Braille
  - Non-compliant drinking fountains
  - Protruding objects (fire extinguishers, drinking fountains, edges of counters)
  - Operable parts too high (switches, outlets, dispensers, etc.)
  - No accessible service counters at Town Hall and Police Station
  - Town Hall & Police restrooms with insufficient overall room to accommodate clearances
  - Restroom accessory issues (mounting locations of dispensers, coat hooks, lack of stall door handles, lack of pipe insulation at sinks)
  - Restroom stall issues (door width, stall width/depth, toilet position, incorrectly positioned or no grab bars)

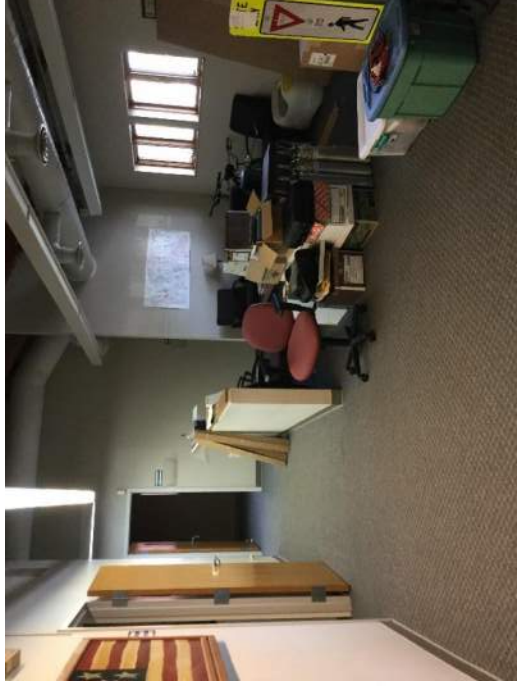
*(See Full Report for specific items by facility)*



