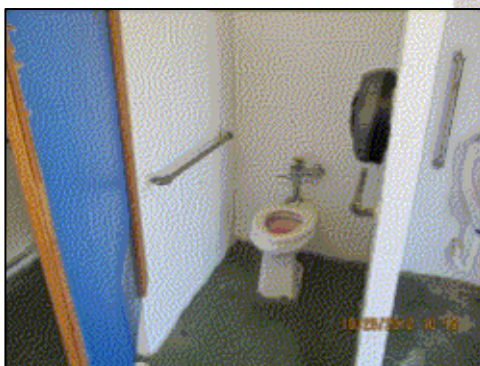


CITY OF RUSHVILLE, INDIANA

Americans with Disabilities Act Self-Evaluation and Transition Plan



Public Review Version

Prepared by:

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Figure 1 – City of Rushville Location Map

Figure 2. City of Rushville facility location map.

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- Sidewalk Inventory
- Curb Ramp Inventory
- Public Parking Lots
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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
BPW – Board of Public Works
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.

The City of Rushville has completed this self-evaluation of all City 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 City will strive to ensure that all residents and visitors are able to access all services, programs, and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the City will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be 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 were assessed at the following facilities identified by the City of Rushville as having programs/services provided:

- City Hall
- Fire Department
- Police Department and Council Chambers
- Street and Sanitation Department
- Parks and Recreation Office
- Animal Shelter
- City Utilities Building
- Booker T. Washington Community Center
- ROW Facilities
 - Sidewalks
 - Intersection Curb Ramps
 - On-Street Parking
- Public Parking Lots
- City Parks
 - Waggoner Pool
 - Veterans Memorial Park North
 - Veterans Memorial Park South
 - Community Park
 - Laughlin Park
 - Wilkie Park
 - Riverside Park

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of City facilities, or entire facilities, 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.

In addition to City facilities, the self-evaluation reviewed existing City 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.

An inventory and assessment of sidewalks and curb ramps within the City was also performed. Following completion of the inventory and assessment, the transition plan outlined the findings and identified modifications required to the sidewalks and curb ramps to provide equal access for persons with disabilities. A statement of probable construction cost was prepared and included in the study report. The Transition Plan assigned priorities for modifications to the sidewalk and curb ramp facilities required to provide access to all users. The results of the self-evaluation identified a number of barriers within the City right-of-way. 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.

It is the goal of the City of Rushville to make facilities for all services, programs and activities fully accessible as soon as possible, with the time required being largely dependent on a number of economic factors and future changes to the ADA Standards for Accessible Design (ADASAD), the Proposed Accessibility Guidelines for Pedestrian Facilities within the Public Right-of-Way (PROWAG), or other unforeseen requirements that would necessitate additional improvements to City facilities. The City has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the City is fully compliant with applicable standards.

The results of the self-evaluation identified a number of barriers at City facilities. The estimated cost to correct these deficiencies is over \$3,500,000. Exact costs cannot be determined without a detailed review of other codes or additional review of several facilities (structural, etc.). 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 should be categorized into a phasing program to spread the cost for implementation out and address the most serious deficiencies at the most used City facilities. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances there are procedural or other modifications that can be made to provide equal access to City programs and some modifications are not required until renovations are completed. These modifications are noted within this report.

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

The City of Rushville is located in east-central Indiana (Figure 1) in central Rush County and is classified as a “public entity” pursuant to Title II of the ADA. The City 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.

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.

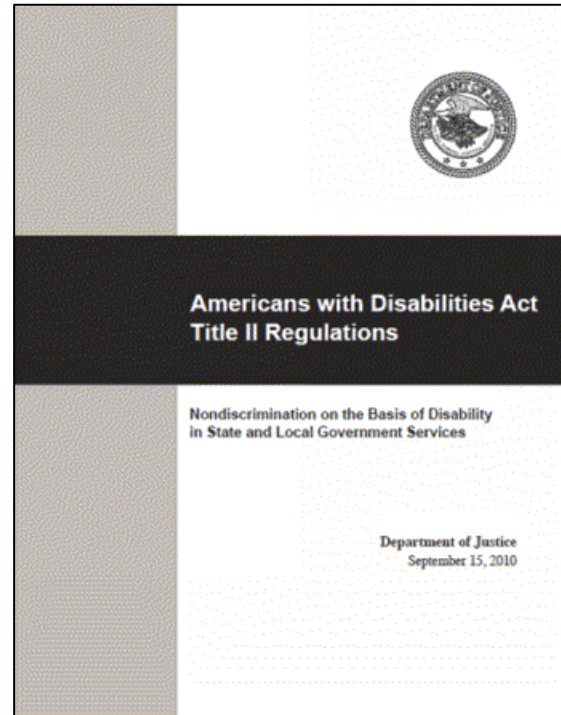


Figure 1. Rushville Location Map.

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 the City of Rushville. 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 City can take action to remove those barriers to ensure that the City is not discriminating against individuals with disabilities. Title II of the ADA stipulates that the City of Rushville 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 City's policy of nondiscrimination on the basis of disability related to City 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 City of Rushville is committed to complying with the tenets of Title II of the ADA of 1990, and other Federal and state statutes and regulations intended to make City-owned and operated facilities, programs, services, and activities accessible to persons with disabilities. This ADA Self-Evaluation 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 2012, the City of Rushville was made aware of the requirements of the ADA by the Federal Highway Administration (FHWA) and Indiana Department of Transportation (INDOT), who made several presentations throughout the state on the topic. The City responded by ultimately contracting DLZ Indiana, LLC to assist in preparing a SETP.

A work plan was developed whereby DLZ ADA specialists provided training to City staff on collection of ROW and non-ROW facility data pursuant to the applicable guidelines. DLZ provide City staff with forms on which to record the data. Subsequently, City staff assessed City-owned and operated facilities for compliance with ADA and provided the data to DLZ to complete the ADA SETP. The complete project work plan included:

- Facility audits (by City staff)
- Self-evaluation of City programs, services and activities (by DLZ)
- Facilitate designating an ADA Coordinator (by City with DLZ assistance)
- Develop grievance procedures (by City with DLZ assistance)
- Outreach to advocacy groups and the general public (by DLZ)
- Prioritize facilities improvements for accessibility (by DLZ)
- Develop written transition plan (by DLZ)
- Adoption of the transition plan (by City with DLZ assistance)

Facility audits were performed only in those areas open to the public for this project. Areas within City-owned facilities that are not accessible to the public must also be accessible for employees with disabilities as a requirement of Title I. Accessibility in employee work areas will be assessed on a case-by-case basis based on the needs of the individual and nature of their disability. The City is committed to ensuring that all workspaces are accessible pursuant to the requirements of each job and making the necessary modifications when needed. In addition, facilities within the public City right-of-way (ROW) were inventoried. ROW within INDOT's or Rush County's jurisdiction were not included as part of the City of Rushville's ROW facility evaluation. The City has a large population base (6,341 according to the 2010 U.S. Census) and has extensive ROW facilities located throughout the incorporated area.

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 BPW/City 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 City has several mechanisms in place to provide for an ongoing update of the transition plan:

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

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 BPW/City Council.

1.4 Legislative Background & Framework

For more than 40 years, the City of Rushville 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 City 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 City programs, but not all City buildings, to be accessible. The regulation implementing Title II, 28 CFR Part 35 (as amended September 15, 2010) contain two “safe harbor” provisions. Under the first “safe harbor” provision, elements of existing facilities that already comply with either the 1991 ADA 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 City 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 City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the City is required to:

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

1.6 Undue Burden

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. For

example, a city 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 city would have to alter the requirement to provide equal access. Modifying the rule would change the class from college level to something less than college level and would fundamentally alter the original nature of the class.

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

1.7 ADA Self-Evaluation and Transition Plan Requirements

The purpose of this ADA SETP is to document the City's review of access to facilities, 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 City of Rushville:

- 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 City's programs, activities, and services. [\[28 CFR 35.105\(a\)\]](#)

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

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

1.8 Facility Audit

In 2012 and 2013, audits of building and facility interiors, exterior site features at each, and City ROW were performed only in those areas open to the public. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The approximate location of non-ROW City facilities (by number/letter) is shown on Figure 2. The list of facilities that received an accessibility audit included:

1. City Hall (133 W. 1st St.)
2. Fire Department (120 N. Perkins St.)
3. Police Department/Council Chambers (270 W. 15th St.)
4. Street and Sanitation Department (519 E. 9th St.)
5. Parks and Recreation (119 W. 16th St.)
6. Animal Shelter (223 Smiley Ave.)
7. City Utilities Building (601 W. 3rd St.)
8. Booker T. Washington Community Center (525 E. 7th St.)
9. ROW Facilities
 - Sidewalks
 - Intersection Curb Ramps
 - On-Street Parking
10. Public Parking Lots
11. City Parks
 - a. Waggoner Pool (N. Sexton St.)
 - b. Veterans Memorial Park North (W. 15th St.)
 - c. Veterans Memorial Park South (N. Sexton St.)
 - d. Community Park (N. Ft. Wayne Rd.)
 - e. Laughlin Park (N. Spencer St.)
 - f. Wilkie Park (N. Main St.)
 - g. Riverside Park (Water St.)

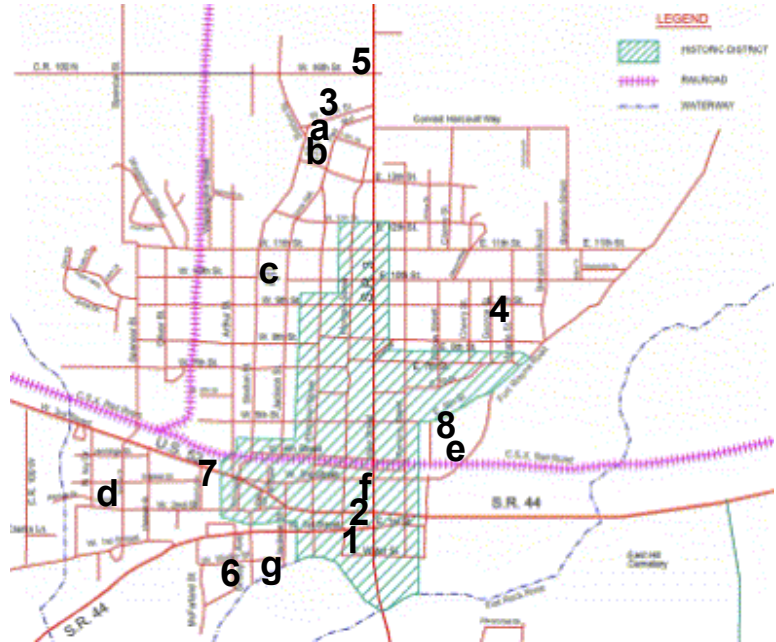


Figure 2. City of Rushville facility location map.

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.

1.9 City Administration and Departments

The City of Rushville is governed by four branches of government: Executive, Legislative, Fiscal, and statutory Boards and Commissions. The Mayor is the city executive and head of the Executive Branch. Also within this branch is the Board of Public Works & Safety (BPWS), comprised of the Mayor and two voters of the City chosen by the Mayor. The BPWS is the chief administrative body of the City and has day-to-day control of operations of the following City Departments:

- Police
- Fire
- Utilities
- Street and Sanitation
- Parks and Recreation

The City Common Council is the Legislative Branch and is comprised of five (5) elected members. The Mayor is the presiding officer over the Council during meetings. The Common Council is responsible for passing ordinances, resolutions, orders and motions for the governing of the City, the control of the City's property and finances, and the appropriation of money.

The City Clerk-Treasurer is the Clerk of the Council and performs the duties prescribed by Indiana Code ([IC 36-4-6-9](#)). The Clerk-Treasurer is also the fiscal officer of the City and head of the Fiscal Branch. The Clerk-Treasurer performs the duties assigned by [IC 36-4-10](#) and other duties required by ordinance. The Clerk-Treasurer also handles all finances for all departments, completes several reports annually, prepares payroll, collects fees, records meeting minutes, provides information to the State Board of Accounts for annual audits, and prepares various reports that are available to the public.

There are a number of statutory and other Boards and Commissions, including:

- Police Pension Board of Trustees
- Firefighters' Pension Board of Trustees
- Historic Review Board
- Board of Zoning Appeals
- Area Plan Commission
- Redevelopment Commission
- Utility Board
- Fiber Board
- Solid Waste Board
- Learning Center Board
- Parks & Recreation Board
- Unsafe Buildings Hearing Board

The specific duties of each of the above are discussed later. In addition, the City sits on, or is represented on, a number of County Boards and Commissions, including:

- Rushville County Economic Development Corporation
- Emergency Management Advisory Council
- Alcoholic Beverage Commission

There are a number of "departments" that provide City 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:

Mayor's Office

The Mayor's Office has the responsibility for a number of day-to-day functions for City government. In addition to fielding general questions and being asked to solve problems from the general public, the Mayor's Office also has responsibility for meetings with various groups or individuals to improve services in the City for residents and businesses. The Mayor's Office has extensive interaction with the public and is located at City Hall at 133 W. 1st Street.

Board of Public Works and Safety

The BPWS oversees the control and safety of the various departments, approves new hires and handles termination of employees, and approves contracts. The BPWS meets at the Council Chambers at 270 W. 15th Street.

City Common Council

The City Common Council has the ultimate decision-making power over fiscal affairs, approving and fixing annual operating budgets of all City departments, adopting resolutions and ordinances, setting priorities for the allocation of public funds, establishing salaries and other compensation, authorizing the expenditure of public funds for specific purposes, fixing tax rates and levies, and authorizing the borrowing of money in the form of bonds and notes. The City Council has regular interaction with the public and meets at the Council Chambers at 270 W. 15th Street.

Clerk-Treasurer's Office

The Clerk-Treasurer's Office performs a number of services and has extensive interaction with the public. The Clerk-Treasurer's Office is responsible for accounting services for the City, various reporting to state and Federal agencies, issuance of permits, and receipt of fees and charges. The Deputy Clerk also performs all Human Resources functions for the City (as Director of Personnel, Purchasing, and ADA Compliance). The City Clerk-Treasurer's Office is located at City Hall.

Fire Department

The Fire Department provides fire protection, rescue, and emergency medical services in the City and has extensive public interaction. They also provide public education programs and fire code enforcement. These services are provided out the fire station at 120 N. Perkins Street.

Police Department

The Police Department provides police protection and responds to public inquiries and complaints in the City and has extensive public interaction. The Police Department has officers with special training to assist in several areas, including programs for children through the schools, training of officers in the state-mandated core areas, and emergency vehicle operations annually along with other state-mandated training. The Police Department is located at 270 W. 15th Street.

Street Department

The Street Department oversees the maintenance and repair of infrastructure, including storm sewers, sidewalks, and road, and removal of ice and snow from City Streets and has little direct public interaction. The department is located at 519 E. 9th Street.

Sanitation Department

The Sanitation Department provides garbage and lawn refuse pickup and has little direct public interaction. The department is located at 519 E. 9th Street.

City Utilities Department

The City Utility Department is responsible for providing water and wastewater services to City residents and businesses. Services include water service connections, transfers, and termination of water and sewer service, meter repair or replacement, investigation of water services issues, water main repair and maintenance, fire hydrant repair, replacement, and installation, meter reading, monthly and annual water quality reporting, operation of the water plant, and billing. Water is supplied from seven groundwater wells and four water storage facilities. The City Utilities office is located at 601 W. 3rd Street (no programs are offered at this facility).

Parks and Recreation Department

The Parks and Recreation Department oversees over 40 acres of park land and maintains 5 parks, as well as additional recreational and other City facilities. The department provides a variety of group and individual programming at the various park facilities. The Parks and Recreation Department has extensive interaction with the public. The offices are located at 119 W. 16th Street.

Animal Control Department

The Animal Control Department is responsible for maintaining the operation of the animal shelter, picking up stray and dead animals, providing pet adoption services to citizens, sending select animals to rescue organizations, and euthanization of animals. The department has regular public interaction and has offices are located at 223 Smiley Avenue.

1.10 Department Self-Evaluation

As part of this self-evaluation, the City distributed a questionnaire to all City departments requesting information about their respective departmental operations and policies regarding ADA compliance.

DLZ staff corresponded with several departments to discuss the intended use of the questionnaire. All policies, programs, activities, and services were evaluated and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Section 3.19 Department Self-Evaluation - Findings & Recommendations.

1.11 Public Outreach

Public outreach began by sending letters by U.S. mail to several disability advocacy groups requesting input on the process and identification of any barriers or perceived barriers to City services. A letter was also sent to the local Arc. A short article was printed in *The Rushville Republican* on December 27, 2013 (see the appendix).

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

- City Hall
- Rushville Public Library (130 W. Third Street)

In addition, a draft in PDF Format was placed on the City website. The report was available beginning January 20, 2014. A meeting to receive public comments on the ADA SETP was held at a regular Board of Public Works and Safety meeting on February 4, 2014, with comments allowed to be submitted prior to that meeting for those unable to attend in person. Meeting information and comments/responses can be found in the appendix.

These public comments should be considered in future planning corrections for City projects related to the removal of architectural and programmatic barriers at City facilities.

2.0 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.

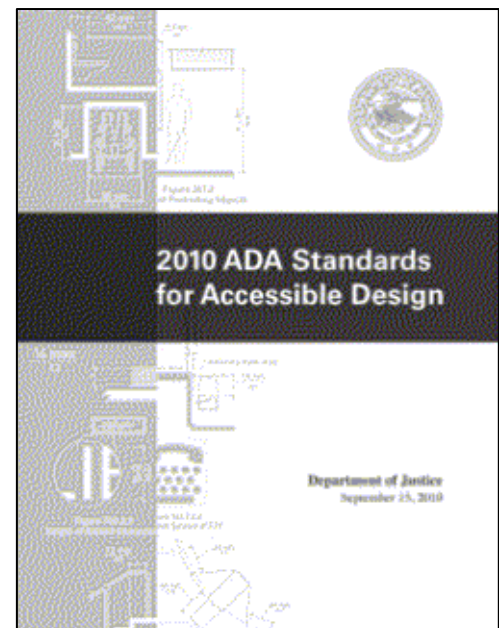
Affirmative Action (AA): a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance qualified 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 Accessibility Guidelines (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.

Blended Transition: a raised pedestrian street crossing, depressed corner, or similar connection between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that has a grade of 5 percent or less.

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

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

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

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

Curb Line: a line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

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

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

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

Discrimination on the basis of disability: means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;

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

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

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

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

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

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

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

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

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

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

Job Description: a detailed summary, usually written, of the major components of a job. A typical job description consists of six major components: essential job functions, knowledge and critical skills, physical demands, environmental factors, the roles of the ADA and other Federal laws such

as the Occupational Safety Health Act, and any explanatory information that may be necessary to clarify job duties or responsibilities.

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

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

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

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

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

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

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

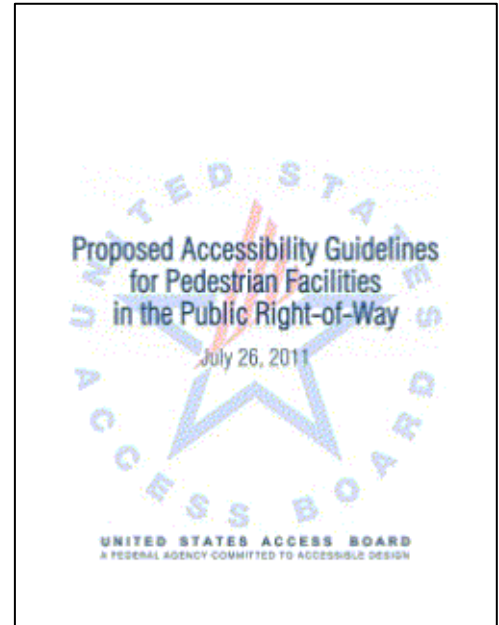
Pedestrian Circulation Path: a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

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 in the 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 City.

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

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

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

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

uncomfortable looking at her. She is not substantially limited in any major life activity, but the interviewer is “regarding her as” if she has a disability.

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

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

Service Animal: any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. See the 2010 revised requirements at 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 City. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of Rushville, the City shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the City must consider whether funding for the modification is available from an outside source. If no such funding is available, the City must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden.

Undue Hardship: with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain

factors. These factors include the nature and cost of the accommodation in relationship to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

Uniform Federal Accessibility Standards (UFAS): one of two standards that state and local governments can use to comply with Title II's accessibility requirement for new construction and alterations. The other standard is the ADA Accessibility Guidelines.

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.

Vertical Surface Discontinuities: vertical differences in level between two adjacent surfaces.

3.0 Self-Evaluation of City Policies, Services, Activities, and Programs - Findings & Recommendations

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

3.1 Program Evaluation Interdepartmental Memo

The self-evaluation of the City's services, programs, and activities required and involved the participation of every City department. The City of Rushville 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 a questionnaire to the City for distribution to all department heads as one measure to determine the level of ADA compliance. This questionnaire requested department staff to provide information. DLZ also provided a separate questionnaire to the City ADA Coordinator as one measure to determine the level of ADA compliance (see *Appendix E* for blank questionnaire). The questionnaire requested information from the ADA Coordinator including the following:

- A. Verification of the list of all City Departments and the location of each, including a short description of primary duties of each and copies of various documents used
- B. Listing of all appointed boards and commissions and when and where each meets
- C. Listing of public meeting rooms and whether they have a permanent audio system and assistive listening devices available
- D. Location of all postings describing the requirements of Title VII of the Civil Rights Act to job applicants and employees
- E. Provide information about how public meetings are publicized and provide a copy of a recent agenda for review
- F. Provide a copy of the Personnel Policy Handbook and Application for Employment
- G. Information related to the appointment of the ADA Coordinator, including copies of resolutions
- H. Information related to publication/adoption of an ADA Notice, adoption of ADA standards and guidelines, grievance procedure, and grievance form, including copies of any documents
- I. List of date, location, and provider of ADA training for staff, including list of staff that attended

**Americans with Disabilities Act Self-Evaluation Program,
Services, and Activities Questionnaire
Harrison County, 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 County 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 County to provide equal access to programs and activities to everyone, without exception.

- A. Verify the list of County Departments and location (include address). Provide a short description of the primary duties of each department and any payments, publications, applications, forms, etc. that are used for each.
- D. 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. 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 County buildings? If so, where (include all locations).
- E. How are public meetings (especially County Commission) publicized? Are agendas posted in County Courthouse/Annex and on the website? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda for all public meetings.
- F. Please provide DLZ with a copy (electronic preferred) of the County's Personnel Policy Manual and Application for Employment (if not available on the web site).
- G. To date, has the County appointed an ADA Coordinator? If so provide information on the date, copies of resolutions/ordinances, etc.

- J. A listing of specific policies or procedures in place to accommodate persons with disabilities for programs offered and instances where City staff has interacted with persons with disabilities and the specific interaction and means to accommodate their needs
- K. Request for a listing of all facilities that can be rented by the public that are owned by the City and providing a copy of the lease agreement for review
- L. Information pertaining to emergency procedures at City facilities, including evacuation plans, emergency assembly areas, and shelters in each building
- M. A list of special events that the City sponsors or which takes place on City property or ROW, including location, duration, and copies of any documentation of the event distributed to the public
- N. Request for information on whether the City has ever received any requests for special accommodation for printed materials and, if so, what was requested and provided
- O. List of all TDD locations at City facilities or list of relay services used (if any)
- P. Information about how the City web site is administered and maintained and the contact person
- Q. The name and contact information for the designated Human Resources person at the City
- R. List of all City buildings owned or leased where programs are provided to the public
- S. Request for information about the City's staff involved with the County EMA that can be contacted with questions
- T. Information related to maintenance of mandatory police officer training via annual mandatory updates on interacting with persons with various mental/developmental disabilities and when the last training was held, as well as any other formal training provided to police officers on interacting with persons with disabilities
- U. Listing of formal programs offered at City Parks and methods available so that residents can register, as well as copies of any publications distributed that contain information on programs of the department
- V. Any specific suggestions from City staff regarding how programs can be made more accessible or training that they believe would be beneficial

Most City Departments responded and the ADA Coordinator provided responses to the 2nd document. The primary purpose of the questionnaires 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.

3.2 Overall Findings – General Policies and Practices

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

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on City 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
- Polling Places
- Curb Ramps and Sidewalks
- Employment

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

3.3 Public Information

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

Self-Evaluation General Findings:

- The City of Rushville adopted Ordinance 2012-28 at a regular meeting on November 7, 2012, which included a “Notice Under the Americans with Disabilities Act” and Grievance Procedure and Policy.
- A poster entitled “Equal Opportunity is the Law”, defining the requirements of Title VII of the Civil Rights Act, is posted in the back lobby of City Hall, the Police Department employee entrance lobby, crew area at the Fire Department, City Utilities, and Street and Sanitation Department, Parks and Recreation Department shop, lobby area at Animal Control, and office/lobby at the Community Center.
- Public notices, public meeting agendas, and other information published by the City have an ADA compliance statement included on them that states: “*In accordance with the Americans with Disabilities Act, if anyone wishes to attend, hear or present evidence at the public hearing on the above referenced matter(s), and is in need of reasonable accommodations; please contact the City of Rushville so accommodations can be made. The City of Rushville may be contacted at 133 West 1st Street, Rushville, Indiana 46173, (765) 932-3735, Fax No. (765) 932-4355.*”. Meeting minutes currently do not have any information on them.
- Signage directing visitors to accessible entrances at City buildings along an accessible route is lacking and the International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances.

Recommended Action:

- Consider minor changes to the language of the ADA compliance statement. This statement should include, at a minimum, language approved by the City Attorney that adds an appropriate amount of notice required (generally 48 hours in advance) to avoid issues with last minute requests for accommodation that cannot be made due to lack of time to make appropriate arrangements.
- Public notification should 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. Include appropriate TDD/TTY number.
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other City activities. The City should endeavor to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- Non-discrimination language should appear on both hard copies and documents posted on the City website.
- List City agencies, departments, and specialized services that offer TDD/TTY in printed City directories.

- The ADA Coordinator should have a list of qualified individuals to contract for services to provide information in alternate accessible formats when individuals have had a request for accommodation, as well as a listing of services that can provide video relay or third-party assistance for persons with hearing loss.
- Signage directing visitors to accessible entrances at all City buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view from the public sidewalk or barrier-free parking spaces at all accessible entrances.

3.4 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 Director of Personnel, Purchasing, and ADA Compliance has been assigned as the ADA Coordinator effective November 7, 2012, by adoption of Ordinance 2012-28. Activities related to ADA compliance should be directed to her, and each City department should designate a liaison for ADA issues and publicize who that person would be.

Recommendations:

- Information regarding the identity of the City's ADA Coordinator should be provided to staff, posted at all City facility locations, incorporated into employee handbooks, staff and public phone directories, and on the City website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the City.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.
- It is recommended the City publish the name, address, e-mail address and phone number of the ADA Coordinator in appropriate public notices, agendas, and City publications frequently distributed to the general public. Publications should also include the TDD/TTY number, if available.

3.5 Grievance/Uniform Complaint Procedures

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

Self-Evaluation Findings:

- The City of Rushville adopted Ordinance 2012-28 at a regular meeting on November 7, 2012, which included a Grievance Procedure and Policy that provides for resolution of complaints. The procedure designates the ADA Coordinator as the person charged with completing the investigation of all grievances.
- An ADA Complaint Form has been prepared and is available to the public at the office of the ADA Coordinator (Clerk-Treasurer's Department). The Complaint Form is not available on the City of Rushville web site but there is an intention to have it placed there.

Recommendations:

- The City should formalize and publish procedures for ADA-specific complaint handling to assist with the tracking of complaint resolution. Centralized record keeping of such information will help the City to regularly update its compliance efforts, and plan for additional compliance implementation.
- 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.
- Information regarding the complaint process should be provided on the City's website. Forms or a method to alert the City of an ADA-related complaint should be available on the website.
- The City should review its current administrative policy and be able to provide the ADA Complaint Form in an alternate accessible format, i.e. Braille, 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 City should make efforts to inform City staff and the general public of the name of the City's ADA Coordinator, grievance procedures, the steps for handling grievances, and the City policies for remediation of grievances.

3.6 Public Meetings

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

Self-Evaluation Findings:

- The following boards/commissions meet at various times on City business and would be considered open meetings that can be attended by anyone:
 - City Common Council (meets in Council Chambers, 270 W. 15th Street, 1st and 3rd Tuesday each month)
 - Board of Public Works and Safety (meets in City Hall Conference Room or Council Chambers, meets on an as-needed basis)
 - Redevelopment Commission (meets in Council Chambers, 1st Friday each month)
 - Parks and Recreation Board (meets in Council Chambers, 2nd Tuesday each month)
 - Unsafe Building Committee (meets at City Utilities Building conference room, 601 W. 3rd Street, 3rd Wednesday each month)
 - Utility Board (meets in Council Chambers, 3rd Tuesday each month)
 - Historic Board (meets at the Rush County Museum, 619 N. Perkins St., 2nd Tuesday each month)
 - Police Pension Board of Trustees (meets annually and as-needed otherwise)
 - Firefighters' Pension Board of Trustees (meets annually and as-needed otherwise)
- There are access issues at all meeting facilities that may make attending a public meeting difficult for persons with disabilities.
- The Council Chambers has an audio system without fixed seating and no assistive listening devices are available. Assistive Listening Devices are only required when both fixed seating and an audio system are both present but it is recommended that Assistive Listening Devices be made available for persons with hearing impairments in other meeting areas as well.
- City public notices and agendas include a statement regarding how requests for accommodations for persons with disabilities can be made, but no TDD/TTY number is provided.

- Beginning in early 2013, all City Council and BPWS meetings have been shown live and also recorded and available for viewing on-line at <http://rushvillein.suiteonemedia.com/Web/Home.aspx>. The computer screen includes a summary of the meeting actions (who is speaking and topic, etc.) next to the video and allows users to “jump” to any point in the meeting. There is no transcript or closed captioning of the actual conversations that take place during the meeting for the hearing impaired.

Recommendations:

- The City should continue to schedule and hold public meetings in the most accessible locations whenever possible. Meetings which the public regularly attends should be made the highest priority.
- The City should develop procedures for obtaining and providing auxiliary aids such as assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies. Compliant signage that includes the International Symbol of Access for Hearing Loss should be installed once assistive listening devices are available.
- The City should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Live and recorded meetings broadcast on the website should provide options for accommodating persons with hearing disabilities. Options could include a more detailed transcript or closed captioning.
- Provide meeting agendas and minutes in alternative formats when requested.
- The City should assemble a list of readily accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
- The City should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all City departments for their programs and events.



International Symbol of
Access for Hearing Loss

3.7 Accommodations to Access Programs, Services, and Activities

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

Self-Evaluation Findings:

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to City programs, services, or activities.
- Public meeting locations have some access issues that need to be resolved to improve accessibility.
- City staff cited many examples of accommodations that have been made by employees of the City to afford individuals with disabilities the opportunity to have equal access to programs, services, and activities (see Section 3-19).
- The staff suggested that more information and training on how to accommodate an individual with a disability would be beneficial.
- Staff in most departments noted circumstances where they have improvised to achieve satisfactory solutions to remove barriers to the best of their ability.

Recommended Action:

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas. All City departments and divisions should be provided with the City's ADA compliance statement for accommodations.
- Front line staff such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities.
- The City should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services, and activities.
- The City should 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. A less desirable, but effective, means to provide access would be to use one of the many services available (Relay Indiana, Deaf Link, etc.) to provide two-way communication for persons with hearing disabilities.
- 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.
- The City should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.
- The ADA Coordinator should continue to monitor programmatic access.

3.8 Special Events and Private Events on City Property

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

Self-Evaluation Findings:

- The City sponsors a variety of special events on City property, primarily through the Parks and Recreation Department and programs they offer. Examples include Kids Summer Camp, Mayor's 5K Walk/Run, horseshoe tournament, Valentines Dance, Haunted Hay Ride, ice skating rink, Heart of Rushville Farmers Market, and summer concerts at Riverside Park.
- The City allows the public to use a variety of City facilities. These include primarily facilities of the Parks and Recreation Department.
- Facilities available for rent include:
 - Old Park Office
 - Laughlin Shelter
 - Memorial Park Shelter
 - Gazebo
 - Open Shelter
 - Booker T. Washington Community Center meeting room
 - Amphitheater
 - Tent at the amphitheater

- The Parks and Recreation Department has a Facilities Rental Agreement. The agreement does not include any provisions for accessibility of the facilities or requirements for the renter to ensure that the facility meets their needs for accessibility.
- The Parks and Recreation Department also leases athletic fields to local children's and adult baseball and softball associations.

Recommended Action:

- The City should ensure all facilities rented/leased are fully accessible.
- Guidelines or policies should be in place for ensuring that all special events are accessible. This is particularly important for events on closed City streets, as often these types of events may eliminate access to on-street barrier-free parking. Be especially mindful of items that might present a barrier to disabled pedestrians, including electrical cords, water lines, etc.
- The City attorney should consider adding language to the rental agreement about accessibility needs.

3.9 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 non-discrimination rules as the City.

Self-Evaluation Findings:

- No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.
- The City contracts legal services with a private law firm.
- The City contracts with a private firm to provide website maintenance services.
- The City contracts with the Rush County Area Plan Commission to administer planning/zoning and building services.

Recommended Action:

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

3.10 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 and invitations extended to local advocacy groups.
- No complaints or grievances were reported related to inability to accommodate customers with disabilities or inability of persons with disabilities to access City programs or facilities.

