

City of Norman

ADA Self-Evaluation & Transition Plan

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In Association with:





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1.0 Introduction

1.1 Legislative Mandate

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

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

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

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

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

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

This document describes the process developed to complete the evaluation of the City of Norman's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 10 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate the entire community.

1.3 Discrimination and Accessibility

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

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



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

1.3.1 Physical Barriers

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

1.3.2 Programmatic Barriers

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

1.3.3 Ongoing Accessibility Improvements

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

1.3.4 City of Norman Approach

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

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



2.0 Public Outreach

Public Workshops

The City hosted public workshops on October 26, 2017 and May 9, 2018, both at 6:00 PM, to provide a summary of the Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility. Initial Self-Evaluation findings were also presented during the May public workshop.

Citizen Steering Committee

In addition, the City contacted local disability organizations to form an external Citizen Steering Committee and hosted meetings with the committee on August 17, 2017, February 27, 2018, and May 9, 2018. The Citizen Steering Committee meeting notes are provided in **Appendix A**.

Web Survey

The City also developed a web survey open to the public. The survey was designed to help the City locate areas of greatest concern to the public and help provide better access to the community.

<https://www.surveymonkey.com/r/RTZGN92>

Web Map

The City also developed an online map to allow the public to identify specific locations where they experienced issues related to accessibility, safety, connectivity, or suggestions for accessibility improvements that are needed in Norman.

<http://wikimapping.com/wikimap/Norman-ADA-Transition-Plan-Update.html>

The web survey and map were posted on the City's web page, sent out through social media, and emailed to the Citizen Steering Committee for redistribution. Both will remain online through the end of 2018 and serve as a tool to solicit feedback from the public on the Transition Plan.



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3.0 Self-Evaluation and Summary of Findings

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

3.1 Programs, Procedures, and Policies Review

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

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

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

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

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

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

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



3.1.1 Departmental Surveys and Interviews

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

Survey of All Departments: Self-Evaluation Findings

- Most department contacts are aware that ADA obligations exist. However, they were not aware of the specific requirements.
- Department contacts were unaware of a City-wide ADA grievance policy and procedure. However, all City staff are aware of the City's general grievance policy and procedure located in the Personnel Manual, which does not specifically address ADA Title I or Title II.
- Most department contacts were unsure if the City has a reasonable accommodation policy and procedure.
- Most department contacts were unsure if the City has a process on how to obtain alternate formats of City documents or the types of formats available. Each Department ADA Liaison should retain a list of all alternate formats available and ensure all City staff is aware of the City's alternate format policy and procedure. Alternate formats are auxiliary aids, services, or devices that enable effective communication for individuals with disabilities.
- Most department contacts were unsure if the City has a public notice under the ADA. This notice is required by all Title II entities regardless of their size and is required to be publicized on an ongoing basis. The notice should include brief statements regarding employment, effective communication, making reasonable modifications to policies and programs, not placing surcharges on modifications or auxiliary aids and services, and filing complaints. This notice should be published on a continuous basis on the City's website and in locations that are open to the public and employees. See **Section 3.1.11 Public Notice Under the ADA**.
- While conducting ADA Liaison training is not specifically required, it will help fulfill the City's ADA obligations. All departments have an ADA Liaison; however, no specific training has been conducted to ensure all Liaisons are aware of their roles and responsibilities.
- Various department contacts stated that they were aware of ADA complaints within the last five (5) years. These complaints should be added to the City's Action Log. See **Section 3.1.21 Previous ADA Complaints (Title I & II)** and **Appendix H** example ADA Action Log.
- Department contacts were unaware of policies and procedures or guidelines in place regarding ADA compliant purchasing and procurement. The Financial Services Department should ensure that all policies on purchasing and procurement are readily available City-wide.
- Most department contacts indicated they do not use ADA checklists to ensure ADA compliance. The City's ADA/504 Coordinator should work with each department ADA Liaison to create checklists that provide guidance regarding Department programs, services, and activities.



Survey of All Departments: Self-Evaluation Findings (cont.)

- Most department contacts were unaware of a City-wide non-discrimination statement that is required to be included in all information distributed by the City. The City's ADA/504 Coordinator should work with each department to ensure that a City-wide non-discrimination policy statement is developed and readily available to all City staff.

Survey of All Departments: Possible Solutions

The possible solutions associated with each of the departmental surveys and interviews have been incorporated into **Sections 3.1.2 – 3.1.25** of this document, as applicable for all City programs, policies, and procedures.

3.1.2 Department-Specific Information

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

City Attorney's Office

City Attorney's Office: Self-Evaluation Findings

- ADA language is not included in the standard form contract used for construction projects. It is typically included in bid specs, which the City Attorney's Office does not review.
- The City has not received any official tort claims within the last five (5) years.
- Office staff has not nor are they required to attend annual ADA training. However, ADA training is a part of mandatory discrimination training for City employees.

City Attorney's Office: Possible Solutions

- ADA language should be included in the standard form contract used for construction projects. Each standard contract should undergo a review for ADA language.
- Office staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.

City Clerk's Office

City Clerk's Office: Self-Evaluation Findings

- Office staff has not nor or they required to attend annual ADA training. However, ADA training is a part of mandatory discrimination training for City employees.
- The office does not currently have an alternate format policy, procedure, and request form.
- The office does charge a fee to duplicate records. However, additional fees are not charged for alternate formats.



City Clerk's Office: Self-Evaluation Findings (cont.)

- Council meeting agendas and minutes do not include a City-wide non-discrimination statement.
- The City of Norman Action Center does not currently have guidance or policies and procedures in place to support staff in assisting individuals with disabilities.
- The Facility Maintenance Division does not currently utilize an ADA checklist to ensure compliance.