# Findings: Town Facilities



# Findings: Town Facilities



# Findings: Town Facilities

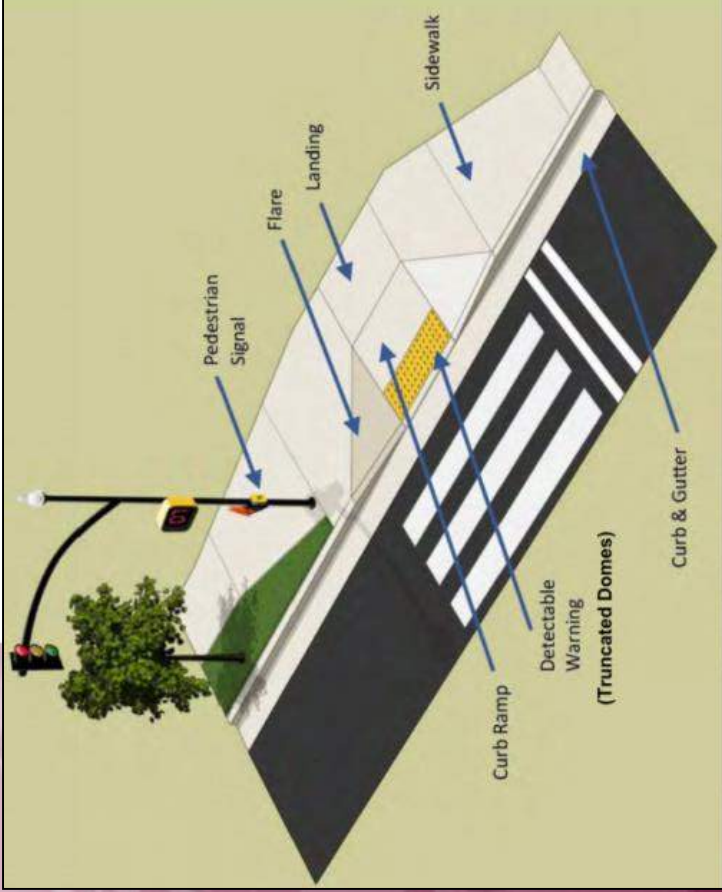




# Findings: Town Facilities



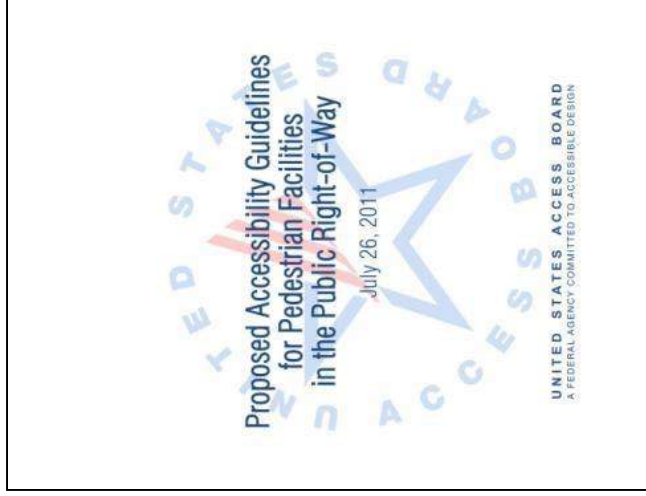
# ROW Self-Evaluation



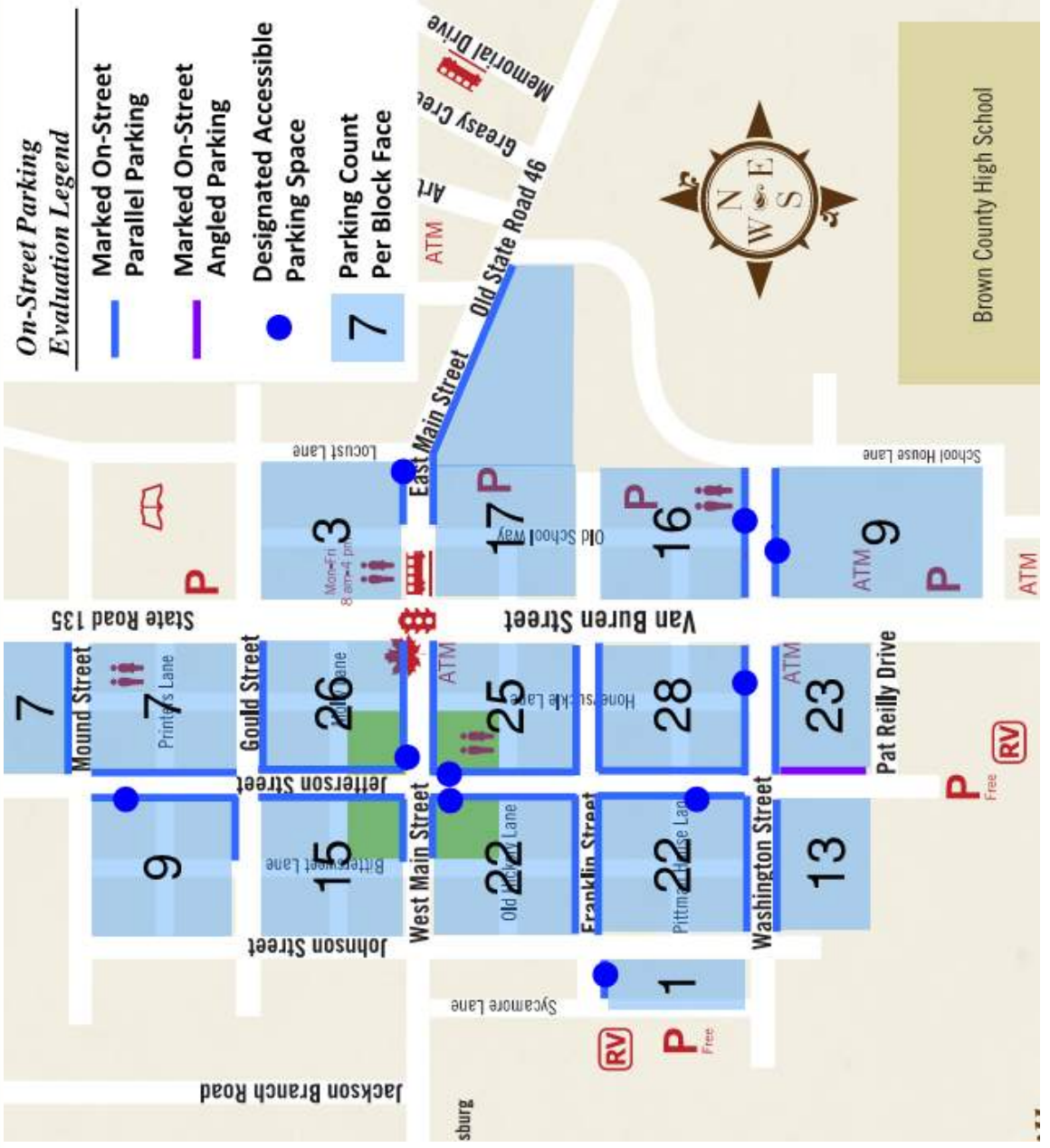
## Review of ROW Facilities

(does NOT include INDOT, County, or other incorporated ROW)

- Curb Ramps and Blended Transitions
- Sidewalks
- Parking – (marked and/or metered)