Recommended Action:

- Conduct periodic customer satisfaction surveys or gather input from recipients of City services using an alternate method, such as public hearings or focus groups. An additional emphasis

should be made to survey individuals with disabilities and organizations representing individuals with disabilities.

- Consider organizing a task force of local citizens, disability advocates, and City leaders to discuss accessibility issues and priorities for the City's programs. These groups are typically led by the chief elected official (Mayor) in cities that choose this program.
- 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.

3.11 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 City will honor the request unless a suitable substitute exists or the request is not required under the law. In addition, the City may provide qualified interpreters via video from a remote location as long as it can meet the performance requirements of [28 CFR 35.160\(d\)](#).

Auxiliary Aids and Services

Self-Evaluation Findings:

- The City has not provided people with disabilities written materials and publications in Braille or large print text, nor have they been asked to do so.
- No auxiliary aids are available currently in City Council Chambers or other public meeting rooms.
- The City has assisted customers with disabilities by modifying procedures to provide alternate means to complete transactions and offered assistance to complete City forms.
- The HR Department stated that temporary accommodations have been made to employees returning to work from illness or injury. These accommodations have included flexible work hours, assignment of special parking spaces during recovery, and reorganization of work spaces to provide additional space.

Recommended Action:

- The City should provide staff training and information regarding auxiliary aids and effective communication.
- The City should consider the purchase of auxiliary listening devices for City Council Chambers and other City meeting rooms. Compliant signage that includes the International Symbol of Access for Hearing Loss should be provided outside of all rooms that provide an Assistive Listening System and Devices. Signs should include guidance on where the devices are located.
- The City 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.



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Interpreter Services

Self-Evaluation Findings:

- There is not a City-wide contract for qualified sign language interpreters for departments to select from.
- No departments indicated that they had utilized the services of interpreters in the past.

Recommended Action:

- The City should consider a City-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.
- Interpreters should be provided upon request for accommodations or in situations where an interpreter is known to be required.
- The City should 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\(d\)](#).

Telecommunications Devices for the Deaf

Self-Evaluation Findings:

- The City of Rushville's 9-1-1 system is combined with and administered by Rush County. The system is equipped with TDD.
- The phone/contact list page on the City's website provides no TDD number.
- TDD/TTY numbers are not available for the majority of City departments.

Recommended Action:

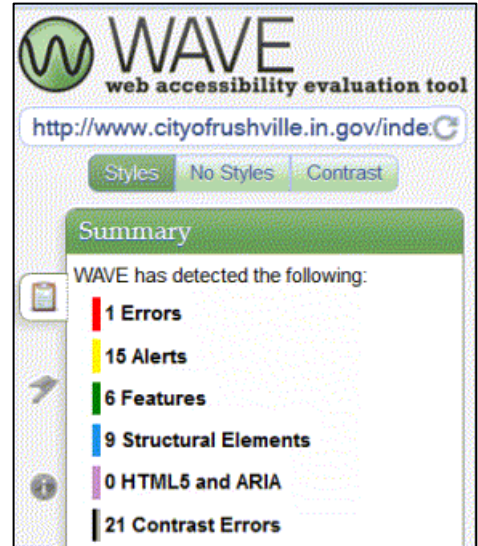
- Where the City uses an automated answering system for receiving and directing incoming telephone calls, the City should enable this system to provide real-time communication with individuals using auxiliary aids and services, including TTY and telecommunications relay systems ([28 CFR 35.161\(b\)](#)).
- The City 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.
- The City should provide a centralized, direct, TDD/TTY telephone in the office of the ADA Coordinator.
- The City should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.

Website

Self-Evaluation Findings:

- The website is shared between the City of Rushville and Rushville City. Each has their own tabs and content but some of the information, especially for visitors, is shared.
- The "Council" page on the website has a button that displays Ordinance 2012-28: An Ordinance of the Common Council of the City of Rushville, Indiana, Adopting the Notice Under the Americans with Disabilities Act and the Grievance Procedure.
- There is no other information on ADA, including no contact information for the ADA Coordinator.
- Maintenance services for the City website are provided by an outside consultant.

- The City website does not appear to be fully accessible by individuals with disabilities. An analysis using [WAVE \(Web Accessibility Evaluation Tool\)](#) found a number of errors and alerts in the layout of the site (see WAVE report of detected errors on home page to the right).
- The Utility Office has web-based pages for online bill pay. It does not appear as though the pages are accessible but this should be verified.
- Beginning in early 2013, all City Council and BPWS meetings have been shown live and also recorded and available for viewing on-line at <http://rushvillein.suiteonemedia.com/Web/Home.aspx>. The computer screen includes a summary of the meeting actions (who is speaking and topic, etc.) next to the video and allows users to “jump” to any point in the meeting. There is no transcript or closed captioning of the actual conversations that take place during the meeting for the hearing impaired.
- Many documents are available on the website in Portable Document Format (PDF), including meeting agendas and minutes. Some documents are downloaded in Microsoft Excel format.



Recommended Action:

- The City's website development team should work to develop and refine procedures to design, maintain, update, and monitor website accessibility. Utilize an accessibility checklist similar to that published by the [Access Board](#).
- The City should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, programs, services, or activities. Verify accessibility with one of the free web evaluation tools ([WAVE](#), [FAE](#), [W3C](#), [ATRC](#)).
- Recorded and live meetings broadcast on the website should provide options for accommodating persons with hearing disabilities. Options could include a more detailed transcript or closed captioning.
- The City should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, programs, services, or activities.
- The City's website should 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.
- The City should consider creating a webpage related to accessibility issues and provides contact information for the City ADA Coordinator, grievance and complaint procedures, self-evaluation/transition plan, and local resources.
- The City should list the departments that offer TDD/TTY in the website phone directory (when this is implemented).
- The City should work to improve the accessibility of web pages through the use of web accessibility analysis to meet or exceed Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 establishes a minimum level of accessibility for electronic information. Information on the requirements, along with suggestions for making websites accessible can be found at www.ada.gov/websites2_prnt.pdf.

- The University of Wisconsin Trace Center (<http://trace.wisc.edu/world/web/>) provides resources and on-line information that might assist the City in further development and implementation of an accessible website.
- The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible (www.w3.org/WAI/).
- The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility (www.icdri.org/section508/index.htm).
- The Access Board provides a number of resources on their website as well (www.access-board.gov/links/communication.htm).

3.12 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 is the main point of contact for requesting and providing information in alternate formats on a request for accommodation basis.
- Most City departments and offices produce printed information that is distributed and available to the public.
- City staff indicated that they assist with filling out forms, if assistance is requested, or when alternative formats are not available.
- The majority of the departments stated they did not have a standard procedure to communicate and produce accessible alternate formats for people with disabilities.

Recommended Action:

- The City should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- 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 City should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings.

3.13 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 City 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

3.14 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:

- Accessible directional and informational signs are not provided at any City facilities and City-owned sites.
- Inaccessible entrances do not provide signage directing users to accessible entrances.
- Signage that is present at various facilities is not compliant, typically not including both visual and tactile characters and Braille.

Recommended Action:

- An accessible signing strategy for City facilities should be developed for interior and exterior directional, informational, and permanent room signs.
- Design standards for accessible signs 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.

3.15 Staff Training

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

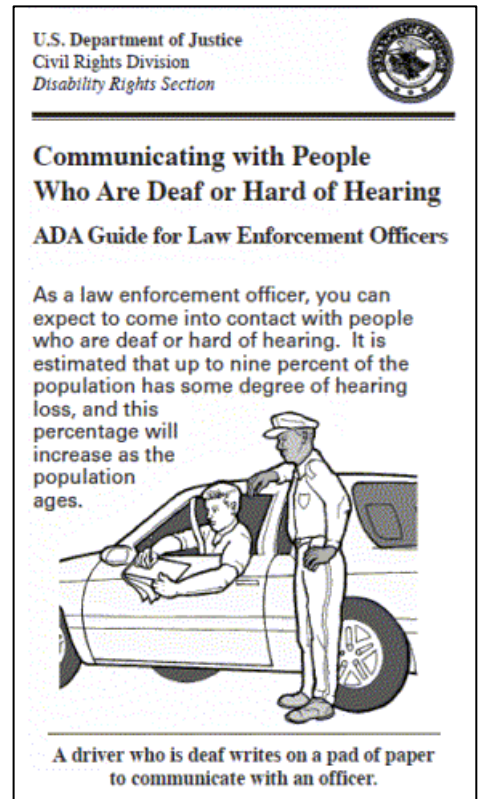
Self-Evaluation Findings:

- The ADA Coordinator has not attended ADA-related training on Title II requirements and diversity training.
- The Police Department has provided the following training to their staff:
 - Officers receive yearly mandatory training for one hour each on mental health issues and autism.
- Street Department staff attended ADA seminars sponsored by DLZ Indiana, LLC in 2012 and INDOT in 2013.
- City staff may not be knowledgeable about the different types of reasonable modifications that would make their services accessible. Some Departments have made minor adaptations to their programs regarding accessibility.

Recommended Action:

- The City should provide training regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:
 - Requirements of the ADA for the City of Rushville

- Consequences of Non-Compliance
 - Acceptable Terminology and Phrases
 - Grievance/Complaint Procedures
 - Reasonable Accommodations
 - Awareness and Sensitivity
 - Disability Etiquette – a good resource is http://transition.fcc.gov/cgb/dro/504/disability_primer_4.html
 - 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
- Training materials and handbooks should be prepared, if needed, in alternate formats.
 - The ADA Coordinator should provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public.
 - It is recommended that the Police Department continue to receive training on ADA accessibility issues related to their activities. In particular, training on communicating with people who are deaf or hard of hearing (reference www.ada.gov/lawenfcomm.pdf) and developing a policy on the topic as well (refer to 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).
 - Officers should be provided training materials on “Disabilities and Law Enforcement”, which is available on the U.S. Department of Justice web site (www.ada.gov/policeinfo.htm).



3.16 Emergency Evacuation Procedures

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

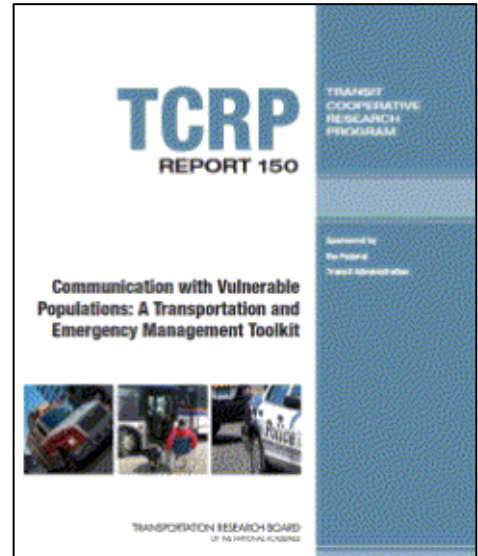
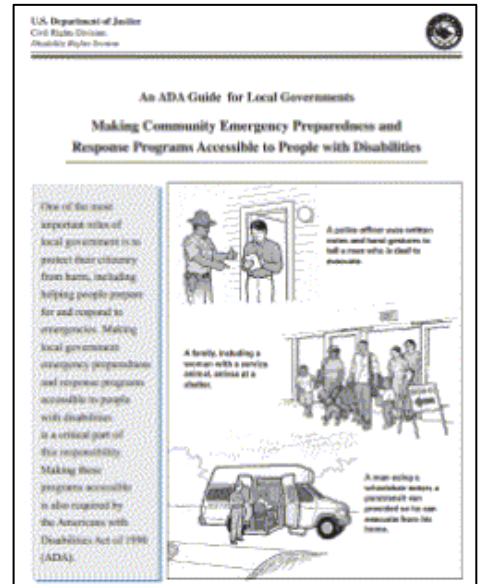
Self-Evaluation Findings:

- The City of Rushville works in conjunction with Rush County Emergency Management Agency (EMA), who coordinates with the Indiana Department of Homeland Security (IDHS), United States Department of Homeland Security, and the Office for Domestic Preparedness, and many other State and Federal agencies. They also work with City response agencies of all types, ensuring preparedness and response capabilities for any manmade or natural disaster that may

occur anywhere within the City of Rushville. The EMA is responsible for writing, updating and disseminating the Rush County Comprehensive Emergency Management Plan (CEMP), Strategic Preparedness Plan, Standard Operating Procedures, Memoranda of Understanding (MOU), and Mutual Aid Agreements.

- The Mayor, Police Department, Fire Department, Street Department, and Animal Control all have a role to play during emergencies that is outlined in the Emergency Support Functions section of the CEMP.
- Rush County's CEMP specifically mentions persons with disabilities or special needs who may require additional response assistance. The CEMP states in the "ESF #1 – Transportation Support Function (SF)" of the document that there is a need to *"work with local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific needs for accessibility for transporting and housing the disabled in shelters or how they would identify those that have special needs.
- The CEMP states in the "ESF #2 – Communications SF" of the document that there is a need to *"work with appropriate state and local agencies/departments to communicate and assist persons with special needs"*. It does not detail the specific methods of communication or assistance.
- The CEMP states in the "ESF #3 – Firefighting and Emergency Medical Services SF" of the document that there is a need to *"work with appropriate state and local agencies/departments to communicate and assist persons with special needs"*. It does not detail the specific methods of communication or assistance. It is not clear if this is a copied, unedited version of this statement from ESF #2.
- The CEMP states in the "ESF #6 – Mass Care" of the document that there is a need to *"provide victim related recovery efforts such as counseling, support for persons with special needs or assisting with processing benefit claims"*. It also states the need to work with local agencies to assess persons with special needs. It does not detail the specific methods of support for persons with special needs or how those persons would be identified.
- The CEMP states in the "ESF #7 – Resource Support SF" of the document that there is a need to *"work with appropriate state and local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific methods of how to move or care for them.
- The CEMP states in the "ESF #8 – Health and Medical SF" of the document that there is a need to *"work with appropriate state and local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific methods of movement or care.
- The CEMP states in the "ESF #10 – Hazardous Materials SF" of the document that there is a need to *"work with appropriate state and local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific methods of movement or care. It is also not clear if this is an unedited copy of ESF #8 language.
- The CEMP states in the "ESF #14 – Public Safety and Security SF" of the document that there is a need to *"work with state and local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific methods of movement or care. It is also not clear if this is an unedited copy of ESF #8 and #10 language.
- The CEMP states in the "ESF #15 – External Affairs (Public Information) SF" of the document that there is a need to *"work with appropriate state and local agencies and departments in the movement and care of persons with special needs"*. It does not detail the specific methods of movement or care. It is also not clear if this is an unedited copy of ESF #8 language.
- Rush County EMA has made special outreach efforts that are voluntary to identify "special/functional needs individuals" and information about them. The goal of the information is to have information available for first responders during emergencies regarding the number of people at a residence, special needs they might have, contact information for primary care givers, and any special equipment they might need for life or medical support.

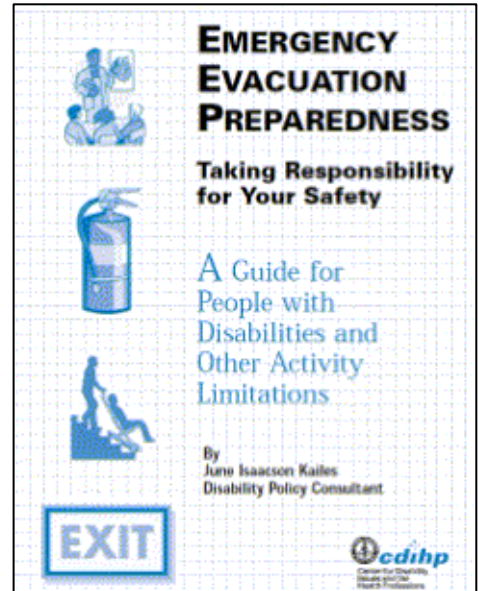
- The EMA has an agreement with Rush County Schools Corporation to utilize school bus transportation and bus drivers for use in evacuation from affected areas and/or transportation to clinic sites or shelters. It is not clear if buses are available that are accessible to persons in wheelchairs.
- During 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, United Way, etc. These organizations readily communicate with each other and exchange ideas, supplies, equipment, and volunteers.
- The Rush County Sheriff's website includes a link to the CodeRED Emergency Notification System, which allows EMA to telephone registered users in case of an emergency situation that needs immediate action. This system is able to dial 50,000 phone numbers per hour and delivers a recorded message to a live person or answering machine after making three attempts to connect. The system has a feature that allows residents to identify that they have special needs but this feature is not currently activated. The enrollment form includes a check box for phone numbers that are TDD/TTY devices. The CEMP does not mention the CodeRED system in the version that was provided (dated May 2013).
- No local advocacy groups for the disabled are included, or mentioned as being included, in any aspect of the CEMP. Groups such as The Arc of Rush County could assist in evaluating accessibility of shelters and vehicles, as well as identifying the special needs that may be required at shelters, especially in the event of a long-term evacuation.
- The City of Rushville has adopted Ordinance 2013-6 entitled "An Ordinance Establishing and Implementing the City of Rushville Evacuation Plan 2013 and Established Emergency Measures for the Mayor to Establish a State of Emergency and for the Chief of Police to Implement Such Plan in the Event of an Emergency". The City of Rushville Flood Evacuation Plan 2013, prepared by Rush County EMA, includes discussion of Special Needs Population Evacuation. It states that specialized transportation equipment may be required for *"the evacuation of people residing in a nursing home or hospital, or those who may be mobility impaired"*.
- Emergency procedures for any City buildings are very generic. It does not appear that the City has established emergency procedures to safely evacuate or move persons with disabilities to safe areas of buildings in City facilities.



Recommended Action:

- The CEMP should review and address the specific needs for evacuation of persons with disabilities or other special needs. The City 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
- www.cdihp.org/evacuation/emergency_evacuation.pdf
- onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_150.pdf
- www.nod.org/assets/downloads/Guide-Emergency-Planners.html
- www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm
- The EMA should clearly identify and publicize in their CEMP and website 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 allowing them to get there sooner and without having to contact the City 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.
- The next CEMP amendment should provide more detailed information for the various Emergency Support Functions related to special needs populations. In the event of an emergency, more detailed information of the topic discussed previously will be essential to assisting emergency responders in providing the necessary services to those with special needs. For example:
 - ESF #1 – should identify the types of vehicles needed and who would be anticipated to provide them.
 - ESF #2 – should identify means of communication needed (American Sign Language, writing utensils, etc.) and who would be expected to provide assistance specifically.
 - ESF #3 – verify that this is not an unedited copy of ESF #2, should include more detailed information related to specific emergency medical services that might be required for persons with special needs and sources of these services, including medication.
- Ensure that vehicles used for evacuation can accommodate persons with special needs and that adequate numbers of these vehicles can be provided to provide timely evacuation of hospitals and nursing homes.
- 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 City should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities, to all employees and volunteers charged with assisting in evacuations.
- 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 The Arc of Rush County and other advocacy groups to update lists of homebound individuals and others needing assistance in the event of evacuation and encourage individuals with special needs to register on the CodeRED system.
- All City staff should be made aware of the location of the posted accessible evacuation routes within their facilities once emergency evacuation plans have been finalized. 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.
 - Provide access to shelter locations in facilities for emergencies such as tornadoes.

3.17 Parking, Curb Ramps, and Sidewalks

The City of Rushville has an extensive network of public streets and sidewalks, with portions of the ROW being under the control of INDOT (including US-52, SR-44, and SR-3). The City also maintains on-street parking in several blocks of the downtown and two public parking lots. 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. An inventory of sidewalks and intersection curb ramps in City ROW was completed and identified facilities that are not in compliance or are in need of repair. This is included in this SETP in Appendix A.

The City of Rushville also has a number of parking facilities both within and outside of the public ROW. A total of four (4) City-owned parking lots exist, along with on-street parking along a number of the streets in and around the downtown area.

Self-Evaluation Findings:

- The City has extensive pedestrian and parking facilities located within the ROW and City-owned parking lots. These facilities are found in most areas of the City.
 - There are many areas in Rushville where sidewalks have displacements and/or cross slope issues due to tree roots, several other areas have sidewalks with cross slopes exceeding 2% maximum, a number of areas of sidewalk are not 48" in width as required, several areas of sidewalks have vegetation growing within the cracks/seams or overhanging into the sidewalk, and there are missing segments of sidewalks that result in discontinuity of the PAR.
 - Several of the existing blended transitions and curb ramps do not have detectable warning plates, curb ramps are missing at alleyways, top landings have excessive cross slopes, and debris accumulation in the gutter pan indicates drainage issues at the bottom of several ramps/blended transitions.
 - Existing on-street parking includes a total of approximately 272 marked spaces on 14 blocks, of which 15 spaces are marked as barrier-free (on-street parking counts require 18 total barrier-free spaces be provided). Many spaces lack proper signage, mounting heights of

- some signs is too low, and many spaces do not have an access aisle marked and/or do not have access to a curb ramp.
 - City-owned parking lots do not provide the required number of van-accessible and/or barrier-free spaces, access aisles are not present, and signage is missing or non-compliant.
- Design of roads, bridges, sidewalks, and ADA curb ramps are the responsibility of the Street Department or consultants that they hire.
- The City bases its standards on INDOT's curb ramp design standards, including a library of standard technical specifications and construction detail drawings, which establish minimum standards for improvements and assure ADA compliance. These specifications identify the requirements for detectable warnings, maximum slope, landings, and other geometric features. The purpose of INDOT construction standards is to regulate and ensure the construction of improvements result in the coordinated and compliant development of curb ramps, sidewalk, and pedestrian facilities throughout the City.
- No obvious programs or policies were noted regarding providing temporary accessible routes during construction projects.

Recommended Action:

- The City should develop a curb ramp reconstruction program to correct deficiencies and ensure accessibility especially on routes regularly utilized by persons with disabilities.
- None of the noted issues within the ROW prohibit use (with the exception of missing curb ramps) but can make use very difficult. Of particular concern are sidewalk displacements that are 1" or greater or missing curb ramps. These create trip hazards to all users, are barriers to many users, and are extremely difficult for wheelchair users. Severe sidewalk displacements could have temporary layers of asphalt placed until they can be permanently addressed.
- The City should continue to prepare design plans and construction documents to meet or exceed state and Federal accessibility requirements.
- The City should consider establishing construction guidelines and procedures for monitoring and maintaining accessible paths of travel throughout construction for pedestrians and bicyclists, i.e. sidewalk detour plans.
- Provide advance notice of all street or sidewalk closures on informational materials and the City website.
- The City should continue to update its design standards to meet any additions or changes to ADA standards.
- A comprehensive review of parking in the downtown area should be performed to ensure that the location and distribution of barrier-free parking is appropriate given the types of business in the area.

3.18 Employment

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

Self-Evaluation Findings:

- The Clerk-Treasurer's Department primarily provides services to job applicants, City employees, and retirees. The Deputy Clerk performs all Human Resources job functions for the City.
- The Deputy Clerk is also the ADA Coordinator so all Title I and II issues fall under the same person.
- The City contracts with a private law firm to advise them on Family Medical Leave Act (FMLA), ADA, and questions about personnel policy. The firm authored the current Policy and Procedure Manual.

- The Policy and Procedure Manual for the City of Rushville includes the following statement on page 12 entitled “IV. Equal Employment Opportunity”: *It is the policy of the City to provide equal employment opportunities without regard to race, color, religion, national origin, veterans’ status, age, disability, or any other legally protected characteristic. This policy relates to all phases of employment including, but not limited to, recruitment, employment, placement, promotion, demotion, transfer, lay-off, recall, termination, rates of pay or other forms of compensation, selection for training, use of all facilities, and participation in all company-sponsored employee activities. This policy will be carried out by the City in a manner consistent all (sic) applicable state and federal laws.*”

The final paragraph of this section further states: *“In carrying out its commitment to equal employment opportunity, the City will make reasonable accommodations for applicants and employees with qualified disabilities who can perform the essential functions of the job with reasonable accommodations, as long as those accommodations do not impose undue hardship on the City”.*

- Section “V. No-Tolerance Harassment Policy” includes language that prohibits harassment based on disability (in addition to other characteristics).
- Section “X. Complaint Resolution Procedure” includes a grievance procedure that is to be followed for employment-related issues.
- The Policy and Procedure Manual includes an “Acknowledgement of Receipt” that all employees are required to sign confirming that they have received a copy of the manual.
- The Policy and Procedure Manual includes nothing specifically regarding disability-related work absences.
- The Policy and Procedure Manual was updated in July 2012.
- The City has posted Federal and state equal employment opportunity notices and posters in all appropriate employee areas and has indicated that all advertisements for job announcements state that the City is an “Equal Opportunity Employer”.
- The HR Department provides reasonable accommodations to applicants or employees with a disability upon request.
- The City’s “Employment Application” has the following statement at the bottom: *“The City of Rushville is an Equal Opportunity Employer. We consider applicants for all positions without regard to race, color, religion, gender, national origin, age, disability, veteran status or any other legally protected status. All reasonable requests for ADA assistance during the testing process must be submitted in writing with your application.”*
- The Rushville Police Department has a different application form and process. Their “Application Form” states *“Equal Opportunity Employer – Discrimination in employment because of race, religion, creed, color, natural origin (sic), ancestry, age, sex, or liability for service in the Armed Forces is prohibited by City policy. In addition, the City employment policy requires compliance with national and state employment practices, laws, and regulations. The City is an equal opportunity employer”.*
- The Rushville Police Department “Application Form” has as the final page an “Authorization to Release Information”, which states, among other information about an applicant, that “MEDICAL RECORD” is one of the types of information to be released to the Police Department as part of consideration of employment. The ADA prohibits employers from asking questions that are likely to reveal the existence of a disability before making a job offer (i.e., the pre-offer period). This prohibition covers written questionnaires and inquiries made during interviews, as well as medical examinations. However, such questions and medical examinations are permitted after extending a job offer but before the individual begins work (i.e., the post-offer period).

Recommended Action:

- The City should continue to practice the City policies of non-discrimination as required by ADA and other applicable laws.
- The City should consider updates to the Policy and Procedure Manual to reflect recent changes to ADA, employment law, and case law. Potential updates could include:
 - Stronger language about the City's commitment to ADA Title I compliance.
 - A section related to procedures for requesting short- and long-term accommodations for a disability. This section should note that accommodation would be considered not only for new hires but also for current employees who become disabled during the course of their employment.
 - More comprehensive language regarding prohibition against disability discrimination. An example offered by the EEOC is *"The City of Rushville prohibits any and all types of discrimination against a qualified applicant or employee on the basis of (1) a current disability, (2) record of a prior disability, (3) being perceived or regarded as disabled, or (4) a relationship or association with someone with a disability. A qualified applicant or employee is an individual who can perform the essential functions of the job in question, either with or without a reasonable accommodation"*.
 - More comprehensive language regarding disability accommodation. An example offered by the EEOC is *"Requests for accommodations can be either oral or in writing, and individuals are not required to use any particular words in making a request. The ADA Coordinator is responsible for determining if an individual is considered 'qualified' and if a 'reasonable accommodation' exists. As such, an applicant or employee in need of an accommodation, or a manager aware of an applicant's or employee's need for an accommodation, should contact the ADA Coordinator who will promptly engage in the interactive process with the applicant or employee regarding the requested accommodation"*.
- Consult with a qualified labor attorney regarding the noted statement on the Police Department Application form regarding providing medical records PRIOR to a job offer. Make any needed corrections to the form to be compliant with all applicable laws, including ADA.
- The City should consider providing on-going training in providing services to persons with a range of disabilities and developing strategies for appropriate modifications.
- The City should confirm that HR staff members and others that receive phone calls are trained in the use of TDD equipment or other means of communicating over the telephone with a person with hearing disabilities.

3.19 Department Self-Evaluation Findings and Recommendations

DLZ prepared and distributed a questionnaire in October 2012 to all City departments that included a request for information about each. A 2nd questionnaire was submitted that asked for broader information than department specific. All of 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 for both questionnaires). DLZ reviewed responses and coordinated clarifications and questions with the ADA Coordinator. A general summary follows, with completed forms included in the appendix. 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.

Self-Evaluation Findings:

- The City has numerous departments with extensive, daily public interaction that is both in person and over the telephone.

- Several departments reported having interacted with persons with various disabilities and expressed an ability to find a way to successfully provide accommodation.
- Several, but not all, departments have identified a person to be the liaison with the ADA Coordinator.
- No departments responded that the programs offered for persons with disabilities were different in any way.
- Many departments have publications, documents, and forms that are reviewed, provided to the public, or submitted to them by the public. Many of these documents are completed at the service counter.
- Some departments stated that they believe that their offices/spaces are accessible while others noted items that they know present challenges to persons with disabilities.
- Some departments made several good suggestions on how they could improve accessibility to their programs, particularly to remove architectural barriers. Many also cited a need to provide funding to correct the deficiencies.
- Several departments requested assistance on identifying ways to accommodate persons with disabilities in their offices.

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 barriers present, all of which can be addressed by architectural modifications, various methods of equal accommodation, or changes in procedures.
- Funding will be a key component in some instances but many improvements in service to persons with disabilities can be done inexpensively and within a short 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.

3.20 Facility Self-Evaluation Findings and Recommendations

DLZ performed a self-evaluation of the following City facilities:

- | | |
|--|---|
| • City Hall | • City Utilities Building |
| • Fire Department | • Booker T. Washington Community Center |
| • Police Department and Council Chambers | • ROW Facilities |
| • Street and Sanitation Department | ○ Sidewalks |
| • Parks and Recreation Office | ○ Intersection Curb Ramps |
| • Animal Shelter | ○ On-Street Parking |

- Public Parking Lots
- City Parks
 - Waggoner Pool
 - Veterans Memorial Park North
 - Veterans Memorial Park South
 - Community Park
 - Laughlin Park
 - Wilkie Park
 - Riverside Park

It was noted by City staff that there are no programs offered at the Fire Department, Parks and Recreation office, or Street and Sanitation Department facilities, therefore no accessibility review was performed. A comprehensive review of accessibility at all public areas of the other facilities was performed consistent with ADAAG and PROWAG standards, as appropriate. Note that the items mentioned below for each facility is a summary. Detailed information about each facility can be found in the appendix.

Self-Evaluation Findings:

- City Hall – City Hall houses a majority of the programs offered by the City of Rushville. A number of barriers and/or non-compliant items exist at the City Hall. These include:
 - The parking lot behind the building has no accessible parking or signage.
 - The exterior ramp run exceeds the 30' maximum without an intermediate landing, there is no edge protection, and handrails do not extend the required 12" past the top and bottom.
 - The stairs to the side entrance do not have handrails that extend the required 12" past the top and bottom.
 - The stairs at the front entrance exterior door does not have a top landing that is 60" minimum depth.
 - Front entrance vestibule stairs have handrails on only one side and has inadequate landings at the top and bottom.
 - There is no signage identifying the side entrance as the accessible entrance and the front door has no signage directing persons to the side entrance.
 - The side entrance door has a threshold that exceeds ½", the door closes too quickly, and the glazing panel extends to below 10" above the floor.
 - The front entrance doors have glazing panels that extend less than 10" above the floor. There are steps within the vestibule, and the top landing at the inner door is not 60" depth.
 - There is no signage at the restroom door, hardware is a knob, and there is not enough latch side swing space inside.
 - The fire extinguisher in hallway between the front lobby and rear entrance protrudes.



Non-compliant exterior ramp at City Hall.



City Hall side entrance has glass within 10" of the bottom of the door.

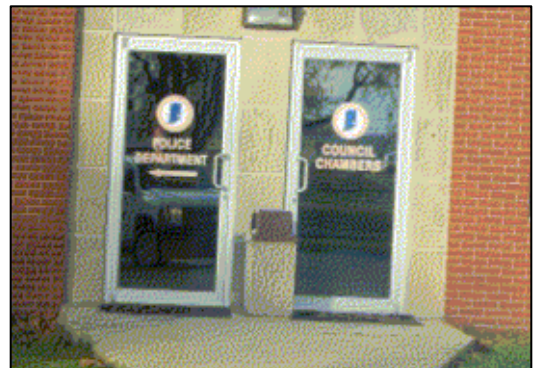
- The restroom does not provide 60" diameter turning area due to being less than 60" width between side walls, there is not adequate clear space adjacent to the toilet for a wheelchair, piping under the sink is not insulated, the mirror is mounted too high, the toilet is too close to near wall, toilet paper dispenser is not properly located between 7-9" from the front of the toilet, and the grab bars are too short and not installed at proper height.
- Coat rack and hangers at side entrance protrude.
- There are no work spaces with knee space in the front lobby.
- Police Department and Council Chambers – The City of Rushville owns the facility which has two distinct entrances, one for each primary function. A number of barriers and/or non-compliant items exist. These include:
 - There are 3 distinct parking areas – the west lot is employees, the east lot is public lot for the Council Chambers, and the south area is public parking for the Police Department. The west lot has no barrier free spaces, the east lot has the 2 that are required but none are designated van-accessible with proper signage, and the south area has 1 space but there is no signage at all.
 - The east parking lot has a curb ramp that has excessively sloped side flares and has no landing for changes in direction for persons parking in this lot and proceeding to the Police Department door on the south side of the building (public entrance).
 - The employee-only entrance on the east side adjacent to the Council Chambers door does not have proper signage directing persons to the front public entrance. Only indication is a large arrow pointing south.
 - The Police Department public entrance has glass within 10" of the bottom.
 - Several interior doors at Police Department have knobs.
 - The Council Chambers entrance door closes too quickly, requires excessive force to open, has glass within 10" of the bottom of the door, and the required pull side clear space parallel to the door opening is blocked by a trash receptacle.
 - The restroom door in the Council Chambers does not have the required 32" clear width opening, closes too quickly, and requires too much effort to open.
 - Fire extinguisher in hallway protrudes.



