



ADA Transition Plan

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City of Lincoln



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ADA TRANSITION PLAN UPDATE CITY OF LINCOLN

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This self evaluation analysis and transition plan gives the City of Lincoln a comprehensive guidance document for appropriate ADA compliance.



ADA Transition Plan

Section: I

Executive Summary

- A. Introduction
- B. Development of ADA Transition Plan
 - 1. Self-Evaluation of Policies, Procedures and Practices
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EXECUTIVE SUMMARY

A. INTRODUCTION

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive civil rights protections to qualified individuals with disabilities in employment, public accommodations, State and local government services, and telecommunications. An ADA primary goal is to ensure equal participation in public life for all Americans with disabilities. Public entity programs, services and activities are covered by Title II of the ADA.

Under Title II, a public entity may not deny the benefits of its programs, services, and/or activities to individuals with disabilities by maintaining inaccessible facilities housing these programs, services and activities. A public entity's programs, services, and activities, when viewed in their entirety, must be made accessible to and usable by individuals with disabilities unless access will result in a fundamental alteration in the nature of the program; result in undue financial and administrative burdens or threaten or destroy a historic property significance.

The City recognized that the ADA Transition Plan is a living document that needs to be updated throughout the transition planning period due to changing mitigation priorities and development of new case laws. To comply with the government standards for accessibility to City *programs, services and activities*, this Transition Plan:

- Evaluates existing policies, procedures and practices as they pertain to the City's programs, services and activities;
- Provides findings and recommendations with regard to policies, procedures and practices;
- Identifies physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Assesses the extent of architectural barriers to program accessibility in the public rights-of-way and within the buildings, parks and other facilities operated by the City;
- Describes in detail the methods that will be used to make the facilities accessible;
- Estimates costs for mitigation solutions;
- Specifies the steps necessary to achieve compliance;
- Provides a schedule for barrier removal/mitigation;
- Sets priorities for barrier elimination; and
- Indicates the official responsible for implementation of the plan.

The City has invited the public to participate in the development of the Self-Evaluation and Transition Plan. The formally adopted Plan is expected to reflect and address submitted comments, questions, and recommendations.

B. DEVELOPMENT OF ADA TRANSITION PLAN UPDATE

1. SELF-EVALUATION OF POLICIES, PROCEDURES AND PRACTICES

In addition to identifying and modifying physical barriers, Title 28 CFR Part 35, *Non Discrimination on the Basis of Disability in State and Local Government Services*, requires that a public entity evaluate its policies, procedures and practices. The following outlines the minimum requirements for a public entity's self-evaluation:

- Evaluate its policies, procedures, and practices as they pertain to the City’s programs, services and activities; and make necessary modifications to those that do not meet the programmatic requirements of Title II of the ADA
- 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
- Maintain, file and make available for public inspection a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made

The City must evaluate such policies, procedures and practices regarding communication, auxiliary aides and services, emergency response, publications, determination for undue burden, public activities, employment, and new construction of facilities, in addition to physical accessibility to City facilities.

It is also recommended that for program barrier mitigation, a detailed outline of administrative requirements and detailed requirements of needed policies be included. The policy outline would serve as a guideline upon which the City's future policies may be built.

2. ACCESS COMPLIANCE ASSESSMENTS OF FACILITIES

The transition plan is used to document the access barriers for the public rights-of-way and several City buildings and parks. The documented disabled access barriers identify existing building conditions that deviate from current State and Federal standards. For each barrier, this Transition Plan outlines the code deviations and requirements from the ADA Accessibility Guidelines (ADAAG) and Title 24 of the California State Accessibility Standards (CBC).

These facilities were assessed as phase I. They were chosen due to age, importance, or more frequent public use. Phase II is comprised of the buildings and parks that are newer and not expected to have significant disabled access barriers. The balance of buildings and parks in Phase II will be surveyed and documented at a later date.

- City Hall, 600 Sixth St; exteriors and public right-of-way
- Police Department, 640 Fifth St; exteriors and public right-of-way
- Police Activities League, H St; interiors, exteriors, and public right-of-way
- Airport offices and pilot lounge, 1420 Flightline Drive; exteriors and public right-of-way
- Carnegie Library, 590 Fifth St; interiors, exteriors, and public right-of-way
- Chamber of Commerce, 540 F St; exteriors, and public right-of-way
- Twelve Bridges Library, 485 Twelve Bridges Drive; exteriors, and public right-of-way
- Civic Center, 427 E St; interiors, exteriors, and public right-of-way
- Community Center, 2010 First St; interiors, exteriors, and public right-of-way
- McBean Park, 65 McBean Park Dr; interiors, exteriors, and public right-of-way
- Joiner Park, 1701 Nicolaus Rd; interiors, exteriors, and public right-of-way
- Markham Park, 1175 Toyon Circle; interiors, exteriors, and public right-of-way
- Downtown public parking lots in three locations
- Selected downtown blocks for sidewalks, curb ramps, and on street parking

Survey

The survey of City facilities fulfills the first requirement for the Transition Plan, by identifying physical obstacles limiting the accessibility of the City’s programs and activities to disabled individuals. Field assessments of City buildings and facilities were conducted in accordance with current accessibility

standards, Title II of the ADA, the Americans with Disabilities Act, and California Title 24 part 2 CBC. Some recommendations in the rights-of-way were developed based on the Access Board's revised draft guidelines for Accessible Public Rights-of-Way and the physical obstacles were surveyed in accord with applicable provisions in the ADA and CBC.

Report Production

The following information contains the minimum data SSA included in the Transition Plan- Assessment Reports:

- Item number of barrier and/or room numbers, corresponding to schematic site and floor plans
- Area/location of the barrier; for example room name or number
- Description of the barrier (as-built situation)
- As-is measurement/dimension
- Method of mitigation (e.g. physical alteration, purchase, program modification, equivalent facilitation, etc.)
- Detailed description of proposed solution and, if applicable, an alternative or interim solution
- Code citations, specifying the applicable sections in the State accessibility regulations, and in the federal standards
- Severity of individual barriers (three levels: 1=severe, 2=moderate, 3=mild)
- Unit and estimated unit price
- Total estimated cost for barrier removal
- Survey information, such as special site conditions

Prioritization

The relative importance of each barrier, according to its impact upon the disabled population was taken into account when developing the prioritization criteria for barrier mitigation.