City Clerk's Office: Possible Solutions

- Office staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- The City should develop an alternate format policy, procedure, and request form. This policy and procedure should provide guidance to staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. This standardized statement should be accessible to all employees to utilize in all departmental materials that are distributed by the City of Norman, including meeting agendas and minutes. See **Section 3.1.10 Non-Discrimination Policy**.
- The City should develop guidance or policies and procedures to support staff in assisting individuals with disabilities.
- The Facility Maintenance Division should develop and utilize an ADA checklist to ensure ADA compliance for all facilities.

City Manager's Office

City Manager's Office: Self-Evaluation Findings

- Office staff has not nor or they required to attend annual ADA training. However, ADA training is a part of mandatory discrimination training for City employees.
- The City does not appear to have a vendor database that includes professional services to assist individuals with disabilities.



City Manager's Office: Possible Solutions

- Office staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- The City should develop a vendor database or update any existing vendor databases to include professional services to assist persons with disabilities that can be utilized by every City department. Upon completion, the City should develop guidance on how to use this information and distribute the information to each department to assist in obtaining vendor information.

Financial Services Department

Financial Services Department Self-Evaluation Findings

- Department staff has not nor are they required to attend annual ADA training. However, ADA training is a part of mandatory discrimination training for City employees.
- The Department does not have policies and procedures in place regarding information and technology purchases.

Financial Services Department Possible Solutions

- Department staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- The Department should develop policies and procedures to ensure that purchases regarding information and technology are ADA compliant before purchase.

Fire Department

Fire Department Self-Evaluation Findings

- The Department attends annual continuing education training on dealing with mental and physically disabled individuals. The Department keeps up with industry changes and trends as they occur and incorporates them in EMT refresher training provided by the Department's Training Division.
- The Department offers facility tours. All facilities are ADA accessible except the upper level in Station #2.

Fire Department Possible Solutions

- The Department should attend annual training specific to the ADA. This should include training on how to assist and rescue persons with disabilities.
- The Department should develop tour guidance to ensure ADA accessibility and that participants only tour ADA accessible areas of the facility.



Human Resources Department

Human Resources Department Self-Evaluation Findings

- The Department does provide new employee orientation that includes training on policies and procedures for workplace discrimination and harassment including Title I of the ADA. However, training is not specifically detailed regarding the ADA.
- The City's ADA/504 Coordinator is not included in the new employee orientation process.
- The Department does not provide annual training. However, the Department provides refresher training on discrimination and harassment on a regular basis that includes Title I of the ADA.
- The Department does not have a Reasonable Accommodation Policy, Procedure, and Request Form.
- The Department does not utilize a consistent City-wide non-discrimination statement.

Human Resources Department Possible Solutions

- The Department should incorporate specific ADA training into the new employee orientation.
- The City's ADA/504 Coordinator should be included in the new employee orientation process. This can be accomplished by including a business card, incorporating a specific slide in the presentation, or an in-person introduction.
- The Department should provide annual training for employees to ensure that employees are aware of their rights and obligations under the ADA.
- The Department should develop a Reasonable Accommodation Policy, Procedure, and Request Form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form.**
- The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. This standardized statement should be accessible to all employees to utilize in all departmental materials that are distributed by the City of Norman, including meeting agendas and minutes. See **Section 3.1.10 Non-Discrimination Policy.**



Information Technology Department

Information Technology Department Self-Evaluation Findings

- The Department provides reasonable accommodations when requested. However, the Department does not have a Reasonable Accommodation Policy, Procedure, and Request Form.
- Department staff has not nor or they required to attend annual ADA training. However, ADA training is a part of mandatory discrimination training for City employees.
- The Department manages the overall website. However, each City department is responsible for updating their content as necessary.

Information Technology Department Possible Solutions

- The Department should utilize the City's adopted Reasonable Accommodation Policy, Procedure and Request Form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.
- Department staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- All City departments who take on the responsibility of updating the website with department content should attend annual training to ensure ADA compliance.

Municipal Court

Municipal Court Self-Evaluation Findings

- The Court does not have a reasonable accommodation or modification request policy, procedure, or request form.
- The Court does not appear to have a vendor database that includes professional services to assist individuals with disabilities.

Municipal Court Possible Solutions

- The Court should develop a Court-specific reasonable accommodation request policy, procedure, and request form separate from the City-wide policy and procedure. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.
- The Court should utilize the City's vendor database to access professional services to assist individuals with disabilities. The Court shall also utilize developed guidance on how to use this information and distribute the information within the department to assist in obtaining vendor information.



Parks & Recreation Department

Parks & Recreation Department Self-Evaluation Findings

- Department staff attends an annual conference for the Oklahoma Recreation and Park Society (ORPS). This conference provides continuing education sessions that keep staff up-to-date on service, design and programming issues in the field of parks and recreation. Additional opportunities for training and education are also offered throughout the year for park planning and recreation staff at various conferences, seminars, and programs. Department staff has not attended annual training that is specific to ADA. However, ADA training is a part of mandatory discrimination training for City employees.
- The Department does not utilize a formal grievance policy and procedure specific to the Parks and Recreation Department. Staff attempt to respond to all questions and complaints as they are received, either by direct contact with the Department, or whenever issues are sent to the City's general action center line. A complaint log is not retained.
- The Department does not currently have an alternate format policy, procedure, and request form.
- The Department makes reasonable accommodations and modifications on a case-by-case basis. However, the Department does not have a reasonable modification policy, procedure, and request form, nor does the Department retain an accommodation or modification log.
- The Department does rent pavilions and buildings that require a written Use Agreement. However, these agreements do not contain specific language for the ADA.

Parks & Recreation Department Possible Solutions

- Department staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- The Department should utilize the City's ADA grievance policy, procedure, and form with appeals process and retain a complaint log. See **Section 3.1.5 ADA Grievance Procedure and Grievance Form with Appeal Process**.
- The Department should utilize the City's alternate format policy, procedure, and request form. This policy and procedure shall guide staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department should utilize the City's adopted reasonable modification policy, procedure, and request form and retain a modification log. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.
- The Department should revise use agreements to include specific language to clarify the City's obligations under the ADA.