City Hall non-compliant restroom.



East parking lot at Police/Council Chambers.



Council Chambers entrance has glass within 10" of the bottom of the door and clear space is blocked by trash receptacle.



Police Department entrance has glass within 10" of the bottom of the door.

- Restroom sign is located on door and needs to be on latch side wall, door lock requires twisting, doorway width is too narrow, sink controls are knobs, no insulation provided for pipes under the sink, the mirror and paper towel dispenser are mounted too high, the light switch is too high, there is inadequate clear space adjacent to the toilet for a wheelchair, the toilet seat is too low, and grab bars are too short.
- The service window in the Police Department lobby is too high and has no accessible work surface.
- Animal Shelter offers limited programs at this facility and the facility has limited areas open to the public. A number of barriers and/or non-compliant items exist. These include:
 - There is no parking provided on the site.
 - Trench drains on the approach to the front door are oriented parallel to the path of travel and exceed ½" opening.
 - Clear width opening of entrance door is less than 32", has hardware that requires grasping and pinching, and closes too quickly.
- City Utilities – offers limited programs at this facility and the facility has limited areas open to the public. A number of barriers and/or non-compliant items exist. These include:
 - The door to enter the lobby is extremely heavy to open and has glass within 10" of the bottom.
 - Lobby is very narrow and does not provide adequate diameter for wheelchair to turn (60" minimum).
 - The service counter is substantial size, indicating that it is used as a work surface for check writing and other tasks. The service counter is too high and protrudes into the walkway.
- Booker T. Washington Community Center – offers a wide variety of programs for the community, including a playground, meeting rooms, pre-school, and offices for community groups. The facility was originally constructed at the turn of the 20th century and used as a school. The building is currently on the National Register of Historic Places. Non-compliant items include:
 - The site has one (1) barrier-free parking space (required to be van-accessible) that includes no van-accessible signage or access aisle and is not wide enough to accommodate van-accessible parking space dimensions (16 feet total). The curb ramp access point at the parking space is likely to be blocked by the vehicle.



Council Chambers public restroom has a number of issues.



Animal Shelter approach walkway includes trench drain with large openings.



Narrow lobby with high, protruding counter at City Utilities.

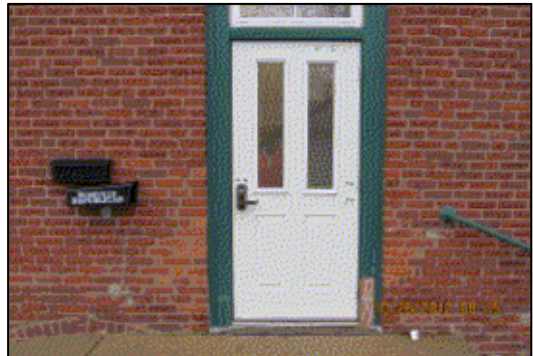


Non-compliant parking space and bench in sidewalk to ramp at the Community Center.

- The bus loading zone has signage but no access aisle is marked and the curb ramp access point is not proximal to the logical drop-off area.
- Walks on the site have areas with excessive cross slopes, landings at changes of direction that are not flat, and surface level changes. A bench blocks access to the exterior ramp leading to the accessible side entrance.
- Curb ramps are not compliant, with excessive cross slopes at landings.
- Handrails at the exterior ramp and exterior stairs are not compliant.
- There is no signage at non-accessible entrances directing persons to the accessible side entrance.
- The drinking fountain inside the side entrance door is on an accessible route and not within an alcove. Only one fountain is provided.
- Restroom signage is not compliant throughout the facility.
- Panic hardware on some doors protrudes.
- Several doors have non-compliant hardware (knobs) that requires grasping and turning.
- The side entrance has no signage identifying it as the accessible entrance and has a threshold that is too high.
- The front entry door closes too quickly.
- Entry doors to the pre-school and conference room do not have compliant clear width openings.
- Fire extinguisher protrudes in corridor on 2nd floor near lift.
- The wheelchair lift doors are manually operated and have no standby power.
- Interior stairs have non-compliant handrails which are only on one side.
- Men's restroom does not have adequate turning area or clear space at the sink, faucet controls are knobs, exposed pipes below the sink are not insulated, towel dispensers are too high, there is inadequate clear space adjacent to the toilet, flush controls are on the narrow side of the toilet, toilet paper dispenser is not installed in the correct location, and there are no grab bars.
- Women's restroom has knobs that require grasping and turning to operate and lock, faucet controls are knobs, there is inadequate clear space adjacent to the toilet, toilet paper dispenser is not installed in the correct location, and the grab bar on the side is not compliant.
- The Head Start restroom does not have adequate turning area, no knee space below the sink, inadequate clear space at sinks, faucet controls



Non-compliant ramp creates cross slope issues along walk.



Side entry door not marked as the accessible entrance, is on a non-compliant ramp, and has a 2" threshold.



Protruding fire extinguisher.



Men's restroom toilet area has several issues.

that require grasping and turning, no clear space adjacent to toilets, and no grab bars. NOTE: it is assumed that all pre-school children using this restroom would be assisted.

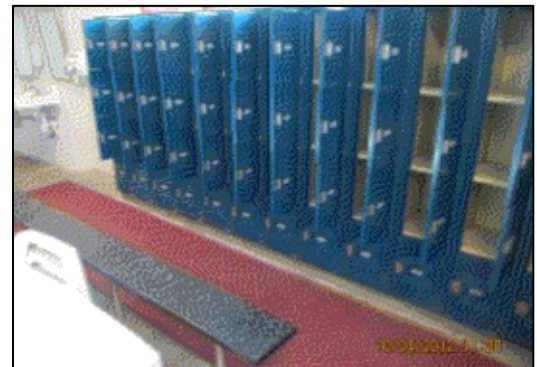
- The kitchen does not have a work surface with proper height and knee space.
- The playground has no accessible path from the building, the surfacing on the play area is not accessible, and the play structure has no transfer platform.
- Waggoner Community Pool – This community facility includes a pool and locker room facilities. Non-compliant issues include:
 - The parking lot does not include an adequate number of barrier-free spaces and van access aisles are too narrow.
 - The drinking fountains are not in an alcove.
 - The restrooms in the men's and women's locker rooms have no compliant signage, pipes under the sinks are not insulated, the toilet in the accessible stall is too far from near wall, toilet seat is too high, toilet paper dispenser is not properly located, grab bars are not compliant, and no ambulatory stall is provided as required.
 - The men's and women's showers both lack accessible equipment.
 - The men's and women's locker rooms both have benches without backs and which are too narrow in depth.
 - Not enough accessible spaces are provided at picnic tables.
 - The swimming pool has a perimeter of over 300 feet that requires more than one means of accessible entry. Only one (sloped entry) is provided. The existing sloped entry has no handrails and bottom landing is in water that exceeds 30" depth. The water slide chute protrudes into the sloped entry.
- North Memorial Park – Non-compliant issues include:
 - Only three total parking spaces provided, including one with ISA symbol on pavement (signage not required but recommended). There is no access aisle for the space.
 - Restroom doors have non-compliant signage, high thresholds, and doors with spring hinges that close too quickly.
 - Restrooms have sinks that are mounted too high, have inadequate width clear space under sinks, controls that require grasping and turning, mirror that is mounted too high (women's), urinal is too high and has controls that are too high (men's,



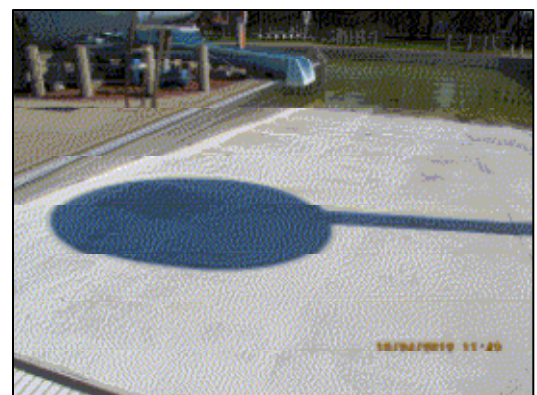
Women's restroom non-compliant sign and door hardware.



Community Center playground.



Locker room benches have no back support and are too narrow.



Sloped entry at Waggoner Pool lacks handrails and water slide protrudes.

only one urinal is present so compliance is optional), stall doors that have no handles, stalls that are not adequate width, toilets located too far from the wall, toilet paper dispensers installed improperly, non-compliant and missing grab bars, and no toe clearance.

- Bleachers at the ball diamond are not on an accessible surface and have no designated companion seating or wheelchair parking spaces.
- There is no accessible route to the picnic shelter or grill and picnic tables at the picnic shelter do not have knee space below.
- There is no accessible route to player seating areas at ball diamond and no wheelchair spaces.
- There is no accessible route to the play area, ground play elements are not on an accessible route, surfacing material is not compliant, no access platform is provided at the wooden play structure, and the transfer seat at play structure is too high.
- South Memorial Park – Non-compliant issues include:
 - A curb blocks access to the sidewalk from the on-street parking space.
 - The shelterhouse door is not on an accessible route, has a step on each side of the threshold, and has non-compliant door hardware.
 - Doors at the men's and women's restrooms have a small step at the entry and non-compliant signage.
 - Restrooms have sinks with rims that are too high, faucets are not compliant, mirror and towel dispensers are mounted too high (women's), urinal and its controls are too high (men's, only one urinal is present so compliance is optional), stall doors have no handles, stall door swings into clear space outside entrance (men's), stalls are not adequate width, flush controls are not on the wide side (men's), toilet paper dispensers are not properly located, grab bars are not compliant, and there is no toe clearance.
 - The shelterhouse has light switches that are mounted too high.
 - There is no accessible route to the picnic shelter, gazebo, or grill and picnic tables at the picnic shelter do not have knee space below. There is no level, clear space next to benches for wheelchairs.
 - There is no accessible route to the basketball court and no level space adjacent to bench for wheelchair.



North Memorial Park restroom sink area.



Picnic shelter is not on an accessible route and picnic tables are not accessible.



South Memorial Park restroom with non-compliant sign and step into door.



Picnic shelter has no accessible route and picnic tables are not accessible.

- There is no accessible route to the play areas, ground play elements are not on an accessible route, surfacing material is not compliant, and the transfer seat at play structure is too low.
- Girl Scout Cabin (South Memorial Park) – Non-compliant issues include:
 - There is no compliant surface for the accessible route.
 - The front door has a small step to enter and hardware is a knob that requires grasping and turning.
 - Single-user restroom has non-compliant signage, hardware is a knob that requires grasping and turning, clear width opening of the doorway is inadequate, there is not adequate turning space inside, there is no knee space below the sink, clear space in front of the sink is not adequate, mirror above the sink is too high, the light switch is too high, there is not clear space adjacent to the toilet, the toilet seat is too low, toilet paper dispenser is not located properly, and there are no grab bars.
 - The light switch and electrical outlets in the main room are too high.
- Laughlin Park – houses a number of programs and has a number of barriers and/or non-compliant items, including:
 - All parking spaces are in lawn areas which provide no access for persons with disabilities.
 - The shelterhouse restroom and door are severely non-compliant with narrow and low door openings, no signage, and no room for wheelchair to enter or ability to use the facilities.
 - Shelterhouse door requires a step to enter and the inside lip is too high also and hardware is a knob that requires grasping and turning.
 - Men's and women's restroom doors have non-compliant signage and threshold is too high (men's).
 - Men's and women's restrooms have sinks with inadequate clear width (women's), sink controls that require grasping and turning, exposed pipes under the sinks are not insulated, urinal is too high (men's, only one urinal is present so compliance is optional), stalls are not adequate width, flush controls are not on the wide side, toilet paper dispensers are not properly located, grab bars are not compliant, and there is no toe clearance.
 - No wheelchair spaces are provided at any grandstand seating at ball diamonds and no companion seats are marked.



Playground equipment is not on an accessible route and surfacing is not accessible.



Girl Scout Cabin is not on an accessible route and has a small step at the door.



Laughlin Park shelterhouse restroom and door are inaccessible.



Laughlin Park men's restroom stall.

- There is no accessible route to player seating areas at ball diamond and no wheelchair spaces. There is no accessible route to the basketball courts.
- There is no accessible route to the picnic shelter, gazebo, or grill and picnic tables at the picnic shelter do not have knee space below. There is no level, clear space next to benches for wheelchairs.
- There is no compliant surface accessible route to play equipment. The surfacing of the play area is not accessible. Transfer platforms on the play equipment are not compliant.
- Community Park – houses a number of programs and has a number of barriers and/or non-compliant items, including:
 - Barrier-free parking spaces are not provided at all lots, some lots are gravel surface, and no signage exists.
 - The men's and women's restrooms are not located on an accessible route, have non-compliant signage, have no swing side space on the pull side of the door (has severe level change), sinks have no insulation on pipes underneath, urinal is too high (men's, only one urinal is present so compliance is optional), there are no doors on stalls, stalls are not wide enough, have no clear space adjacent, toilet is too far from near wall (men's), flush controls located on narrow side (women's), grab bars are not compliant, and there is no toe space.
 - There is no accessible route to the picnic shelter or grill and picnic tables at the picnic shelter do not have knee space below.
 - There is no accessible route to basketball courts.
 - There is no compliant surface accessible route to play equipment. The surfacing of the play area is not accessible. Transfer platforms on the play equipment are not compliant.
- Wilkie Park – houses a limited number of barriers and/or non-compliant items, including:
 - Access to the gazebo includes steps.
- Riverside Park – houses a number of programs and has a number of barriers and/or non-compliant items, including:
 - No barrier-free parking is provided in the gravel lot and no signage is present.
 - Walks in the park have areas that exceed 5% running slope, lack level landings at changes of direction, surface level changes at material



Laughlin Park typical bleacher seats.



Picnic shelter, grill, and basketball court lack accessible routes to them.



Community Park restrooms are not on an accessible route and have no level landing at the entrance door.



Community Park play structure is not on an accessible route, transfer platform does not comply, and surfacing is not accessible.

transitions, and surface level change at a large crack.

- Restrooms have non-compliant signage, exposed pipes under the sinks are not insulated, mirrors are mounted too high, urinal is mounted too high and flush controls are too high (men's), stall doors are not self-closing, toilet in men's stall is too far from the near wall, women's stall is too narrow, flush controls are on the narrow side (women's), toilet paper dispenser is not properly located and is over the grab bar, side grab bars are too short, and coat hooks on the back of the stall door are too high. The women's restroom requires an ambulatory stall. The most compliant ambulatory stall is too wide, has a door that has a clear width opening that is too narrow, has an in-swinging door, has no grab bars, and has a coat hook that is too high.
- There is no accessible route to the picnic shelter or grill and picnic tables at the picnic shelter do not have knee space below.
- City Parking Lots – the City owns property for public parking outside the public ROW in four different lots. All have various issues, barriers, and/or non-compliant items, including:
 - Improper number of barrier-free parking spaces
 - Lack of van-accessible parking
 - Improper or missing signage
 - Missing access aisle



Riverside Park parking lot is gravel.



Riverside Park women's stall is too narrow, toilet paper dispenser is over the short side grab bar, and flush control is not on the wide side of the toilet

Recommended Action:

- Specific priorities for each facility and corrections needed, with costs where they can be estimated, to fully comply with ADA standards are included in the following section of this report and the appendices.
- 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. These include:
 - Restripe parking lots to provide compliant spaces, with proper signage, at locations closest to accessible entrances at all facilities.
 - 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.
 - 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 PAR outside of facilities.
 - Provide a cup dispenser at all drinking fountains below 48" height that can be used by anyone at functional drinking fountains, along with a waste container.



Public parking lot spaces with no access aisles or signage.

- Develop a door replacement plan for all doors that have glass below 10” and knobs that require grasping and turning to open. While some existing doors may be exempt, they present a safety hazard due to potential glass breakage when hit by a wheelchair. In the meantime, the push side of these doors should have temporary kick plates added to avoid glass breakage for persons using wheelchairs. Ensure that staff inside of rooms with knobs can see into the hallway in the event someone on the outside cannot open the door.
- 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.
- Investigation is needed in greater detail at Council Chambers to ensure that public restrooms are fully accessible. The number of fixtures available to the public is very low and consideration should be given to converting one of the existing sets of restrooms to fully compliant single user restrooms.
- Priority needs to be given to corrections in the meeting rooms that are required to provide full access in each but does not have a negative effect on the historical components within (railings, furniture, etc.).
- Ensure that all public assembly areas (meeting rooms and courtrooms) have the proper number 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.
- 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.
- Prioritize improvements at City parks to provide a fully compliant park rather than try to address several parks at one time unless funding allows. Focus should be on the highest use parks and the pool.
- Improvements at various City facilities (especially the Community Center) will require careful planning and analysis to avoid impacting historical aspects of the facilities.

4.0 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 City ROW facilities by City staff. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for providing access to City programs.

4.1 Data Collection and Methodology

The self-evaluation of the City's Public ROW began with a review of available mapping to identify locations of all on-street parking, sidewalks, and curb ramps within the City limits. This map was generated based on the available information.

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 unique forms for the various types of facilities.

4.2 Database Analysis

Upon completion of the Inventory and Assessment, the data collected was compiled into data sheets for each data collection point or location. Throughout the SETP, 'location' refers to a single data collection point. This may be a City 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.

4.3 Barrier Ranking

The City's self-evaluation of the public ROW 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 city services, residential zones, and 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 City Hall, 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. These included, 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.
- **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 included, 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.

4.4 Contributing Contextual Analysis

The self-evaluation of the City's ROW included identification of contributing contextual factors for use in barrier ranking. These factors are NOT included in the priorities given in the Appendices. These factors will be analyzed on a yearly basis as the City identifies the work scope for that year's improvements. Locations of City and other governmental facilities, commercial centers, and densities of residential development may change over time, and should be reevaluated to accommodate the current greatest need for improvements at time of implementation.

5.0 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 City sidewalks.

5.1 Pedestrian Access Route

Per R204 of the PROWAG, *'a pedestrian access route 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 PAR 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

City staff evaluated all existing sidewalks within City ROW and estimated the amount required to be replaced and/or reconstructed due to presence of one or more issues related to accessibility. Priority was not assessed as part of the self-evaluation but should be a consideration annually when the City budgets for sidewalk improvements.

5.2 Width

Requirements:

Per R302.3, the continuous clear width shall be 4' minimum exclusive of the width of curb. 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.

Within the City, several locations surveyed were less than 48" in width. Many sections also exceed 200' of length with no passing space available. Many locations a driveway serves this purpose but others have driveways with excessive cross slopes.

Addressing the Issue:

Where ROW is available, sidewalk width can be corrected by widening the sidewalk to at least the minimum requirement. Five feet should be considered for all new sidewalk construction.

5.3 Grade (Running Slope)

Requirements:

Per R302.5, the grade (running slope) of the sidewalk PAR shall not exceed the grade of the adjacent street. Otherwise, a 5% maximum is imposed.

Within the City, few locations were over the 5% maximum running slope. Approximately 95% of locations evaluated were found to be less than 5% running slope.

Addressing the Issue:

For running slopes of over 5% (where not adjacent to roadways exceeding that), 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.
- Installation of handrail and landings per PROWAG requirements for areas between 5% and 8.33%, where a more cost effective measure cannot be implemented due to grade, right-of-way, or adjacent fronting buildings.

5.4 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 and will be discussed in Section 5 - Crosswalks.

In surveying the cross slope of the sidewalks, the following classifications were found:

- Sidewalk panels had cross slopes over 2% maximum.
- Sidewalk panels exhibited variations in cross slope in excess of 4% leading to a higher priority ranking.

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.
- Providing a compliant cross slope area at required clear width to accommodate PAR and creating steeper transitional area between PAR and curb. Often referred to as the furnishings zone (see illustration).
- Installation of curb or retaining walls in areas where grading cannot be implemented due to right-of-way, or adjacent fronting buildings.



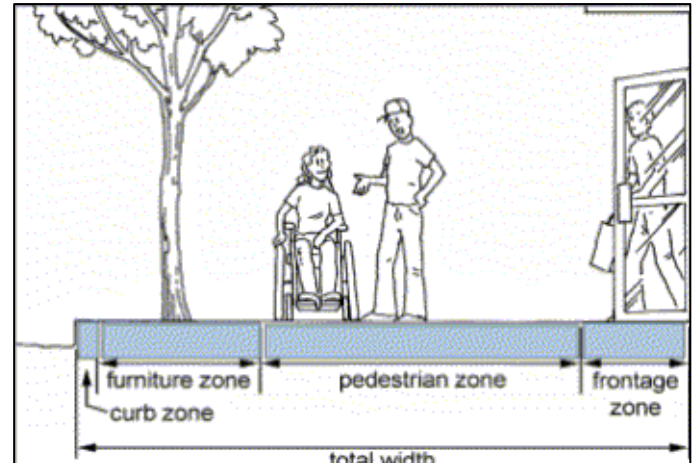
Example of Cross Slope Data Collection

This illustration from the FHWA publication “*Designing Sidewalks and Trails for Access*” shows the divisions of sidewalk width by function—furnishings zone, pedestrian zone, and frontage zone. Understanding these zones and the role of the Pedestrian Access route may be useful in developing solutions to cross slope issues in downtown areas.

5.5 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 $\frac{1}{2}$ " maximum with those between $\frac{1}{4}$ " and $\frac{1}{2}$ " being beveled at slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed $\frac{1}{2}$ ". Elongated openings should be placed perpendicular to dominant direction of travel.



During the evaluation, surface condition was evaluated for damage from cracking and spalling. Displacements due to differential heaving of sidewalk panels or severe cracking of walks was by far the most prevalent issue related to sidewalk non-compliance. This is a typical condition in communities with aged walks and large trees along narrow tree lawn areas.

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.

Level Changes

- Temporary placement of concrete or asphalt to ramp from adjacent panel
- Grinding edge at surface changes of up to $\frac{1}{2}$ " to achieve allowable bevel
- Replacement of concrete sidewalk panel
- Where right-of-way is available, route sidewalk around large trees to avoid further heaving



Example of change in level that is common along sidewalks. These situations are a trip hazard and may be difficult for wheelchair users to negotiate.

Surface Condition

- Replacement of damaged concrete sidewalk panel
- If asphalt surface such as multi-use trail, mill and overlay with new surface
- Maintenance to keep free of vegetation and debris

5.6 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 in the City 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 were generally classified as vertical displacements and slip hazards.

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. Similar restrictions on location of trash bins for pickup could be developed. Moveable signage could be added to the City's Sign Standards section of the municipal code to regulate location and clear space requirements.

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



Example of obstruction narrowing sidewalk width to under 48" minimum required.

5.7 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 City's ROW 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 C* for data reports.

5.8 Sidewalk Barrier Ranking Analysis

The City's self-evaluation of the public ROW 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 city services, residential zones, and 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. These categories are further defined in Section 4 of this report. Within Appendix C, the sidewalks are ranked by percent defective after considering the physical impedance factors.

Self Evaluation Findings:

Based on the data collected, a linear footage of replacement required was calculated for each data location. The square footage (assuming 5 foot wide replacement) was multiplied by the approximate cost of sidewalk replacement (in 2013 dollars). Based upon these calculations, the estimated cost of improvements required to make all sidewalk facilities accessible is over \$1.6 million. Note that the costs provided above do not include costs for ROW 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 C* for specific information related to sidewalks along each City street.

5.9 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 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.

The City of Rushville, as a general policy, plans infrastructure projects with the inclusion of pedestrian facilities, unless there are substantial safety or cost reasons for not doing so. The City strives for connectivity within its jurisdiction and illustrates this with its ongoing master planning efforts through the Engineering Department.

Per the policy statement in FHWA's **Accommodating Bicycle and Pedestrian Travel: A Recommended Approach**, "*bicycle and pedestrian ways shall be established in new construction and reconstruction projects in all urbanized areas unless one or more of three conditions are met:*

- *bicyclists and pedestrians are prohibited by law from using the roadway. In this instance, a greater effort may be necessary to accommodate bicyclists and pedestrians elsewhere within the right of way or within the same transportation corridor.*
- *the cost of establishing bikeways or walkways would be excessively disproportionate to the need or probable use. Excessively disproportionate is defined as exceeding twenty percent of the cost of the larger transportation project.*
- *where sparsity of population or other factors indicate an absence of need."*

'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*)

The City also places an emphasis on pedestrian safety as a key consideration for the appropriateness of pedestrian facilities in any given corridor. All requests for pedestrian facilities necessitate an assessment of current conditions and needs in order to be considered for implementation.

From the FHWA's publication, '**Bicycle and Pedestrian Transportation Planning Guidance**', an assessment might include the following:

- Determination of current levels of use for bicycling and walking transportation trips, and current numbers of injuries and fatalities involving bicyclists and pedestrians.
- Evaluation of the existing transportation infrastructure (including on- and off-road facilities) to determine current conditions and capacities and to identify gaps or deficiencies in terms of accommodating potential and existing bicycle and pedestrian travel.
- Identification of desired travel corridors for bicycle and pedestrian trips.
- Examination of existing land use and zoning, and the patterns of land use in the community.
- Basis of the need for modifications to the transportation system through surveys, origin destination studies, public input, or other data collection techniques.

(A complete listing of recommended considerations can be found at www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/inter.cfm).

6.0 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 City ROW. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility on City curb ramps.

All intersections were evaluated within City-owned ROW. A total of 421 intersection quadrants were noted as having at least one location with pedestrian facilities that would necessitate a curb ramp being present. Of these locations, a quadrant could have anywhere from 1 to as many as 3 curb ramps required to accommodate all pedestrian crossing movements. Quadrants noted with more than 2 curb ramps required are typically at streets that “jog”.

6.1 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** – 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** – 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 ROW 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. 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.

6.2 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. Within the City, few locations did not provide adequate clear width for the curb ramp run.

Addressing the Issue:

Ramp width could be limited by adjacent ROW availability, obstructions, or simply have been constructed too narrow to meet current requirements. If unobstructed area is available within the ROW, the ramp can be widened by replacement or addition of pavement. If ROW or an obstruction

is a limiting factor, a different ramp configuration may alleviate the problem. If not, the ramp or obstruction may need to be relocated, or inquiries made about obtaining additional ROW.

6.3 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 shall be 5% minimum and 8.3% maximum but shall not require the ramp length to exceed 15 feet. 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 City, the ramp running slope data was collected and noted if it exceeded 8.33%.

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

6.4 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, adjacent to tree lawns, or had returned curbs instead of flares.
- Many locations required two flared sides and exceeded the 10% maximum slope. Distinction is not made whether one or both side flares were out of compliance.
- Some locations required only one flared side and said location exceeded the 10% maximum slope. The opposite side bordered on adjacent tree lawn.

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
- Using a returned curb instead of flare
- Replacing flare and removing curb as necessary to accommodate corrected flare.

6.5 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 City, characteristics included:

- Locations met landing slope and size requirements.
- Locations met landing size requirement, but lacked the appropriate landing slopes.
- Locations met slope requirement, but lacked the appropriate landing size.
- Were non-compliant in both landing slope and 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
- 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

6.6 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);
- Pedestrian at-grade rail crossings not located within a street or highway;
- Transit stops (not applicable for City of Rushville).

Detectable warnings should not be provided at crossings of residential driveways as the pedestrian ROW continues across residential driveway aprons. They should be provided at high traffic commercial drive ways provided with yield or stop control since these function similarly to roadways, such as those found at large commercial centers.

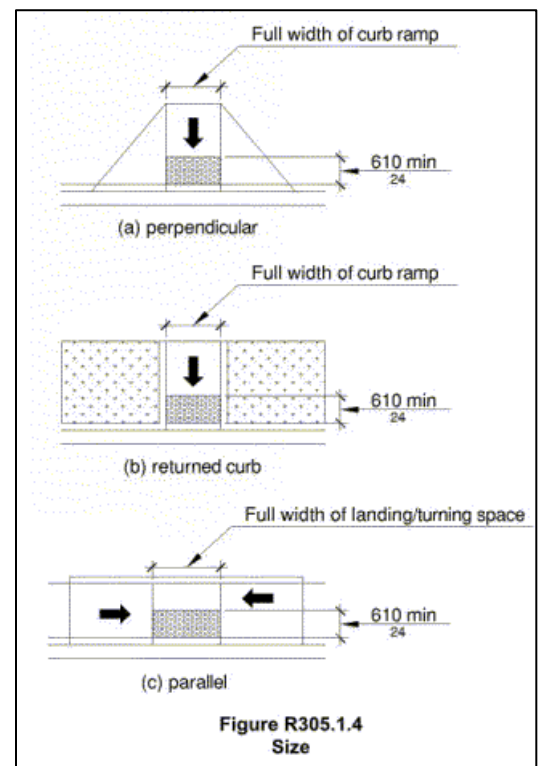
Per R305.1, detectable warning surfaces shall extend 2.0 feet minimum in the direction of pedestrian travel. At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the ramp run (excluding any flared sides), blended transition, or turning space.

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 Illustration from the PROWAG regarding placement and dimensions.

Evaluation of the curb ramps found that nearly all curb ramps in the City were lacking any detectable warnings.

Addressing the Issue:

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

6.7 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 of the City's curb ramps noted the following:

- Some curb ramps were located within 6' of a drainage structure, indicating potential for a drainage problem during heavy rain events.
- Few curb ramps exhibited evidence of ponding, including buildup of debris and sediment at the foot of the ramp.
- A majority of ramps did not exhibit a potential for drainage concerns.

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.

6.8 Obstructions, Protrusions, and Utility Considerations

Requirements:

Per R402.2, protruding objects are those objects with leading edges more than 2.25' and not more than 6.7' 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 in the City 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.

Addressing the Issue:

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.

6.9 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 ½" maximum with those between ¼" and ½" being beveled at slope not steeper than 50% across the entire discontinuity. Horizontal openings such as grates and joints may not exceed ½". Elongated openings should be placed perpendicular to dominant direction of travel.

Displacements observed included:

- Horizontal displacements at the gutter line.
- Vertical displacements at the gutter line.
- Locations did not exhibit any displacements over the required threshold.

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.

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

- Replacement of damaged ramp panel
- Maintenance to keep free of vegetation and debris
- Avoid inclusion of depressed grooves in future projects to limit freeze/thaw and debris problems associated with the grooves.

6.10 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 City's ROW 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.

No existing ramps or transitions exhibited full compliance with all criteria, though many have issues that are extremely minor and the ramps are generally fully usable. The extent of reconstruction required for the ramps 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.

6.11 Curb Ramp Barrier Analysis

The City's self-evaluation of the ROW 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 city services, residential zones, and 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. These categories are further defined in this report. Within Appendix C, the curb ramps are ranked as

- Low-Usable: a curb ramp is present and has elevation changes of less than 2", would generally be considered usable though not without potential issues for some users

- Medium-Difficult to Use: a curb ramp is present and has elevation changes of 2" to <4", would be considered usable but likely will present difficulties and could present barrier to use to some
- High/Unusable: a connection is made to the curb but there is a level change of 4" or greater or vertical curb present that is not usable by someone in a wheelchair or with other mobility impairments
- High: locations where pedestrian facilities exist but there is no connection to the curb and no curb ramp present

Self Evaluation Findings:

- Compliant - 0 locations
- Low-Usable - 188 locations
- Medium-Difficult Use – 182 locations
- High/Unusable – 238 locations
- High – 99 locations

In addition, the methodology used for estimating costs of corrections included dividing all curb ramps into cost groups based on amount of rework required. These groups made the following assumptions in order of magnitude. Photo examples of each group are shown below the group description.

- **Cost Group 1** – Locations where only minor non-compliant issues need to be corrected. This work may include removal of flare, grinding curb, removal of necessary pavement panels, or addition of detectable warning.
- **Cost Group 2** - Locations where work would include removal of the single panel of sidewalk, minor curb work, and replacement with one panel of concrete, including detectable warning plate.
- **Cost Group 3** - Ramp Reconstruct, Basic (Ramp Only, no ROW issues, no sidewalk impacts): Work includes correcting slope issues, removal of ramp and landing, reconstruction to provide a compliant, level landing and ramp that connects with detectable warning plate.
- **Cost Group 4** - Ramp Reconstruct, Moderate (Ramp, 2 panel sidewalk each side, No ROW issues): Work would include same as Cost Group 3 but due to greater slope issues, would also include concrete sidewalk panels to each side of the ramp to correct.
- **Cost Group 5** - Ramp Reconstruct, Major (Ramp, 3-5 panel sidewalk each side, No ROW issues): Work would include same as Cost Group 3 but due to greater slope issues, would also include several concrete sidewalk panels to each side of the ramp to correct.
- **Cost Group 6** - Ramp Reconstruct, Parallel (Change ramp to Parallel configuration due to ROW limiting landing availability): Work would include removal of existing ramp, reconstruction to convert to a parallel ramp, including a level landing coming off the crosswalk, ramps in each direction to tie into existing sidewalk, additional sidewalk panels as needed, and detectable warning plates.
- **Cost Group 7** - Ramp Reconstruct, ROW (Flagging of potential ROW needs, Limited application, ROW acquisition costs not included): This category is included in order to flag locations where ROW may be needed to construct compliant ramps. These will need to be looked at on a case-by-case basis to determine extent of work, ROW required, and technical feasibility of creating a compliant ramp. This cost group may also include ROW limited locations where conversion from one ramp to two perpendicular ramps alleviates the deficiencies.