Overall Prioritization Criteria according to programmatic functions:

- Importance of the program function
- Frequency of Use
- Program location and relation to other programmatic functions

In the public rights-of-way (PRoW), where the City has sole responsibility/authority over streets, roads and walkways, the ADA Transition Plan references the City's multi-year Capital Improvement Plan and annual budget, which includes the General Capital Improvements Projects fund for providing curb ramps or mitigating barriers in pedestrian sidewalks. In addition, the Transition Plan schedule prioritizes barrier-mitigation within pedestrian routes that serve public entities, including but not limited to local government offices, transportation facilities, places of public accommodation.

Prioritization Criteria for PRoW according to barrier location:

- Priority 1: Pedestrian routes wherein request(s) for barrier removal by any person with mobility and/or vision disabilities seeking full and equal access
- Priority 2: Pedestrian routes serving State and local government offices and facilities
- Priority 3: Pedestrian routes serving important transportation corridors, including pathways leadings to schools.
- Priority 4: Pedestrian routes serving commercial/business zones and other Title III entities
- Priority 5: Pedestrian routes serving residential neighborhoods and undeveloped regions.

Based on the above prioritization criteria and the facilities master priority number for each City facility, sidewalks within sections of mid-blocks and curb ramps at street intersections serving or connecting to City facilities were given a priority order.

Since persons with disabilities utilize certain buildings and facilities with greater frequency, the impact of barriers identified at these facilities was greater. Upon compilation of the survey results, appropriate City staff helped determine a prioritization criteria for key items found in the survey and obtain additional information to determine a final level of prioritization.

Prioritization Criteria for Facilities according to barrier location:

- Priority 1: Basic public access and potentially hazardous conditions
- Priority 2: Access to program function areas.
- Priority 3: Access to public common areas that support program function areas. (Such as restrooms, drinking fountains, public telephones, etc.). Provision of visual/audible signal devices connected to the existing fire alarm system.
- Priority 4: Barriers not included in priorities 1, 2 and 3:
- Priority 5: Barriers not addressed by the ADAAG. However, they are addressed by the California State Accessibility Standards (CBC) and are not in compliance and/or interpretations of regulations as set forth by the Division of the State Architect's office (DSA).

Further detail regarding the prioritization criteria used to evaluate specific mitigation recommendations at each facility is included in the ADA Transition Plan document.

Official(s) Responsible

For the duration of the Transition Planning schedule, the City has designated the ADA Coordinator and the City Engineer as the officials responsible to oversee the implementation of the Transition Plan. The City Engineer has been designated responsible for the implementation of the barrier-mitigation schedule within the public rights-of-way; and also support the City's ADA Coordinator, where appropriate, in the planning, prioritization and coordination of site improvements within City facilities.

Public Input

The Final Draft of the Transition Plan was completed in January 2011, and distributed for public comment. A Notice of Preparation of the Transition Plan was posted on the City of Lincoln website from January 27, 2011 through March 7, 2011, and advertised in City of Lincoln's eBulletin during that period. The Notice of Preparation was also advertised in the Lincoln News Messenger on February 3, 2011. Comments on the Draft Transition Plan were due to the Public Services Department by 5pm on March 7, 2011. Public Services received three comments with their corresponding responses:

Comment 1: Why are the railroad crossings not considered in the transition plan?

Response 1: The focus of the Transition Plan is to evaluate City of Lincoln facilities, and access to parking and transit most immediately adjacent to each facility. Union Pacific Railroad at grade crossings fall outside that scope. However, the City of Lincoln is pursuing opportunities to upgrade the railroad crossings through town to better accommodate accessible paths of travel.

Comment 2: Does the Transition Plan specify wheel chair ramps for the Lincoln Women's Club?

Response 2: The Transition Plan is specific to City owned facilities. Planning for accessibility improvements for privately owned facilities are the responsibility of the owner.

Comment 3: It is No Wonder why people are leaving California, Not starting a new business, or Simply being forced to close small ones! How does Government think they can ever 'ensure equal participation in public life for all Americans with disabilities'!!

Response 3: No comment.

Transition Plan Implementation

The document should be maintained by the person or persons designated as responsible for implementation of the Transition Plan. Indication of the official responsible for implementation of the plan fulfills the final requirement of a Transition Plan. The final product is a working document to be modified as barriers are removed or alterations are made.

The City's final document will, for at least three years following completion, be maintained on file and made available for public inspection.

The Transition Plan is a living document and is open to modification throughout the transition period to reflect changing priorities and funding for barrier mitigation.

C. FACILITY MASTER PRIORITY LIST

Based on the data collected in the field, a facilities priority list was developed in conjunction with City staff. This helped identify facilities that are to be included in the first phase of barrier mitigation within the City's Transition Plan.

The first phase of barrier mitigation within the Transition Plan includes the following City facilities:

Facility	Work Areas	Priority Rank
City Hall, 600 6 th	exterior, selected PRow	1 – Phase 1
McBean Park Pavilion	exterior, parking, interior	2 – Phase 1
Community Center, 2010 1 st	exterior, interior	3 – Phase 1
Civic Center, 427 E St.	exterior, interior, PRow, lot 3 east	4 – Phase 1
Carnegie Library, 590 5 th	exterior, interior, PRow	5 – Phase 1
Twelve Bridges Library, 485 Twelve Bridges Dr	exterior	6. – Phase 1
Former Police Department HQ, 640 5 th	exterior	7 – Phase 1
Police Activities League, H St.	exterior, interior	8 – Phase 1
Parking Lot 1, 6 th & F	exterior, PRow	9 – Phase 1
Parking Lot 2, F St btw 6 th & 7 th	exterior, PRow	10 – Phase 1
Parking Lot 3 west, btw F & G, 5 th & 6 th	exterior	11 – Phase 1
McBean Park, Parking and Path of Travel	exterior	12 – Phase 1
McBean Park, Pool	exterior, interior, selected PRow	13 – Phase 1
McBean Park, East Restroom	exterior, interior	14 – Phase 1
McBean Park, Picnic Area	exteriors, interiors	15 – Phase 1
McBean Park, Gazebo	exterior, interior	16 – Phase 1
McBean Park, Baseball Stadium	exterior, interior	17 – Phase 1
McBean Park, Football Stadium	exterior, interior	18 – Phase 1
McBean Park, Baseball fields	exteriors	19 – Phase 1
Joiner Park, 1701 Nicolaus Rd	exteriors, interior	20 – Phase 1
Markham Park, 1175 Toyon Circle	exteriors, interior	21 – Phase 1
Airport offices & pilot lounge, 1420 Flightline	exteriors, selected PRow	22 – Phase 1
Chamber of Commerce, 540 F	exteriors, selected PRow	23 – Phase 1