Planning & Development Department

Planning & Development Department Self-Evaluation Findings

- Department staff have attended limited training regarding the ADA. However, ADA training is a part of mandatory discrimination training for City employees.
- Department staff do not utilize specific checklists regarding ADA compliance.
- The Department provided an excerpt from the Norman Historic Preservation Handbook. The document states, "The City can provide ramp plans from Norman Health Systems as well as a list of carpenters who can build ramps." However, this information is not available, and the Department does not make recommendations for contractors.

Planning & Development Department Possible Solutions

- Department staff should attend annual ADA training to ensure all staff is aware of the City's obligations and rights under the ADA.
- Department staff should utilize specific checklists to ensure ADA compliance, including a checklist for plans review.
- The Department shall revise the Norman Historic Preservation Handbook to reference ADA laws and guidelines and to take out information regarding contractors.

Police Department

Police Department Self-Evaluation Findings

- Department staff is required to attend a 2-hour in-service PowerPoint presentation the Department co-developed with the Office of Disability Concerns. This presentation covers portions of the ADA that includes information on technology, service animals, the Department's arrest policy and procedure for those with disabilities, etc.
- The Department currently has a policy and procedure that is considered their ADA policy and procedure. This policy and procedure is in the Norman Police Department Policy Manual - Lexipol Policy 333.1 Purpose and Scope. However, this policy and procedure is not an actual ADA policy and procedure and should be used as a policy statement for the Department.
- The Department currently has a policy and procedure regarding alternate formats. This policy and procedure is in the Norman Police Department Policy Manual - Lexipol Policy 333.2 Communications with Persons with Disabilities Policy. However, this policy and procedure is not an actual alternate format policy and procedure and should be used as guidance material.
- The Department manual states that the Department has an ADA Coordinator. However, this individual should be an ADA Liaison for the Police Department and not considered the City's ADA Coordinator.
- The Department manual states that when completing a report or other documentation, and a modification has been provided, such services should be noted in the related report. This section does not specify that modifications should be reported to the Police Department's ADA Liaison or City ADA/504 Coordinator to ensure that all logs are updated.



Police Department Self-Evaluation Findings (cont.)

- The Department manual provides information on how to assist an individual who has a service animal. However, the manual does not give specific guidance on how to make arrangements for the care of their service animal.
- The Department manual provides information regarding the use of video remote interpreting service, if an interpreter is not available, for interrogations. However, information is not provided on how to obtain either of these services.
- The Department manual provides a section providing guidance on interpreters. However, the manual does not include information on how to obtain these services.
- The Department manual states that an individual with speech or hearing disabilities has the right to an interpreter and the officer shall use the department-approved procedures to provide a qualified interpreter. However, these “department-approved procedures” are not referenced.
- The Department manual states that the Department shall ensure that anyone who wishes to file a complaint, can do so. The manual further states that the department will provide alternate formats. However, the manual does not reference information on how to file a complaint or the alternate format policy and procedure.
- Department information regarding Ride-Alongs does not provide information for reasonable accommodations or modifications under the ADA.
- The Department manual provides limited information on anti-retaliation and does not mention coercion.
- The Department manual provides information regarding personal appearance and states that any member who has a condition due to a protected category (e.g., race, physical disability) that affects any aspect of hygiene covered by this policy may qualify for accommodations and should report any need for an accommodation to the Chief of Police. However, the manual does not reference the reasonable accommodation policy and procedure.
- The Department manual mentions engaging in the interactive process to consider reasonable accommodations for any employee with a temporary or permanent disability that is protected under Federal or State law. However, the manual does not reference the reasonable accommodation request policy and procedure.

Police Department Possible Solutions

- Department staff should attend annual training specific to the ADA. This should include training on how to assist and rescue persons with disabilities.
- The Department should utilize and update the Department manual with the City's ADA grievance policy, procedure and form with appeals process and retain a complaint log. See **Section 3.1.5 ADA Grievance Procedure and Grievance Form with Appeal Process**.
- The Department manual should be updated to include the City's ADA/504 Coordinators and the Department's ADA Liaison contact information.
- The Department manual should be updated to include language that ensures any documentation related to ADA accommodations and modification are relayed to the ADA Liaison or ADA/504 Coordinator.



Police Department Possible Solutions (cont.)

- The Department should utilize and update the Department manual with the City's alternate format policy, procedure and request form. This policy and procedure should guide staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department manual should be updated to include specific guidance on how to make arrangements for the care of a service animal.
- The Department manual should be updated to include specific guidance on how to obtain video remote interpreting service, if an interpreter is not available, for interrogations.
- The Department manual should be updated to include guidance on how to obtain interpreters.
- The Department manual should be updated to state the location of the department-approved procedure to provide a qualified interpreter.
- The Department manual should be updated to reference information on how to file a complaint and the alternate format policy and procedure.
- Department information regarding Ride-Alongs should be updated to include specific information regarding the City's adopted reasonable modification policy, procedure and request form and alternate format policy, procedure and request form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form** and See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department manual should be revised to include information regarding the City's retaliation and coercion policy. See **Section 3.1.9 Retaliation or Coercion Policy**.
- The Department manual provides information regarding personal appearance and states that any member who has a condition due to a protected category (e.g., race, physical disability) that affects any aspect of hygiene covered by this policy may qualify for accommodations and should report any need for an accommodation to the Chief of Police. However, the manual does not reference the reasonable accommodation policy and procedure. The Department manual should be revised to include specific information regarding City's adopted reasonable modification policy, procedure and request form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.
- The Department manual mentions engaging in the interactive process to consider reasonable accommodations for employees with a temporary or permanent disability that is protected under Federal or State law. However, it does not reference the reasonable accommodation request policy and procedure. The Department manual should be revised to include specific information regarding City's adopted reasonable modification policy, procedure and request form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.