Analysis of the inventory based on cost group is included Appendix C. Note that the costs provided below do not include costs for ROW purchase, easements, appraisals, etc. and it is very likely that exact costs of the program will vary based on a number of factors. It is estimated that curb ramp improvements would cost approximately \$1.6 million. Prioritization of curb ramp improvements should focus on locations that have no usable crossings for pedestrians and should be annually reviewed by the City during their budgeting process.

7.0 Self-Evaluation of Pedestrian Facilities within the Public Right-Of Way – Miscellaneous

This segment of the self-evaluation plan summarizes the review of current miscellaneous facilities within the public ROW. The findings of City staff and recommendations contained in this segment will provide the basis for the implementation of specific improvements to accessibility for on-street parking and rail crossings. Other potential items in the ROW that were not audited and may be present in limited number include site furnishings (benches, trash receptacles, picnic tables, etc.) and accessible pedestrian signals.

7.1 Site Furnishings

Requirements:

Site furnishing standards are not currently included in the PROWAG. The ADASAD should be used to evaluate furnishings since it would be considered “best practice” in the absence of detailed information in PROWAG. Furnishings should be located on an accessible route.

Benches require the following elements per 903 of ADASAD. As outdoor benches are not specifically addressed, it is not anticipated all standards will be compliant and/or applicable to all situations.

- Clear level ground space at end of bench, minimum of 30” x 48”;
- Seat 42” min. length x 20” min. depth;
- Seat 17” min. -19” max. above finish ground;
- Back support (42” min. length and extend from point 2” max above seat to 18” min. above seat, and be 2” max. from rear edge of seat measured horizontally.

Trash receptacles require the following elements:

- Clear level ground space 36” x 48” for forward approach;
- Opening within 15” – 48” reach range above finish grade;
- Opening mechanism operable with one hand; no pinching or grasping; less than 5 lbs of force

Picnic tables require the following elements per 902:

- Clear level ground space of 36” minimum width around all sides;
- Surface height between 28” min. and 34” max;
- Seat 17” min. -19” max. above finish ground;
- Knee clearance per 306.3;
- Have at least one side or end accessible by wheelchairs using forward approach with 30”x48” min. clear space

Self Evaluation Findings:

As noted, site furnishings are very limited and no data was provided by City staff. Any future update to this plan should include a review of compliance of site furnishings.

Addressing the Issue:

The following solutions may be implemented to address site furnishing deficiencies identified in the future:

- Relocate to accessible route or area with required clear space.
- Provide additional pavement to accommodate adjacent clear space requirement at benches.
- Adjust operating mechanism on trash receptacles to reduce force required.
- Provide new furnishings in cases of improper dimensional criteria.

7.2 Accessible Pedestrian Signals

Requirements:

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)’.*

General Accessible Pedestrian Signal Requirements (Additional requirements not listed here may be provided in the MUTCD for specific locations and crossing time parameters):

- Accessible pedestrian signals shall be used in combination with pedestrian signal timing.
- Signs shall be mounted adjacent to or integral with pedestrian pushbuttons, explaining their purpose and use.
- Positioning of pedestrian pushbuttons and the legends on the pedestrian pushbutton signs shall clearly indicate which crosswalk signal is actuated by each pedestrian pushbutton.
- Pushbutton shall activate both the walk interval and the accessible pedestrian signals.
- Vibrotactile walk indications shall be provided by a tactile arrow on the pushbutton that vibrates during the walk interval.
- Have an audible walk indication during the walk interval only. The audible walk indication shall be audible from the beginning of the associated crosswalk.
- The accessible walk indication shall have the same duration as the pedestrian walk signal.
- Audible tone walk indications shall repeat at eight to ten ticks per second. Audible tones used as walk indications shall consist of multiple frequencies with a dominant component at 880 Hz.
- Automatic volume adjustment in response to ambient traffic sound level shall be provided up to a maximum volume of 100 dBA.
- To enable pedestrians who have visual disabilities to distinguish and locate the appropriate pushbutton at an accessible pedestrian signal location, pushbuttons shall clearly indicate by means of tactile arrows which crosswalk signal is actuated by each pushbutton. Tactile arrows shall be located on the pushbutton, have high visual contrast (light on dark or dark on light), and shall be aligned parallel to the direction of travel on the associated crosswalk.
- An accessible pedestrian pushbutton shall incorporate a locator tone.

In addition, pedestrian pushbuttons should be located to meet all of the following criteria:

- On an accessible route within 1.5' to 6' from edge of curb, shoulder, or pavement;
- Between the edge of the crosswalk line (extended) farthest from the center of the intersection and the side of a curb ramp (if present), but not greater than 5 feet from said crosswalk line;
- Push button parallel to crosswalk to be used;
- Push button to be within unobstructed, accessible reach range (between 15" – 48" above finish grade and within 10" of adjacent level clear space, 3.5' recommended in MUTCD).

Within the City of Rushville, very few intersections have pedestrian signal heads and most of those are located within INDOT ROW. It is unknown if any are new enough to meet the proposed requirements of the new PROWAG.

Addressing the Issue:

The City Engineering Department intends to include these in future infrastructure improvement projects where new signal construction or alterations including signal controller, software or signal head replacement occurs.

7.3 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 angles 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)'. While PROWAG does not require specific delineation of barrier-free and van parking, it is generally recommended that some spaces be specifically marked as van-accessible. Where van-accessible spaces are 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 PROWAG. 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.

Marked on-street parking within Rushville is located mainly in the downtown area. Throughout other areas of the City, on-street parking is provided but not marked. Within these areas, reserved parking exists for those displaying disabled placards, but spaces are provided at resident request.



Photo illustrates on-street parallel parking on E. 2nd St. Sign height is too low.

Marked parking within the City consists of parallel and angled parking on at least part of 14 City blocks. Counts were taken on each block face where marked parking is provided to determine the number of parking spaces required. Currently, a total of 272 total spaces are provided, with 15 designated as accessible. Per the parking counts, the City needs to provide 18 spaces for compliance. Parking requirements are calculated on and to be provided on a per block face basis. As such, all 18 of the existing spaces may not be in a location to satisfy the requirements to count towards the total numbers needed. See Appendix C 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 aisles were missing or do not provide a connection to a curb ramp or other sidewalk access.
- Slopes exceeded 2% maximum.
- Not located adjacent to accessible route or ramp.
- No accessible parking provided.
- Missing or non-compliant signage.

Addressing the Issue:

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 faced 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.

7.4 Rail Crossings

Requirements:

Per R302.7.4, "*flangeway gaps at pedestrian at-grade rail crossings shall be 2.5 inch maximum on non-freight rail track and 3 inch maximum on freight rail track. Flangeway gaps pose a potential hazard to pedestrians who use wheelchairs because the gaps can entrap the wheelchair casters*".



Photo of angled parking at the Post Office. Access aisle is not wide enough and there are no signs present.

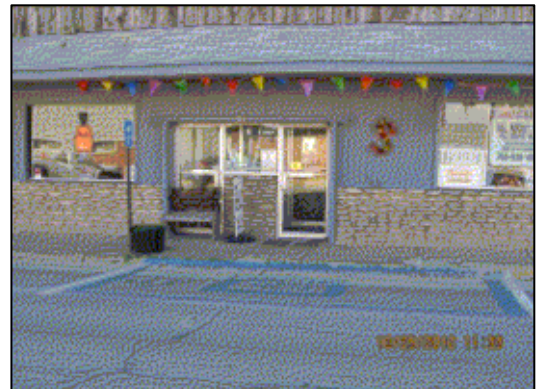


Photo illustrates on-street parallel parking W. 3rd St. Space is not located near a curb ramp and would be difficult to use.



Photo illustrates on-street angled parking on W. 3rd St. No access aisle is painted and sign is too low.

Per R305.2.5, “at pedestrian at-grade rail crossings not located within a street or highway, detectable warning surfaces shall be placed on each side of the rail crossing. The edge of the detectable warning surface nearest the rail crossing shall be 6.0 feet minimum and 15.0 feet maximum from the centerline of the nearest rail. Where pedestrian gates are provided, detectable warning surfaces shall be placed on the side of the gates opposite the rail”.

The City of Rushville has a number of at-grade railroad crossings with pedestrian crossings, particularly crossing 4th Street as the tracks bisect several blocks of vehicle traffic lanes and create very steep PARs. No detailed review of conditions was performed by City staff. Based on DLZ staff familiarity with portions of the City and in reviewing available information, the following issues are noted:

- Sidewalks transition to inaccessible slopes near crossing.
- Condition of pavement is not stable, firm, and slip resistant.
- Flangeway gap varies and may exceed maximum allowed.
- No detectable warnings were observed at any rail crossings.
- No pedestrian gates were observed (not required).

Rail right-of-way is typically approximately 80' wide. Based on this information, all improvements related to the flangeway gaps and required detectable warnings would fall within the right-of-way controlled by the railroads.

Addressing the Issue:

As an interested party, the City could notify the railway of the condition of the pedestrian crossings and the need for improvements to meet accessibility standards. Costs are not provided for corrective actions at railroad crossings.



Photo illustrates on-street angled parking on N. Morgan St. Access aisle is not marked and space available is not compliant. Also note the curb ramp is not 48" width.



Photo illustrates on-street parallel parking at City Hall. Sign is too low.



Photo illustrates on-street angled parking at Rush County Courthouse. Six spaces are provided with no access aisles and signs are present for half of the spaces.

8.0 Transition Plan

The Transition Plan describes how the City of Rushville will be transitioning to full compliance with the ADA and applicable standards. Public entities, like the City, are required to provide access to City programs, services, and activities for all of the recipients. Thus, the City 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 City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [\[28 CFR 35.150 \(d\)\(3\)\(i\)\]](#)
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [\[28 CFR 35.150 \(d\)\(3\)\(ii\)\]](#)
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [\[28 CFR 35.150 \(d\)\(3\)\(iii\)\]](#)
- 4) The name of the official responsible for the plan's implementation. [\[28 CFR 35.150 \(d\)\(3\)\(iv\)\]](#)

The transition plan is a reaction to the findings of the facility audits, assessments of City policies, services, programs, and activities, and input from advocacy groups and the public. Recommended actions for City policies and programs can be found in Section 3.0, though these recommendations are generally the minimum needed to meet standards and are based on information that could easily be obtained or was gathered by various means.

The specific architectural and site improvement modifications required to make programs accessible are listed in the City of Rushville Facility Reports (see appendix). Facility reports include buildings and their related grounds, as well as ROW facilities and public parking lots. 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 City's first priority.

The portion of the transition plan to bring facilities outside INDOT or City right-of-way but within City ROW (curb ramps and sidewalks) into compliance is within the City's area of responsibility. See *Appendix C* for a description of existing ROW facilities and results of the compliance review.

8.1 Phasing of Corrections

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

Site priorities were determined by evaluating each site's level of use, social need, civic function, and the general uniqueness of the site. At the time of the development of this report, few public complaints had been received about City-owned facilities. Complaints were not used as criteria to

determine the phasing of improvements for any particular site, though future complaints could be the basis for funding improvements.

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

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

8.2 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 on the City's website, City Hall, and the Rushville Public Library for public review and comment beginning on January 20, 2014. Comments could also be provided via e-mail as advertised and posted. The public comments were incorporated in the final report. The final Transition Plan was then submitted to the Board of Public Works and Safety for public hearing and adoption at its regular meeting on February 4, 2014.

In creating priorities, it is the City's intent to evaluate all areas of potential deficiency and to make structural changes where necessary and 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 disabled community. It must be emphasized that it is the City's intention that all individuals with all types of disabilities be reasonably accommodated to provide access to all programs offered at all facilities.

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

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

8.3 Priorities for Barrier Removal

All barriers are not equal in the impact they have on persons with disabilities to have equal access to City facilities or programs. Following evaluation of all facilities and programs, a prioritization had to be done to identify a ranking system to utilize when determining which capital improvements need to be considered first and those that could be implemented in subsequent years.

1. **High priority** barriers prohibit access for disabled persons, make access extremely troublesome, or present safety hazards to all users. These barriers likely do not have 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, rest rooms, and transaction and information counters. Examples of high priority barriers would include:
 - service counter height

- non-compliant doors
 - extremely non-compliant slopes for accessible routes or ramps
 - protruding objects
 - displacements in walks or high thresholds
 - missing handrails or grab bars
 - some signage
 - lack of barrier-free parking
 - extremely non-compliant dimensional issues (narrow doors, corridors, etc.)
2. **Medium priority** barriers partially prohibit access or make access quite difficult for disabled persons. For medium priority barriers, alternative routes or treatments to overcome the barrier may or may not exist. Typically these barriers are obstacles to amenities such as secondary entry points, light switches, vending machines, and drinking fountains. Medium priority barriers may also be barriers which are significant obstacles prohibiting access but for which alternative access is available or assistance is readily available to navigate around the barrier. The presence of the medium priority barrier possibly causes a minor danger to a disabled person who is attempting to use the facility. Examples of medium priority barriers would include:
- minor non-compliant slopes
 - some signage
 - minor issues with doors
 - stairwell/stair issues, particularly where an elevator is available
 - restroom fixture issues
 - moderately non-compliant dimensional issues
3. **Low priority** barriers typically do not limit access to facilities or services for disabled persons. For low priority barriers, alternative routes or treatments are typically available or assistance can be provided to overcome the barrier. It is not likely that the presence of a low priority barrier would cause a danger to a disabled person who is attempting to use or access the facility. Examples of low priority barriers would include:
- many signage issues
 - minor issues with light switches, electrical outlets, etc.
 - minor non-compliant dimensional issues

The costs to remove barriers by priority for each site are shown in Table 8-1 and detailed for each facility in the appendices. In addition, a time frame has to be identified to determine an average annual budget to consider. For the purposes of this report, no time frame was utilized since the consultant cannot predict economic conditions in the City's budget in future years nor commit the City to dedicated funding. The current administration, led by the Mayor, is dedicated to improving access to City programs.

The City is committed to improving accessibility and reviewing funding of improvements annually. It is conceivable that a majority of the improvements required could be completed in a reasonable time period. 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 it is realistic that all improvements can be made in less than 10-20 years, particularly when considering that there are also likely to be a large number of other improvements needed by the City as part of regular maintenance, upkeep, and repairs.

In some instances, it may be advantageous to construct all improvements at a site at once rather than correct the high priority barriers first and come back at a later date to correct the medium or low priority barriers. For some sites, the total cost of construction for the corrections requires that they be spread out over two or more phases. The City of Rushville has the right to modify the priorities

based on funding levels and changes in City programs, activities, and services to have flexibility in accommodating community requests and complaints. Interim resolutions, such as assigning aids, temporary signing for alternate routes or sites, and modifications of programs, activities, and services may be implemented at the City's discretion to handle existing insufficiencies or access complaints received. All costs noted in the appendices and Table 8-1 are 2013 cost opinions, based on the conditions noted in each appendix, and subject to change based on market conditions, economic conditions, inflation, material selection, etc. Multiple phases of projects, multiple bidding packages, design parameters, etc. all have an impact on project costs that cannot be finitely identified in a study with this level of detail and uncertainty related to funding.

Based on the costs developed to address the architectural and engineering improvements required to fully comply with ADASAD and PROWAG standards, a total of over \$3,500,000 in improvements would be required (2013 costs) to achieve ADA compliance at all of the City building and park facilities listed, ROW, and parking lots. It is important to note at this point that many of the identified deficiencies are not significant barriers to access and some improvements are not required until such time as a major building renovation is completed. The figure noted above also does not include all necessary revisions since many non-compliant items require additional investigation to determine the required corrective actions. This does not avoid the need for the City of Rushville to ensure all programs are accessible by some means. If the City of Rushville 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 over \$175,000 (in 2013 dollars) to bring all of the City facilities evaluated in the appendix of this report up to current ADA standards (no inflation included). These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, design, additional investigation that may be needed (structural analysis, etc.), compliance with other codes, etc. The City should consider forming a committee comprised of facility staff, parks & recreation, etc. to identify the most urgent access needs based on their experiences and features of each facility. There may be grants available to make some of these improvements and this should be investigated further.

8.4 Transition Plan Phasing

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

Any changes to the ADA policy after the sites were surveyed are not reflected in these basic cost estimates. Additionally, it is the City's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA 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 compliant 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 and the Transition Plan should be adjusted to reflect this knowledge.

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

8.5 Curb Ramps and Sidewalks

The City has performed a self-evaluation of these facilities within the public ROW. A phased implementation of the required corrections to remove physical barriers within the City's right-of-way is required and recommended. The City has limited funds and cannot immediately make all facilities fully accessible. Prior to setting priorities, baseline criteria needed to be established to develop a starting point for ranking the deficient infrastructure were identified.

Criteria to be considered included 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 city services, residential zones, and 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. As noted, contextual factors are NOT included in the priorities given in the appendix. These factors will be analyzed on a yearly basis as the City identifies the work scope for that year's improvements. Locations of City and other governmental facilities, commercial centers, and densities of residential development may change over time, and should be reevaluated to accommodate the current greatest need for improvements at time of implementation.

At the time of the development of this report, few public complaints had been received about City-owned facilities. Complaints were not used as criteria to determine the phasing of improvements for any particular area, though future complaints could be the basis for funding improvements.

8.4 ROW Maintenance Activities and Recommendations

A key component to ensuring ROW 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 City staff. Examples of maintenance activities that may be required within the public ROW 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.

8.6 Plan Updates and Enforcement

Changes to the City of Rushville'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 City staff, and administrative costs. Some of the suggested language for City ADA documentation has been suggested in this report, but these suggestions are not exhaustive.

TABLE 8-1. THE CITY OF RUSHVILLE - ADA SELF-EVALUATION STUDY AND TRANSITION PLAN
Cost of Correction for Interior and Exterior Elements by Site

Facility Name	Low Priority	Medium Priority	High Priority	Total Cost*
City ROW – Sidewalks				\$1,661,100
City ROW – Curb Ramps	\$ 228,500	\$ 366,300	\$ 996,800	\$1,591,600
City ROW – On-Street Parking	\$ 0	\$ 0	\$ 2,025	\$2,025
City Parking Lots	\$ 0	\$ 0	\$ 2,050	\$2,050
City Hall	\$ 200	\$ 38,250	\$520	\$38,970
Police Department/Council Chambers	\$ 170	\$ 8,420	\$ 2,920	\$11,510
Animal Shelter	\$ 0	\$ 400	\$ 3,500	\$3,900
Utilities Office	\$ 0	\$ 100	\$ 510	\$610
Girl Scout Cabin	\$ 420	\$ 9,100	\$ 2,080	\$11,600
Community Center	\$ 1,330	\$ 17,880	\$ 37,250	\$56,460
Waggoner Community Pool	\$ 1,400	\$ 29,550	\$ 8,000	\$38,950
Riverside Park	\$ 1,890	\$ 8,400	\$ 6,500	\$16,790
Wilkie Park	\$ 0	\$ 0	\$ 2,500	\$2,500
Community Park	\$ 0	\$ 8,870	\$ 14,680	\$23,550
Laughlin Park	\$ 0	\$ 24,340	\$ 15,350	\$39,690
South Memorial Park	\$ 0	\$ 18,030	\$ 7,850	\$25,880
North Memorial Park	\$ 350	\$ 16,730	\$ 8,770	\$25,850
TOTAL ESTIMATED COST**				\$3,553,035

* = Costs for some ROW improvements do not include grading or repaving costs.

** = Some facilities require additional reviews of other codes and/or analysis of the facility to determine options and costs available to correct deficiencies. Total cost does not reflect the items with costs marked "TBD" in the appendix.

Notes:

1. Some facilities may have inaccessible components for which costs cannot be estimated without additional detailed investigation, survey, and/or design, which is not within the scope of this plan. Those costs are noted on the facility appendices and are not included in the figures on those sheets or within this compiled cost estimate.
2. Priorities included on facility cost sheets and on this summary are based on consultant's philosophy for prioritization and is not intended to represent any minimization of importance of providing full and complete accessibility and compliance with relevant statutes and guidelines. General basis is included within the text of the Transition Plan.
3. A number of the corrective actions identified and priced out would not be required if equal facilitation/access is provided in another manner or changes are made to the City's procedures. Other non-compliant items have low cost alternatives until permanent solutions are implemented. For example, non-compliant drinking fountains can have a cup dispenser and waste basket provided instead of replacement with compliant fountains.
4. Costs included are only to provide compliance under Title II of the ADA and is limited to areas of City facilities open and accessible to the public at all times. This does not eliminate the need for the City to provide accessibility for employees with disabilities, as needed, to allow them to perform their required job duties.
5. Actual schedule for implementation of the Transition Plan is dependent on a number of factors unknown at the time of preparation of the Transition Plan, including, but not limited to: availability of funding within the City budget, reprioritization based on input from disabled persons, award of grants or other funding to make corrective actions, changes to the ADA Accessibility Guidelines or other guidance that is not available at this time, etc.

9.0 ADA Policy and Grievance or Complaint Procedure

The City of Rushville has designated the Director of Personnel, Purchasing, and ADA Compliance as its ADA Coordinator per Ordinance 2012-28 on November 7, 2012. The ADA Coordinator will delegate the responsibility of preparing an initial investigation and response to departmental management staff members. The ADA Coordinator is responsible for coordinating the efforts of the City to comply with Title II and for investigating any complaints that the City has violated Title II of the ADA. The Coordinator is also responsible for coordinating the efforts of the City to comply and all other applicable state and Federal physical and program accessibility requirements.

It is desired that individuals with complaints, questions, or concerns bring them to the attention of the ADA Coordinator or other Department Head in an informal manner and that they be resolved at that level. The following information should be provided to all departments and posted conspicuously in all City buildings and the website:

- It is the policy of the City of Rushville that every employee makes reasonable efforts to accommodate the needs of the disabled. If an employee is not able to address the concern within their authority to act, the issue may be elevated to a formal complaint. Notification of complaints, grievances or issues should be submitted as soon as possible, but no later than 180 calendar days after the date of the alleged violation or discriminatory act.
- Anonymous formal complaints or grievances will not be accepted, though if the nature is such that a potential hazard is reported, it should be investigated.
- Formal notification of complaints, grievances, or issues must be submitted to the City in writing on a designated form, which shall contain specific information about the alleged violation or discrimination. Specific information shall include name, address, contact number of the complainant and the date, location and complete description of the issue or problem. The matter will be documented and logged and assigned to the proper department for follow-up.
- Alternative means of filing complaints, grievances or issues may be accepted as shown below; however, all complaints, grievances, or issues must provide all the information required consistent with the format of the official designated form:
 - Telephone: Contact the ADA Coordinator at (765) 932-2672 during normal business hours. A message may also be left on the after-hours answering machine.
 - Website: The City's website is www.cityofrushville.in.gov/index.asp. The "Contact Us" page on the site should contain a fill-in the blank notification form which upon submission will be forwarded to the ADA Coordinator.
 - E-mail: An e-mail message containing all of the required elements as stated above can be sent to ADACoordinator@cityofrushville.in.gov.
 - Regular mail: Written notice, preferably on a City-provided notice form or containing all of the required elements as stated above, can be sent to:

City of Rushville ADA Coordinator
Human Resources Department
133 W. 1st Street
Rushville, IN 46173

- Questions concerning the notification and follow-up process may be addressed to the ADA Coordinator at (765) 932-2672.
- The ADA Coordinator will render a decision within the timeframe specified in the Grievance Procedure.
- Appeal: The current Grievance Procedure includes a provision for appeals to the Mayor or his designee.

- Every reasonable attempt will be made by the City of Rushville to remedy the disability complaints, grievances, or issues in a timely manner subject to staff and budget constraints.

Recommended Action:

- Update the Grievance Procedure if it is deemed necessary.
- The information noted above should be added to the City website as soon as possible.

The current Grievance Procedure is included in Appendix E.

10.0 ADA Tool Kit

10.1 Introduction

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

If you need any additional assistance, please contact:

ADA Coordinator
Phone: (765) 932-2672
E-mail: ADACoordinator@cityofrushville.in.gov

10.2 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/).

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 (http://www.ada.gov/regs2010/ADAREgs2010.htm#titleII_final_2010) describes Title II of the ADA, 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) 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) 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 (<http://www.access-board.gov/pubs.htm>). 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. In addition to the guidelines, guidance material is also available to assist staff in understanding and implementing Federal accessibility guidelines.

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

Guidelines and Standards for Facilities

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

- *ADA Standards for Accessible Design* (ADASAD). This document (www.ada.gov/2010ADASTandards_index.htm) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA. 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.
- *State and Local Government Facilities: ADAAG Amendments*. The Access Board is issuing final guidelines to provide additional guidance to the DOJ and the DOT in establishing accessibility standards for new construction and alterations of state and local government facilities covered by Title II of the ADA. The guidelines will ensure that newly constructed and altered state and local government facilities are readily accessible to and usable by individuals with disabilities in terms of architecture, design, and communication.
- *Building Elements for Children: ADAAG Amendments*. The Access Board is issuing final guidelines to provide additional guidance to the DOJ and the DOT in establishing alternate specifications for building elements designed for use by children. These specifications are based on children's dimensions and anthropometries and apply to building elements designed specifically for use by children ages 12 and younger.
- *Play Areas: ADAAG Amendments*. The Access Board is issuing final accessibility guidelines to serve as the basis for standards to be adopted by the DOJ for new construction and alterations of play areas covered by the ADA. The guidelines include scoping and technical provisions for ground level and elevated play components, accessible routes, ramps and transfer systems, ground surfaces, and soft contained play structures.
- *Recreation Facilities: ADAAG Amendments*. The Access Board is issuing final accessibility guidelines to serve as the basis for standards to be adopted by the DOJ for new construction and alterations of recreation facilities covered by the ADA. The guidelines include scoping and technical provisions for amusement rides, boating facilities, fishing piers and platforms, golf courses, miniature golf, sports facilities, and swimming pools and spas.

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.

- *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.
- *Visual Alarms Technical Bulletin.* In passing the ADA, Congress specifically directed the Access Board to provide greater guidance regarding communications accessibility. Thus the ADAAG require that where emergency warning systems are provided in new or altered construction, they must include both audible and visible alarms that meet certain technical specifications. This bulletin was developed to provide more technical information about the types of visual fire alarms available and how and where their use is required. (www.access-board.gov/adaag/about/bulletins/alarms.htm)
- *Text Telephones Technical Bulletin.* Text telephones are machinery or equipment that employs interactive graphic (i.e., typed) communications through the transmission of coded signals across the standard telephone network. Text telephones can include, for example, devices known as TDDs (telecommunications display devices or telecommunications devices for deaf persons) or computers. This bulletin was developed to provide more technical information about the types of text telephones available and how and where their use is required. (www.access-board.gov/adaag/about/bulletins/ttys.htm)
- *Ground and Floor Surfaces Technical Bulletin.* Over 27 million Americans report some difficulty in walking. Of these, eight million have a severe limitation and one-fifth of this population is elderly. Ambulatory persons with mobility impairments - especially those who use walking aids - are particularly at risk of slipping and falling even on level surfaces. The information in this bulletin is intended to provide designers with an understanding of the variables that affect the measurement and performance of materials specified for use on walking surfaces and to better describe the requirements of an accessible route.
- *Parking Technical Bulletin.* Accessible parking requires that sufficient space be provided alongside the vehicle so that persons using mobility aids, including wheelchairs, can transfer and maneuver to and from the vehicle. Accessible parking also involves the appropriate designation and location of spaces and their connection to an accessible route. This bulletin was developed to provide more detailed information about the requirements for accessible parking including the Configuration, location, and quantities of accessible parking spaces. (www.access-board.gov/adaag/about/bulletins/parking.htm)
- *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 ADASAD. This update is expected in 2013. While ADASAD covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public 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 ADASAD 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/adaag/dws/update.htm)

- *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 bulletin provides information about the types of systems that are currently available and tips on choosing the appropriate systems for different types of applications. (www.access-board.gov/Adaag/about/bulletins/als-a.htm)
- *Guide to the ADAAG 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/play/guide/intro.htm)
- *Summaries of 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. (www.access-board.gov/recreation/summary.htm)
- *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/outdoor/outdoor-rec-rpt.htm).

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. (<http://www.access-board.gov/transit/html/vguide.htm>)
- *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/transit/manuals/transit%20manual%20-%20g.htm)

- *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* (1st edition) and *Guide for the Development of Bicycle Facilities* (3rd 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).
- *Manuals on ADAAG for Transportation Vehicles*. These technical assistance documents (www.access-board.gov/transit/manuals/Manuals-list.htm) are one of a series provided to help in understanding the background and underlying rationale of the ADAAG for Transportation Vehicles (Vehicle Guidelines) and how the guidelines may apply in a particular case. The documents in this series include:
 - Buses, vans, and systems
 - Over-the-road buses and systems
 - Automated guideway transit vehicles and systems
 - Trams, similar vehicles, and systems
- *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. This publication reports on the experience of two transit accessibility leaders who 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/sec508/standards.htm)
- 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/)

- *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/telecomm/rule.htm)

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

10.3 Resources for Providing Accessible Programs & Facilities

- *ADA Document Portal:* This website (<http://adata.org/ada-document-portal>) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- *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 (www.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) 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) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program (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.

10.4 Technical Resources

The City should utilize the many disability-related resources available through the internet. Begin at AbleData (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.riglobal.org/about/government-structure/commissions/icta-international-commission-on-technology-and-accessibility/)
- **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).

- **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
DHHSHelp@fssa.IN.gov
www.in.gov/fssa/ddrs/2637.htm
- American Sign Language Interpreter Network - www.aslnetwork.com/
- Registry of Interpreters for the Deaf – 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.
- *Assistive Listening Systems Technical Bulletins* - are available on the U.S. Access Board's website (www.access-board.gov/adaag/about/bulletins/als-a.htm).
- *Closed Caption Machine* - To the extent practical, City Divisions should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- *Enlarging Printed Materials* - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- *Optical Readers* - Equipment that can translate printed information into an audio format should be available to Departments.
- *TDD* - To the extent necessary, City Divisions should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.

- *Telecommunications for the Deaf, Inc.* – 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) include information about telecommunications access such as 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 City 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 City staff to follow. If a City employee is ever unsure how to best serve a person with a disability, just ask them.

- **Ask Before You Help**

Just because someone has a disability, 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 city owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.

- **Terminology**

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

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

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

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

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

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

Community Groups, Organizations, Associations and Commissions

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

- *Ability Resources, Inc.:* Ability Resources Inc. (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) 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.
- *American Association of People with Disabilities:* The American Association of People with Disabilities (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).
- *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) 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).
- *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) 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).
- *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).
- *State of Indiana Division of Disability & Rehabilitative Services (DDRS):* www.in.gov/fssa/ddrs/2637.htm
- *State of Indiana Protection and Advocacy Services (IPAS):* 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
- *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

- *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/
- *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/

- *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
- *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/
- *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

Figures

Appendix A

City of Rushville Facility Costs and Priority

APPENDIX A

City of Rushville - ADA SELF EVALUATION STUDY AND TRANSITION PLAN					
Site #	Facility Name	Low Priority	Medium Priority	High Priority	Total Site Cost
1	Rushville City Hall 135 W 1st St., Rushville, IN 46173	\$200	\$38,250	\$520	\$38,970
2	Police Department/Council Chambers 270 W. 15th St., Rushville, IN 46173	\$170	\$8,420	\$2,920	\$11,510
3	Rushville Animal Shelter 223 Smiley Ave., Rushville, IN, 46173	\$0	\$400	\$3,500	\$3,900
4	Rushville Water Company 601 W 3rd St., Rushville, IN 46173	\$0	\$100	\$510	\$610
5	Rushville Girl Scout Cabin 1321 N Sexton St., Rushville, IN 46173	\$420	\$9,100	\$2,080	\$11,600
6	Booker T. Washington Community Center 525 E 7th St., Rushville, IN 46173	\$1,330	\$17,880	\$37,250	\$56,460
TOTALS		\$2,120	\$74,150	\$46,780	\$123,050

NOTE: The costs included are based on review of information collected by City staff and included on evaluation forms. Costs developed are based on this information, review of photographs provided by the City, and clarifications of condition provided by City staff. Actual costs may not be reflected based on a number of factors and several items could not have corrective actions priced due to lack of more detailed investigation that is outside the scope of an ADA evaluation. Items such as review for compliance with other relevant codes, structural analysis, etc. may significantly alter the actual cost of corrective actions.