ADA Transition Plan

Section II

Self Evaluation

Policies, Procedures, and Practices

Introduction

Methodology and Overview

A. Findings, Recommendations, and Model Policies

1. General Requirements and Recommendations

2. Program Access Requirements and Recommendations

3. Suggested Model Policies

B. Questionnaire Format



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INTRODUCTION

To ensure compliance with the American's with Disability Act of 1990, California Government Code 11135, and the California Fair Employment and Housing Act, the City of Lincoln is updating its ADA Transition Plan; this update includes:

- Identifying barriers and code deviations limiting access to programs, services and activities
- Describing methods of barrier mitigation and accommodation for persons with disabilities
- Specifying the recommended schedule for removing identified barriers
- Indicating the official responsible

Project Background

The City recognizes that the ADA Transition Plan is a living document that requires updating throughout the transition planning period due to changing priorities and new case law developments. The City also received input from individuals with disabilities and organizations representing individuals with disabilities, who suggested keeping the self evaluation and Transition Plan current on a regular basis to better address any new or revised programs, services and activities.

The self evaluation of policies, procedures and practices pertaining to the City's programs, services and activities was conducted by Sally Swanson Architects, Inc. (SSA) in cooperation with members of the City of Lincoln's management team. The City's management team was instrumental in data gathering and the systems analysis process, a critical part of the project.

The concept at hand is to be prepared and capable of providing the service necessary to disabled persons in a manner that affords opportunity to participate in the City's programs, services, and activities in a useable manner in the most integrated setting possible.

Methodology

SSA staff developed a survey question format to examine access to City of Lincoln's programs, services, and activities by disabled persons. The survey tool is based on requirements in ADA Title II, the California Fair Employment and Housing Act, and mandates in California Government Code 11135. The question scope was modeled using the ADA Title II administrative requirements identifying the categories for evaluating programs, services and activities described in the U.S. Department of Justice ADA Title II Technical Assistance Manual. The Equal Employment Opportunity Commissions guidance document regarding addressing the needs of employees with disabilities in emergency management was also incorporated into the review process.

The City formed a self evaluation team comprised of representatives from all departments within Lincoln City Government. Team members are knowledgeable regarding program mission and delivery systems in the departments they represent. Each team member was responsible for analyzing programs and responding to the survey questions as defined by their departments' functions. The data was then submitted to SSA for review and analysis. City publications were reviewed then additional information, clarification and potential policies were discussed.

PROCESS OVERVIEW

The Americans with Disabilities Act is the most comprehensive civil rights statute in the United States. Appropriate compliance with ADA requirements can appear to be difficult. In addition to the ADA, California has also enacted far reaching State laws that expand upon the ADA. During the course of the program evaluation, the intent is to provide evaluation team members with a social context which explains the necessity for the ADA and California statutes. The process also covers the requirements for State and Local government mandated by ADA title II provisions.

Analysis

The ADA requires an evaluation of all programs, services and activities provided by a covered entity. Additionally, there are a number of administrative, or general, requirements that must be complied with to successfully meet the ADA mandate. These requirements were used by SSA as a basis to compare the department's evaluation responses to mandates for appropriate compliance. Each department and/or division program evaluation team member was requested to review a copy of the survey questions utilized in making a detailed examination of the programs, services and activities within their department's areas of responsibilities.

City departments and divisions completed these questionnaires in 2010. The department and/or division program evaluation team members were encouraged to:

- Respond to the items within the survey questions to which they have personal knowledge.
- Mark as "N.A." those items that fall outside their program responsibility scope and indicate to the best of their knowledge whose responsibility they believe it to be.

The survey questions are seen as a living document. Respondents/surveyors were encouraged to submit or insert new questions, as they deemed fit. Attachments of policies, posters, or procedural documents, which might serve to be beneficial to all parties, were encouraged.

As of this review, the City provides services through the following Departments, as described on the City of Lincoln website:

Finance & Administrative Services Department

The Finance & Administrative Services Department consists of finance, information technology, central services, and administrative support functions.

Lincoln Police Department

The Lincoln Police Department provides a full range of 24-hour law enforcement services.

Fire Department

The major function and responsibility of the Fire Department is to reduce the risk of life and property loss resulting from fire and hazardous materials incidents, and to provide emergency medical assistance to the citizens of Lincoln.

Public Services Department

The Public Services Division handles environmental quality/water, environmental quality/wastewater, public utilities, transportation, public facilities, and administrative support services.

Development Services Department

The Development Services Department is responsible for the coordination and delivery of a wide variety of development-related services and community services. The Department functions are divided between the Planning and Building Division, Engineering, Economic Development, Development Financing, Code Enforcement and Affordable Housing.

Library

The Lincoln Public Library is the destination and starting point for your information needs. The library provides educational, recreational, and cultural resources to meet information needs, supplement schoolwork, and further life-long learning opportunities. The Library promotes courteous service, effective practices, and cooperation among libraries to meet the needs of the citizens.

The Carnegie Library downtown supports library service by providing a variety of educational and recreation materials for all ages, internet access, and story times. This location has been serving the community since 1909.

Twelve Bridges Library; open since October 2007, is joint-use facility with Sierra College and Western Placer Unified School District. The library provides meeting rooms, a homework center, a technology center, and a collection of materials for adults and children, with additional support to college and high school students.

As with other cities, the City's organization is fluid and changes often in response to community needs and/or personnel skill sets. These recommendations, influenced by organizational structure, may require periodic adjustments to match on-going revisions in City personnel job duties.

The next section of this report addresses the findings and recommendations which are followed by model policies that SSA is recommending the City edit, adopt, and implement.