Public Works Department

Public Works Department Self-Evaluation Findings

- The City currently utilizes the Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way as guidance. However, these guidelines have not been formally adopted.
- The City does not currently have a formal request policy and procedure for ADA elements within the public rights-of-way.

Public Works Department Possible Solutions

- The City currently utilizes the Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way as guidance (PROWAG). The City should formally adopt PROWAG to enable City enforcement of these guidelines throughout the design and construction process of pedestrian facilities in the public rights-of-way.
- The City should develop a request policy, procedure, and request form for the public to request ADA elements within the public rights-of-way, such as sidewalks, curb ramps, pedestrian signals, etc.

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

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

ADA/504 Coordinator: Self-Evaluation Findings

The City of Norman has appointed Shawn O'Leary as ADA/504 Coordinator for Title I and Title II. Below is his contact information; however, his full contact information is not published on the City's website or in other City documents:

Shawn O'Leary, P.E.
ADA/504 Coordinator / Public Works Director
201 W. Gray, Building A
P.O. Box 370
Norman, OK 73069-73070
Office: 405-366-5453
Relay: 1-800-722-0353
shawn.oleary@normanok.gov

ADA/504 Coordinator: Possible Solutions

Shawn O'Leary's contact information should be prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator contact information must be included in all materials that are distributed by the City including posting this information on the City's website.



3.1.4 Roles and Responsibilities of the ADA/504 Coordinator

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

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

Roles and Responsibilities of the ADA/504 Coordinator: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA/504 Coordinator was found on the City's website or in City-provided documents.

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

The City should review and adopt the Consultant drafted roles and responsibilities for the ADA/504 Coordinator. These roles and responsibilities are consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pca toolkit/chap2 toolkit.htm>) and should be incorporated into the job description and classification for the ADA/504 Coordinator. See **Appendix C** for a copy of the roles and responsibilities of the ADA/504 Coordinator.

3.1.5 ADA Grievance Procedure and Grievance Form with Appeal Process

Title I

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

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

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

The City does not have ADA-specific grievance policy, procedure, and form with appeals process for Title I. Various general grievance policies and procedures were found in several City departments.

- Page 28 Section 303 of the Personnel Manual. The Harassment Policy references disabilities, but is not specific to ADA Title I.



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

- Page 40 Section 306 of the Personnel Manual. The Grievance and Arbitration Procedures are intended to encourage employees to discuss employment problems with their supervisors, thereby providing a basis to talk over matters of mutual interest, to explain, to reach agreement, to make adjustments, if necessary, and to foster a better understanding between employees and supervisors.
- Page 42 Section 306.3.d of the Personnel Manual. This section states that all grievances are to be submitted to the Human Resources Department on the official "Grievance Form." The manual does not specifically state that this relates to ADA.
- Page 42 Section 306.3 of the Personnel Manual. This section states that no grievance shall be processed unless it is submitted to Human Resources on the approved grievance form.

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

- An ADA Grievance Policy, Procedure, and Form with Appeal Process for Title I was developed as part of this project. These documents should be adopted City-wide, posted on the City's website, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix C** for a copy of the procedure and form.
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.
- The City of Norman Personnel Manual should be revised to include specific information for the newly developed ADA Grievance Policy, Procedure, and Form with Appeals Process for Title I. See **Appendix C** for a copy of the procedure and form.

Title II

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

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

The City does not have an ADA grievance policy, procedure, and form with appeals process for Title II.

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

- An ADA Grievance Policy, Procedure, and Form with Appeal Process for Title II was developed as part of this project. These documents should be adopted City-wide, posted on the web, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix C** for a copy of the procedure and form.
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.



3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form

Title I

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

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

No information regarding a Reasonable Accommodation Request policy, procedure, and request form was found on the City's website or in City-provided documents.

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

The City should develop a reasonable accommodation request policy, procedure, and request form. This policy and procedure should provide a description regarding reasonable accommodation, provide details on how to file a request and participate in the interactive process, and provide an ADA accessible request form. The request form should include the requestor's contact information, type of accommodation being requested, and specific details regarding the need for a reasonable accommodation.

Title II

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

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

No information regarding a Reasonable Accommodation Request policy, procedure, and request form was found on the City's website or in City-provided documents.

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

The City should develop a reasonable modification request policy, procedure, and request form. This policy and procedure should provide a description regarding reasonable modifications, provide details on how to file a request and participation in the interactive process, and provide an ADA accessible request form. The request form should include the requestor's contact information, type of modification being requested, and specific details regarding the specific City program, services, or activity needing a reasonable modification.

3.1.7 Service Animal Guidance

Many individuals with disabilities use service animals to assist them in their everyday life. Title I of the ADA requires all employers to provide reasonable accommodations to qualified individuals with disabilities who are employees or applicants for employment unless doing so would cause undue hardship. Title II of the ADA requires all State and local government entities to make reasonable modifications to their policies, practices, or procedures to accommodate individuals with disabilities. Reasonable accommodations and modifications may include adjustments



to allow service animals. All State and local government entities should have guidance to assist staff when dealing with reasonable accommodations and modifications.

Service Animal Guidance: Self-Evaluation Findings

The City does not have service animal guidance for requests for reasonable accommodations or modifications from qualified applicants, employees, or the public.

Service Animal Guidance: Possible Solutions

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

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

3.1.8 ADA Grievance Procedure and Grievance Form with Appeals Process for Section 508 of the Rehabilitation Act

Section 508 of the Rehabilitation Act of 1973, requires that all electronic and information technologies developed and used by any Federal government agency must be accessible to individuals with disabilities. This includes websites, video and audio tapes, electronic books, televised programs, and other such media. Individuals with disabilities may still have to use special hardware and/or software to access the resources. This law pertains to the Federal government. However, each state can adopt these regulations for state use. The State of Oklahoma has adopted these technology requirements; therefore, the City of Norman is required to comply. Details regarding the Oklahoma Electronic and Information Technology Accessibility law (EITA), along with accessibility tools, training, and related resources can be found here: <https://www.ok.gov/accessibility/>

ADA Grievance Policy, Procedure and Form with Appeals Process for Section 508 of the Rehabilitation Act Self-Evaluation Findings

No information regarding an ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act was found on the City's website or in City-provided documents.