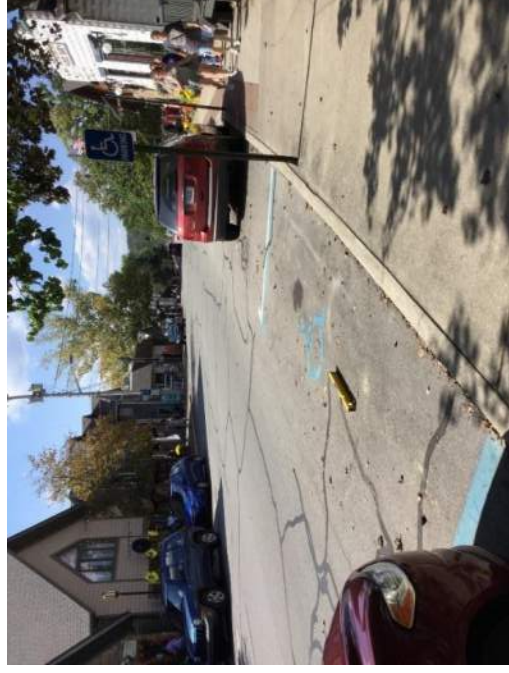
# Locations: Pedestrian Right-Of-Way



# Findings: Pedestrian Right-Of-Way

## On-Street Parking:

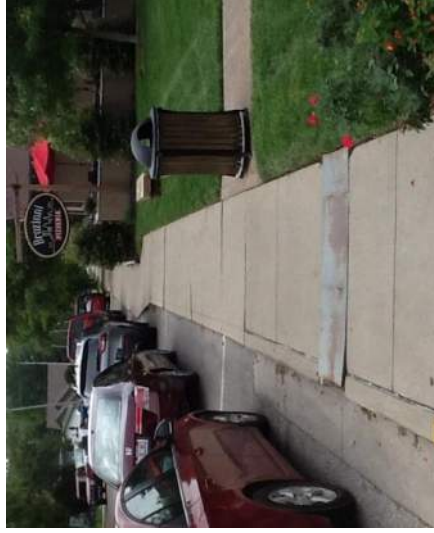
- In general, these observations were made:
  - Consists mainly of parallel parking.
  - Accessible signage was missing at 3 locations.
  - Slopes exceeded 2% maximum at 5 locations.
  - Not located adjacent to accessible route or ramp and/or ramp was not compliant at 8 locations.
  - No accessible parking provided or provided insufficient quantity on 7 blocks.



# Findings: Pedestrian Right-Of-Way

- Sidewalks
  - Turf overgrowth impacting clear width (2%)
  - Low Priority cross slopes over 2% (77%)
  - Surface level changes of varying degrees (36%)
  - Vegetative obstructions or protrusions (61%, 41%)

*(See Full Report for specific items by location)*

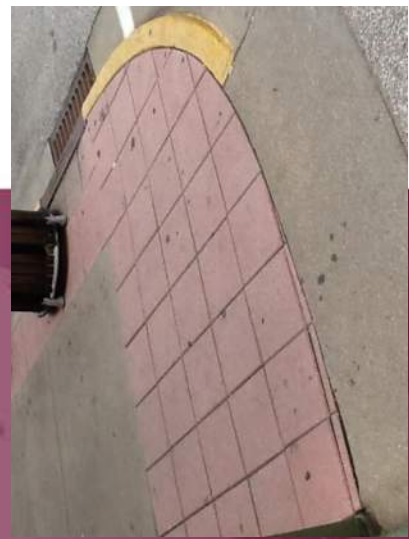


# Findings: Pedestrian Right-Of-Way

- **Curb Ramps & Blended Transitions**

- Excessive running slope (24%)
- Lack of, or non-compliant flare where required (26%)
- Lack of turning space or ramp landing (13%)
- Excessive slope on landings (27%)
- **Lack of detectable warning (42%)**
- **Non-compliant detectable warning (36%)**
- **Level changes (52%, mostly at gutter)**
- Evidence of ponding (18%)
- Crosswalk issues with widths and slopes

*(See Full Report for specific items by location)*



# Prioritization

## Building Facilities (Contextual Factors)

### Level of Use

- Is the facility utilized quite frequently and by a large cross-section of the public?

### Social Need

- Does the facility provide a social service or program for less fortunate or transient citizens?

### Civic Function

- Does the facility provide access to civic programs and services that implement the civil and political rights provided by the government.

### General Uniqueness

- Does the building, facility, or site provide a distinct program or service that cannot occur at a different location or facility?