Key to success in program compliance will be the City appointing a staff member to coordinate the City's ADA compliance efforts. Suggested duties for the ADA Coordinator position are outlined in the next section under "General Administrative Requirements and Recommendations". This person is more likely to be successful if they report either to the City Manager or the City Attorney. Since the individual must coordinate the City's efforts to comply with Title II and investigate any complaints alleging the City's violation of Title II, it is essential that the ADA Coordinator have sufficient authority to perform the duties and receive necessary cooperation from other Staff members. For an individual to be effective in this role, experience, knowledge, skills, and personal qualities are necessary prerequisites. At this time it is anticipated that the City Clerk will be the appointed ADA Coordinator.

The ADA Coordinator is expected to have a well developed skill set to assure the City's ongoing compliance with regulations. More information regarding the role of the ADA coordinator can be found at ADA.gov, the U.S. Department of Justice website regarding ADA implementation. When visiting this site special note should be made of the "Tool Kit for State and Local Governments" and 28 CFR 35.107.

Senate Bill 262 (Chapter 872/Statutes of 2003) authorizes the State Architect to establish and publicize a program for voluntary State certification as a "Certified Access Specialist" (CASP). Certification is open to any person who meets specified experience criteria and completes testing in a wide range of disabled access matters. The Division of the State Architect maintains a directory of current Certified Access Specialists (https://www.apps.dgs.ca.gov/casp/casp_certified_list.aspx). The City should consider using these specialists as a resource for ADA technical assistance. SSA has CASp certified personnel available as well. There may also be opportunities to pool resources with nearby Cities and Counties and/or existing Joint Power Authorities.

REPORT FINDINGS

The recommendations following are based upon self evaluation questionnaire answers from City department representatives. The information requested includes six focus subjects regarding how the program service or activity provides disabled access to participants with disabilities. An overall administrative questionnaire also provides information relative to City organization for delivering services to disabled persons. Information provided by the departments indicates there are more programs being provided by the City departments than disclosed by the questionnaire and there are subject areas where Staff does not understand disabled requirements.

Based upon responses in the self evaluation questionnaires and additional information gleaned from available documents, recommendations were developed for subject areas where improvements will provide compliance with ADA civil rights provisions.

1. GENERAL REQUIREMENTS AND RECOMMENDATIONS:

ADA Coordinator's Duty Statement:

The following are characteristics for the ADA Coordinator's role that are important for the City's disability civil rights compliance. Characteristics should include, but not be limited to:

- A reporting relationship to City's senior management providing a communication conduit facilitating rapid reporting of emerging issues relative to the City's compliance.
- Responsibility for monitoring the City's self evaluation and transition plan implementation including consultation with City management concerning the appropriate development and policy distribution.
- Responsibility for administering the City's grievance process.
- Functions as resource to the City regarding ADA and California State Laws regarding civil rights for persons with disabilities.
- Functions as City liaison with disability advocacy groups and support resources. Responsible for obtaining input from advocacy groups regarding City's policies.
- Responsible for providing information to emergency management and safety teams within City Government who plan and coordinate disaster response within City run facilities.

At this time it is anticipated that the City Clerk will be appointed the ADA Coordinator for the City.

Grievance or Complaint Procedure:

A comprehensive grievance or complaint procedure needs to be established and implemented. Important attributes for the process are as follows:

The comprehensive grievance or complaint procedure should be easily available to Lincoln citizens, employees, applicants, and visitors. Availability should include the City's web site and notice posting in all City offices and service contractor's sites that perform services for the City.

All City employees should have an awareness of the grievance procedure, an ability to explain the process in general, and if necessary refer complainants to the ADA Coordinator.

Assistance matching with need should be available for persons with disabilities to complete the grievance procedure.

Filing a grievance should prompt an objective fact finding investigation with set time lines for review and response at each level. The complainant should be kept informed on progress and the grievance decision or result.

The City Attorney should review all negative findings prior to distributing the final grievance report.

It is suggested that the ADA Coordinator be the first level of review and the City Manager be the second level of review. It is advisable for the City to make alternative dispute resolution available should an impasse be reached.

A suggested model policy and process is outlined in section III, Suggested Model Policies, item 9.

Posting of ADA Rights Notices in all offices:

Suggest running an ad in the newspaper at least once a year regarding compliance with laws. The following topics are important:

- Ensure reference is given to Government Code 11135, the Fair employment and Housing Act, (FEHA) and Section 504 of the Rehab Act of 1973 if you receive Federal Funds.
- List the name and contact information for the ADA Coordinator.
- Solicit input from persons with disabilities.
- Policies are available for public review and comment. The objective for this information in the notice is to ensure useable access to City programs and City sites for persons with disabilities and senior Citizens, their insights are valuable.

A notice sample is provided in this report, section III, Suggested Model Policies, item 8.

City-wide Harassment Policy (zero tolerance):

Develop a model a zero tolerance disability and age based anti-harassment policy similar to the City's Sexual Harassment Prevention Policy. Put all anti-harassment policies on the same staff wide distribution and training schedule.

Contract language

Ensure that the City does not enter into business agreements or contracts that assign the City's civil rights responsibility to the contractor.

Program Oversight

The City should consider forming an appointed citizen advisory body comprised of persons with disabilities, seniors, and those having an interest in civil rights for persons with disabilities and seniors. This body could function in relationship to the ADA coordinator to facilitate continuous improvement and ongoing compliance with State and Federal mandates.

It is recommended that the City conduct public forums to seek comment on the City's compliance as appropriate during the transition plan implementation period. This will afford consensus with Citizens and the City for prioritizing work and program compliance with law mandates.

2. PROGRAM ACCESS REQUIREMENTS AND RECOMMENDATIONS:

Physical Access to Program Sites

The City is required to create a Transition Plan, containing the following minimum elements:

- A list of architectural or physical barriers within the sites from which the City operates.
- A schedule for removing architectural or physical barriers.
- A statement regarding the method to be employed in removing the identified barriers.
- The name of the person or persons responsible for implementing barrier removal.

For physical access to programs sites see this report section III, Access Compliance Assessments of Facilities. The assessment report outlines physical barriers and the schedule for removal.

It is also recommended that the City create a “housekeeping” policy regarding furniture placement, bulletin boards, brochure racks and other items that may create an access barrier to an otherwise accessible environment.

Communication policy

Debates have been ongoing among experts from the Deaf community regarding the continued use of TTY’s in view of current technology advances. This issue is important as many members of the Deaf community are becoming more accustomed to communicating through emails with the assistance of blackberries and other personal communication devices. Consensus is building that eventually TTY’s will be obsolete; however, the transition is incomplete at this time. Therefore, it is recommended that TTY’s still be employed for emergencies and areas of sensitive or personal communications.