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

- The City should develop an ADA grievance policy, procedure, and grievance form with the appeals process for Section 508 of the Rehabilitation Act. The form should include the complainant's contact information, description of the electronic and information technology in question, and specific details regarding the non-conforming aspects and remedy that is being requested.



ADA Grievance Policy, Procedure and Form with Appeals Process for Section 508 of the Rehabilitation Act Possible Solutions (cont.)

- This policy, procedure, and form should be adopted City-wide, posted on the City's website, and publicized in common areas that are accessible to all employees and areas open to the public.
- The City should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.

3.1.9 Retaliation or Coercion Policy

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

Retaliation or Coercion Policy: Self-Evaluation Findings

No information regarding a retaliation or coercion policy was found on the City's website or in City-provided documents. The City does have limited information regarding retaliation in the City of Norman Personnel Manual and City Ordinance – Chapter 7. However, this language does not include coercion.

Retaliation or Coercion Policy: Possible Solutions

- The City should draft and adopt a City-wide retaliation and coercion policy that is accessible to all employees and the public. U.S. Equal Employment Opportunity Commission guidance on retaliation and related issues can be found here: <https://www.eeoc.gov/laws/guidance/retaliation-guidance.cfm>.
- The City should revise existing language within the City of Norman Personnel Manual and the City Ordinance – Chapter 7 to reference the drafted and adopted City-wide retaliation and coercion policy.

3.1.10 Non-Discrimination Policy

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

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

1. Non-Discrimination Statement Policy, which documents the requirement to include a non-discrimination statement in any City publication or document distributed to employees or to the public.
2. Non-Discrimination Contract Clause, which documents the requirement to include a non-discrimination contract clause in all City contracts that are Federally funded. However, this does not include contracts or agreements with contractors.



Non-Discrimination Statement Policy

Non-Discrimination Statement Policy: Self-Evaluation Findings

The City has several different variations of a non-discrimination statement. This statement should be consistent City-wide and policy guidance should be provided on how the non-discrimination statement shall be applied.

Non-Discrimination Statement Policy: Possible Solutions

- The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. This standardized statement should be accessible to all employees and utilized in all departmental materials that are distributed by the City of Norman.
- An ADA Grievance Policy, Procedure and Form with Appeal Process for Title I was developed as part of this project. The form contains a copy of the non-discrimination statement for Title I. See **Appendix C** for a copy of the form and non-discrimination statement.

Non-Discrimination Contract Clause

Non-Discrimination Contract Clause: Self-Evaluation Findings

No information regarding a non-discrimination contract clause was found on the City's website or in City-provided documents.

Non-Discrimination Contract Clause: Possible Solutions

The City should develop a consistent non-discrimination contract clause. This clause should state that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in all City programs, services, or activities. This clause should be accessible to applicable departments to use in all contracts that are Federally funded. This would include any contract with Federal funding and all joint use agreements.

3.1.11 Public Notice Under the ADA

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



Public Notice Under the ADA: Self-Evaluation Findings

No information regarding a public notice under the ADA was found on the City's website or in City-provided documents.

Public Notice Under the ADA: Possible Solutions

A Public Notice Under the ADA was developed as part of this project. This notice should be adopted by the City, posted on the web, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix C** for a copy of the procedure and form.

3.1.12 Title II/504 ADA Assurance

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

Per 49 CFR Part 27.9, "Each application for Federal financial assistance to which this part applies, and each application to provide a facility, shall, as a condition to approval or extension of any Federal financial assistance pursuant to the application, contain, or be accompanied by, written assurance that the program or activity will be conducted or the facility operated in compliance with all the requirements imposed by or pursuant to this part. An applicant may incorporate these assurances by reference in subsequent applications to the Department."

Title II/504 ADA Assurance: Self-Evaluation Findings

No information regarding a Title II/504 ADA Assurance was found on the City's website or in City-provided documents.

Title II/504 ADA Assurance: Possible Solutions

The City should develop a Title II/504 ADA Assurance in accordance with the Code of Federal Regulations (49 CFR 27.9). U.S. Department of Justice guidance on retaliation and related issues can be found here:

http://www.ecfr.gov/cgi-bin/text-idx?SID=4eaa2f4650bc6df3cb86ce50e3074cf1&tpl=/ecfrbrowse/Title49/49cfr27_main_02.tpl

3.1.13 Alternate Format Policy, Procedure, and Request Form

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



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

No information regarding an alternate format policy, procedure, and request form was found on the City's website or in City-provided documents.

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

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

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

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

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

No information regarding a disclaimer was found on the City's website or in City-provided documents.

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

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

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

As a part of the ADA Transition Plan process, the ADA/504 Coordinator will be provided the Self-Evaluation findings, recommendations, and necessary funding sources to bring the City of Norman into ADA compliance. This information should be separated and categorized to assist the City in establishing future policies and procedures for the ADA Transition Plan updates and corrections.

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

No policies and procedures for ADA Transition Plan Updates and Corrections for Title I were found on the City's website or in City-provided documents.



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

The City should develop customized policies and procedures for ADA Transition Plan updates and corrections. These policies and procedures should address the internal process for updating and correcting issues found during the ADA transition plan process.

3.1.16 ADA Liaison Committee

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

ADA Liaison Committee: Self-Evaluation Findings

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

ADA Liaison Committee: Possible Solutions

The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and areas open to the public, including posting this information on the City's website.

3.1.17 Employment Practices Review

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

The City of Norman Personnel Manual, City of Norman's Website, City Ordinance – Chapter 7, City of Norman Police Department Manual, Human Resources Department, employment forms, and documents were reviewed and additional information was obtained during the survey and interview process. This information was reviewed for consistency with current accessibility requirements and standards.