# Prioritization

## Pedestrian Right-Of-Way (Contextual Factors)

### Areas of High Pedestrian Activity

- Adjacent to downtown, schools, community centers, churches, public transportation hubs, retail centers, and parks

### Areas with a Higher Concentration of Persons with Disabilities

- Senior centers, assisted living communities, and areas adjacent to medical facilities, etc.

### Areas of High Volume Streets

- Connectors between residential areas and destinations such as shopping, employment, and medical.

### Areas Accessing Place of Public Accommodation

- Serving government offices and facilities, public libraries, and community centers



# Prioritization

## Physical Impedance Factors

### High Priority

- **Prohibit** access for disabled persons, make access extremely troublesome, or present safety hazards to all users.
- Likely do not have acceptable alternative routes or treatments to overcome the barrier.
- Examples: Lack of accessible parking, stairs only, no exterior accessible route, narrow doors, extreme slopes or displacements, missing rails
- For ROW, missing curb ramps, extreme slopes, particularly cross slopes impacting lateral balance, trip hazards, and fixed obstructions limiting vertical and horizontal clearance.

### Medium Priority

- Partially prohibit access or make access quite difficult.
- Examples: Obstacles to amenities such as service counters, secondary entry points, light switches, vending machines, and drinking fountains.
- For ROW, moderate deviations in running and cross slopes, changes in level  $\frac{1}{2}$ " to 1", obstructions that allow tight passage, landing and PAR width deviations.

# Prioritization

## Low Priority

- Do not limit access for most disabled persons.
- Typically, alternative routes or treatments are available or assistance can be provided to overcome the barrier.
- Examples: Signage issues, minor dimensional non-compliances
- For ROW, minor deviations in slopes and changes in level, landing and PAR width deviations, and presence of standard elements such as detectable warnings not in compliance with guidelines.
- Closely evaluate the cost implications vs. increase in accessibility in regards to corrections to these highly usable areas.

# Estimated Cost Summary

TOWN OF NASHVILLE ADA SELF EVALUATION AND TRANSITION PLAN						
FACILITY SUMMARY						
Name & Location	Ownership Status	Low Priority	Medium Priority	High Priority	Total Site Cost	Total Site Cost
Town Hall 200 Commercial Street	Town Owned	\$23,860	\$10,980	\$18,350	\$53,190	\$53,190
Police Station 200 Hawthorne Drive	Town Owned	\$19,840	\$7,300	\$2,920	\$30,060	\$30,060
Public Restroom 1 Old School Way	Town Owned	\$4,330	\$18,550	\$0	\$22,880	\$22,880
Public Restroom 2 Mound Street	Town Owned	\$4,930	\$18,050	\$0	\$22,980	\$22,980
Public Restroom 3 Village Green	Town Owned	\$7,055	\$550	\$6,100	\$13,705	\$13,705
Wastewater Treatment S. Van Buren St./Treatment Plant Rd.	Town Owned	\$31,210	\$1,010	\$200	\$32,420	\$32,420
Town Parking Lot Old School Way Restrooms	Town Owned	\$4,330	\$18,550	\$0	\$22,880	\$22,880
Town Parking Lot O'Reilly and Jefferson	Town Owned	\$0	\$3,655	\$2,410	\$6,065	\$6,065
Town Parking Lot Pittman House	Town Owned	\$560	\$0	\$0	\$560	\$560
Town Parking Lot Sycamore and Washington	Town Owned	\$0	\$0	\$1,555	\$1,555	\$1,555
<b>TOTALS</b>		<b>\$96,115</b>	<b>\$78,645</b>	<b>\$31,535</b>	<b>\$206,295</b>	<b>\$206,295</b>

All cost estimates for Town facilities are based on a single unified bid with 2019 estimated costs. Bidding in a different manner or different time period will require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical or structural concerns.





Table 3.1. Summary of On-Street Parking Probable Cost to Correct

<b>On – Street Parking Summary</b>	
Low Priority	\$600
Medium Priority	\$2,400
High Priority	\$900
<b>Total Estimated On-Street Parking Improvement Costs</b>	<b>\$3,900</b>

Table 4.1. Summary of Sidewalk Probable Cost to Correct

<b>Sidewalk Summary</b>	
Low Priority Sidewalk	\$23,680
Medium Priority Sidewalk	\$137,280
High Priority Sidewalk	\$78,360
<b>Total Estimated Sidewalk Improvement Costs</b>	<b>\$239,230</b>

Table 5.1. Summary of Curb Ramp Probable Cost to Correct

<b>Curb Ramp Summary</b>	
Low Priority Curb Ramps	\$37,000
Medium Priority Curb Ramps	\$31,600
High Priority Curb Ramps	\$71,200
<b>Total Estimated Curb Ramp Improvement Costs</b>	<b>\$139,800</b>