All publications should be available in alternative format upon request, and availability notice should be contained within the documents and publicly posted in City offices. Information provided electronically must be available to persons with disabilities. Policy should state that the City provides publications in alternative formats upon request. It is not recommended that such publications be prepared in alternative formats in advance of demand. Rather, when alternative format is requested, the specific format required should be explored with the requestor. For example, a request for information in large print may result in production of the information in question at font size 14 or perhaps at font size 18 depending upon the visual acuity of the requestor. In many cases alternative format accommodations can be managed through providing the requested material electronically.

It is recommended that the City Web Master receive training in the development and maintenance of accessible websites. This would assist the City in maintaining compliance under California Government Code Section 11135(d). Field testing of the web site by persons with disabilities is strongly encouraged. Particular attention should be paid to any portions of the website that would require the user to complete forms or questionnaires on line.

A resource list for alternative format vendors should be developed regarding auxiliary aides and services and alternative communication formats. This list should include Braille, Real time Captioners, Sign Language Interpreters, Note takers, and Audio Tape Production Services.

It is suggested that the City ADA Coordinator be responsible for maintaining the list of resources and services as a support system to all City Departments.

Effective Communication; Policy regarding provision of auxiliary aides and services

Readers, Note takers, Sign Language Interpreters, Real Time Captioners, Braille, large print, and audio recording must be considered and resources must be available.

Notice for requesting aides and services for City government meetings needs to be developed and added to all City meeting agendas for Council, Commissions, and Boards. Notice should also be posted in all City offices and on the City website. All meeting notices should contain a statement offering auxiliary aides and services to persons needing such service to participate in the meeting. This statement should identify the lead time needed by the City to process the request. It is recommended that communications and auxiliary aids or services be handled by the same process.

Videos purchased by the City should contain Captioning. Audio descriptors are available for persons who are blind, if such format would be desirable.

It is suggested that the City utilize the local independent living center as a resource to identify auxiliary aides and services vendors in and around Lincoln. It is also suggested that the City ADA Coordinator be responsible for maintaining the list of resources and services as a support system to all City Departments.

A suggested auxiliary aids and services policy is outlined in section III.

Emergency response for persons with disabilities

In emergency management two distinctly different scenarios must be planned for and addressed. The first scenario involves a community wide event, such as an earthquake. In this scenario the event impact affects numerous persons and facilities throughout the City. As such, the City uses the County Office of Emergency Services when the event overwhelms the City resources. Planning should include issues relative to safe areas, emergency response teams, the identification of persons needing assistance, site visitors, etc.

Common concerns regarding regional emergency response planning includes the following:

1. A TTY Number should be listed for the Sheriff's Department.
2. Politically correct language should be used. Care should be taken to delete such terms as "special", or "wheelchair bound". The latter could be replaced with "wheelchair user" or "rider".
3. Discussion should take place regarding procedures for local entities to request services from County OES.
4. Access to care shelters should be defined.
5. The needs of care shelters which include accessible cots, sign language interpreters, durable medical supplies, temperature control, access to medication and the means of keeping it at appropriate temperatures and transportation to shelters should be considered.
6. Planning should take place to ensure persons with disabilities who are not in need of acute medical care can receive mainstream sheltering.
7. The document should contain a notice regarding being available in alternative format upon request.

The City may wish to provide this feedback to the County as a part of the City's good faith effort to comply with its civil rights mandates.

The other scenario is a localized event within a single site, for example, a fire in a City building. For this event response plans should be revisited to ensure that the needs of persons with disabilities who are visitors to the site for City employees can be handled. The Equal Employment Opportunity

Commissions authored guidance outlining procedures for identifying employees who may need assistance in an emergency. It is recommended that this policy guidance be utilized by the City. It is also recommended that the ADA Coordinator have an active role with Safety Staff concerning the development and practice of emergency exercises. This is an area where training may be considered. If conducted training should address:

- The pros and cons of using evacuation equipment from upper floors
- The pros and cons for safe areas of refuge
- The use of reasonable accommodation in emergency response planning
- How visitors with disabilities can be responded to in site specific emergencies

City Publications

Set policy for reviewing City publications and any audio visual products to ensure first person and politically correct language is used. Training for staff doing this review will be needed.

In order to reinforce the City's commitment to barrier free service delivery, the communications that portray persons with disabilities and seniors is an essential element to setting a discrimination free tone throughout the City. The following is a language and etiquette guide which can be used to evaluate City communication and to train staff regarding appropriate interactions. It is recommended that all City produced publications and audio visual products use the guidance set forth in this document as a standard.

When outsourcing the production of City publications for audio visual materials the contract provisions should address appropriate language, etiquette, and inclusion of persons with disabilities and seniors. Language within the products rendered under this agreement shall use appropriate "person first" language when communicating with or about persons with disabilities. If persons are portrayed in the products developed under this contract, persons with disabilities and seniors shall be included in an appropriate manner as represented by their presence in the community. Under no circumstances shall the aforementioned parties be portrayed in a condescending or inappropriate manner. Terms such as, "handicapped", "victim of", "suffers from", or "wheelchair bound" will not be used.

Program access in historic sites

The City operates programs that are housed within historic structures at the Carnegie Library and the Civic Center. The buildings do not have full access to all floors at this time and there are physical barriers present in a majority of the building floor area.

Considerations need to be given to the library to ensure there are equivalent program participation opportunities for disabled persons. Currently only the lower level is accessible and there are programs provided on the upper floor. Relocating the programs is a viable option and contingency operational plans should be developed for accommodating disabled persons that cannot use the upper floor.

The Civic Center is being considered for remodel in order to house different departments or programs, there is no facility use plan for future uses at this time. When the building is remodeled, compliance with current building code will afford the required access throughout the building.

Undue Burden

A policy and procedure addressing how the City determines “Undue Burden” is not in place at this time. It is suggested that any determination for declaring undue burden be reviewed by the Department head, City attorney, and have approval by the City Manager. Reasonable time limits need to be established for each to act.