Employment Practices Review: Self-Evaluation Findings

- The Human Resources Department provides new employee orientation. This orientation provides guidance on the employee handbook and harassment and discrimination policies. The orientation does not include specific ADA policies and procedures or the ADA/504 Coordinator's contact information.
- Applicants may utilize the website, job information telephone line, and the local cable channel for job announcements. The City offers alternate formats such as, closed captioning on the local cable channel to provide information regarding job announcements.
- No specific ADA training program is provided for City staff. However, the City does provide annual training regarding harassment and discrimination.



Employment Practices Review: Possible Solutions

- The new employee orientation should provide guidance on specific ADA policies and procedures and should include the City's ADA/504 Coordinator.
- The City should provide alternate formats for job announcements, such as paper applications. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The City should provide specific annual ADA training to ensure that City staff are aware of their obligations and rights under the ADA.

3.1.18 Job Description Review

The ADA does not require an employer to develop or maintain job descriptions. Nevertheless, employers can certainly benefit from having well-written job descriptions that spell out the “essential functions” for each employment position. When job descriptions are written, they must be non-discriminatory.

A written job description can help employers identify whether an applicant will be able to perform the essential tasks required for a position. During the interview process, employers are not allowed to ask if an individual has a disability that would prevent them from performing certain job tasks. Employers may, however, ask applicants whether they can perform the “essential functions” of a position, such as the ability to meet attendance expectations or to operate a particular machine. If an applicant notifies the employer that he or she is unable to perform an essential job function because of a disability, the employer must then consider whether it is possible to reasonably accommodate the disability.

Ten (10) City job descriptions were reviewed. The following section provides a summary of the findings and possible solutions. A complete summary of the job description reviews is provided in **Appendix D**.

Job Description Review: Self-Evaluation Findings

- Most job descriptions do not have recommended headings for clarification.
- Most job descriptions contained discriminatory language. When describing actual job duties, there are some physical demands. However, specific language must be used so that someone with a disability can disqualify themselves.
- Job descriptions do not have disclaimer language to remind employees and applicants that the description is subject to change.
- Some job descriptions do not provide the physical requirements. These requirements are needed to assist individuals with determining their qualifications.
- Job descriptions do not include ADA compliant language ensuring the public entity does not discriminate based on a disability. Descriptions should also include language stating reasonable accommodations are available upon request.



Job Description Review: Possible Solutions

- Job descriptions should separate information under specific headings for better clarification. Under these headings, the City may use as many sub-headings as necessary to cover all aspects of the job description. These headings are: Job Title, Job Summary, Essential Functions, Non-Essential Functions and Job Specifications.
- When listing physical demands in a job description, the wording must be such that someone with a disability can disqualify themselves. ADA compliant equivalent language must be used. For example: Instead of “carry” or “lift”, use “move”, “transport”, “position”, “install”, “remove”, “hoist” and/or “transfer”. See the **Appendix D** for Equivalent Language Guidance.
- The City should include disclaimer language on all job descriptions to remind employees and applicants that the description is subject to change.
- All job descriptions should provide physical requirements to ensure clarity.
- Job descriptions should separate information under specific headings for better clarification. Under these headings, the City may use as many sub-headings as necessary to cover all aspects of the job description. These headings are: Job Title, Job Summary, Essential Functions, Non-Essential Functions and Job Specifications.
- When listing physical demands in a job description, the wording must be such that someone with a disability can disqualify themselves. ADA compliant equivalent language must be used. For example: Instead of “carry” or “lift”, use “move”, “transport”, “position”, “install”, “remove”, “hoist” and/or “transfer”. See the **Appendix D** for Equivalent Language Guidance.
- The City should include disclaimer language on all job descriptions to remind employees and applicants that the description is subject to change.
- All job descriptions should provide physical requirements to ensure clarity.
- The City should develop a consistent City-wide non-discrimination statement for Title I (employment) and include this statement in every job description and vacancy announcement. This statement ensures individuals that the City does not discriminate based on a disability and it provides information on how to obtain a reasonable accommodation or modification.

3.1.19 Emergency Management Plan Review

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

Disabilities manifest themselves in varying degrees and the functional implications of the variations are important for emergency evacuation. One (1) person may have multiple disabilities, while another may have a disability whose symptoms fluctuate. Everyone needs to have a plan to be able to evacuate a building, regardless of his or her physical condition.



While planning for every situation that may occur in every type of an emergency is impossible, being as prepared as possible is important. One way to accomplish this is to consider the input of various people and entities, from executive management, human resources, and employees with disabilities to first responders and other businesses, occupants, and others nearby. Involving such people in the development of the City's Emergency Management Plan will help everyone understand the evacuation plans and the challenges that businesses, building owners and managers, and people with disabilities face.

The following programs, services or documents were reviewed:

- City of Norman Emergency Operations Plan
- City of Norman Draft Emergency Operations Plan – Children's Annex
- Cleveland County Recovery Center Draft Plan
- Hazard Analysis General Information and History
- Hazard Priorities
- City of Norman Safety Manual

Emergency Management Plan Review: Self-Evaluation Findings

Upon review of the above-mentioned documents, no specific document provides the necessary information to ensure the City of Norman has an adequate emergency management plan in place for employee evacuation and emergency operations that would assist persons with disabilities in the event of an emergency.

Emergency Management Plan Review: Possible Solutions

- The City should establish an emergency management committee to assist in all phases of the emergency management plan process for employee evacuation and emergency operations for the City that details how to assist persons with disabilities in the event of an emergency. The City should seek and include input from the disability community to help identify the greatest needs of the community and to provide the most accessible emergency management plan.
- The emergency management plan should include the most common issues that persons with disabilities face, such as:
 - Emergency notifications;
 - Evacuations;
 - Accessible emergency transportation;
 - Accessible shelters;
 - Access to needed medications, refrigeration, and back-up power;
 - Access to needed mobility devices or service animals during transit or at shelters;
 - Temporary accessible housing for when individuals can return home; and
 - Effective Communications policies and procedures.