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City Hall, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>There is no accessible parking space, access aisle, or vertical signage.</i>		
	Provide a van-accessible parking space with access aisle and vertical sign. The parking space and access aisle must be on pavement that is flat +/- 2%. Cost assumes existing pavement. Federal Guideline: 208.2, 208.2.4, 216.5	High	\$420
4	Walk		
	<i>The accessible route to the door does not lead to the parking.</i>		
	See item 5-1 below Federal Guidelines: 206.3	N/A	\$0
	<i>The walk surface is not continuous without changes in level greater than 1/4".</i>		
	Eliminate the 1" step at the door threshold by replacing the metal threshold. Federal Guidelines: 403.4	High	\$100
5	Exterior Ramp		
	<i>The existing ramp slope is acceptable at 6.8% slope but the length is longer than the 30' allowed.</i>		
	Rework the ramp so that max. length is no more than 30'. One solution is to provide a landing about mid-ramp and then slope back to the parking area to create the accessible route needed per item 4-1. Federal Guideline: 405.6	Medium	\$31,500
	<i>The existing ramp does not have protection from drop-offs at the edges.</i>		
	The new railings in item 5-1 will eliminate this problem. Federal Guideline: 405.9	N/A	\$0
	<i>The handrails are higher at the top landing. Handrails should be from 34" to 38" above the ramp surface with 12" extensions at top and bottom. Handrails for landings are not required except at the 12" extension of the ramp handrails. 42" high Guardrails are required by the 2008 Indiana Building Code for landings that are more than 30" above the adjacent surface.</i>		
	New railings are included in item 5-1 above. Federal Guideline: 505.4	N/A	\$0
6	Front Exterior Stairway		
	<i>Front Entrance Landing surface exceeds 1:48 slope. The photo shows that there is no landing at the top of these stairs. A landing is required for alterations and new construction on both sides of any accessible door. However, an existing building, built before March 14, 2012, only requires one accessible route to each program, service and activity. The accessible route for this building is the ramp. Just inside the front entrance door is another stair.</i>		
	Optional: Provide a new stair, landing and railings. Federal Guideline: 101.2; Figure 404.2.4.1	N/A	\$0

8-1	Side Entry Door		
	<i>The accessible entrance should have signage designating its accessibility.</i>		
	Provide signage with the International Symbol of Accessibility. Federal Guideline: 216.6	Medium	\$100
	<i>The threshold of the door exceeds the height maximum of 1/2". (1")</i>		
	See item 4-2. Federal Guideline:	N/A	\$0
	<i>The automatic closer does not meet the 5 second minimum sweep time. (4 seconds)</i>		
	Adjust or replace this door closer. Federal Guideline: 404.2.8.1	Medium	\$490
	<i>The bottom 10" is not smooth or covered by a kick plate. (5")</i>		
	This is a requirement for alterations or new construction. Section 404.2.10 exception 4 exempts existing doors. Federal Guideline: 404.2.10	N/A	\$0
8-2	Front Entry Doors		
	<i>The front entrance door and the inside hall are separated by 7 risers and the bottom landing may be too close to the door to provide adequate maneuvering space inside the building. Just outside this door the landing is inadequate for the required maneuvering space. Cost given is for a new sign.</i>		
	Optional: Provide a major remodeling to make this entrance accessible. (Only one accessible route is required into existing buildings.) Required: Provide a sign to designate this as an non-accessible entrance. Federal Guideline: 210.2	Low	\$100
	<i>Provide a sign on the inside designating this exit as non-accessible.</i>		
	Reference item 6-1. Federal Guideline: 216.6	Low	\$100
8-3	Restroom Door		
	<i>Provide door lockset.</i>		
	See item 16. Federal Guideline: 404.2.7	N/A	\$0
	<i>There is no sign.</i>		
	See item 16 Federal Guideline: 703	N/A	\$0
	<i>Remodel space as required to achieve maneuvering space on the inside. (pull side of the door)</i>		
	Note: See item 16 below. Federal Guideline: 404.2.4.1	N/A	\$0
9	Corridor/Aisle		
	<i>Fire extinguisher protrudes from the wall more than the 4" max.</i>		
	Relocate this fire extinguisher out of the circulation path. Federal Guideline: 307	Medium	\$70

16	Single-User Restroom		
	<i>There are no signs describing (visual or tactile). Signs are required at restrooms and enclosed stairs.</i>		
	Provide sign. Federal Guideline: 703	Medium	\$100
	<i>Existing door lockset has round knobs. Handles, pulls, latches, locks, etc. must be operable with one hand with no tight grasping, pinching or twisting of the wrist.</i>		
	Provide door lockset with lever handles. Federal Guideline: 404.2.7	Medium	\$300
	<i>The door does not lock from the inside without the use of twisting or grasping.</i>		
	Note: This requirement will be in the solution above. Federal Guideline: 404.2.7	N/A	\$0
	<i>Restroom Door: There is insufficient maneuvering space on the inside (pull side of the door).</i>		
	Note: Remodel of space to achieve maneuvering clearances. Federal Guideline: 404.2.4.1	Medium	\$5,150
	<i>The exposed pipes underneath the lavatory are not insulated to provide protection from hot surfaces and sharp edges.</i>	Medium	\$100
	Insulate the exposed pipes underneath the lavatory. Federal Guideline: 606.5		
	<i>The height of the reflecting surface of the mirror above the sink exceeds the 40" max above the floor. (50")</i>		
	Relocation of the mirror is included in item above. Federal Guideline: 603.3	N/A	\$0
	<i>The space on one side of the toilet does not meet the minimum of 16". (12")</i>		
	Relocation of the toilet is included in item above. Federal Guideline: 604.2	N/A	\$0
	<i>The flush control is not on the wide side of the toilet.</i>		
	Rotation of the toilet is included in item above. Federal Guideline: 604.6	N/A	\$0
	<i>The toilet paper dispenser exceeds the 9" max distance in front of the toilet.</i>		
	Relocate the toilet paper dispenser. Federal Guideline:	Medium	\$70
	<i>Grab bars exceed the 36" maximum height from floor level. (42"). Grab bars also do not meet the 42" nor the 36" minimum length requirement (both are 24").</i>		
	Replacement of the grab bars is included in item 16-4 above. Federal Guidelines: 604.5.1, 604.5.2	N/A	\$0
18-1	Rear Entrance Lobby		
	<i>There is a coat rack that protrudes more than 4" from the wall</i>		
	Relocate the coat rack outside the path of circulation. Federal Guideline:	Medium	\$70

18-2	Front Lobby		
	<i>There is no knee space provided underneath the work surface.</i>		
	One solution is to provide a new desk or table for public use that has the proper height and knee space. Federal Guideline: 902.4.1	Medium	\$300
	Facility Total:		\$38,970
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	200
Medium	\$	38,250
High	\$	520

Police Department/Council Chambers, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
1-1	<i>West parking lot with 33 spaces has no barrier-free parking. Total of 1 van-accessible and 1 barrier-free space is required.</i>		
	Restripe parking lot to include required spaces and 8' access aisle between them, with appropriate signage. Federal Guideline: 502	Medium	\$300
1-2	<i>East parking lot with 30 spaces has 2 barrier-free spaces but none have "van-accessible" signage required.</i>		
	Paint out the handicap sign on the pavement at the parallel parking space. Provide one "Van-Accessible" sign below one of the vertical signs. Federal Guideline: 502	Medium	\$150
4	Curb Ramp		
	<i>Photograph shows a curb ramp present in east lot that has excessive flare slopes and no landing.</i>		
	Reconstruct curb ramp. Federal Guideline: 406	High	\$2,700
8-1	Rear Entrance Doors		
	<i>Signage at both Exterior Entrances: No action required.</i>		
	There are no signs posted that tell people the entrance is accessible. When all entrances are accessible, the International Symbol of Accessibility is not required at each entrance. Federal Guideline: 216.6	N/A	\$0
	<i>Back Entrance - Council Door: The automatic closer on the front entrance does not achieve the 5 second minimum time limit for it to close. (2.92 seconds) The cost given is to replace the closer.</i>		
	Adjust or replace this door closer as required to achieve the proper swing time and force. Federal Guideline: 404.2.8.1	Medium	\$490
	<i>Glazing is below 10" from ground level.</i>		
	Note: Only the bottom 5" is a smooth kickplate. The requirement for alterations and new construction is for the bottom 10" of doors to be smooth on the push side. Federal Guideline: 404.2.10	High	\$110
	<i>Trash receptacle between doors blocks the clear width on the pull side of one door.</i>		
	Move trash receptacle. Federal Guideline: 404.2.4.1	High	\$0

8-2	Front Entrance		
	<i>The automatic closer on the front entrance does not achieve the 5 second minimum time limit for it to close.</i>		
	Adjust or replace this door closer as required to achieve the proper swing time and force. The cost given is to replace the closer. Federal Guideline: 404.2.8.1	Medium	\$490
	<i>Glazing is below 10" from ground level.</i>		
	Note: Only the bottom 5" is a smooth kickplate. The requirement for alterations and new construction is for the bottom 10" of doors to be smooth on the push side. Federal Guideline: 404.2.10	High	\$110
8-3	Interior Doors		
	<i>There are no signs signifying the use of each room.</i>		
	The ADA requires interior signs at doors for restrooms, enclosed stairs and some exit conditions. If there are signs at other interior doors, then they must comply with ADA guidelines. See item 16 for restroom. Federal Guideline: 216	N/A	\$0
	<i>Door has knobs which require tight grasping, pinching, or twisting of the wrist.</i>		
	Replace the lockset in this door. The new lockset shall have lever handles. Federal Guidelines: 404.2.7	Medium	\$300
9	Corridor/Aisle		
9-1	<i>The fire extinguisher is in the path of circulation.</i>		
	Fire extinguisher protrudes from the wall more than the 4" max. Relocate it out of the path of circulation. Federal Guidelines: 307	Low	\$70
16	Single-User Restroom		
	<i>Only 29" clear width exists at this door. (32" min.)</i>		
	Replace this door assembly with one that provides 32" minimum width clearance. Photo 165 Federal Guideline: 404.2.3	Medium	\$1,250
	<i>The automatic closer does not achieve the 5 second minimum time limit for it to close (2.45 seconds). The cost given is to replace the closer.</i>		
	Adjust or Replace the door closer. Federal Guideline: 404.2.8.1	Medium	\$490
	<i>The door lockset requires twisting.</i>		
	Replace the lockset with one that can be opened from the inside without twisting or grasping. Federal Guideline: 404.2.7	Medium	\$300
	<i>The faucet controls on the sink do not meet the requirements.</i>		
	Replace the faucet controls with lever handles. Federal Guideline: 606.4	Medium	\$430

	<i>The pipes underneath the sink are not insulated to protect from hot surfaces or sharp edges.</i>		
	Insulate the waste and hot water lines under the lavatory. Federal Guideline: 606.5	Medium	\$100
	<i>The paper towel dispenser exceeds the 48" maximum height limit. (52")</i>		
	Lower the paper towel dispenser so that the paper slot is no more than 48" above floor. Federal Guideline:	Medium	\$70
	<i>The bottom of the mirror's reflecting surface exceeds the 40" maximum height limit. (50")</i>		
	Lower the mirror so that the bottom of the reflecting surface is no more than 40" above floor. Remove shelf and block out over ceramic tile wainscot as required. Federal Guideline: 603.3	Medium	\$210
	<i>There may be inadequate clear space adjacent to the toilet for a wheelchair (based on photos). Trash can currently in the way also.</i>		
	Review options for providing clear space, which may entail reviewing sink placement. At a minimum, trash can needs to be moved. Federal Guideline:	N/A	\$0
	<i>The light switch is above the 48" maximum height limit. (51")</i>		
	One solution is to change the switch to an occupancy sensor. Federal Guideline: 205.1	Medium	\$210
	<i>The toilet seat is below the 17" minimum height requirement. (16")</i>		
	One solution is to replace the toilet seat with a thicker seat designed especially for this purpose. Federal Guideline: 604.4	Low	\$100
	<i>The grab bars do not achieve the length requirements. The side grab bar should be 42" long located at 12" off the back wall. The back grab bar should be 36" long located at 6" off the side wall. Both bars should be at 33" to 36" above the floor.</i>		
	Replace the grab bars. Federal Guidelines: 604.5	Medium	\$180
18	Police Lobby		
	<i>The work surface is above the 34" maximum height limit. (46")</i>		
	One solution is to provide a desk or table that does provide proper knee space and work surface height. Federal Guidelines: 226.1, 902.2	Medium	\$500
20	Assembly Area		
	<i>There is a permanent assistive listing system provided but no signage signifying same. ALDs are not required in rooms without fixed seating but highly encouraged.</i>		
	Provide a sign to alert public to the existing "assistive listening system" in this room and where receivers can be obtained. Federal Guideline: 216.10	Medium	\$100

34	Work Surface/Service Counter		
	A work surface is needed just outside the entrance to the Police Dept. Photo 159		
	Provide a work surface with top between 28 and 34" above floor. Federal Guideline: 902.3	Medium	\$2,850
	Facility Total:		\$11,210

General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.

Prioritization Summary

Low	\$	170
Medium	\$	8,420
High	\$	2,920

Animal Shelter, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
4	Walks		
4-1	<i>Gratings at bottom of walk to front door have openings greater than 1".</i>		
	Replace 2 sections of gratings with new gratings that will not permit passage of a sphere greater than 0.5 inches in diameter. Federal Guideline: 403.2, 302.3	High	\$500
8-1	Main Entrance		
	<i>The clear width of the door does not reach the minimum requirement of 32". (28") Also, there is a screen door hung at this entrance.</i>		
	Remove the screen door and the primary door assemblies. Replace only the primary door assembly; ADA does not allow 2 doors in series separated by less than 4'-0". Federal Guideline: 404.2.3	High	\$3,000
	Main Entrance: Replace the door lockset.		
	Note: This is included in item above. Federal Guideline: 404.2.7	N/A	\$0
18	Rooms		
	<i>A work surface for the public is needed but not provided. Current work surface has insufficient space under the work surface.</i>		
	One solution is to provide a desk or table with top from 28"-34" above floor and at least 27" high space below. Federal Guideline: 902.2	Medium	\$400
	Facility Total:		\$3,900

General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.

Prioritization Summary

Low	\$	-
Medium	\$	400
High	\$	3,500

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Water Company, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>Access aisle is "not clearly marked at this time".</i>		
	Provide painted lines for ADA-compliant parking space and access aisle. Provide a "van-accessible" sign and mount on wall. Federal Guideline: 502.3.3	High	\$200
8	Doors, Doorways, and Gates		
	<i>There are no signs on the doors.</i>		
	Provide an ADA-compliant sign beside the restroom door. Federal Guideline: 216.8	Medium	\$100
	<i>Glazing exists on the door within 10" of the bottom.</i>		
	Install kick plate and filler strip on push side of door to remove hazard. Federal Guideline: 404.2.10	High	\$110
18	Public Lobby		
	<i>The lobby does not provide adequate (60" diameter) turning space for a wheelchair.</i>		
	Investigate options to provide turning space. Will require widening a portion of the lobby to provide minimum 36"x60" T-shaped turning space. Federal Guideline: 304.3, 306	High	TBD
	<i>Service counter height is too high for wheelchair user to be able to utilize at 36" (28-34" required).</i>		
	Provide equal accommodation (clipboard) or lower service counter when removing protrusion. Federal Guideline: 307.2	High	\$100
	<i>Service counter protrudes into the pedestrian path.</i>		
	Modify counter or place cane-detectable objects below to remove hazard. Federal Guideline: 307.2	High	\$100
	Facility Total:		\$610

General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.

Prioritization Summary

Low	\$	-
Medium	\$	100
High	\$	510

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Girl Scout Cabin, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
4	Walks		
	<i>The width of the existing walkway is less than the 36" minimum requirement. The surface is not slip-resistant, firm and stable. The existing walking surface is not continuous without steps.</i>		
	Provide a new 36" (min.) wide walk and landing to the entry door. Federal Guideline: 302.1, 305.2, 403.2, 403.4, 403.5.1	High	\$910
8-1	Entrance Door		
	<i>There is only one entrance and that has a 2.5" step up to it.</i>		
	Remove the existing landing and provide a new landing at the door with top at the height of the interior floor, and level +/- 2%, with the maneuvering clearances required. Federal Guideline: 303.2	High	\$1,170
8-2	Restroom Door		
	<i>There is no sign for the restroom.</i>		
	Provide an ADA-compliant sign. Federal Guideline: 216.8	Medium	\$100
	<i>Is not operable with one hand with no tight grasping, pinching or twisting of the wrist.</i>		
	Provide a new lockset with lever handles. Federal Guideline: 404.2.7	Medium	\$300
16	Single-User Restroom		
	<i>There are no signs signifying the use of the area.</i>		
	Note: The solution is given above at item 8-2. Federal Guideline: 216.8	N/A	\$0
	<i>The door handle does not comply. The door does not lock without the use of twisting or grasping actions</i>		
	Note: The solution is given above at item 8-3. Federal Guideline: 404.2.7	N/A	\$0
	<i>The 22" width of the door does not meet the minimum clear requirement of 32".</i>		
	Replace this door assembly. Federal Guideline: 404.2.3	Medium	\$1,250
	<i>The 49" turning area does not meet the 60" minimum requirement.</i>		
	Enlarge the restroom as required to provide the proper turning area. Federal Guideline: 304.3.1	Medium	\$7,000
	<i>There is no room underneath the lavatory because of the vanity cabinet.</i>		
	The cost of lavatory replacement is included in item above. Federal Guideline: 606.2	N/A	\$0
	<i>Exposed pipes underneath the sink are not insulated to protect from hot surfaces and edges.</i>		
	The cost of this insulation is included in item above. Federal Guideline: 606.5	N/A	\$0
	<i>The bottom of the reflective surface of the mirror is at 44" above floor.</i>		

	Relocate the mirror down so that the reflective surface is no more than 40" above the floor. Federal Guideline: 603.3	Medium	\$70
	<i>Light switch is above the 48" maximum height above floor level. (50")</i>		
	One solution is to change the light switch to an occupancy sensor. Federal Guideline: 205.1	Medium	\$210
	<i>Top of toilet seat is below the minimum height requirement of 17". (16")</i>		
	Replace the toilet seat with a special thickness toilet seat designed for ADA compliance. Federal Guideline: 604.4	Medium	\$100
	<i>Toilet paper can not turn freely because it hits the side of the toilet seat.</i>		
	Relocate the toilet paper dispenser to new ADA-compliant location. Federal Guideline:	Medium	\$70
	<i>Provide grab bars at ADA-compliant locations beside and behind the toilet.</i>		
	The cost of the grab bars is included in item 16-4 above. Federal Guideline: 604.5	N/A	\$0
18	Lodge Room		
	<i>The light switches are above the 48" max height above floor level. (50")</i>		
	One solution is to change the light switch to an occupancy sensor. Federal Guideline: 205.1	Low	\$210
	<i>The electrical outlets are above the 48" max height above floor level. (50")</i>		
	Relocate one electrical outlet or provide a plug strip at least 15" above floor, but no more than 48" above floor. Federal Guideline: 308.1	Low	\$210
	Facility Total:		\$11,600

General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.

Prioritization Summary

Low	\$	420
Medium	\$	9,100
High	\$	2,080

Booker T. Washington Community Center, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>One barrier-free parking space provided. Is not signed as "van-accessible", has no painted access aisle adjacent to it, and vehicle is not prevented from overhanging space and blocking pedestrian access route.</i>		
	Note: Ensure that slopes and measurements are adequate. Provide painted access aisle on curb ramp side to prevent the vehicle from blocking the ramp. Consider addition of bumper block. Federal Guideline:	High	\$300
2	Curb Ramp		
	<i>The existing curb ramps (2) do not have a level landing. One at drop-off and one at parking.</i>		
	Note: Reconstruct both curb ramps and consider location that is most appropriate. Federal Guideline:	High	\$5,400
3	Passenger Loading Zone		
	<i>The access aisle and vehicle pull-up space has a 6" curb. Photo shows this to be a bus unloading zone.</i>		
	One solution is to provide a new passenger loading zone access aisle. Federal Guideline: Figure 503.3	N/A	Included above
4	Walk		
	<i>The surface level changes exceed 1/4". It is at 1/2" but has a slope exceeding 1:2.</i>		
	Replace the non-conforming curb ramp and landings. The cost of this work is included in item 4-1 above. Federal Guideline: 303	N/A	\$0
	<i>The accessible route to the ramp from the accessible parking is blocked by a bench.</i>		
	Move the bench. Federal Guideline: 403.5.1	N/A	\$0
5	Exterior Ramp		
	<i>The exterior ramp has no compliant handrails or edge protection.</i>		
	Install compliant handrail system with proper edge protection. Cost assumes that landings required are compliant size with handrail installation. Federal Guideline: 505	High	\$3,250

6	Exterior Stairway		
	<i>Handrail extends only 6" beyond the top of the stair instead of the 12" requirement. Accessible route is ramp at the side of the building.</i>		
	Replacement of this stair is not required as this building already has 1 accessible entrance. A sign directing persons to the accessible entrance is required. A similar sign is required at the accessible entrance. Cost is for 2 signs. Federal Guidelines: 101.2, 210.1 (Exception 2), 504, 505.10.3	Medium	\$200
7	Drinking Fountain		
	<i>Two spouts are required but only one drinking fountain is provided.</i>		
	Spout outlet should be 36" maximum above the floor (for wheelchair users) per 602.4 and from 38" to 43" above floor for standing persons per 602.7. The lowest cost solution is to provide a paper cup dispenser adjacent to the existing drinking fountain no higher than 48" above floor. The cost given is for the paper cup dispenser. Federal Guideline: 602.4 and 602.7	Medium	\$60
8-1	Men's Restroom Door		
	<i>The pictogram does not have the text descriptor (visual and tactile) located below the pictogram field. The existing sign is also mounted too high.</i>		
	Replace this sign. Federal Guideline: 703.6.1	Low	\$100
	<i>The accessible restrooms are not identified by signs with the International Symbol of Accessibility.</i>		
	Replace this sign. Federal Guideline: 216.8	N/A	Included above
8-2	Women's Restroom Door		
	<i>The pictogram does not have the text descriptor (visual and tactile) located below the pictogram field. The existing sign is also mounted too high - replace this sign.</i>		
	Replace this sign. Federal Guideline: 703.6.1	Low	\$100
	<i>The accessible restrooms are not identified by signs with the International Symbol of Accessibility.</i>		
	Replace this sign. Federal Guideline: 216.8	N/A	Included above
8-3	ICAP Office Door		
	<i>The doors have round knobs instead of levers.</i>		
	Replace the lockset on this door to achieve lever handle. Federal Guideline: 404.2.7	Medium	\$300
8-4	Front Entrance Door		
	<i>Non-Accessible Entrance: There is no sign directing traffic to the accessible entrance.</i>		
	See item 6 above. Federal Guideline: 216.6	N/A	Included above

	<i>Door closes too quickly.</i>		
	Adjust door closer. Cost is for new closer. Federal Guideline: 404.2.8.1	Medium	\$490
8-5	Side Entrance Door		
	<i>Threshold exceeds maximum height of 1/2". (2")</i>		
	Replace the landing outside the door to achieve 1/4 inch or less between interior floor level and exterior landing level. Replace the concrete ramp up to this landing. Federal Guideline: 404.2.5	High	\$8,100
	<i>There is no sign directing traffic to the accessible entrance.</i>		
	Provide a sign designating accessibility. Federal Guideline: 216.6	N/A	Included above
8-6	Head Start Door		
	<i>The clear width of this door is only 30" (32" minimum required). This is an historic door with glass transom so replacement is not taken lightly. If this is the only entrance into this room, can the function of this room be changed so that it does not house a unique program, activity, or service? Cost is to replace the door assembly.</i>		
	Replace this door assembly. Federal Guideline: 404.2.3	High	\$3,700
8-7	Conference Room North Door		
	<i>The clear width of this door is only 30" (32" minimum required).</i>		
	This is an historic door with glass transom so replacement is not taken lightly. If this is the only entrance into this room, is this the only Conference room in the building making it a unique program? Our recommendation is to name another room (any accessible room) as the conference room and move that activity to the secondary room when a wheelchair-user wants to participate. Cost is for two new signs. Federal Guideline: 404.2.3	Medium	\$200
9	Corridors		
	<i>Electric outlets are only 14" above floor level.</i>		
	Relocate at least 1 electrical outlet to 15" above floor in each corridor. Federal Guideline: 308.3	Low	\$210
	<i>The fire extinguisher at upper level protrudes more than 4" from the wall.</i>		
	Relocate the fire extinguisher out of the path of circulation. Federal Guideline: 307.2	Medium	\$70
10	Building level		
	<i>The Platform Lift does not have power-operated doors or gates. The existing are manually operated.</i>		
	No action is required. It is understood the Lift was in compliance with ASME A17.1 (Safety Code for Elevators and Escalators, Section XX, 1990) when it was installed. The requirement in 410.6 is for NEW facilities or alterations. Compliance is required if the lift is ever replaced. Federal Guideline: 410.6	N/A	\$0

	<i>Platform lift does not contain standby power in case of an emergency.</i>		
	No action is required. It is understood the Lift was in compliance with ASME A17.1 (Safety Code for Elevators and Escalators, Section XX, 1990) when it was installed. The requirement in 207.2 is for NEW facilities or alterations. Compliance is required if the lift is ever replaced. Federal Guideline: 207.2	N/A	\$0
11	Interior Stairs		
	<i>Inner handrails on stairway that switchback or dogleg are not continuous.</i>		
	No action is required. This is a requirement for NEW construction. In existing buildings and alterations, stairs between levels that are connected by an accessible route shall not be required to comply with 504, except that handrails complying with 505 shall be provided when the stairs are altered. Federal Guidelines: 210.1 and 505.3	N/A	\$0
	<i>Handrails with a continuous gripping surface are not provided on both sides of the stairs.</i>		
	No action is required. This is a requirement for NEW construction. In existing buildings and alterations, stairs between levels that are connected by an accessible route shall not be required to comply with 504, except that handrails complying with 505 shall be provided when the stairs are altered. Federal Guideline: 210.1 and 505.2	N/A	\$0
	<i>There are not signs indicating the floor level at each landing.</i>		
	No action is required. Signs are only required at exit stair doors by 216.4.1. This is an open stair per the photos. Federal Guideline: 216.4.1	N/A	\$0
15-1	Head Start Multiple-User Restrooms		
	<i>The sign on the doors is not compliant.</i>		
	Replace the sign. Federal Guideline: 216.8	Medium	\$100
	<i>The turning area is not 60" minimum size requirement. (43")</i>		
	This bathroom is considered a place where children are taught to use the toilet. Thus it is more important to have two toilets (for emergencies) than to have one big 5'x5' stall. One solution is to remove the vanity cabinet and change to one wall-hung lavatory, hung for a knee clearance of 24". The 60" diameter circle better serves this room's purpose out in front of the toilets where the teacher will be. The cost assumes only one lavatory to make more room for the turning circle. Federal Guideline: 606.2; See exception 4.	Medium	\$2,700
	<i>There is no space beneath the sink.</i>		
	See item above for solution to this problem. Federal Guideline: 305 and 306	N/A	\$0
	<i>The faucet controls are knobs.</i>		
	Replace the faucet to achieve lever controls. Federal Guideline: 606.4	N/A	\$0

	<i>Exposed pipes of the sink are not insulated to provide protection from hot surfaces and sharp edges.</i>		
	Insulate the waste and hot water lines of the new lavatory. The cost of this work is included in item above. Federal Guideline:	N/A	\$0
	<i>There are no doors on the stalls.</i>		
	No doors are required. It is understood that there are no doors so that the children can be assisted. Federal Guideline: 102, 103	N/A	\$0
	<i>The space in front of the stall does not reach the 42" minimum requirement.</i>		
	The work listed in item above will eliminate this problem. Federal Guideline: 102, 103	N/A	\$0
	<i>Toilet seat height is only 15" in lieu of the 17" required for adults.</i>		
	No action on the toilet seat height is required. Requirements for children are flexible. Federal Guideline: 102	N/A	\$0
	<i>The toilet paper dispenser location does not meet the requirements.</i>		
	Relocate the toilet paper dispenser on the accessible side. Federal Guideline: 604.7	Medium	\$70
	<i>There are no grab bars provided in the stalls.</i>		
	Provide new grab bars . This is included in item above. Federal Guideline: 604.5	N/A	\$0
	<i>The existing panel between the toilets may be mounted too low.</i>		
	Reinstall the side partition between toilet stalls so that the bottom of the panels is 9" minimum above floor. This is a low priority because dimensions for children's needs are typically less than the adult dimensions listed. Federal Guideline: 604.8.1.4	Low	\$200
16-1	Men's Single-User Restroom		
	<i>Provide a new sign. See item 8-1.</i>	N/A	See above
	Note: The signs on the doors do not meet requirements . Federal Guideline: 216.8		
	<i>The turning area is not to the 60" minimum size requirement.</i>		
	Renovate this room as required to create a 60" diameter turning space. Federal Guideline: 606.2	Medium	\$8,000
	<i>The space underneath the sink does not meet the height requirements.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 606.2	N/A	Included above
	<i>The faucet controls are knobs.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 606.4	N/A	Included above
	<i>The exposed pipes underneath the sink are not insulated.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 606.5	N/A	Included above

	<i>The towel dispenser and waste containers do not meet the 48" maximum height requirement. (53")</i>		
	This violation will be solved by the work in item above. Federal Guideline: 604.7	N/A	Included above
	<i>The toilet does not have a 60" wide space of its own.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 604.3.1	N/A	Included above
	<i>Toilet seat height does not reach the height requirement.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 604.4	N/A	Included above
	<i>The flush controls of the toilet do not meet requirements.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 604.6	N/A	Included above
	<i>There are no grab bars provided.</i>		
	Provide grab bars beside and behind the toilet. Federal Guideline: 604.5	N/A	Included above
	<i>The toilet paper dispenser is not in the proper location.</i>		
	This violation will be solved by the work in item above. Federal Guideline: 604.7	N/A	Included above
16-2	Women's Single-User Restroom		
	<i>The existing sign is not compliant.</i>		
	Cost of the new sign is in Item 8-2. Federal Guideline: 216.8	N/A	\$0
	<i>The restroom door has a knob instead of a lever lockset. The existing lockset requires twisting and grasping to open from the inside.</i>		
	Replace the door's lockset. Federal Guideline: 404.2.7	Medium	\$300
	<i>The lavatory faucet has round knobs.</i>		
	Replace the faucet with lever controls. Federal Guideline: 606.4	Medium	\$430
	<i>The toilet does not have a 60" wide space of its own.</i>		
	Provide a 60" wide space for the toilet. The problem is the short wall beside the toilet supporting the lavatory countertop. Remove the short wall and countertop and substitute a wall-hung lavatory. Federal Guideline: 604.3.1	Medium	\$3,000
	<i>The toilet paper dispenser is not in the proper location.</i>		
	Provide a new floor-supported toilet paper dispenser. Federal Guideline: 604.7	Medium	\$150
	<i>The existing grab bar does not extend to 54" from the rear wall.</i>		
	Relocate the side grab bar. Federal Guideline: 604.5	Medium	\$70
	<i>The existing back grab bar is only 32" long; 36" is the minimum.</i>		
	Replace the back grab bar. Federal Guideline: 604.5	Medium	\$140

18-1	ICAP Room		
	<i>Switches do not meet requirements.</i>		
	Replace the light switches with occupancy sensors or relocate the light switches. Federal Guideline: 205.1	Low	\$210
	<i>Electrical outlets do not meet requirements.</i>		
	Relocate one electrical outlet or provide a plug strip at least 15" above floor. Cost is to relocate the outlet. Federal Guideline: 205.1	Low	\$210
	<i>Built-in work spaces do not provide proper knee space.</i>		
	If the desk is for the use of the public instead of an employee, then it should be accessible. Replace it if it does not have a knee space of 30" wide x 27" high X 9" deep (min. - 25" max.) Federal Guideline: 226, 902	Medium	\$500
18-2	Head Start Room		
	<i>Built-in work spaces do not provide knee space of required dimensions. Work surfaces used primarily by children 5 years and younger shall not be required to comply with 902.4 where a clear floor or ground space complying with 305 for a parallel approach is provided.</i>		
	Knee space under the work surface is not an issue if children are 5 years and younger. Federal Guideline: 305, 902.4	N/A	\$0
18-3	Kitchen		
	<i>The work surfaces in the Kitchen are at 36" above floor. Work surfaces should be between 28" min and 34" maximum.</i>		
	One solution is to lower this entire countertop 2" by modifying each of the base cabinets. Federal Guideline: 902.3	Medium	\$1,100
	<i>The cabinet hardware is not operable without twisting or grasping.</i>		
	One solution is to provide pull type hardware that is accessible for each of the base cabinet doors and drawers. Federal Guideline: 309.4	Low	\$230
	<i>The fire extinguisher protrudes more than 4" from the wall.</i>		
	Relocate the fire extinguisher Federal Guideline: 307.2	Low	\$70
25	Play Equipment Areas		
	<i>There is no accessible travel path into the play area. The accessible route adjacent to play equipment must be firm, resilient safety surfacing that meets CPSC safety requirements.</i>		
	Provide an accessible travel path into the play area. Cost is for engineered wood fiber path to swings and play structure and around each. Federal Guideline: 1008.2	High	\$15,000

	<i>There is no accessible route of travel from the entry to each different play activity. Clear width at ground level of accessible routes connecting play components is 60" minimum.</i>		
	Provide a 60" wide accessible route of travel from the entry to each different play activity. Federal Guideline: 1008.2; 1008.2.4.1	High	Included above
	<i>Where elevated play components are provided, at least 50% must be on a 36" wide accessible route.</i>		
	Provide a 36" wide accessible route to 50% of the elevated play components. Federal Guideline: 1008.2.4.2	High	Included above
	<i>There is no transfer platform provided to allow access to elevated areas within the play area.</i>		
	Provide a transfer platform with transfer steps and supports to the elevated play area. Cost is estimated for new ladder that can be purchased/constructed that is compliant. May require installation of new play structure (cost does not include new structure). Federal Guideline: 1008.3.1, 1008.4.4	High	\$1,500
	<i>The minimum clear level area is not provided around all play components.</i>		
	Provide minimum clear level area around all play components. Federal Guideline: 1008.4.2	High	Included above
	Facility Total:		\$56,460
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	1,330
Medium	\$	17,880
High	\$	37,250

Appendix B

City of Rushville Park Facility Costs and Priority

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APPENDIX B

City of Rushville - ADA SELF EVALUATION STUDY AND TRANSITION PLAN					
Site #	Facility Name	Low Priority	Medium Priority	High Priority	Total Site Cost
1	Waggoner Community Pool - Rushville, IN 46173	\$1,400	\$29,550	\$8,000	\$38,950
2	Riverside Park - W. Water St., Rushville, IN 46173	\$1,890	\$8,400	\$6,500	\$16,790
3	Wilkie Park - N. Main St., Rushville, IN, 46173	\$0	\$0	\$2,500	\$2,500
4	Community Park - N. Ft. Wayne Rd., Rushville, IN 46173	\$0	\$8,870	\$14,680	\$23,550
5	Laughlin Park - N. Spencer St., Rushville, IN 46173	\$0	\$24,340	\$15,350	\$39,690
6	South Memorial Park - N. Sexton St., Rushville, IN 46173	\$0	\$18,030	\$7,850	\$25,880
7	North Memorial Park - W. 15th St., Rushville, IN 46173	\$350	\$16,730	\$8,770	\$25,850
TOTALS		\$3,640	\$105,920	\$63,650	\$173,210

NOTE: The costs included are based on review of information collected by City staff and included on evaluation forms. Costs developed are based on this information, review of photographs provided by the City, and clarifications of condition provided by City staff. Actual costs may not be reflected based on a number of factors and several items could not have corrective actions priced due to lack of more detailed investigation that is outside the scope of an ADA evaluation. Items such as review for compliance with other relevant codes, structural analysis, etc. may significantly alter the actual cost of corrective actions.