The standard for undue burden is high. The City’s resources must be considered as a whole. Consideration in this area is necessary on a case by case basis. The examination must be in conjunction with the overall financial resources of the City and/or whether the modification in question would fundamentally alter the nature of the City’s program. Consideration of other means for creating access should be examined as a part of this analysis. Frequently, this is an area where outside consultation is advisable prior to the issuing the decision.

City Events

Set policy to require all City meetings, events, trainings or other public forums to be accessible and useable by persons with disabilities. Consider, access to public speaking facilities and equipment, integrated seating, line of site, policy accommodations for persons with speech impairments during time limited public comment periods, service animal relief areas. The City may wish to cross reference this requirement with Communications and Auxiliary Aids and Services.

Employment

The Human Resources Department has comprehensive established policies and procedures in accord with federal and state employment laws. Over time laws will change or have new additional provisions, policy formulation at that time is advisable.

Construction

Set policy for reviewing any new construction, new leased space, or lease renewals. It is recommended that lease renewals be based upon a disabled access survey and lease renewal approval be contingent upon the lease space being compliant with access construction codes. Current codes require access plan reviews for new construction for permit approval before construction and access inspections of the physical environment during construction with inspection approvals before occupancy.

Training

Evaluate new and old access policy to determine staff training needs. Suggest training for staff having public contact, ADA training in the new employee orientation, training for supervisors regarding the Fair Employment and Housing Act requirements.

Any new policy or procedure that is adopted due to this review will need to be presented to Staff so they will understand the policy or procedure in sufficient detail for implementation. It is important for the City to examine the following areas which may represent some of the unmet training needs:

- General State and Federal Civil Rights requirements which the City must comply with regarding persons with disabilities
- Appropriate language and etiquette when interacting with or writing about persons with disabilities or seniors
- The reasonable accommodation interactive process mandated by the Fair Employment and Housing Act

- Act, the US DOJ, Role Call Training Video Tape Series for Law Enforcement Officers
- TTY's are necessary for operators receiving emergency calls from the public
- An ongoing training program should be developed to enhance and maintain the skills of the City ADA Coordinator in order that he/she can function as a in-house resource for the City
- New employee orientation should contain language, etiquette and civil rights requirements
- As noted in the Emergency Response section in this report; training is advisable for those personnel handling emergency management in City facilities.

SSA is able to provide the training noted or assist in locating training resources as requested.

Former Users of Illegal Drugs

Set Policy to ensure the City does not discriminate against former users of illegal drugs.

A FURTHER DETAILED PROGRAM REVIEW OF THESE AREAS IS ADVISED:

Law Enforcement/First responders

Public Works policy regarding setting accessible paths of travel around construction sites and rights of way relative to sidewalks and curb cuts.

HR for ensuring all the legal mandates are included in the programs and processes.

Program Access Resource Tools

To help implement access to City programs by Lincoln's Citizens and provide guidance to Staff, the City should assemble a general program accessibility resource readily available to all departments. Each department should add to the resource as necessary based upon specific department needs. The resource should include information, guidance, and technology available to help Staff communicate with persons having various disabilities. City Staff with guidance from the ADA Coordinator should periodically review the resource elements as new technologies become available in order to ensure that the best accommodations are included. Suggested elements for program access resources and tools are described following.

Alternative Format Communications

Resources for producing publications such as applications and registration forms on audiotape or audio recording electronic files, large-print text, Braille, and accessible format electronic media should be gathered.

American Sign Language Interpreters

A list of American Sign Language interpreters should be considered and updated on a scheduled basis to ensure the interpreters are available when necessary. Some programs, such as emergency services, may need interpreters available on a twenty-four hour schedule.

Interpreters should be qualified for the vocabulary and content necessary and certified for special duty such as emergency medical services or confidential information for legal matters. Many uncertified interpreters available through service companies have good skills and can handle most duties.

Assistive Listening Systems

Public meetings and conferences need systems and equipment to amplify sound for persons with hearing impairments. There are different system types suitable for different hearing disabilities, equipment should be chosen that will accommodate the greatest number of users.

Closed Captioning

Closed captioning on films and videotapes used for public meetings should be provided. Captioning for training and other programs should be provided on an as needed basis. Either owned equipment or a service provider should be discussed for best meeting the City's needs.

Optical Readers

Equipment or services that can translate printed information into audio format should be available to departments.

Text Telephone (TTY)

City departments should have access to a text telephone (TTY) or to a telephone transfer service as required by the law and provided by public telephone companies.

Transportation

Departments providing transportation for their programs are required to ensure accessible transportation as needed and requested by program participants. The City should continue to maintain any accessible transportation vehicles in the fleet. Discussion should take place regarding best meeting the City's needs for purchase versus contract lift-equipped vans or buses to transport individuals who use wheelchairs for programs conducted by the City and its departments.

Enlarging Printed Materials

A copy machine capable of enlarging printed materials should be readily available at each site where programs or public counter services are provided.

Guide to Disabilities and Service Etiquette

A guide to disabilities and etiquette for Staff providing services should be made available to staff with public contact duties. The guide is necessary, with periodic scheduled training, to make sure Staff is familiar with various disabilities, sensitive to the persons needs, and will not offend or demean them. The guide should be updated on a scheduled basis so current acceptable etiquette can be used by Staff providing services to the public.

Assistive Technology Equipment "Tool Crib"

The City should gather adaptive aids and equipment for being available to departments or programs that do not have the budget or personnel to provide their own. There may be local area equipment resources the City could consider as well.

Internet Resources

There are many disability related resources available on the Internet that should be listed as a resource. For example, the National Institute on Disability and Rehabilitation Research of the US Department of Education maintains www.abledata.com, which provides up-to-date links to assistive technology and disability-related resources.

III. SUGGESTED MODEL POLICIES

The following is a policy set designed for the City of Lincoln to assist in implementing State and Federal Disability Civil Rights mandates. It is suggested that each policy be reviewed by the ADA Coordinator, the City Attorney and Staff as appropriate before formal adoption by City Council and subsequent implementation by staff.

Policies are expected to be revised periodically due to changing priorities and new case laws. It is recommended that the City evaluate its policy statements at least annually relative to model policies and ADA accommodation practices.

1. Policy Statement – Auxiliary Aides and Services

It is the policy of the City of Lincoln to provide auxiliary aides and services to qualified persons with disabilities to enable them to participate in the programs, services and activities of City Government.

What is required?

Title II of the ADA requires that State and Local Governments provide auxiliary aides and services to qualified persons with disabilities when necessary to ensure useable access to the programs, services and activities.