# Town Programs/Policies

**Self-Evaluation of Town programs included the following general categories:**

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on Town Property
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Employment



# Findings: Programs/Policies

**The Town meets many of the requirements for accessibility in their programs and services. However, room for improvement was seen in the following areas:**

- Standard non-discrimination notice printed on publications/availability of other formats
- Standard language on all Town meeting agendas regarding availability of and request for accommodations
- Staff training (ADA requirements, interaction with people with disabilities, equal accommodation alternatives, etc.)
- Improve accessibility for hearing impaired persons – Additional ALD, phone system with TDD/TTY communication
- Update ordinances to reflect current nomenclature
- Publish Grievance procedure



# Implementation

## PROJECTED TOWN COMMITMENTS

- 20 year timetable for facilities at approximately \$10,315 annually
- Pedestrian ROW will be a set minimum dollar value of \$20,000 (new and/or replacement of existing)
- Plan Implementation
  - Implement immediate low cost, programmatic changes where possible.
  - Physical barriers addressed in order of priority

Table 6.1. Facility tier listing for prioritization.

Tier 1	Tier 2	Tier 3
<ul style="list-style-type: none"> <li>• Town Hall</li> <li>• Public Restroom 1 (Old School Way) and Parking Lot</li> <li>• Public Restroom 3 (Village Green)</li> </ul>	<ul style="list-style-type: none"> <li>• Police Station</li> <li>• Public Restroom 2 (Mound Street)</li> <li>• O'Reilly and Jefferson Lot</li> <li>• Sycamore and Washington Lot</li> </ul>	<ul style="list-style-type: none"> <li>• Waste Water Treatment</li> <li>• Pittman House Lot</li> </ul>

- Delay architectural changes as needed if equal accommodation can be provided.
- Schedule for implementation on a yearly basis



# Tasks Remaining

- **Provide Public Participation and Comment Period for Transition Plan** (Ends July 20, 4pm)
  - Review public comments for potential plan revisions.
- **Adopt Transition Plan** (anticipated at next regular meeting)
- **Regular reviews and updates done as required and recommended**
  - Document corrective actions and removal of barriers in an annual summary
  - Document changes to ADA and other guidance
  - Maintain documentation of all activities, grievances, etc. as required by law



# Discussion & Questions

- To provide additional comment, request reasonable accommodations, or to resolve future concerns, contact:

**Phyllis Carr, ADA Coordinator**  
**Phone: (812) 988-5526 Email:**  
**[pcarr@townofnashville.org](mailto:pcarr@townofnashville.org)**





# Appendix E

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## *Forms and Notices*

Grievance Procedure

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# Title II of the Americans with Disabilities Act Town of Nashville Notification Procedure

Instructions: Sign and return original with signature to:

ADA Coordinator  
Town of Nashville  
200 Commercial Street  
P.O. Box 446  
Nashville, Indiana 47448

Please fill out this form completely. Please note that this ADA notification procedure is for facilities, services and programs owned and/or operated by the Town of Nashville.

<b>Your name</b> ( <i>complainant</i> ):			
<b>Address:</b>			
<b>Contact numbers:</b>	<i>Home:</i>	<i>Work:</i>	<i>Mobile:</i>
<b>E-mail address:</b>			
Reason for grievance/complaint, or why you feel you have been discriminated against. Please be specific and provide as much information as possible. (i.e. location, date, time, names, etc.) Use a separate sheet if more space is needed.			
<b>State if you require an alternative form for any written follow-up communications:</b>			
<b>Your signature:</b>			<b>Date:</b>

If you have questions about this form, need an accommodation, or a different format, please contact Town Hall at (812) 988-5526 or send an email to [pcarr@townofnashville.org](mailto:pcarr@townofnashville.org).

Please allow us 30 business days to investigate and respond to your complaint.

# **Town of Nashville**

## **Grievance Procedure under**

### **The Americans with Disabilities Act**

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

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

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

**Phyllis Carr**  
**ADA Coordinator/Administration Manager**  
**200 Commercial Street**  
**P.O. Box 446**  
**Nashville, Indiana 47448**

Within 15 calendar days after receipt of the complaint, ADA Coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Town of Nashville and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Town Council Executive or his/her designee.

Within 15 calendar days after receipt of the appeal, the Town Council Executive or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Town Council Executive or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by ADA Coordinator or his/her designee, appeals to the Town Council Executive or his/her designee, and responses from these two offices will be retained by the Town for at least three years.