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Waggoner Community Pool, Park Road, Rushville, Indiana			
Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>There are 2 van-accessible parking spaces for 58 total parking spaces (2 accessible and 1 van are required).</i>		
	Provide one additional accessible parking space. Federal Guideline: Table 208.2	Medium	\$420
	<i>The accessible parking spaces share an access aisle but travel behind other parked cars is required.</i>		
	It is acceptable, but not preferable, that the accessible route not pass behind parked vehicles. Federal Guideline: 502.3	N/A	\$0
	<i>Cars and vans when parked may have over-hanging bumpers that reduce the clear width of the accessible route to less than 36".</i>		
	One solution is to provide wheel stops to control (at two spaces). Federal Guidelines: 502.7	Medium	\$150
15-1	Men's Restroom		
	<i>There are no signs to indicate the use of the rooms.</i>		
	Provide an ADA-compliant sign at the restroom. Federal Guideline: 216.6	Medium	\$100
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The accessible toilet stall does not have an out-swinging door.</i>		
	An in-swinging door at the accessible stall is acceptable if the door does not swing into the required fixture space of the toilet (60" wide x 59" deep). Federal Guideline: Figure 604.8.1.1(b), 604.8.1.2	N/A	\$0
	<i>The toilet in the accessible stall is only 14" from the side wall (16" -18" acceptable).</i>		
	Relocate the toilet. Federal Guideline: 604.2	Low	\$1,300
	<i>The toilet seat with top at 20" above floor, exceeds the max. height limit of 19".</i>		
	Replace the toilet seat with a lower profile design. Federal Guideline: 604.4	Low	\$50
	<i>The toilet paper dispenser is only 1" in front of the toilet (7"-9" to the centerline is required).</i>		
	Relocate the toilet paper dispenser to the ADA-compliant location. Federal Guideline: 604.7	Medium	\$70
	<i>The rear grab bar has been removed and is on the floor of the stall. Maintenance is needed.</i>		
	Reinstall the grab bar. Federal Guideline: 604.5.2	Medium	\$70

	<i>The side grab bar is mounted at 37" above floor (33"-36" is acceptable).</i>		
	Remove and reinstall the grab bar. Federal Guideline: 604.5.1	Medium	\$70
	<i>There is no ambulatory stall provided although there are more than six urinals and toilets in both restrooms.</i>		
	Modify a typical toilet stall to meet the requirements of an "Ambulatory Accessible Compartment. Replace the stall door with one providing 32" minimum clear width and provide a 42" long grab bar on each side wall. Verify the stall depth to be 60" minimum. Federal Guideline: 213.3.1	Medium	\$3,730
15-2	Women's Restroom		
	<i>There are no signs to indicate the use of the rooms.</i>		
	Provide an ADA-compliant sign at the restroom. Federal Guideline: 216.6	Medium	\$100
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The accessible toilet stall does not have an out-swinging door.</i>		
	An in-swinging door at the accessible stall is acceptable if the door does not swing into the required fixture space of the toilet (60" wide x 59" deep). Federal Guideline: Figure 604.8.1.1(b), 604.8.1.2	N/A	\$0
	<i>The toilet seat with top at 20" above floor, exceeds the max. height limit of 19".</i>		
	Replace the toilet seat with a lower profile design. Federal Guideline: 604.4	Low	\$50
	<i>The toilet paper dispenser is only 2" in front of the toilet (7"-9" to the centerline is required).</i>		
	Relocate the toilet paper dispenser to the ADA-compliant location. Federal Guideline: 604.7	Medium	\$70
	<i>Accessible stall: Both grab bars are mounted at 37" above floor (33"-36" is acceptable). The side bar is also mounted too close to the back wall. A 42" long bar like this one should have the back of the bar at 12" from the rear wall.</i>		
	Remove and reinstall both grab bars. Federal Guideline: 604.5.1	Medium	\$140
	<i>There is no ambulatory stall provided although there are more than six fixtures.</i>		
	Modify a typical toilet stall to meet the requirements of an "Ambulatory Accessible Compartment. Replace the stall door with one providing 32" minimum clear width and provide a 42" long grab bar on each side wall. Verify the stall depth to be 60" minimum. Federal Guideline: 213.3.1	Medium	\$3,730

17-1	Women's Shower		
	<i>There is no shower fitted with special access equipment.</i>		
	This shower room appears most suitable for a 30"x60" roll-in shower. A new 30" long concrete masonry unit wall is needed from floor up to 6'-8" above floor. Provide a seat or a grab bar on one short wall and grab bars on each of the other two walls. Provide controls and shower spray unit to comply with 309.4. Remove existing shower head and controls. Confirm that a second existing shower head and set of controls will have to be removed to allow space for this shower. Confirm existing shower room is at least 66" wide. Federal Guidelines: 608.2.2, 608.3.2	Medium	\$2,300
	<i>There is not a removable showerhead with a flexible hose.</i>		
	Included in item above. Federal Guideline: 608.5	N/A	Included above
	<i>There is no fixed/folding seat provided in the showers.</i>		
	A less expensive grab bar can be substituted for the seat in roll-in type shower compartments. The cost of the grab bar is included above. Federal Guideline: Figure 608.3.2	N/A	Included above
	<i>There are no grab bars provided.</i>		
	Grab bars are included in item above. Federal Guidelines: 608.5.2	N/A	Included above
17-2	Men's Shower		
	<i>There is no shower fitted with special access equipment.</i>		
	This shower room appears most suitable for a 30"x60" roll-in shower per Figure 608.2.2. A new 30" long concrete masonry unit wall is needed from floor up to 6'-8" above floor. Provide a seat or a grab bar on one short wall and grab bars on each of the other two walls. Provide controls and shower spray unit to comply with 309.4. Remove existing shower head and controls. Confirm that a second existing shower head and set of controls will have to be removed to allow space for this shower. Confirm existing shower room is at least 66" wide. Federal Guidelines: 608.2.2, 608.3.2	Medium	\$2,300
	<i>There is not a removable showerhead with a flexible hose.</i>		
	Included in item above. Federal Guideline: 608.5	N/A	\$0 Included above
	<i>There is no fixed/folding seat provided in the showers.</i>		
	A less expensive grab bar can be substituted for the seat in roll-in type shower compartments. The cost of the grab bar is included in item above. Federal Guideline: Figure 608.3.2	N/A	Included above
	<i>There are no grab bars provided.</i>		
	Grab bars are included in item above. Federal Guidelines: 608.5.2	N/A	Included above

19-1	Women's Locker Room		
	<i>The fixed bench does not reach the 20" width requirement (9").</i>		
	Install new bench that meets dimensional requirements of 17-19" above the floor, 42" long, 20-24" deep seat mounted to a wall or with back support that is minimum 42" long. Federal Guideline: 903.4	Medium	\$500
	<i>There is no clear 30"x48" floor space at the end of the bench seat that has one full side adjoining an accessible route.</i>		
	Ensure new bench is installed in location with required clear space. Federal Guideline: 305	N/A	\$0
19-2	Men's Locker Room		
	<i>The fixed bench does not reach the 20" width requirement. (9")</i>		
	Install new bench that meets dimensional requirements of 17-19" above the floor, 42" long, 20-24" deep seat mounted to a wall or with back support that is minimum 42" long. Federal Guideline: 903.4	Medium	\$500
	<i>There is no clear 30"x48" floor space at the end of the bench seat that has one full side adjoining an accessible route.</i>		
	Ensure new bench is installed in location with required clear space. Federal Guideline: 305	N/A	\$0
22	Site Furniture		
	<i>There is only one picnic table that is accessible.</i>		
	5% of the seating spaces at dining surfaces should be accessible. If the capacity of each table is 6 seats, then 2 wheelchair spaces are required. Provide one additional accessible table. Federal Guideline: 226.1	Medium	\$2,200
23	Swimming Pool		
	<i>There is only one accessible entry into the pool. A second entry is required as the Pool has over 300 lineal feet of Pool wall.</i>		
	Provide a permanent lift for entry into the pool. Federal Guideline: 242.2	High	\$8,000
	<i>There are no handrails on the sloped entry into the pool.</i>		
	Provide two handrails at 33"-38" apart. Federal Guideline: 1009.3.3	Medium	\$6,450
	<i>Sloped entry extends to water that exceeds 30" depth and the water slide chute protrudes into ramp at the north wall.</i>		
	Provide landing at the bottom of the ramp along the south wall that is at 24-30" water depth (along with handrails noted above). Federal Guideline: 1009.3.2	Medium	\$6,450
	Facility Total:		\$38,950
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	1,400
Medium	\$	29,550
High	\$	8,000

Riverside Park Walking Trail, Water Street, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>All parking provided is gravel surface that is firm but is not stable. No permanent barrier-free spaces are provided.</i>		
	Provide firm surface, permanent, marked barrier-free parking in a number and configuration that meets the requirements based on total number of parking spaces for each lot. Assumed that 1 van and 1 barrier-free space required with shared access aisle in each lot. Federal Guidelines: 208, 502	High	\$12,000
15-1	Men's Restrooms		
	<i>There are no signs to signify the use of the area.</i>		
	Provide an ADA-compliant sign. Federal Guideline: 216.8	Medium	\$100
	<i>The exposed pipes are not covered to protect from hot surfaces and sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The mirror is above the 40" maximum height limit (57").</i>		
	Relocate the mirror so that the bottom of the reflecting surface is no more than 40" above floor. Federal Guideline: 603.3	Medium	\$140
	<i>The accessible urinal is too high at 24" (17" max. to lip) and less than the 13-1/2" minimum requirement of protrusion from the wall.</i>		
	One solution is to relocate this urinal down and use shims to hold it away from the wall. Federal Guideline: 605.2	Medium	\$1,500
	<i>The flush controls for the urinals are above the 48" maximum height limit above the floor level (54").</i>		
	Rework the plumbing piping above the urinal as required to relocate the flush valve down to ADA-compliant height. Federal Guideline: 308, 309, 605.4	Medium	\$420
	<i>Stall doors are not self-closing.</i>		
	Replace (or adjust if possible) the hinges on the stall door as required. Federal Guideline: 604.8.1.2	Low	\$100
	<i>The accessible toilet is too far from the sidewall at 20" (16" to 18" allowed).</i>		
	Relocate the toilet to the proper location. Federal Guideline: 604.2	Low	\$1,300
	<i>The toilet paper dispenser is only 6" in front of the toilet. The centerline of this unit should be at 7"-9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to the proper location. Federal Guideline: 604.7	Low	\$70

	<i>The side grab bar is only 36" long (42" min.).</i>		
	Replace the side grab bar with a 42" (min.) long grab bar. Federal Guideline: 604.5.1	Low	\$100
	<i>The coat hooks are above the maximum height limit of 48" (58").</i>		
	One solution is to provide an additional coat hook at 48" or less above floor. Federal Guideline: 603.4	Medium	\$50
15-2	Women's Restrooms		
	<i>There are no signs to signify the use of the area.</i>		
	<i>Provide an ADA-compliant sign.</i> Federal Guideline: 216.8	Medium	\$100
	<i>Flush control is on the wrong side above the porcelain toilet. (It needs to be on the wide side of the toilet).</i>		
	Relocate the flush control to the wide side. Federal Guideline: 604.6	Medium	\$210
	<i>The waste and hot water supply lines below the lavatories are not insulated.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The bottom of the reflective surface of the mirror is too high at 48" above floor (40" max.).</i>		
	Lower the mirror to the ADA-compliant height. Federal Guideline: 603.3	Medium	\$140
	<i>The accessible stall door does not have handles on both sides, is not self-closing, and does not latch.</i>		
	Correct the problems with the stall door. Federal Guideline: 604.8.1.2	Low	\$150
	<i>The accessible stall width is only 56". The minimum width allowed is 60".</i>		
	<i>One solution is to move the side wall over 4". If this makes the adjacent stall unusable, then that toilet will have to be moved.</i> Federal Guideline: 604.2	Medium	\$1,510
	<i>The toilet paper dispenser is only 5" in front of the toilet. The centerline of this unit should be at 7"-9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to the proper location. Federal Guideline: 604.7	Low	\$70
	<i>The side grab bar is only 36" long (42" min.).</i>		
	Replace the side grab bar with a 42" (min.) long grab bar. Federal Guideline: 604.5.1	Low	\$100
	<i>The coat hooks are above the maximum height limit of 48" (50"+).</i>		
	Provide an additional coat hook at 48" or less above floor. Federal Guideline: 603.4	Medium	\$50

	<i>The ambulatory stall is too wide at 54" (36" is max.).</i>		
	One solution is to provide an additional side partition wall to create a stall of the proper width. Federal Guidelines: 604.8.2.1	Medium	\$500
	<i>The ambulatory stall door is too narrow at 24" (32" is min. clear)</i>		
	Provide a new out-swinging stall door with handles both sides and decrease width of the adjacent front panel to accommodate. Federal Guideline: 404	Medium	\$1,000
	<i>The ambulatory stall has no grab bars.</i>		
	Provide grab bars for the ambulatory stall. Federal Guideline: 604.8.2.3	Medium	\$180
22	Site Furniture		
	<i>There is no accessible path to the covered picnic area.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Assume 200 lf total sidewalk needed. Federal Guideline: 206.2.2	High	\$6,000
	<i>The Picnic Table has insufficient knee space.</i>		
	Provide at least one accessible Picnic Table. Federal Guideline: 306.3.3	Medium	\$2,200
	<i>There is no path leading to the grill/fire pit.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
	<i>There is no accessible clear, level space (30" x 48" min.) centered on the work surface of the grill.</i>		
	Provide an accessible clear, level space (30" x 48" min.) centered on the work surface of the grille. Federal Guidelines: 1011.2	Medium	\$100
33	Trails		
33-1	<i>Trail signs do not provide the proper information.</i>		
	Provide trail signs that give information about the trail or trail segment relevant to persons with any physical limitations. Assume 5 total signs needed. Federal Guidelines: 1017.11	High	\$500
	Facility Total:		\$16,790

General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.

Prioritization Summary

Low	\$	1,890
Medium	\$	8,400
High	\$	6,500

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Wilkie Park, Main Street, Rushville, Indiana			
Item #	Description	Priority	Estimated Cost
22	Site Furniture		
	<i>There is no ramp to allow access to the seating area. There are two 8" steps.</i>		
	Provide an accessible ramp with handrails both sides per ADA Guideline 405. Another solution might be to lower this raised seating area down to grade level. Federal Guideline: 405	High	\$2,500
	Facility Total:		\$2,500
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	-
Medium	\$	-
High	\$	2,500

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Community Park, Ft. Wayne Road, Rushville, Indiana			
Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>Paved parking area has no barrier-free spaces identified.</i>		
	Stripe and place signage for 1 van-accessible space. Federal Guidelines: 208, 502	High	\$150
4	Walk		
	<i>No accessible route is provided from parking to any site features.</i>		
	Install compliant walks to all site amenities. Assumed that 300 lf is required. Federal Guidelines: 206, 403	High	\$9,000
8-1	Women's Restroom Door		
	<i>There is no sign at this entrance.</i>		
	Provide an ADA-compliant sign at the ADA required location. Federal Guideline: 216.8	Medium	\$100
	<i>There is no accessible route to this entrance.</i>		
	Provide a 36" wide accessible path up to the landing for this door. Federal Guideline: 206.2.2	High	Included above
	<i>There is an existing ramp from the existing lawn into the door that is not compliant.</i>		
	Remove the ramp outside this door and provide an exterior concrete landing with size as required for maneuvering clearances. Federal Guideline: 206.2.2	High	\$900
8-2	Men's Restroom Door		
	<i>There is no sign at this entrance.</i>		
	Provide an ADA-compliant sign at the ADA required location. Federal Guideline: 216.8	Medium	\$100
	<i>There is no accessible route to this entrance.</i>		
	Provide a 36" wide accessible path up to the landing for this door. Federal Guideline: 206.2.2	High	Included above
	<i>Restroom Building - Men's Side: There is no accessible route to this entrance.</i>		
	Remove the ramp outside this door and provide an exterior concrete landing with size as required for maneuvering clearances. Federal Guideline: 206.2.2	High	\$900
15-1	Men's Restroom		
	<i>There is no sign.</i>		
	See Item 8-2 above. Federal Guideline: 216.8	N/A	Included above
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100

	<i>The urinal has the top of the lip at 22" above floor (17" max.).</i>		
	Compliance is not required if only one urinal is present. Federal Guideline: 605.2	N/A	\$0
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. Federal Guideline: 604.3.1	High	\$3,730
	<i>There is no toilet paper dispenser.</i>		
	Provide a toilet paper dispenser with center at 7 to 9" in front of the toilet at from 15" to 48" above the floor. Federal Guideline: 604.7	Medium	\$100
	<i>There is no rear grab bar and the side grab bars are too short at 31" (42" min.).</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Please confirm. Federal Guideline: 604.8.1.4	N/A	\$0
	<i>The flush controls are not compliant with the requirements.</i>		
	Rework the exposed plumbing as required to set the flush valve control to the wide side of the toilet. Federal Guidelines: 604.6	Medium	\$210
15-2	Women's Restroom		
	<i>There is no sign.</i>		
	See Item 8-1 above. Federal Guideline: 216.8	N/A	Included above
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. Federal Guideline: 604.3.1	Medium	\$3,730
	<i>The toilet paper dispenser is only 2" in front of the toilet. (7" to 9" required)</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70

	<i>There is no rear grab bar and the side grab bars are too short at 32" (42" min.).</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Please confirm. Federal Guideline: 604.8.1.4	N/A	\$0
	<i>Women's Restroom: The flush controls are not compliant with the requirements.</i>		
	Rework the exposed metal plumbing as required to set the flush valve control to the wide side of the porcelain toilet. Federal Guidelines: 604.6	Medium	\$210
22	Site Furniture		
	<i>There is no accessible path to the covered picnic area.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
	<i>The Picnic Table has insufficient knee space (6" instead of the required 8" at 27" above grade).</i>		
	Provide at least one accessible Picnic Table. Federal Guideline: 306.3.3	Medium	\$2,200
	<i>There is no path leading to the grill/fire pit.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
24	Games and Sports Area		
	<i>There is no accessible path to the basketball court.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
25	Play Equipment Area		
	<i>There is no accessible path provided to the play equipment. Ground surfaces on accessible routes serving Play Areas must comply with ASTM F 1951. Ground surfaces in use zones must comply with ASTM F 1292.</i>		
	Provide a 60" wide accessible route (60" wide because this area is larger than 1000 square feet) to at least one of each kind of ground-level play component. Federal Guideline. 206.2.2, 1008.2	High	Included above

	<i>None of the elevated play components are on a accessible route.</i>		
	At least 50% of the elevated play components must be on an accessible route. Provide a 36" wide accessible route to these components. Federal Guideline: 240.2.2, 1008.2.4.2	Medium	Included above
	<i>There are no compliant transfer platforms at the Elevated Play Components.</i>		
	Provide a transfer platform and transfer steps as a means to move from transfer platform to levels with elevated play components at 50% of the Elevated Play Components. Federal Guidelines: 240.2.2, 1008.3	Medium	\$1,500
	<i>There is no accessible 60" diameter turning space provided on the same level as the play components at the swings.</i>		
	Provide an accessible 60" diameter turning space on the same level as the play component at one swing. Federal Guideline: 1008.4	Medium	Included above
	<i>There is no accessible 30"x48" minimum clear space provided on the same level as the play components at every accessible component.</i>		
	This requirement will be achieved with the addition of the accessible routes to the accessible components. Federal Guideline: 1008.4.2	N/A	Included above
	<i>Where play components require transfer to entry points or seats (i.e.: swings) the entry points or seats shall be 11" min. and 24" max. from the clear floor or ground. (currently 32")</i>		
	Lower at least one of the swing seats so that it is no more than 24" above ground. Federal Guideline: 1008.4.4	Medium	\$90
	Facility Total:		\$23,550
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	-
Medium	\$	8,870
High	\$	14,680

North Memorial Park, W. 15th Street, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
1	Parking		
	<i>There is only one accessible parking space and it does not have the vertical signage. Also, the aisle is not clearly marked to discourage parking in the aisle.</i>		
	Recommend providing sign (not required since only 3 total parking spaces) and paint striping for the accessible parking space and adjacent aisle. Federal Guideline: 502.3.3, 502.6	High	\$370
	<i>The accessible route from the parking space requires travel behind other parked cars.</i>		
	It is recommended (but not required) to provide marked crossings to enhance pedestrian safety when crossing vehicle traffic lanes. Federal Guideline: 502.3	Low	\$150
8-1	Men's Restroom Door		
	<i>The sign is not ADA-compliant.</i>		
	Provide an ADA-compliant sign at the ADA required location. Federal Guideline: 216.8	Low	\$100
	<i>The landing outside the entrance is 2" below the interior floor level.</i>		
	Remove and replace the concrete landing. Remove and replace the accessible route up to the landing for the length required to rise 2" at a max. slope of 1 in 20. (5%) Federal Guidelines: 302.4	High	\$1,200
	<i>The door closer has a sweep time of less than 5 seconds (3 actual).</i>		
	Adjust or replace this door closer (cost is to replace). Federal Guideline: 404.2.8.1	Medium	\$490
8-2	Women's Restroom Door		
	<i>The sign is not ADA-compliant.</i>		
	Provide an ADA-compliant sign at the ADA required location. Federal Guideline: 216.8	Low	\$100
	<i>The landing outside the entrance is 3" below the interior floor level.</i>		
	Remove and replace the concrete landing. Remove and replace the accessible route up to the landing for the length required to rise 3" at a max. slope of 1 in 20 (5%). Federal Guidelines: 302.4	High	\$1,200
	<i>The door closer has a sweep time of less than 5 seconds (<3 actual).</i>		
	Adjust or replace this door closer (cost is to replace). Federal Guideline: 404.2.8.1	Medium	\$490
15-1	Men's Restrooms		
	<i>The sign is not ADA-compliant.</i>		
	See item above. Federal Guidelines: 216, 703	N/A	Included above
	<i>The lavatory exceeds the height limit of 34" (35").</i>		
	Relocate the lavatory down to ADA-compliant height. See item below for cost and priority. Federal Guideline: 606.3	N/A	Included below

	<i>There is insufficient clear space below the lavatory.</i>		
	Provide a 30" wide x 27" high clear space below the lavatory by remounting the lavatory on proper support hanger. Federal Guidelines: 606.2, 306.3.1	Medium	\$950
	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The urinal has the top of the lip at 25" above floor. (17" max.).</i>		
	Compliance is not required since there is only 1 urinal. Federal Guideline: 605.2	N/A	\$0
	<i>The flush control for the urinal exceeds the 48" maximum height limit.</i>		
	Compliance is not required since there is only 1 urinal. Federal Guidelines: 308, 309, 605.4	N/A	\$0
	<i>The stall door does not meet the requirements.</i>		
	At least one accessible stall is required. One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. This will enable the installation of an accessible stall door. Federal Guideline: 604.8.1.2	Medium	\$3,730
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	Included in item above. Federal Guideline: 604.3.1	N/A	Included above
	<i>The toilet paper dispenser is not mounted 7" to 9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There is no rear grab bar and the side grab bar is too short at 24" (42" min.).</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Federal Guideline: 604.8.1.4	N/A	Included above
	<i>The mirror exceeds the 40" maximum height limit (58").</i>		
	Relocate the mirror to ADA-compliant height. Federal Guidelines: 603.3	Medium	\$140
15-2	Women's Restrooms		
	<i>The sign is not ADA-compliant.</i>		
	See item above Federal Guidelines: 216, 703	N/A	Included above

	<i>The lavatory exceeds the height limit of 34" (35").</i>		
	Relocate the lavatory down to ADA-compliant height. See item below for cost and priority. Federal Guideline: 606.3	N/A	Included below
	<i>There is insufficient clear space below the lavatory.</i>		
	Provide a 30" wide x 27" high clear space below the lavatory by remounting the lavatory on proper support hanger. Federal Guidelines: 606.2, 306.3.1	Medium	\$950
	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The mirror is above the 40" maximum height limit above the floor (58").</i>		
	Relocate the mirror down to ADA-compliant height. Federal Guideline: 603.3	Medium	\$70
	<i>The stall doors do not meet the requirements.</i>		
	At least one accessible stall is required. One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. This will enable the installation of an accessible stall door. Federal Guideline: 604.8.1.2	Medium	\$3,730
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	Included in item above. Federal Guideline: 604.3.1	N/A	Included above
	<i>The toilet paper dispenser is not mounted 7" to 9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There is no rear grab bar and the side grab bar is too short at 32". (42" min.)</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Federal Guideline: 604.8.1.4	N/A	\$0

21	Baseball Field Bleachers		
	<i>There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$500
	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
	<i>There is no wheelchair parking space provided in the player seating area.</i>		
	Provide at least one wheelchair parking space in the team or player seating area. Provide an accessible route to same. Federal Guideline: 221.2.1.4	Medium	\$250
22	Site Furniture		
	<i>There is no accessible route to any of the site furniture.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	\$2,500
	<i>The Picnic Table has its surface at 26" high (28" min. - 34" max.).</i>		
	Provide at least one accessible Picnic Table. Federal Guideline: 902.3	Medium	\$2,200
	<i>There is no accessible route to the grill to allow access.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
	<i>There is no accessible clear, level space (30" x 48" min.) centered on the work surface of the grille. (Grass)</i>		
	Provide an accessible clear, level space (30" x 48" min.) centered on the work surface of the grille. Federal Guidelines: 1011.2	Medium	Included above
24	Baseball Field		
	<i>There is no accessible route to the seating at the baseball field.</i>		
	This is included in item above. Federal Guidelines: 403.2, 302.1	N/A	Included above
25	Play Equipment Area		
	<i>There is no accessible route provided to the play equipment. Ground surfaces on accessible routes serving Play Areas must comply with ASTM F 1951. Ground surfaces in use zones must comply with ASTM F 1292.</i>		
	Provide a 60" wide accessible route (60" wide because this area is larger than 1000 square feet) to at least one of each kind of ground-level play component. Federal Guideline. 206.2.2, 1008.2	High	\$2,500

	<i>None of the elevated play components are on a accessible route.</i>		
	At least 50% of the elevated play components must be on an accessible route. Provide a 36" wide accessible route to these components. Federal Guideline: 240.2.2, 1008.2.4.2	High	Included above
	<i>There are no transfer platforms at the Elevated Play Components.</i>		
	Provide a transfer platform and transfer steps as a means to move from transfer platform to levels with elevated play components at least 50% of the Elevated Play Components. Federal Guidelines: 240.2.2, 1008.3	Medium	\$1,500
	<i>There is no accessible 60" diameter turning space provided on the same level as the play components at the swings.</i>		
	Provide an accessible 60" diameter turning space on the same level as the play component at least one swing. Federal Guideline: 1008.4	Medium	Included above
	<i>Where play components require transfer to entry points or seats (i.e., swings) the entry points or seats shall be 11" min. and 24" max. from the clear floor or ground.</i>		
	Lower at least one of the swing seats so that it is no more than 24" above ground. Federal Guideline: 1008.4.4	Medium	\$70
33	Trails		
	<i>Obstacles on the trails exceed 2" in height. (3" curb)</i>		
	Provide smooth transitions. Federal Guideline: 1017.5	Medium	\$600
	<i>Trail signs do not provide the proper information.</i>		
	Provide trail signs that give important information to users with physical limitations. Assume 5 signs. Federal Guidelines: 1017.11	High	\$500
	Facility Total:		\$25,850
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	350
Medium	\$	16,730
High	\$	8,770

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Laughlin Park, N. Spencer Street, Rushville, Indiana

Item #	Description	Priority	Estimated Cost
8-1	Shelterhouse Door		
	<i>There is no sign on the Shelter House or its restroom door.</i>		
	Provide sign at both doors. Federal Guideline: 216.8	Medium	\$200
	<i>There is no accessible route to the entrance.</i>		
	Provide an accessible route to at least one accessible entrance. Federal Guideline: 206.4	High	\$1,500
	<i>The door has a knob which requires tight grasping, pinching or twisting of the wrist.</i>		
	Replace the lockset with a lockset with lever handle. Federal Guidelines: 404.2.7	Medium	\$300
	<i>The threshold of the door has a 5" step on the outside and a 1" step on the inside.</i>		
	Relocate the existing door assembly down so that the sill of the door is at floor level. Provide a new concrete landing outside the door, with top at no more than 1/4" below floor level. Federal Guideline: 303.2	High	\$1,250
8-2	Shelterhouse Restroom Door		
	<i>The width and height of the doorway both fail to comply with the requirements.</i>		
	One solution is to replace this door assembly with a new door assembly of ADA-approved dimensions and hardware. Federal Guideline: 404.2.3	Medium	\$1,470
8-3	Men's Restroom Door		
	<i>The sign is not ADA-compliant.</i>		
	Provide sign at the men's restroom door. Federal Guideline: 216.8	Medium	\$100
	<i>The metal threshold exceeds the maximum height of 1/2".</i>		
	Provide an ADA-compliant metal threshold. Federal Guideline: 404.2.5	High	\$100
8-4	Women's Restroom Door		
	<i>The sign is not ADA-compliant.</i>		
	Provide sign at the women's restroom door. Federal Guideline: 216.8	Medium	\$100
	<i>The door closer has a sweep time of less than 5 seconds.</i>		
	Adjust or replace this door closer (cost is to replace). Federal Guideline: 404.2.8.1	Medium	\$490
15-1	Women's Restrooms		
	<i>There are no signs on the door to identify the use of the area.</i>		
	See item 8-4 above. Federal Guideline: 216.8	N/A	\$0
	<i>There is insufficient clear space below the lavatory.</i>		
	Provide a 30" wide x 27" high clear space below the lavatory by remounting the lavatory on proper support hanger. Federal Guidelines: 606.2, 306.3.1	Medium	\$950

	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The clear space in the stall does not comply with the requirements.</i>		
	One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. Provide new accessible stall door and front partition. Federal Guideline: 604.3.1	Medium	\$3,730
	<i>The flush control is on the wrong side of the accessible toilet.</i>		
	If the work above is completed, the control will be on the correct side. Federal Guideline: 604.6	N/A	\$0
	<i>The toilet paper dispenser is not 7-9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There are no grab bars on the rear wall and the side bars do not meet the requirements.</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Federal Guideline: 604.8.1.4	N/A	\$0
15-2	Men's Restrooms		
	<i>The sign on the door is not ADA-compliant.</i>		
	See item 8-3 above. Federal Guideline: 216.8	N/A	\$0
	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The urinals exceed the height limit of 17" max above floor level. (25")</i>		
	Relocate the urinal to ADA-compliant location. Federal Guideline: 605.2	Medium	\$1,300

	<i>The clear space in the stall does not comply with the requirements.</i>		
	One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. Provide new accessible stall door and front partition. Federal Guideline: 604.3.1	Medium	\$3,730
	<i>The flush control for the toilet is on the wrong side of the toilet. (Piping above the porcelain)</i>		
	Adjust the plumbing to correct the orientation of the valve. Federal Guideline: 604.6	Medium	\$210
	<i>The toilet paper dispenser is not 7-9" in front of the toilet. (3")</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There are no grab bars on the rear wall and the side bars do not meet the requirements.</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. (The Indiana Building Code now requires an 18" vertical bar so now is a good time to provide that one as well) Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Federal Guideline: 604.8.1.4	N/A	\$0
16	Shelterhouse Single-User Restroom		
	<i>This restroom does not meet ADA requirements and needs to be rebuilt to conform. The toilet does appear to be 18" off the side wall.</i>		
	Demolish the existing walls and remove, but salvage, the lavatory to provide a 60" wide space for the toilet. Build new walls for a room big enough to enclose a 5' diameter turning space. Reinstall the lavatory, provide grab bars, move the toilet paper dispenser and provide lever handles on both sides of the restroom door. Federal Guidelines: 213.1	Medium	\$5,000
21-1	Baseball No. 1 Grandstand / Bleachers		
	<i>There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$1,500