What are auxiliary aides and services?

Auxiliary aides and services can be a wide variety to meet needs. The list below is not exhaustive. Customary accommodations include:

- Interpreting services for the deaf and hard of hearing;
- Assistive listening devices for the hard of hearing;
- Braille;
- Note takers when a person's disabilities prevent them from being able to take notes in meetings;
- Information provided on audio tape;
- Real time captioning for persons who are deaf or hard of hearing and do not use sign language;

What steps should City staff take?

- Make certain that meeting notices inform people that they may request auxiliary aides and services to facilitate their participation in the meeting, if such services are necessary due to a disability.
- Make certain that City publications inform the public that the publications are available in alternative format upon request;
- Ensure that staff persons who are listed as contact persons in notices about auxiliary aides and services are prepared to interact with the requestor, obtaining information regarding the nature of the request. The ADA coordinator should be responsible for maintaining notice documents, contact lists and records regarding assignment of responsibility for implementation. This person also must have knowledge of the resources in the community and the City's procurement system.
- The assigned staff person should then procure the needed auxiliary aides and services and ensure that they are received appropriately by the person with the disability.

Surcharge

It is important to be aware that it is unlawful to levy a surcharge for providing an auxiliary aide or service.

2. Policy Statement: Service Animals

It is the City of Lincoln's policy to admit service animals into all sites where the City provides programs, activities or services.

What is required?

Title II of the ADA as well as a variety of California statutes requires that service animals be admitted to sites open to the public.

What is a service animal?

A service animal can be any one of a variety of species that are specifically trained to perform a task(s) for a person with a disability that they cannot perform for themselves because of a disability. No "special" card or license is required to be carried by the owner of the service animal.

How can I tell if an animal is a service animal?

You may ask the following questions:

- Is that a service animal?
- What service does it perform for you?

What action may be taken if the service animal became threatening or disruptive?

If the service animal became disruptive or threatening, the Owner may be asked to remove the animal from the premises.

It is advisable to document what has occurred, including the witness names and contact information. City staff should also immediately notify their supervisor and the ADA Coordinator about the incident.

3. Policy Statement: Reasonable Accommodation

It is the policy of the City of Lincoln to provide effective accommodations to qualified applicants and employees with disabilities.

What is a reasonable accommodation?

A reasonable accommodation is an adjustment within the selection process, or the provision of auxiliary aides and services during the selection process which does not fundamentally alter the selection competition or result in a person with a disability gaining an undue advantage in the competitive process. Examples may include, but not be limited to:

- Holding the interview in an accessible site in the event a candidate has a mobility impairment (it is a best practice to ensure that all selection activities takes place in accessible locations as the hiring authority may not be aware of the mobility impairments impacting candidates).
- Provision of sign language interpreters for persons who are deaf or hard of hearing;
- Providing extra time for persons whose selection is impacted by a learning disability.

A reasonable accommodation is also an adjustment in the manner in which the essential functions of a job are performed.

Examples may include, but are not limited to:

- Making the work site accessible to, and useable by the employee with the disability;
- Schedule adjustments which may include as appropriate, telecommuting;
- Modification of supervisory style;
- Acquiring or modifying workplace equipment suitable to mitigate the employee's disability.

An adjustment to the provision of benefits and privileges to ensure that all staff receives benefits and privileges in an equitable manner. Examples may include, but are not limited to:

- Making break rooms accessible;
- Holding City sponsored social events, such as holiday or retirement parties in accessible locations.

What is a definition of a qualified person with a disability?

A qualified person with a disability is a person who 1) meets the minimum qualifications of the position in question; 2) is able to perform the essential functions of the position with or without reasonable accommodations; 3) is a person who has a disability as defined by the California Fair Employment and Housing Act, which states in part, a person with a disability is

- A person with a physical or mental disability that limits a major life activity;
- A person with a history of a physical or mental disability that limits a major life activity;
- A person who is regarded as having a physical or mental disability that limits a major life activity.

Within the reasonable accommodation process, physical or mental disability is most central to the issues encountered.

What happens when a reasonable accommodation is requested?

Generally the employee or applicant will inform the employer of the need for reasonable accommodation. However, when the employee knows or has reason to know the applicant or employee has a disability impacting the work environment the employer must engage in an interactive process. The interactive process is designed to identify and implement an effective reasonable accommodation.

NOTE: the City must determine if this process will be administered by the ADA Coordinator, the first line supervisor or both parties in collaboration with each other.

What is the interactive process?

The interactive process can be thought of as an interaction between the employee/applicant and the employer to address mitigating barriers to employment which are created by the disability in question. The following five steps demonstrate how the interactive process can be effective.

- i. The employer becomes aware of the impact of the disability within the employment situation.
- ii. The employer and the employee/applicant discuss potential solutions (here medical information and resources from experts such as the job accommodation network may be employed).
- iii. After giving primary consideration to the employee/applicant's input the employer selects an effective reasonable accommodation.
- iv. The employer puts the reasonable accommodation in place in a timely manner.
- v. The employer follows up to determine if the reasonable accommodation is effective.

When should medical information be requested?

If medical information is needed the request should be justified by the employer's need to know or the business necessity of the operation. For example, in most cases the employer will need to know;

- If the employee/applicant has a mental or physical disability that limits a major life activity;
- If the physical or mental limitation is long term or permanent;
- How the limitation impacts the employee/applicant in the selection process, performance of essential functions of the position or in the receipt of benefits and privileges in an equitable manner.

When is a request an undue hardship?

If a request is unduly costly, extensive, substantial, and disruptive or would fundamentally alter the nature of the operation, it may be an undue hardship for the City to provide the accommodation in question.

It is very important to be aware that if a decision is made based on a reasonable accommodation being unduly costly it is necessary to make that determination considering the entire City resources rather than any sub section, program or department within the City. Outside consultation is often useful before making a negative determination.

4. Policy Statement: Reasonable Modification

It is the policy of the City of Lincoln to make reasonable modifications of policies to afford opportunities for qualified persons with disabilities to participate in the City's programs, services, and activities.

What is a reasonable modification?