U.S. Department of Justice checklist and guidance on emergency management plans can be found here:

- <https://www.ada.gov/pca toolkit/chap7emergencygmtadd1.htm>.
- <https://www.ada.gov/emergencyprepguide.htm>



3.1.20 City Ordinance Review

Twenty-three (23) applicable ordinances were reviewed for consistency with current accessibility requirements and standards.

City Ordinance Review: Self-Evaluation Findings

- Chapter 1: General Provisions
 - No specific ADA information is mentioned.
- Chapter 2: Administration
 - Emergency notifications are sent electronically to the media and through City channels only. Alternate formats are not provided.
 - Code violation notices are provided in-person and in writing. Alternate formats are not provided.
- Chapter 3: Animal Control
 - This chapter does not provide guidance or policy and procedure information regarding Service Animals.
- Chapter 4: Boards and Commissions
 - All meetings are open to the public and held in accessible facilities. However, ADA checklists are not utilized to determine compliance.
 - All agendas are posted on the City's website. They may also be posted on the entity's website, on the front window or display box at the meeting location. However, they are not currently available in alternate formats.
 - The City does not have a City-wide non-discrimination statement. Currently, there is not a statement on the agendas or minutes.
 - The disability community does not appear to be included in the member selection process.
- Chapter 5: Building Construction
 - ADA features are inspected for compliance as outlined in the City / State adopted building codes. However, no specific ADA checklists are utilized.
- Chapter 6: Cable Television
 - No specific information is mentioned regarding closed captioning.
 - No specific information is mentioned regarding utility poles being prohibited within an accessible pedestrian path.
- Chapter 7: Civil Rights
 - Minimal information listed for the Norman Human Rights Commission.
 - This specific chapter contains outdated language, such as handicapped person.
- Chapter 7.5: Elections
 - Alternate formats of documents, forms, etc. are not available.
 - Voting facilities are monitored by the Cleveland County Election Board and not by the City's Election Commission.
- Chapter 8: Finance
 - No specific information is mentioned regarding information and technology purchases for ADA compliance prior to purchase.
- Chapter 9: Fire Prevention
 - No specific ADA information is mentioned.



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

- Chapter 10: Health and Safety
 - This chapter prohibits obstructions that restrict the access or usage of the public easement, right-of-way or of any meter connected to the City water supply. However, the chapter does not include language that prohibits obstructions within an accessible pedestrian route.
- Chapter 11: Reserved
 - No specific ADA information is mentioned.
- Chapter 12: Labor Relations
 - No specific ADA information is mentioned.
- Chapter 13: License and Occupations
 - No specific ADA information is mentioned.
- Chapter 14: Municipal Court
 - No specific ADA information is mentioned.
- Chapter 15: Offenses
 - This chapter prohibits obstructions that block, encumber, or otherwise obstruct the free, convenient and normal use of any public sidewalks, street, highway, bridge, alley road or other passageway, or an entrance, corridor or passageway of any public building or structure. However, the chapter does not include specific language that prohibits obstructions within an accessible pedestrian route.
- Chapter 16: Public Improvements
 - No specific ADA information is mentioned.
- Chapter 17: Retirement System
 - No specific ADA information is mentioned.
- Chapter 18: Sign Regulations
 - No specific ADA information is mentioned.
- Chapter 19: Subdivision Regulations
 - An Owner or developer who is to construct sidewalks subsequent to the improvement of a lot or parcel of land prior to the final inspection of such improvement must submit a surety for cost and compliance. However, the surety does not have specific language included regarding ADA obligations or compliance requirements.
 - The chapter references that all sidewalks shall meet handicapped access requirements under the ADA or per or any successive Federal requirements or standards governing accessibility. However, it does not specifically mention the Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way.
- Chapter 20: Traffic Regulations
 - This Chapter states that no person shall park, stop, or stand a vehicle on a crosswalk or sidewalk. However, there is no reference to the ADA requirements and PROWAG.
- Chapter 21: Utility Services
 - No specific ADA information is mentioned.
- Chapter 22: Zoning
 - No specific ADA information is mentioned.



City Ordinance Review: Possible Solutions

All City ordinances should be updated as noted in the following section:

- Chapter 2: Administration
 - Emergency notifications are sent electronically to the media and through City channels only. Alternate formats are not provided.
 - Code violation notices are provided in-person and in writing. Alternate formats are not provided.
- Chapter 3: Animal Control
 - This chapter should be revised to include guidance and City policy and procedure information regarding Service Animals.
- Chapter 4: Boards and Commissions
 - The City should utilize checklists to ensure ADA compliance for ADA compliant meeting locations.
 - The City should develop an alternate format policy, procedure and request form. This policy and procedure shall guide staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested.
 - The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. This standardized statement should be provided on all meeting agendas and minutes.
- Chapter 5: Building Construction
 - The City should utilize checklists to ensure ADA compliance for building construction and update this chapter to include guidance and City policy and procedure information.
- Chapter 6: Cable Television
 - This chapter should be revised to include guidance on effective communication efforts and policies.
 - This chapter should be revised to include language that prohibits utility poles being located within an accessible pedestrian path.
- Chapter 7: Civil Rights
 - This chapter should be revised to include detailed contact information for the Norman Human Rights Commission.
 - This chapter should be revised to include updated ADA language in accordance with the U.S. Department of Justice. See the **Appendix D** for Equivalent Language Guidance.
- Chapter 7.5: Elections
 - This chapter should be revised to include information regarding alternate formats of documents, forms, etc.
 - Voting facilities are monitored by the Cleveland County Election Board and not by the City's Election Commission. The City of Norman should communicate with the Cleveland County Election Board to ensure all voting facilities are ADA compliant.



City Ordinance Review: Possible Solutions (cont.)