	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
21-2	Baseball No. 2 Grandstand / Bleachers		
	<i>There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$1,500
	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
21-3	Baseball No. 3 Grandstand / Bleachers		
	<i>There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$1,500
	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
21-4	Baseball No. 4 Grandstand / Bleachers		
	<i>Baseball Field No. 4: There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$1,500
	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
21-5	Baseball No. 5 Grandstand / Bleachers		
	<i>Baseball Field No. 5: There are no wheelchair parking spaces provided with the fixed (bleacher) seating.</i>		
	Provide 1 accessible 36" wide x 48" deep wheelchair parking space with clear line of sight for each 25 bleacher seats. Provide an accessible route to the wheelchair spaces. Federal Guideline: 221.2	High	\$1,500

	<i>There are no fixed companion seats provided with the fixed (bleacher) seating.</i>		
	Provide a sign designating a fixed companion seat beside each required wheelchair parking space. Federal Guideline: 221.3, 802.3	Medium	Included above
22	Site Furniture		
	<i>There is no accessible path leading to the seating area.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	\$1,500
	<i>The Picnic Table has insufficient knee space (6" instead of the required 8" at 27" above grade).</i>		
	Provide at least one accessible Picnic Table. Federal Guideline: 306.3.3	Medium	\$2,200
	<i>There is no path leading to the grill / fire pit.</i>		
	Provide a 36" wide accessible route to at least one of each type of site amenity. Federal Guideline: 206.2.2	High	Included above
	<i>There is not adequate room in front of the trash receptacle to allow enough space to turn around.</i>		
	Move the trash receptacle or provide another. Federal Guideline: 1011.2.1	Low	\$0
24-1	Basketball Court		
	<i>There is no accessible route to the basketball court.</i>		
	Provide a 36" wide accessible route to the basketball court. Federal Guideline: 206.2.2	Medium	\$500
24-2	Baseball Field #2		
	<i>There is no wheelchair space provided inside the player seating area.</i>		
	Provide at least one wheelchair parking space in the team or player seating area. This is a low priority because the baseball field is exempt from being an accessible route. Federal Guideline: 221.2.1.4	Medium	\$250
24-3	Baseball Field #3		
	<i>Baseball Field No. 3: There is no wheelchair space provided inside the player seating area.</i>		
	Provide at least one wheelchair parking space in the team or player seating area. This is a low priority because the baseball field is exempt from being an accessible route. Federal Guideline: 221.2.1.4	Medium	\$250
24-4	Baseball Field #4		
	<i>Baseball Field No. 4: There is no wheelchair space provided inside the player seating area.</i>		
	Provide at least one wheelchair parking space in the team or player seating area. This is a low priority because the baseball field is exempt from being an accessible route. Federal Guideline: 221.2.1.4	Medium	\$250

24-5	Baseball Field #5		
	<i>Baseball Field No. 5: There is no wheelchair space provided inside the player seating area.</i>		
	Provide at least one wheelchair parking space in the team or player seating area. This is a low priority because the baseball field is exempt from being an accessible route. Federal Guideline: 221.2.1.4	Medium	\$250
25	Play Equipment Area		
	<i>There is no accessible route provided to the play equipment. Ground surfaces on accessible routes serving Play Areas must comply with ASTM F 1951. Ground surfaces in use zones must comply with ASTM F 1292.</i>		
	Provide a 60" wide accessible route (60" wide because this area is larger than 1000 square feet) to at least one of each kind of ground-level play component. Federal Guideline. 206.2.2, 1008.2	High	\$3,500
	<i>None of the elevated play components are on a accessible route.</i>		
	At least 50% of the elevated play components must be on an accessible route. Provide a 36" wide accessible route to these components. Federal Guideline: 240.2.2, 1008.2.4.2	High	Included above
	<i>There are no transfer platforms at the Elevated Play Components.</i>		
	Provide a transfer platform and transfer steps as a means to move from transfer platform to levels with elevated play components at 50% of the Elevated Play Components. Federal Guidelines: 240.2.2, 1008.3	Medium	\$1,500
	<i>There is no accessible 60" diameter turning space provided on the same level as the play components at the swings.</i>		
	Provide an accessible 60" diameter turning space on the same level as the play component at one swing. Federal Guideline: 1008.4	High	Included above
	<i>There is no accessible 30"x48" minimum clear space provided on the same level as the play components at every accessible component.</i>		
	This requirement will be achieved with the addition of the accessible routes to the accessible components. Federal Guideline: 1008.4.2	High	Included above
	Facility Total:		\$39,690
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	-
Medium	\$	24,340
High	\$	15,350

South Memorial Park, Sexton Street, Rushville, Indiana			
Item #	Description	Priority	Estimated Cost
8-1	Shelterhouse Door		
	<i>The entrances are not on an accessible route.</i>		
	Provide an accessible route to at least one accessible entrance. Federal Guideline: 206.4	High	\$500
	<i>There are no signs to identify the use of the restrooms</i>		
	Provide signs at the men's and women's restroom doors. Federal Guideline: 216.8	Medium	\$200
	<i>The threshold of the door has a 5" step on each side.</i>		
	Relocate the existing door assembly down so that the sill of the door is at floor level. Federal Guideline: 303.2	High	\$1,250
	<i>The door has a knob which requires grasping and twisting of the wrist.</i>		
	Replace knob with compliant hardware. Federal Guideline: 404.2.7	Medium	\$300
8-2	Men's Restroom Door		
	<i>The landing outside the entrance is 4" below the interior floor level.</i>		
	Lower the door assembly per item above. Remove and replace the concrete landing. Federal Guidelines: 302.4	High	\$900
	<i>The sign is not ADA compliant.</i>		
	Provide a sign at the men's restroom door. Federal Guideline: 216.8	Medium	\$100
	<i>The door closer has a sweep time of less than 5 seconds (2.1 actual).</i>		
	Adjust or replace this door closer. (cost is to replace) Federal Guideline: 404.2.8.1	Medium	\$490
8-3	Women's Restroom Door		
	<i>The landing outside the entrance is 3" below the interior floor level.</i>		
	Remove and replace the concrete landing. Remove and replace the accessible route up to the landing for the length required to rise 3" at a max. slope of 1 in 20 (5%). Federal Guidelines: 302.4	High	\$1,200
	<i>The sign is not ADA compliant.</i>		
	Provide a sign at the women's restroom door. Federal Guideline: 216.8	Medium	\$100
15-1	Women's Restrooms		
	<i>The sign is not ADA compliant.</i>		
	See item 8-3. Federal Guideline: 216.8	N/A	\$0
	<i>The lavatory exceeds the height limit of 34" (35").</i>		
	Relocate the lavatory down to ADA-compliant height. Federal Guideline: 606.3	Medium	\$830

	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The exposed pipes are not insulated and do not protect against hot surfaces or sharp edges.</i>		
	Provide insulation for the waste and hot water lines. Federal Guideline: 606.5	Medium	\$100
	<i>The mirror is above the 40" maximum height limit above the floor (57").</i>		
	Relocate the mirror down to ADA-compliant height. Federal Guideline: 603.3	Medium	\$70
	<i>The towel dispenser exceeds the 48" maximum height limit above the floor (58").</i>		
	Relocate the towel dispenser down to ADA-compliant height. Federal Guideline:	Medium	\$70
	<i>The stall doors do not meet the requirements.</i>		
	At least one accessible stall is required. One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. This will enable the installation of an accessible stall door. Federal Guideline: 604.8.1.2	Medium	\$3,730
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	Included in item above. Federal Guideline: 604.3.1	Medium	Included above
	<i>The toilet paper dispenser is not mounted 7" to 9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There is no rear grab bar and the side grab bar is too short at 34" (42" min.).</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Please confirm. Federal Guideline: 604.8.1.4	Medium	Included above
15-2	Men's Restrooms		
	<i>The sign is not ADA compliant.</i>		
	See item 8-2. Federal Guideline: 216.8	N/A	\$0
	<i>The lavatory exceeds the height limit of 34" (35").</i>		
	Relocate the lavatory down to ADA-compliant height. Federal Guideline: 606.3	Medium	\$830

	<i>The faucet control requires grasping and twisting of the wrist.</i>		
	Provide a lever handle for the faucet. Federal Guideline: 606.4	Medium	\$430
	<i>The urinal has the top of the lip at 26" above floor. (17" max.).</i>		
	Relocate the urinal to ADA-compliant location. Federal Guideline: 605.2	Medium	\$1,300
	<i>The stall door does not meet the requirements.</i>		
	At least one accessible stall is required. One solution is to remove the adjacent stall and toilet to achieve the 5' wide space required. This will enable the installation of an accessible stall door. Federal Guideline: 604.8.1.2	Medium	\$3,730
	<i>The clear space in the toilet stall is less than 60" wide.</i>		
	Included above. Federal Guideline: 604.3.1	Medium	Included above
	<i>The flush controls are not compliant with the requirements.</i>		
	Rework the exposed plumbing as required to set the flush valve control to the wide side of the toilet. Federal Guidelines: 604.6	Medium	\$210
	<i>The toilet paper dispenser is not mounted 7" to 9" in front of the toilet.</i>		
	Relocate the toilet paper dispenser to ADA-compliant location. This dispenser can have bottom slot at no higher than 48" but no lower than 12" clear above the grab bar. Federal Guideline: 604.7	Medium	\$70
	<i>There is no rear grab bar and the side grab bar is too short at 24" (42" min.).</i>		
	Provide a 36" long rear grab bar and a 42" long side grab bar in the ADA-compliant locations. Federal Guideline: 604.5	Medium	\$180
	<i>There is no toe clearance on the sides of the stall.</i>		
	Toe clearance is not required in the side wall if the stall is greater than 66" wide. Since one existing stall is being eliminated, it is reasonable to assume at least 66" of width will be achieved. Please confirm. Federal Guideline: 604.8.1.4	Medium	Included above
18	Shelterhouse		
18-1	<i>The light switch is located above the forward reach limit of 48" (52").</i>		
	Relocate the light switch. Federal Guidelines: 205.1, 308.2, 308.3	Medium	\$210
22	Site Furniture		
	<i>There is no accessible path to the picnic area.</i>		
	Provide at least one accessible route to the picnic area. Federal Guideline: 206.2.2	High	\$500
	<i>The Picnic Table has its surface at 26" (28" min. - 34" max.).</i>		
	Provide at least one accessible Picnic Table. Federal Guideline: 902.3	Medium	\$2,200

	<i>There is no accessible path leading to the seating area.</i>		
	Provide an accessible path to this area. Federal Guidelines: 206.2.2, 403	High	Included above
24	Basketball Courts		
	<i>The route to the basketball courts is not accessible because surfaces are not slip resistant, firm, and stable.</i>		
	Provide an accessible route to the basketball court. Federal Guideline: 206.2.2	High	\$500
	<i>There is no wheelchair spaces provided in the player seating area.</i>		
	Provide at least one wheelchair space in the team or player seating area. Provide an accessible route to same. Federal Guideline: 221.2.1.4	Medium	\$100
25	Play Equipment Area		
	<i>There is no accessible path provided to the play equipment. Ground surfaces on accessible routes serving Play Areas must comply with ASTM F 1951. Ground surfaces in use zones must comply with ASTM F 1292.</i>		
	Provide a 60" wide accessible route (60" wide because this area is larger than 1000 square feet) to at least one of each kind of ground-level play component. Federal Guideline. 206.2.2, 1008.2	High	\$2,500
	<i>None of the elevated play components are on a accessible route.</i>		
	At least 50% of the elevated play components must be on an accessible route. Provide a 36" wide accessible route to these components. Federal Guideline: 240.2.2, 1008.2.4.2	High	Included above
	<i>There are no transfer platforms at the Elevated Play Components.</i>		
	Provide a transfer platform and transfer steps as a means to move from transfer platform to levels with elevated play components at least 50% of the Elevated Play Components. Federal Guidelines: 240.2.2, 1008.3	Medium	\$1,500
	<i>There is no accessible 60" diameter turning space provided on the same level as the play components at the swings.</i>		
	Provide an accessible 60" diameter turning space on the same level as the play component at least one swing. Federal Guideline: 1008.4	Medium	Included above
	<i>There is no accessible 30"x48" minimum clear space provided on the same level as the play components at every accessible component.</i>		
	This requirement will be achieved with the addition of the accessible routes to the accessible components. Federal Guideline: 1008.4.2	Medium	Included above
33	Trails		
	<i>Changes in elevation along pathway at ROW.</i>		
	Provide smooth transitions. Federal Guideline: 1017.5	Medium	\$600

	<i>Trail signs do not provide the proper information.</i>		
	Provide trail signs that give important information to users with physical limitations. Assume 5 signs. Federal Guidelines: 1017.11	High	\$500
	Facility Total:		\$25,880
General Notes: All cost estimates are based on 2013 estimated costs. Bidding environments change and may result in costs that differ from those provided here. There may be other codes or factors not included in the scope of the ADA review that will also impact costs.			

Prioritization Summary

Low	\$	-
Medium	\$	18,030
High	\$	7,850

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Appendix C

City of Rushville Right-of-Way Facility Evaluation

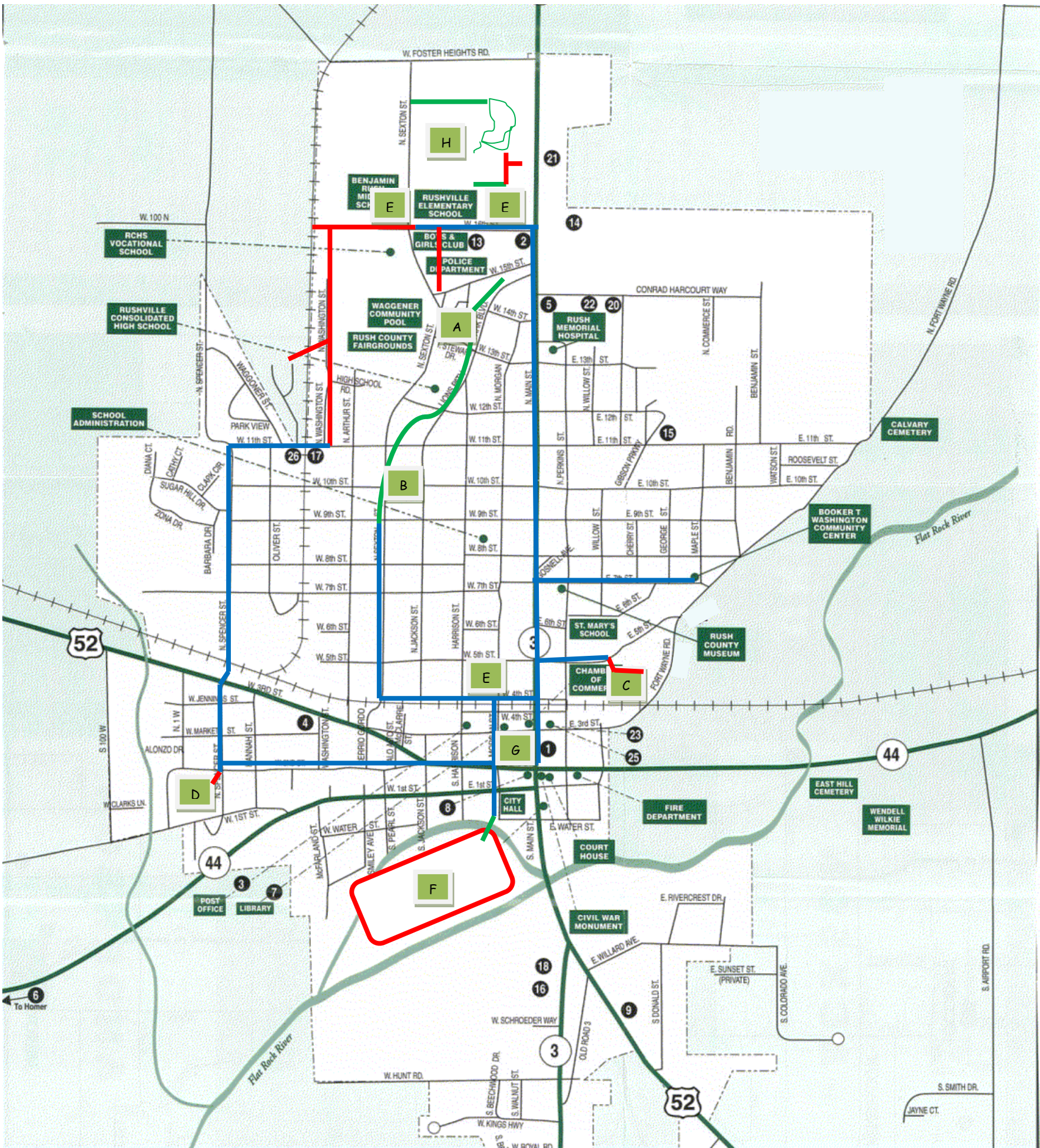
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City of Rushville ADA Inventory in the Public Right-of-Way					
Sidewalk Inventory					
Street	Issues Noted*				Cost @ \$6 per sf
	Running Slope	Cross Slope	Displacements/ Protrusions/ Obstructions	Approximate LF of Replacement Required	
1st Street			X	680	\$ 20,400.00
2nd Street			X	130	\$ 3,900.00
3rd Street			X	2410	\$ 72,300.00
4th Street			X	720	\$ 21,600.00
5th Street			X	2300	\$ 69,000.00
6th Street			X	955	\$ 28,650.00
7th Street		X	X	4250	\$ 127,500.00
8th Street			X	4650	\$ 139,500.00
9th Street	X	X	X	2450	\$ 73,500.00
10th Street	X	X	X	2710	\$ 81,300.00
11th Street	X	X	X	805	\$ 24,150.00
12th Street		X	X	445	\$ 13,350.00
13th Street	X	X	X	160	\$ 4,800.00
14th Street		X	X	150	\$ 4,500.00
Arthur Street		X	X	2145	\$ 64,350.00
Barbara Drive		X	X	25	\$ 750.00
Benjamin Street			X	60	\$ 1,800.00
Cerro Gordo Street			X	330	\$ 9,900.00
Cherry Street		X	X	40	\$ 1,200.00
Conrad Harcourt Way			X	25	\$ 750.00
George Street			X	270	\$ 8,100.00
Gosnell Avenue			X	190	\$ 5,700.00
Hannah Street	X	X	X	580	\$ 17,400.00
Harrison Street	X	X	X	3925	\$ 117,750.00
High School Road			X	5	\$ 150.00
Hollywood Drive		X	X	40	\$ 1,200.00
Jackson Street		X	X	2775	\$ 83,250.00
Jennings Street			X	200	\$ 6,000.00
Julian Street		X	X	110	\$ 3,300.00
Main Street	X	X	X	2225	\$ 66,750.00
Maple Street		X	X	375	\$ 11,250.00
Market Street			X	400	\$ 12,000.00
McLaren Street			X	500	\$ 15,000.00
Morgan Street	X	X	X	5730	\$ 171,900.00
Oliver Street		X	X	1885	\$ 56,550.00
Park Boulevard		X	X	140	\$ 4,200.00
Parkview Drive		X	X	350	\$ 10,500.00
Perkins Street		X	X	5430	\$ 162,900.00
Sexton Street		X	X	5915	\$ 177,450.00
Smiley Street			X	40	\$ 1,200.00
Spencer Street		X	X	520	\$ 15,600.00
Waggoner Street	X	X	X	235	\$ 7,050.00
Washington Street		X	X	190	\$ 5,700.00
Willow Street		X	X	1840	\$ 55,200.00
TOTAL ESTIMATED COST - SIDEWALKS					\$ 1,661,100.00
*Issues noted is based on comments provided by City staff on evaluation forms and is not necessarily all inclusive of issues.					

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Rushville Walking/Pedestrian Path Strategies

New trail/path ---- Sidewalks ---- Existing Trail/Path ---- School Nature Trail



- | | | |
|---------------------------------|---------------------------------|-------------------|
| A. North Veterans Memorial Park | B. South Veterans Memorial Park | C. Community Park |
| D. Laughlin Park | E. School Playground | F. Riverside Park |
| G. Willkie Park | H. Soccer Fields | |

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City of Rushville ADA Inventory in the Public Right-of-Way			
Curb Ramp Inventory			
Location	Priority ¹	Cost Category ²	Base Cost
NW corner Conrad Harcourt Way/Benjamin	High/Unusable	3	\$ 2,700
NE corner 13th/Cherry	Low - Usable	1	\$ 1,000
SE corner 13th/Cherry	High/Unusable	3	\$ 2,700
SW corner 13th/Cherry	High/Unusable	3, 3	\$ 5,400
NW corner 13th/Cherry	High/Unusable	3, 3	\$ 5,400
NE corner 12th/Cherry	Medium - Difficult to Use	3	\$ 1,500
SE corner 12th/Cherry	Medium - Difficult to Use	3	\$ 1,500
SW corner 12th/Cherry	Medium - Difficult to Use	3	\$ 1,500
NW corner 12th/Cherry	Medium - Difficult to Use	3	\$ 1,500
SW corner 12th/George	High/Unusable	3	\$ 2,700
NW corner 12th/George	High/Unusable	3	\$ 2,700
NE corner 12th/Willow	High/Unusable	3, 3	\$ 5,400
SE corner 12th/Willow	Low - Usable	1, 1	\$ 2,000
SW corner 12th/Willow	Low/Medium - Difficult to Use	1, 3	\$ 3,700
NW corner 12th/Willow	High/Unusable	4, 4	\$ 8,000
NE corner 13th/Willow	High/Unusable	2, 2	\$ 3,000
SE corner 13th/Willow	High/Unusable	2, 2	\$ 3,000
SW corner 13th/Willow	High/Unusable	2, 2	\$ 3,000
NW corner 13th/Willow	High/Unusable	2, 2	\$ 3,000
NE corner 12th/Perkins	High/Unusable	2, 2	\$ 3,000
SE corner 12th/Perkins	High/Unusable	2, 2	\$ 3,000
SW corner 12th/Perkins	High/Unusable	2, 2	\$ 3,000
NW corner 12th/Perkins	Low - Usable	1, 1	\$ 2,000
SE corner 13th/Perkins	High/Unusable	1	\$ 1,000
SW corner 13th/Perkins	Low - Usable	1, 1	\$ 2,000
NW corner 13th/Perkins	Low - Usable	1	\$ 1,000
NE corner 12th/Morgan	Low - Usable	1, 1	\$ 2,000
SE corner 12th/Morgan	High/Unusable	3, 4	\$ 6,700
SW corner 12th/Morgan	High/Unusable	3, 3	\$ 5,400
NW corner 12th/Morgan	Low/High	1, 3	\$ 3,700
NE corner 12th/Harrison	High/Unusable	2	\$ 1,500
SE corner 12th/Harrison	High/Unusable	2, 2	\$ 3,000
SW corner 12th/Harrison	Low - Usable	1	\$ 1,000
NE corner 13th/Morgan	High/Unusable	2, 2	\$ 3,000
SE corner 13th/Morgan	High/Unusable	2, 2	\$ 3,000
SW corner 13th/Morgan	High/Unusable	2, 2	\$ 3,000
NW corner 13th/Morgan	High/Unusable	2, 2	\$ 3,000
NE corner 14th/Morgan	High/Unusable	2	\$ 1,500
SE corner 14th/Morgan	High/Unusable	2	\$ 1,500
SW corner 14th/Morgan	High/Unusable	2	\$ 1,500
NW corner 14th/Morgan	High/Unusable	2	\$ 1,500
NE corner 13th/Park Boulevard	High/Unusable	2, 2	\$ 3,000
SE corner 13th/Park Boulevard	High/Unusable	2, 2	\$ 3,000
SW corner 13th/Park Boulevard	High/Unusable	2, 2	\$ 3,000

Location	Priority ¹	Cost Category ²	Base Cost
NW corner 13th/Park Boulevard	High/Unusable	2, 2	\$ 3,000
NE corner 12th/Lions Path	Low/High	1, 2	\$ 2,500
SE corner 12th/Lions Path	High/Unusable	2, 2	\$ 3,000
SW corner 12th/Lions Path	High/Unusable	2, 2	\$ 3,000
NW corner 12th/Lions Path	Low/High	1, 2	\$ 2,500
NE corner 12th/Sexton	Low - Usable	1	\$ 1,000
SE corner 12th/Sexton	Low - Usable	1	\$ 1,000
NE corner Tony Stewart/Sexton	Low - Usable	1	\$ 1,000
SE corner Tony Stewart/Sexton	Low - Usable	1	\$ 1,000
NE corner Park Road/Sexton	Low - Usable	1	\$ 1,000
SE corner Park Road/Sexton	Low - Usable	1	\$ 1,000
NE corner 15th/Sexton	High/Unusable	3	\$ 2,700
SE corner 15th/Sexton	Low - Usable	1	\$ 1,000
NE corner 16th/Sexton	Low - Usable	1, 1	\$ 2,000
SE corner 16th/Sexton	Low - Usable	1, 1	\$ 2,000
SW corner 16th/Sexton	Low - Usable	1, 1	\$ 2,000
NW corner 16th/Sexton	Low - Usable	1, 1	\$ 2,000
NE corner Arthur/High School	High/Unusable	4	\$ 4,000
SE corner Arthur/High School	Low - Usable	1	\$ 1,000
SW corner Arthur/High School	High/Unusable	4	\$ 4,000
NW corner Arthur/High School	High/Unusable	3, 3	\$ 5,400
NE corner Washington/High School	High/Unusable	4	\$ 4,000
SE corner Washington/High School	Low/High	1, 4	\$ 5,000
SW corner Washington/High School	High/Unusable	3	\$ 2,700
NE corner Monroe/Jason	High/Unusable	4	\$ 4,000
SE corner Monroe/Jason	High/Unusable	4	\$ 4,000
NE corner Parkview/Waggoner (south)	High/Unusable	4, 4	\$ 8,000
SW corner Parkview/Waggoner (south)	High/Unusable	4	\$ 4,000
NW corner Parkview/Waggoner (south)	High/Unusable	4, 4	\$ 8,000
SE corner Parkview/Waggoner (north)	High/Unusable	4	\$ 4,000
SW corner Parkview/Waggoner (north)	Low/High	1, 4	\$ 5,000
NE corner 10th/Maple	Low - Usable	1	\$ 1,000
SW corner 10th/Maple	Low - Usable	2	\$ 1,500
NW corner 10th/Maple	Low - Usable	1, 1	\$ 2,000
SE corner 11th/Maple	High/Unusable	3	\$ 2,700
SW corner 11th/Maple	Medium - Difficult to Use	3	\$ 2,700
NE corner 11th/Cherry	Medium - Difficult to Use	1	\$ 1,000
NW corner 11th/Cherry	Medium - Difficult to Use	1	\$ 1,000
NE corner 10th/Gibson	Low/High	1, 3	\$ 3,700
SE corner 10th/Gibson	High/Unusable	3	\$ 2,700
SW corner 10th/Gibson	High/Unusable	3	\$ 2,700
NW corner 10th/Gibson	High/Unusable	3, 3	\$ 5,400
NE corner 10th/George	High/Unusable	3	\$ 2,700
SE corner 10th/George	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 10th/George	Medium/High	2, 3	\$ 4,200
NW corner 10th/George	High/Unusable	3	\$ 2,700

Location	Priority ¹	Cost Category ²	Base Cost
SE corner 9th/Cherry	Medium - Difficult to Use	2	\$ 1,500
SW corner 9th/Cherry	Medium - Difficult to Use	2	\$ 1,500
NE corner 11th/Perkins	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SE corner 11th/Perkins	Medium/High	2, 3	\$ 4,200
SW corner 11th/Perkins	High/Unusable	2, 4	\$ 5,500
NW corner 11th/Perkins	Low/High	1, 3	\$ 3,700
NE corner 11th/Willow	High/Unusable	3	\$ 2,700
NW corner 11th/Willow	Medium - Difficult to Use	2	\$ 1,500
NE corner 10th/Perkins	High/Unusable	3, 3	\$ 5,400
SE corner 10th/Perkins	Low - Usable	1, 1	\$ 2,000
SW corner 10th/Perkins	High/Unusable	4, 4	\$ 8,000
NW corner 10th/Perkins	Low - Usable	2, 2	\$ 3,000
SE corner 10th/Willow	High/Unusable	3	\$ 2,700
SW corner 10th/Willow	High/Unusable	3	\$ 2,700
NE corner 9th/Willow	Low - Usable	1, 1	\$ 2,000
SE corner 9th/Willow	High/Unusable	3, 3	\$ 5,400
SW corner 9th/Willow	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 9th/Willow	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 9th/Perkins	High/Unusable	4, 4	\$ 8,000
SE corner 9th/Perkins	High/Unusable	3, 3	\$ 5,400
SW corner 9th/Perkins	High/Unusable	4, 4	\$ 8,000
NW corner 9th/Perkins	High/Unusable	4, 4	\$ 8,000
NE corner 9th/Morgan	Medium/High	2, 3	\$ 4,200
SE corner 9th/Morgan	High/Unusable	4, 4	\$ 8,000
SW corner 9th/Morgan	Low/High	1, 4	\$ 5,000
NW corner 9th/Morgan	Low/High	1, 4	\$ 5,000
NE corner 9th/Harrison	High/Unusable	3, 3	\$ 5,400
SE corner 9th/Harrison	Low - Usable	1, 1	\$ 2,000
SW corner 9th/Harrison	Low - Usable	1, 1	\$ 2,000
NW corner 9th/Harrison	Low - Usable	1, 1	\$ 2,000
NE corner 10th/Morgan	High/Unusable	4, 4	\$ 8,000
SE corner 10th/Morgan	High/Unusable	4, 4	\$ 8,000
SW corner 10th/Morgan	High/Unusable	4, 4	\$ 8,000
NW corner 10th/Morgan	High/Unusable	4, 4	\$ 8,000
NE corner 10th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 10th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 10th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 10th/Harrison	Medium/High	2, 3	\$ 4,200
NE corner 11th/Morgan	High/Unusable	3, 3	\$ 5,400
SE corner 11th/Morgan	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SW corner 11th/Morgan	High/Unusable	3, 4	\$ 6,700
NW corner 11th/Morgan	High/Unusable	4, 4	\$ 8,000
NE corner 11th/Harrison	Low/Medium - Difficult to Use	1, 5	\$ 6,400
SE corner 11th/Harrison	High/Unusable	4, 4	\$ 8,000
SW corner 11th/Harrison	High/Unusable	3, 3	\$ 5,400
NW corner 11th/Harrison	Low - Usable	1, 1	\$ 2,000

Location	Priority ¹	Cost Category ²	Base Cost
NE corner 9th/Jackson	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SE corner 9th/Jackson	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 9th/Jackson	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SE corner 9th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 9th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 9th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 10th/Jackson	Low - Usable	1, 1	\$ 2,000
SE corner 10th/Jackson	Medium/High	2, 3	\$ 4,200
NW corner 10th/Jackson	Low - Usable	1	\$ 1,000
NE corner 11th/Jackson	High/Unusable	4, 4	\$ 8,000
SE corner 11th/Jackson	Low - Usable	1, 1	\$ 2,000
SW corner 11th/Jackson	Low - Usable	1	\$ 1,000
NW corner 11th/Jackson	High/Unusable	3, 3	\$ 5,400
NE corner 11th/Sexton	Low - Usable	1	\$ 1,000
SW corner 11th/Sexton	Medium - Difficult to Use	3	\$ 2,700
NW corner 11th/Sexton	Low/High	1, 4	\$ 5,000
NE corner 10th/Sexton	High/Unusable	3	\$ 2,700
SW corner 10th/Sexton	Medium - Difficult to Use	2	\$ 1,500
NW corner 10th/Sexton	Low - Usable	2, 2	\$ 3,000
NE corner 9th/Arthur	Low/Medium - Difficult to Use	2, 3	\$ 4,200
SE corner 9th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 9th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 9th/Arthur	Low - Usable	1, 1	\$ 2,000
NE corner 10th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
SE corner 10th/Arthur	High/Unusable	3, 3	\$ 5,400
SW corner 10th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 10th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
NE corner 11th/Arthur	Medium/High	2, 4	\$ 5,500
SE corner 11th/Arthur	High	4, 4	\$ 8,000
SW corner 11th/Arthur	High	4, 4	\$ 8,000
NW corner 11th/Arthur	High/Unusable	4, 4	\$ 8,000
NE corner 11th/Washington	Low/Medium - Difficult to Use	2, 3	\$ 4,200
SE corner 11th/Washington	High	4	\$ 4,000
NW corner 11th/Washington	Medium - Difficult to Use	4	\$ 4,000
NE corner 9th/Oliver	Low - Usable	1, 1	\$ 2,000
SE corner 9th/Oliver	Low - Usable	1, 1	\$ 2,000
SW corner 9th/Oliver	Low/High	2, 4	\$ 5,500
NW corner 9th/Oliver	High/Unusable	3, 3	\$ 5,400
NE corner 9th/Spencer	Low/High	1, 3	\$ 3,700
SE corner 9th/Spencer	Low - Usable	2	\$ 1,500
NW corner 9th/Spencer	High/Unusable	3	\$ 2,700
SE corner 10th/Oliver	Medium - Difficult to Use	2	\$ 1,500
SW corner 10th/Oliver	Low - Usable	3, 3	\$ 5,400
NW corner 10th/Oliver	Medium - Difficult to Use	3	\$ 2,700
NE corner 10th/Spencer	Low - Usable	2	\$ 1,500
SE corner 10th/Spencer	Low - Usable	2	\$ 1,500