A reasonable modification is an adjustment or modification of a City policy or practice in order to create access to City programs, services or activities for a qualified person with a disability. Examples are:

- Granting a variance in building set back requirements to permit the construction of a ramp that creates access for wheel chair users;
- Assisting a person with a disability in completing forms required to receive City services;
- Exempting a person with a disability from the requirement of placing their trash can at the curb to receive trash collection service.

When is the request for a reasonable modification an undue burden?

If granting a request fundamentally alters the nature of the program, service or activity the City of Lincoln may declare the modification an undue burden.

Before making such a determination, City staff must:

- 1) examine whether there are other actions that can be taken to create the desired program access,
- 2) consult with the City ADA Coordinator,
- 3) consult with and get the approval of the City Attorney.

5. Policy Statement: Zero Tolerance Policy for Disability Harassment

It is the policy of the City of Lincoln to have a respectful and civil work and service environment for all employees, applicants and members of the public.

Pursuant to this policy the City will not tolerate the harassment of or jokes about persons with disabilities. Such behavior by City of Lincoln employees may lead to disciplinary action.

Any employee having questions regarding appropriate language or etiquette related to persons with disabilities should contact the City ADA Coordinator for guidance.

The City may wish to add the above to the Employee Handbook.

6. Policy Statement: Drug Policy

It is the policy of the City of Lincoln not to discriminate against former drug users who are in recovery and no longer engaged in the illegal use of drugs. Questions concerning this policy should be directed to the City ADA Coordinator or the City Attorney's office.

7. Policy Statement: California Building Code Enforcement Policy

It is the policy of the City of Lincoln to enforce the California Building Code in order to create and maintain a safe and accessible community. This policy applies to enforcement activities focused on privately owned public accommodations.

The California State Attorney General has mandated that local entities enforce the California Building Code. It is important to note that the City of Lincoln has no authority to enforce the access requirements of the Americans with Disabilities Act or any other Federal mandates. The enforcement of the ADA is primarily a function of the U.S. Department of Justice.

Procedure:

- i. When a complaint is received the City will confirm that it has jurisdiction over the property and matter in questions.
- ii. If the jurisdiction does not exist the City will notify the complainant in writing.
- iii. If jurisdiction does exist the City of Lincoln Building Department will contact the building owner and investigate the alleged Building Code violation.
- iv. If the California Building Code violation is confirmed the building department will give the building owner 90 calendar days to develop an access barrier mitigation plan.

NOTE: This process is a draft only provided to the City of Lincoln to provide general guidance. It is suggested that the City refine this system in order that it meets operational needs of the City. The development of a complaint form is suggested. This process and the complaint form should be made available on line and at the service counter of the City Building Department.

8. Notice of Compliance under ADA & California State Law

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, the Fair Employment & Housing Act (FEHA), Government Code Section 11135 and other applicable codes, the City of Lincoln will not discriminate against individuals on the basis of disability in its services, programs or activities.

Employment: The City of Lincoln will not discriminate on the basis of disability in its hiring or employment practices and will comply with the Fair Employment and Housing Act as well as ADA Title I including the regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Lincoln will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities, including sign language interpreters, documents in Braille and other ways of making information and communication accessible to people who have speech, hearing or vision impairments so they can participate equally in the City programs, services and activities.

Modification to Policies and Procedures: The City of Lincoln will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. For example, individuals with service animals behaving within applicable standards are welcome in City offices and facilities, even when pets are generally prohibited.

Anyone who requires auxiliary aides and services for effective communication, or a modification of policies or procedures to participate in a program, service or activity of the City of Lincoln should communicate with the Department contact person as soon as possible, but no later than 48 hours before the scheduled event.

Neither the ADA, nor state law require the City of Lincoln to take action that would fundamentally alter the nature its programs, activities or services or impose an undue financial or administrative burden. Complaints that a program, activity or service of the City of Lincoln is not accessible should be directed to the ADA Coordinator, Patricia Avila, City Clerk of the City of Lincoln, 600 Sixth Street, Lincoln, CA 95648, or by phone at (916) 434-2490, or by email at pavila@ci.lincoln.ca.us

The City of Lincoln will not place a surcharge on a particular individual with a disability or a group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modification of policy to create access.

Policies for City programs are available for public review and comment by any persons interested.

9. Grievance Procedure under ADA

This grievance procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by the City of Lincoln. The City of Lincoln's Disability Discrimination 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 the complainant and location, date and a description of the problem(s). Alternative means of filing a complaint, such as personal interviews or tape recording the complaint, are available to 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:

Patricia Avila, City Clerk of the City of Lincoln

600 Sixth Street

Lincoln, CA 95648

Phone (916) 434-2490

pavila@ci.lincoln.ca.us

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or the designee will schedule a meeting with the complainant to discuss the complaint and possible resolutions. After an investigation and review, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the complainant. The response will explain his/her position on the issue and offer options for substantive resolution of the complaint.

If the response by ADA Coordinator 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 City Manager.

After receiving the appeal, the City Manager or the designee will review the appeal and the ADA Coordinator finding. Within a reasonable period, after a review, the City Manager or the designee will respond in writing, and, where appropriate in a format that is accessible to the complainant, with a final resolution to the complaint.

NOTE: The notification of compliance should be widely distributed throughout City Government. The U.S. Department of Justice suggests periodic publication of the notice in local newspapers and other forms of dissemination that would reach the constituent base of the City.

The grievance procedure should be distributed through all City departments and be easily available within the City's Website.

City of Lincoln

Americans with Disabilities Act

Self Evaluation: Program Inventory

Person completing this form:

Department: Location:

Phone: Email:

Date completed:

List steps taken to ensure that disabled persons (or their representatives) participate in the completion of this self-evaluation of programs.

Program, Activity or Service	Description / Purpose / Scope	Program, Activity or Service Location	Contact Person Name, Phone & Email	Contractors Used? Yes / No / Who	Eligibility Criteria? Yes / No / What	Modifications provided / offered? Yes / No / What	Fees for disabled? Yes / No / What	Certifications or other recognition? Yes / No / What	Publicity? Yes / No / What



ADA Transition Plan

Section III

Access Compliance Assessment

Survey Data Collected 2010 - Facilities
Survey Data Collected 2010 - Public Right-of-Way



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PLACE HOLDER FOR SURVEY DATA AND
MITIGATION SCHEDULES.



ADA Transition Plan

Section IV

Implementation Schedule

Barrier Mitigation – Phase 1 Facilities and Public Rights-of-Way



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