Location	Priority ¹	Cost Category ²	Base Cost
SW corner 10th/Spencer	High/Unusable	3	\$ 2,700
NW corner 10th/Spencer	High/Unusable	3	\$ 2,700
NE corner 11th/Monroe	High/Unusable	3	\$ 2,700
NW corner 11th/Monroe	High/Unusable	3	\$ 2,700
NE corner 11th/Waggoner	Low - Usable	2	\$ 1,500
NW corner 11th/Waggoner	Medium - Difficult to Use	2	\$ 1,500
SW corner 11th/Oliver	High/Unusable	3	\$ 2,700
NW corner 11th/Oliver	High/Unusable	4	\$ 4,000
SE corner 11th/Spencer	High/Unusable	3	\$ 2,700
SW corner 11th/Spencer	High/Unusable	3	\$ 2,700
SW corner Sugar Hill/Spencer	Medium - Difficult to Use	2	\$ 1,500
NW corner Sugar Hill/Spencer	Medium - Difficult to Use	2	\$ 1,500
NE corner Barbara/Hollywood	High/Unusable	3, 3	\$ 5,400
SE corner Barbara/Hollywood	High	3	\$ 2,700
SW corner Barbara/Hollywood	Low - Usable	1	\$ 1,000
NW corner Barbara/Hollywood	High/Unusable	3, 3	\$ 5,400
SW corner Clark/Sugar Hill	High	3	\$ 2,700
NW corner Clark/Sugar Hill	High/Unusable	4, 4	\$ 8,000
NE corner 8th/Benjamin	Low - Usable	1	\$ 1,000
SW corner 8th/Benjamin	Low/High	1, 3	\$ 3,700
NW corner 8th/Benjamin	Low/High	1, 3	\$ 3,700
NE corner 8th/Maple	Medium/High	2, 3	\$ 4,200
SE corner 8th/Maple	Medium/High	2, 3	\$ 4,200
SW corner 8th/Maple	Medium/High	2, 3	\$ 4,200
NW corner 8th/Maple	High/High	3, 4	\$ 6,700
NE corner 8th/George	Medium/High	2, 3	\$ 4,200
SE corner 8th/George	Medium/High	2, 3	\$ 4,200
SW corner 8th/George	Medium/High	2, 3	\$ 4,200
NW corner 8th/George	Medium/High	2, 3	\$ 4,200
NE corner 7th/George	Medium - Difficult to Use	2	\$ 1,500
NW corner 7th/George	Medium - Difficult to Use	3	\$ 2,700
NE corner 8th/Cherry	Medium/High	2, 3	\$ 4,200
SE corner 8th/Cherry	Low/High	1, 3	\$ 3,700
SW corner 8th/Cherry	Low/High	1, 3	\$ 3,700
NW corner 8th/Cherry	Medium/High	2, 3	\$ 4,200
NE corner 8th/Willow	High/Unusable	3, 3	\$ 5,400
SE corner 8th/Willow	High/Unusable	3, 3	\$ 5,400
SW corner 8th/Willow	Medium/High	3, 3	\$ 5,400
NW corner 8th/Willow	Medium/High	3, 3	\$ 5,400
NE corner 7th/Cherry	Medium/High	2, 3	\$ 4,200
SE corner 7th/Cherry	High	3	\$ 2,700
SW corner 7th/Cherry	High	3	\$ 2,700
NW corner 7th/Cherry	Medium/High	2, 3	\$ 4,200
NE corner 7th/Willow	Medium/High	2, 3	\$ 4,200
SE corner 7th/Willow	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 7th/Willow	Medium/High	2, 3	\$ 4,200

Location	Priority ¹	Cost Category ²	Base Cost
NW corner 7th/Willow	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 7th/Perkins	High/Unusable	3, 3	\$ 5,400
SE corner 7th/Perkins	High/Unusable	3, 3	\$ 5,400
SW corner 7th/Perkins	High/Unusable	3, 3	\$ 5,400
NW corner 7th/Perkins	High/Unusable	3, 3	\$ 5,400
NE corner 8th/Perkins	Medium/High	3, 4	\$ 6,700
SE corner 8th/Perkins	Low - Usable	1, 1	\$ 2,000
SW corner 8th/Perkins	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 8th/Perkins	Low - Usable	2, 2	\$ 3,000
NE corner 8th/Gosnell	High	3	\$ 2,700
SE corner 8th/Gosnell	High	3	\$ 2,700
NE corner 8th/Morgan	High/Unusable	3, 4	\$ 6,700
SE corner 8th/Morgan	Medium/High	2, 3	\$ 4,200
SW corner 8th/Morgan	Medium/High	2, 4	\$ 5,500
NW corner 8th/Morgan	Medium/High	2, 4	\$ 5,500
NE corner 8th/Harrison	Medium/High	2, 4	\$ 5,500
SE corner 8th/Harrison	Low/High/High	1, 3, 4	\$ 7,700
SW corner 8th/Harrison	Low - Usable	1, 1	\$ 2,000
NW corner 8th/Harrison	Medium/High/High	2, 3, 3	\$ 6,900
NE corner 7th/Morgan	High/Unusable	3, 4	\$ 6,700
SE corner 7th/Morgan	High/Unusable	3, 3	\$ 5,400
SW corner 7th/Morgan	Medium/High	2, 4	\$ 5,500
NW corner 7th/Morgan	Low/High/High	1, 3, 4	\$ 7,700
NE corner 7th/Harrison	Low - Usable	2, 2	\$ 3,000
SE corner 7th/Harrison	High/Unusable	3, 3	\$ 5,400
SW corner 7th/Harrison	High/Unusable	3, 4	\$ 6,700
NW corner 7th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 5th/Morgan	Low - Usable	1, 1	\$ 2,000
SE corner 5th/Morgan	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 5th/Morgan	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 5th/Morgan	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 5th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 5th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 5th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 5th/Harrison	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 6th/Morgan	Low	1	\$ 1,000
SE corner 6th/Morgan	High	3	\$ 2,700
SW corner 6th/Morgan	Medium/High	3, 4	\$ 6,700
NW corner 6th/Morgan	Medium - Difficult to Use	3, 3	\$ 5,400
NE corner 6th/Harrison	High/Unusable	3, 3	\$ 5,400
SE corner 6th/Harrison	High/High	3, 4	\$ 6,700
SW corner 6th/Harrison	High	3	\$ 2,700
NW corner 6th/Harrison	High/Unusable	4	\$ 4,000
NE corner 7th/Jackson	High/Unusable	3, 3	\$ 5,400
SE corner 7th/Jackson	High/Unusable	3, 3	\$ 5,400
SW corner 7th/Jackson	Medium/High	3, 5	\$ 8,100

Location	Priority ¹	Cost Category ²	Base Cost
NW corner 7th/Jackson	Low/High	2, 5	\$ 6,900
NE corner 7th/Sexton	Low/Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 7th/Sexton	Low - Usable	2, 2	\$ 3,000
SW corner 7th/Sexton	Low/Medium - Difficult to Use	2, 3	\$ 4,200
NW corner 7th/Sexton	Low - Usable	2, 2	\$ 3,000
NE corner 8th/Jackson	Low - Usable	2, 2	\$ 3,000
SE corner 8th/Jackson	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SW corner 8th/Jackson	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 8th/Jackson	Low/High	1, 3	\$ 3,700
NE corner 8th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 8th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
SW corner 8th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 8th/Sexton	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 7th/Arthur	Low - Usable	1, 1	\$ 2,000
SE corner 7th/Arthur	Low - Usable	1, 1	\$ 2,000
SW corner 7th/Arthur	Low - Usable	1, 1	\$ 2,000
NW corner 7th/Arthur	Low - Usable	1, 1	\$ 2,000
NE corner 8th/Arthur	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 8th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 8th/Arthur	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 8th/Arthur	Low - Usable	1, 1	\$ 2,000
NE corner 7th/Oliver	Medium/High	3, 3	\$ 5,400
SE corner 7th/Oliver	High	3	\$ 2,700
SW corner 7th/Oliver	High	3	\$ 2,700
NW corner 7th/Oliver	Medium - Difficult to Use	3, 3	\$ 5,400
NE corner 7th/Spencer	Low - Usable	2, 3	\$ 4,200
SE corner 7th/Spencer	Low - Usable	2, 3	\$ 4,200
SW corner 7th/Spencer	Low - Usable	2, 3	\$ 4,200
NW corner 7th/Spencer	Low - Usable	2, 3	\$ 4,200
NE corner 8th/Oliver	Medium/High	3, 4	\$ 6,700
SE corner 8th/Oliver	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 8th/Oliver	Low/Medium - Difficult to Use	2, 3	\$ 4,200
NW corner 8th/Oliver	Medium	3, 3	\$ 5,400
NE corner 8th/Spencer	Low - Usable	2, 2	\$ 3,000
SE corner 8th/Spencer	Low - Usable	2, 2	\$ 3,000
SW corner 8th/Spencer	High	3	\$ 2,700
NW corner 8th/Spencer	High	3	\$ 2,700
NE corner 5th/Perkins	Medium - Difficult to Use	3, 3	\$ 5,400
SE corner 5th/Perkins	Low - Usable	2, 2	\$ 3,000
SW corner 5th/Perkins	High/Unusable	3, 3	\$ 5,400
NW corner 5th/Perkins	High/Unusable	3, 3	\$ 5,400
NE corner 6th/Willow	Medium - Difficult to Use	3, 3	\$ 5,400
SE corner 6th/Willow	High	3	\$ 2,700
SW corner 6th/Willow	Medium - Difficult to Use	3	\$ 2,700
NW corner 6th/Willow	High/High	3, 4	\$ 6,700
NE corner 6th/Perkins	High/Unusable	4, 4	\$ 8,000

Location	Priority ¹	Cost Category ²	Base Cost
SE corner 6th/Perkins	High/Unusable	4, 4	\$ 8,000
SW corner 6th/Perkins	Low - Usable	1	\$ 1,000
NW corner 6th/Perkins	High/High/High	3, 4, 4	\$ 10,700
NE corner 5th/Jackson	Low/Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 5th/Jackson	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 5th/Jackson	Medium - Difficult to Use	2, 3	\$ 4,200
NW corner 5th/Jackson	Medium - Difficult to Use	3, 3	\$ 5,400
NE corner 5th/Sexton	High/Unusable	3, 4	\$ 6,700
SE corner 5th/Sexton	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 5th/Sexton	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 5th/Sexton	Low/Medium - Difficult to Use	1, 3	\$ 3,700
NE corner 5th/Arthur	Low - Usable	1, 1	\$ 2,000
SE corner 5th/Arthur	High/Unusable	3, 3	\$ 5,400
SW corner 5th/Arthur	Medium - Difficult to Use	2, 2	\$ 3,000
NW corner 5th/Arthur	Medium - Difficult to Use	2, 2	\$ 3,000
NE corner 6th/Arthur	High	4	\$ 4,000
SE corner 6th/Arthur	High	4	\$ 4,000
SW corner 6th/Arthur	Low/High	2, 3	\$ 4,200
NW corner 6th/Arthur	High	3, 3	\$ 5,400
NE corner 3rd/Perkins	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 3rd/Perkins	Medium/High	2, 3	\$ 4,200
SW corner 3rd/Perkins	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 3rd/Perkins	Medium - Difficult to Use	2, 2	\$ 3,000
SE corner 3rd/Julian	Low - Usable	1	\$ 1,000
SW corner 3rd/Julian	Low - Usable	1, 1	\$ 2,000
NW corner 3rd/Julian	High	3	\$ 2,700
NE corner 4th/Perkins	Low/High	1, 3	\$ 3,700
SE corner 4th/Perkins	Low/High	1, 3	\$ 3,700
SW corner 4th/Perkins	Low/High	1, 3	\$ 3,700
NW corner 4th/Perkins	Low/High	1, 3	\$ 3,700
NE corner 3rd/Morgan	High/Unusable	4, 4	\$ 8,000
SE corner 3rd/Morgan	High/Unusable	3, 3	\$ 5,400
SW corner 3rd/Morgan	High/Unusable	3, 3	\$ 5,400
NW corner 3rd/Morgan	Low/Medium - Difficult to Use	1, 2	\$ 2,500
NE corner 3rd/Harrison	High/Unusable	5, 6	\$ 12,200
SE corner 3rd/Harrison	Low/High	1, 3	\$ 3,700
SW corner 3rd/Harrison	Medium - Difficult to Use	3, 3	\$ 5,400
NW corner 3rd/Harrison	Low - Usable	2, 2	\$ 3,000
NE corner 4th/Morgan	High/High	3, 5	\$ 8,100
SE corner 4th/Morgan	High/High	3, 5	\$ 8,100
SW corner 4th/Morgan	High/Unusable	5, 5	\$ 10,800
NW corner 4th/Morgan	High/High	3, 5	\$ 8,100
NE corner 4th/Harrison	Low - Usable	2, 2	\$ 3,000
SE corner 4th/Harrison	High/High	3, 4	\$ 6,700
SW corner 4th/Harrison	Medium/High	3, 4	\$ 6,700
NW corner 4th/Harrison	High/Unusable	3, 3	\$ 5,400

Location	Priority ¹	Cost Category ²	Base Cost
NE corner 3rd/Jackson	High	3	\$ 2,700
SE corner 3rd/Jackson	Low/High	2, 3	\$ 4,200
SW corner 3rd/Jackson	Low/High	2, 3	\$ 4,200
NW corner 3rd/Jackson	High	3	\$ 2,700
NE corner 3rd/McLaren	High/Unusable	3, 3	\$ 5,400
SE corner 3rd/McLaren	High/Unusable	3	\$ 2,700
SW corner 3rd/McLaren	Medium - Difficult to Use	3	\$ 2,700
NW corner 3rd/McLaren	High/Unusable	3, 3	\$ 5,400
NE corner 4th/Jackson	Medium - Difficult to Use	3	\$ 2,700
NW corner 4th/Jackson	High/Unusable	3	\$ 2,700
NE corner 4th/Sexton	Low - Usable	2	\$ 1,500
NW corner 4th/Sexton	High	3	\$ 2,700
SW corner Jennings/Spencer	Medium - Difficult to Use	3	\$ 2,700
NW corner Jennings/Spencer	Medium - Difficult to Use	3	\$ 2,700
NE corner Market/Spencer	High	3	\$ 2,700
NW corner Market/Spencer	Low/High	2, 3	\$ 4,200
SW corner Market/Hannah	High/Unusable	3	\$ 2,700
NW corner Market/Hannah	High/Unusable	3	\$ 2,700
NE corner Jennings/Hannah	High	3	\$ 2,700
SE corner Jennings/Hannah	High	3	\$ 2,700
SW corner Jennings/Hannah	High/High	3, 3	\$ 5,400
NW corner Jennings/Hannah	High/High	3, 3	\$ 5,400
NE corner 1st/Perkins	High/Unusable	3, 3	\$ 5,400
SE corner 1st/Perkins	Medium - Difficult to Use	3, 3	\$ 5,400
SW corner 1st/Perkins	High/Unusable	4, 4	\$ 8,000
NW corner 1st/Perkins	High/Unusable	3, 4	\$ 6,700
NE corner 1st/Morgan	Low - Usable	4	\$ 4,000
SE corner 1st/Morgan	Low - Usable	4	\$ 4,000
SW corner 1st/Morgan	Low - Usable	2, 2	\$ 3,000
NW corner 1st/Morgan	Low - Usable	2, 2	\$ 3,000
NE corner 2nd/Palo Alto	Low/High	1, 3	\$ 3,700
SE corner 2nd/Palo Alto	High	3	\$ 2,700
SW corner 2nd/Palo Alto	Low - Usable	1	\$ 1,000
NW corner 2nd/Palo Alto	Low - Usable	1, 1	\$ 2,000
NE corner 2nd/Pearl	High	3	\$ 2,700
SE corner 2nd/Pearl	Low/High	1, 3	\$ 3,700
SW corner 2nd/Pearl	Low/High	1, 3	\$ 3,700
NW corner 2nd/Pearl	High	3	\$ 2,700
NE corner 2nd/Cerro Gordo	Low	1	\$ 1,000
NW corner 2nd/Cerro Gordo	High/Unusable	3	\$ 2,700
NE corner 2nd/Washington	Medium - Difficult to Use	3	\$ 2,700
SE corner 2nd/Washington	Low - Usable	1	\$ 1,000
NE corner 2nd/Hannah	Low/Medium - Difficult to Use	1, 2	\$ 2,500
SE corner 2nd/Hannah	Medium - Difficult to Use	2	\$ 1,500
NW corner 2nd/Hannah	Low - Usable	1	\$ 1,500
NE corner 2nd/Spencer	Medium - Difficult to Use	3	\$ 2,700

Location	Priority ¹	Cost Category ²	Base Cost
NW corner 2nd/Spencer	Low - Usable	1	\$ 1,000
NE corner 1st/Hannah	Low - Usable	1	\$ 1,000
NW corner 1st/Hannah	Low - Usable	1	\$ 1,000
NE corner 1st/Spencer	Low - Usable	1	\$ 1,000
NW corner 1st/Spencer	High	3	\$ 2,700
NE corner Smiley/Water	Low - Usable	1	\$ 1,000
SE corner Smiley/Water	Low - Usable	1	\$ 1,000
SW corner Smiley/Water	Low - Usable	1	\$ 1,000
NW corner Smiley/Water	Low - Usable	1	\$ 1,000
TOTAL ESTIMATED COST - CURB RAMPS			\$ 1,591,600
NOTE: several street crossings N/S on 4th Street will be very difficult to accommodate due to presence of railroad tracks paralleling the street, often between the two travel direction lanes. This creates running and cross slopes that are extreme in many cases and locations with less severe slopes should be prioritized for improvements to allow movement of pedestrians with disabilities to the downtown area from the north.			
¹ Priority is based on general criteria. Low Priority includes all existing ramps or blended transitions with elevation changes of <2", Medium Priority is 2-<4", High/Unusable are 4" or greater, and High includes crossing locations between pedestrian facilities for which no ramp exists.			
² Cost Category is estimated based on assumed amount of curb and gutter, pavement removal, sidewalk removal, new sidewalk, ramp construction with detectable warning plate, and restoration. Actual costs will vary especially considering extraneous work needed cannot be determined until survey and design is completed.			

On-Street Parking Spaces			City Of Rushville		
Location (Block Face Perimeter Streets)	Block Face Designation	Total Spaces Provided	Accessible Spaces Provided	Accessible Spaces Required	Estimated Cost of Correction
Block bounded by 4th, Morgan, 3rd, and Harrison	A	8	2	1	\$0
Block bounded by 4th, Main, 3rd, and Morgan	B	28	1	2	\$225
Block bounded by 4th, Perkins, 3rd, and Main	C	18	0	1	\$225
Block bounded by 3rd, Morgan, 2nd, and Harrison	D	21	0	1	\$225
Block bounded by 3rd, Main, 2nd, and Morgan	E	47	1	2	\$225
Block bounded by 3rd, Perkins, 2nd, and Main	F	45	3	2	\$0
Block bounded by 3rd, Julian, 2nd, and Perkins	G	12	0	1	\$225
Block bounded by 2nd, Morgan, 1st, and Harrison	H	14	1	1	\$0
Block bounded by 2nd, Main, 1st, and Morgan	I	23	0	1	\$225
Block bounded by 2nd, Perkins, 1st, and Main	J	32	6	2	\$0
Block bounded by 2nd, Julian, 1st, and Perkins	K	6	0	1	\$225
Block bounded by 1st, Morgan, Water, and Harrison	L	5	0	1	\$225
Block bounded by 1st, Main, Water, and Morgan	M	10	1	1	\$0
Block bounded by 1st, Perkins, Water, and Main	N	3	0	1	\$225
		272	15	18	\$2,025

Deficient

Deficient total 3 spaces

*Note: Location near accessible route or ramp indicates only adjacency. Not intended to imply compliance of adjacent ramp or route. See Sidewalk/Ramp Data for those locations. Costs provided are for bringing req'd number of stalls into compliance and do not include cost to make ALL provided stalls compliant.

Blocks C and G have public parking outside of the ROW.

Key Businesses/Buildings

U.S. Post Office - Block A

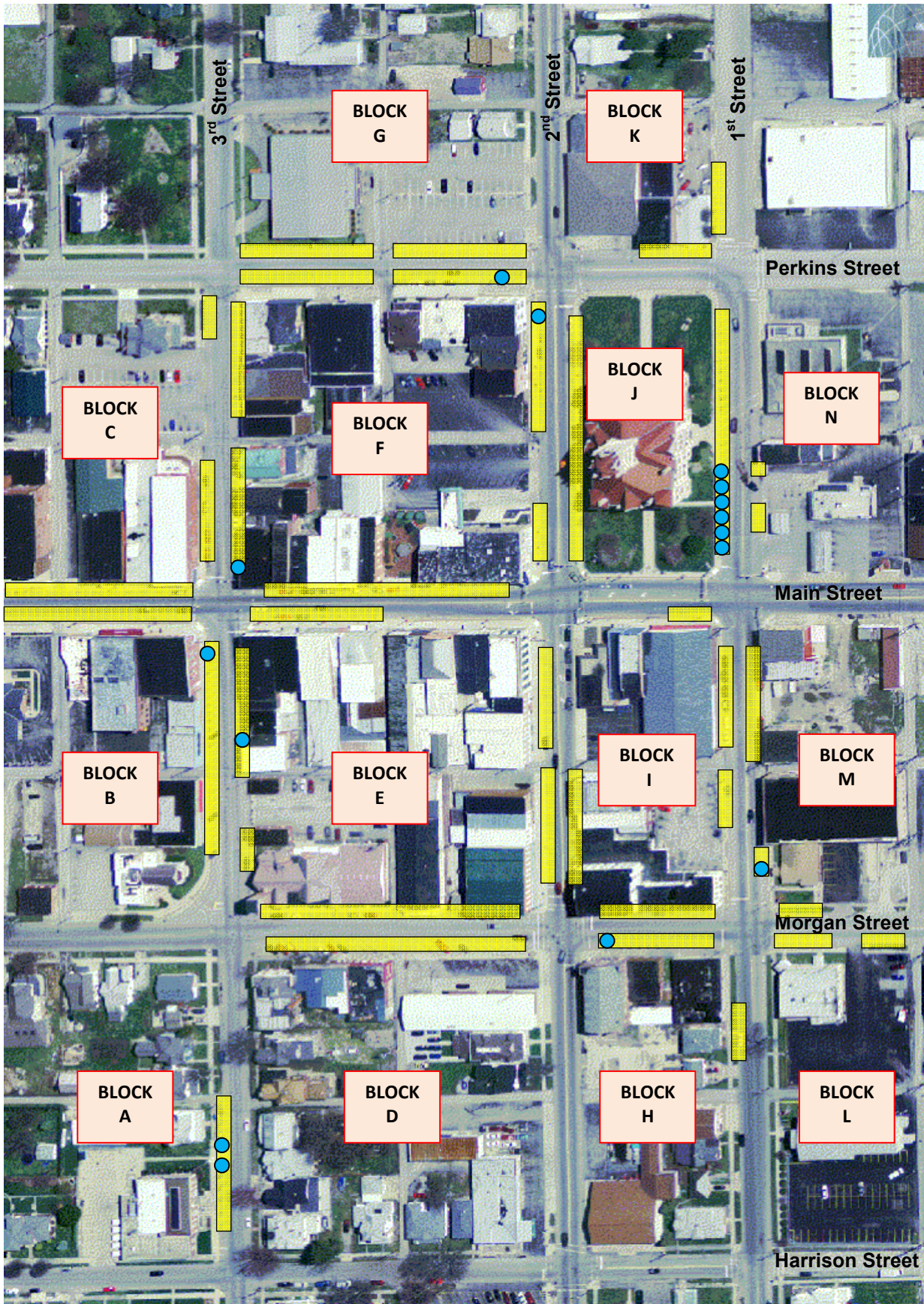
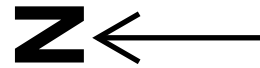
County Courthouse - Block C

City Hall - Block M

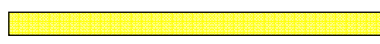
County Sheriff - Block N

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On-Street Parking Map Key



● = Barrier-Free Parking Space



= On-Street Parking Area

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Appendix D

Public Outreach

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Appendix E

Forms and Notices

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ORDINANCE 2012-28

**AN ORDINANCE OF THE COMMON COUNCIL OF THE CITY OF RUSHVILLE, INIANA
ADOPTING THE NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT
AND THE GRIEVANCE PROCEDURE**

WHEREAS, it is required of the City of Rushville under the Americans with Disabilities Act to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act which shall be on file for public inspection at City Hall, 133 West First Street, Rushville, Indiana, and on the City of Rushville Website, www.cityofrushville.in.gov. That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request. Requests for alternate formats of either document should be provided to the City of Rushville and all reasonable requests will be accommodated.

WHEREAS, the City of Rushville also believes that it is in the best interests of its citizens to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act.

Now, therefore, the Common Council of the City of Rushville states as follows:

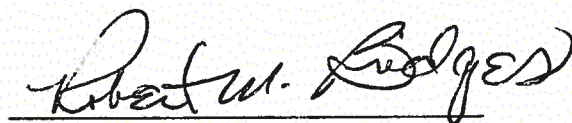
1. The City of Rushville Grievance Procedure and separate Notice under the Americans with Disabilities Act are hereby established effective immediately upon the passage of this Ordinance. The City of Rushville adopts the 2012 Americans with Disabilities Act Standards for Accessible Design and the 2005 Guidelines for Accessible Public Right-of-Way, including any future updates to either document enforceable by the U.S. Department of Justice or other Federal agency with jurisdiction.
2. The City of Rushville shall have on file for public inspection the Grievance Procedure and Notice in City Hall, Rushville, Indiana and shall post them on the City of Rushville, Indiana Website. That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request including copies in alternate format.

SEVERABILITY OF PROVISIONS: If any provision of this Ordinance or the application thereof to any person or circumstances shall be determined to be invalid, the remainder of the Ordinance and the application of its provisions to other persons not similarly situated or to the other circumstances shall not be affected thereby.

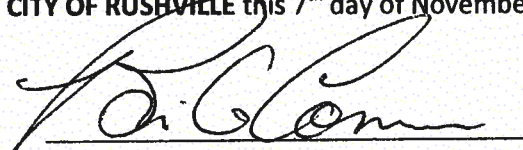
REPEAL OF PREVIOUS ORDINANCES: Any and all ordinances in conflict herewith shall be repealed.

NOW THEREFORE, BE IT ORDAINED BY THE COMMON COUNCIL OF THE CITY OF RUSHVILLE, INDIANA this Ordinance will be in full force and affect from and after its passage and signature by the Common Council of the City of Rushville, Indiana, and as provided by law, and upon any further requirements under Indiana law.

DULY ORDERED BY THE COMMON COUNCIL OF THE CITY OF RUSHVILLE this 7th day of November, 2012.



ROBERT M. BRIDGES, MEMBER



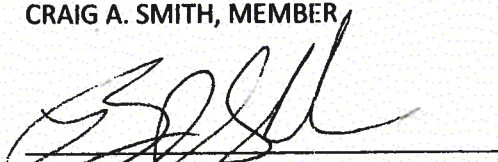
BRIAN G. CONNER, MEMBER



CRAIG A. SMITH, MEMBER

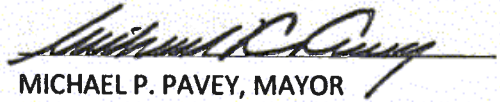


BRADLEY A. BERKEMEIER, MEMBER



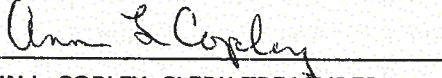
BRIAN J. SHEEHAN, MEMBER

PRESENTED to me for approval and approved this 7th day of November, 2012, at 6:00 p.m.



MICHAEL P. PAVEY, MAYOR
CITY OF RUSHVILLE

ATTEST:



ANN L. COPLEY, CLERK-TREASURER
CITY OF RUSHVILLE

ORDINANCE 2012-28
AN ORDINANCE OF THE COMMON COUNCIL OF THE CITY OF RUSHVILLE, INIANA
ADOPTING THE NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT
AND THE GRIEVANCE PROCEDURE

WHEREAS, it is required of the City of Rushville under the Americans with Disabilities Act to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act which shall be on file for public inspection at City Hall, 133 West First Street, Rushville, Indiana, and on the City of Rushville Website, www.cityofrushville.in.gov. That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request. Requests for alternate formats of either document should be provided to the City of Rushville and all reasonable requests will be accommodated.

WHEREAS, the City of Rushville also believes that it is in the best interests of its citizens to establish a Grievance Procedure and separate Notice under the Americans with Disabilities Act.

Now, therefore, the Common Council of the City of Rushville states as follows:

1. The City of Rushville Grievance Procedure and separate Notice under the Americans with Disabilities Act are hereby established effective immediately upon the passage of this Ordinance. The City of Rushville adopts the 2012 Americans with Disabilities Act Standards for Accessible Design and the 2005 Guidelines for Accessible Public Right-of-Way, including any future updates to either document enforceable by the U.S. Department of Justice or other Federal agency with jurisdiction.
2. The City of Rushville shall have on file for public inspection the Grievance Procedure and Notice in City Hall, Rushville, Indiana and shall post them on the City of Rushville, Indiana Website. That additionally anyone shall be provided copies of the Notice and Grievance Procedure free of charge at that person's request including copies in alternate format.

SEVERABILITY OF PROVISIONS: If any provision of this Ordinance or the application thereof to any person or circumstances shall be determined to be invalid, the remainder of the Ordinance and the application of its provisions to other persons not similarly situated or to the other circumstances shall not be affected thereby.

REPEAL OF PREVIOUS ORDINANCES: Any and all ordinances in conflict herewith shall be repealed.

NOW THEREFORE, BE IT ORDAINED BY THE COMMON COUNCIL OF THE CITY OF RUSHVILLE, INDIANA this Ordinance will be in full force and affect from and after its passage and signature by the Common Council of the City of Rushville, Indiana, and as provided by law, and upon any further requirements under Indiana law.

DULY ORDERED BY THE COMMON COUNCIL OF THE CITY OF RUSHVILLE this 7th day of November, 2012.

ROBERT M. BRIDGES, MEMBER

BRIAN G. CONNER, MEMBER

CRAIG A. SMITH, MEMBER

BRADLEY A. BERKEMEIER, MEMBER

BRIAN J. SHEEHAN, MEMBER

PRESENTED to me for approval and approved this 7th day of November, 2012, at 6:00 p.m.

MICHAEL P. PAVEY, MAYOR
CITY OF RUSHVILLE

ATTEST:

ANN L. COPLEY, CLERK-TREASURER
CITY OF RUSHVILLE

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title D of the Americans with Disabilities Act of 1990, the City of Rushville will not discriminate against qualified individuals with disabilities on the basis of disability in the City's services, programs, or activities.

Employment: The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the Americans with Disabilities Act (ADA).

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

Modifications to Policies and Procedures: The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity, should contact the office of Marcia Fish, Human Resources, Purchasing, and ADA Coordinator (phone: 765-932-2672) as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. Complaints that a City program, service, or activity is not accessible to persons with disabilities should be directed to Marcia Fish, Director of Personnel, Purchasing, and ADA Compliance, (phone 765-932-2672).

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

THE CITY OF RUSHVILLE GRIEVANCE PROCEDURE
UNDER THE AMERICANS WITH DISABILITIES ACT

The Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City. The City'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 the name, address, and 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:

Marcia Fish
Human Resources/Purchasing/ADA Compliance
133 West First Street
Rushville, IN 46173
Phone: 765-932-2672

Within 15 calendar days after the receipt, Marcia Fish or her designee will meet with the complainant to discuss the complaint and possible resolutions. As soon as possible following the investigation, but not in excess of 30 calendar days of the meeting, Marcia Fish or her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City and offer options for the substantive resolution of the complaint.

If the response by Marcia Fish or her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Mayor or his designee.

Within 15 calendar days after receipt of the appeal, the Mayor or his designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Mayor or his 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 Marcia Fish or her designee, appeals to the Mayor or his designee, and responses from these two offices will be retained by the City for at least 3 years.

Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire City of Rushville, 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 county to provide equal access to programs and activities to everyone, without exception.

- A. Verify the list of City Departments and location (include address). Provide a short description of the primary duties of each department and any payments, publications, applications, forms, etc. that are used for each.

- 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. 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 City buildings? If so, where (include all locations).

- E. How are public meetings (especially City Council) publicized? Are agendas posted in City 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.

- F. Please provide DLZ with a copy (electronic preferred) of the City's Personnel Policy Manual and Application for Employment (if not available on the web site).

- G. It is our understanding that Marcia Fish has been appointed as ADA Coordinator? Can you please provide information on the date, copies of resolutions/ordinances, etc.
- H. To date, has the City published a Non-Discrimination Notice, adopted the ADA standards, published a Grievance Procedure, and/or developed a Grievance Form? Include copies of any documentation, resolutions, etc.
- 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 City 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 City facilities for meetings, picnics, etc., including parks? If so, provide a copy of any lease agreements.
- L. Are emergency procedures in place at City facilities for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for each building? Please identify.
- M. Please list any special events that the City 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.
- N. Has the City ever been asked to provide special accommodation for printed materials? If so what was requested and provided?
- O. Do any City facilities have Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

- P. Who is the website developer for the City? 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 City is the "Human Resources" person? Name and contact information is needed.
- R. Does the City own all the buildings that provide services to the public? Does the City lease any buildings to someone else for their use? If yes for either, provide detail about the address, owner, and functions provided there.
- S. Is someone at the City designated as the liaison with the County EMA? If so identify by name and contact info.
- 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 Police Department had any other formal training on interacting with persons with disabilities?
- U. Are any formal programs offered at any of the City Parks? If so, how do people register for them? Do you have a printed quarterly or other publication that is used to advertise programs and allow people to sign up for them? If so provide a copy (electronic is acceptable).
- V. Are there any specific suggestions or thoughts anyone at the City has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful for anyone at the City?