- Chapter 8: Finance
 - This chapter should reference City policies and procedures regarding information and technology purchases for ADA compliance prior to purchase.
- Chapter 10: Health and Safety
 - This chapter should be revised to include language that prohibits obstructions within an accessible pedestrian route.
- Chapter 15: Offenses
 - This chapter should be revised to include language that prohibits obstructions within an accessible pedestrian route.
- Chapter 19: Subdivision Regulations
 - The City should revise language in this chapter and in the surety to provide clarification on the City's obligations.
 - This chapter should be revised to include information regarding specific ADA laws and regulations that should be utilized to achieve compliance.
 - The chapter should provide more detail regarding ADA accessible parking and reference specific ADA laws and regulations.
- Chapter 20: Traffic Regulations
 - This chapter should be revised to include language that prohibits obstructions within an accessible pedestrian route.

3.1.21 Previous ADA Complaints (Title I & II) Review

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

A review of previous ADA complaints from the past five (5) years is necessary to ensure that all complaints have been addressed and updated in the Transition Plan.

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

The City has record of three (3) ADA complaints that have been received in the past five (5) years, as summarized below.

Year	Description	Resolution
2017	City Employee terminated for misconduct; subsequently filed an EEOC charge alleging disability discrimination for alleged failure to "continue to accommodate my light duty restriction".	Received Notice of Charge of Discrimination and Dismissal/Right to Sue Letter at the same time.
2016	City Employee filed EEOC charge seeking waiver of minimum typing requirement included in eligibility to apply for a different position.	Right to Sue Letter issued; no lawsuit filed.
2015	City Employee terminated for misconduct; subsequently filed an EEOC charge for alleged perceived disability.	Right to Sue Letter issued; no lawsuit filed.



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

- The City should consider all findings and solutions that are contained within the ADA Transition Plan document. These should be adopted City-wide to ensure ADA accessibility.
- The City should maintain confidential complaint files and ADA complaint / request logs. These logs should include an internal complaint number, details about the complaint, and details regarding the resolution.

3.2 Programs, Services, and Activities Review

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

3.2.1 Boards, Commissions, Committees, and Councils Review

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

- ADA Citizens Steering Committee
- Animal Shelter Oversight Committee
- Bicycle Advisory Committee
- Board of Adjustment
- Board of Appeals
- Board of Parks Commissioners
- Center City Master Plan Visioning Committee
- Center City Statutory Review Committee
- Central Oklahoma Master Conservancy District
- Children's Rights Coordinating Commission
- Citizens Public Safety Oversight Committee
- City Council
- City Council Oversight Committee
- Community Planning and Transportation Committee
- Finance Committee
- High Density Development Community Discussion
- Strategic Water Supply Citizens Committee
- Community Development Policy Committee
- Comprehensive Plan Steering Committee
- Convention and Visitors Bureau
- Development Oversight Committee for TIF District No. 2
- Economic Development Advisory Board
- Environmental Control Advisory Board
- Floodplain Permit Committee
- Greenbelt Commission
- Historic District Commission
- Human Rights Commission
- Library Board
- Norman Election Commission
- East and Central Libraries AD HOC Advisory Group
- Griffin Park ADHOC Advisory Group
- Norman Forward Sales Tax Citizens Financial Oversight Board



- Reaves Park ADHOC Advisory Group
- Senior Center ADHOC Advisory Group
- Westwood ADHOC Advisory Group
- Norman Housing Authority
- Norman Regional Hospital Authority
- Oversight Committee to End Chronic Homelessness
- Pioneer Multi-County Library Board
- Planning Commission
- Public Arts Board
- Social and Voluntary Services Commission
- Tree Board
- University North Park Business Improvement District Advisory Board

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

- The following Boards have been dissolved and are no longer active:
 - Center City Master Plan (Steering) Visioning Committee
 - Center City Statutory Review Committee
 - High Density Development Community Discussion
 - Strategic Water Supply Citizens Committee
 - Oversight Committee to End Chronic Homelessness
- All meetings are open to the public and held in accessible facilities. However, ADA checklists are not utilized to determine compliance.
- All agendas are posted on the City's website. They may also be posted on the entity's website, on the front window or display box at the meeting location. However, they are not currently available in alternate formats.
- The City does not have a City-wide non-discrimination statement. Currently, there is not a statement on the agendas or minutes.
- The disability community does not appear to be included in the member selection process.

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

- The City should utilize checklists to ensure ADA compliance for ADA compliant meeting locations.
- The City should develop an alternate format policy, procedure, and request form. This policy and procedure shall guide staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested.
- The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. This standardized statement should be provided on all meeting agendas and minutes.



- The City should provide opportunities for the disability community to provide input regarding member selection process, when applicable.

3.2.2 Documents, Forms, and Videos Reviewed

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

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

- The City does not have alternate formats on hand for every document, form, or video.
- The City does not have a policy or procedure in place to address alternate formats. Alternate formats are auxiliary aids, services, or devices that enable effective communication for people with disabilities. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The City does not have a disclaimer for placing responsibility or acceptance for ADA compliance regarding another entity's links, documents, forms, videos that are represented on the City's website.
- The City does not have a policy and procedure on closed captioning.
- During the website evaluations, several versions of non-discrimination statements were found, but they were not consistent. The City does not have a consistent City-wide non-discrimination statement that is used in documents, forms, videos that are distributed by the City.

Documents, Forms, and Videos Reviewed: Possible Solutions

- Each department liaison should develop a list of all documents and forms for their department. The list should include the document or form name, location(s) where it can be found (office location, website link), what alternate formats are available, and how the formats can be obtained. This list should be updated continuously as documents and forms are created and revised. The forms should be reviewed for ADA compliance. Section 508 Compliant PDF Checklist is provided here:

<https://508compliantdocumentconversion.com/compliance-regulations/pdf-compliance-checklist/>

- The City should develop an alternate format policy, procedure, and request form. This policy and procedure shall guide staff regarding the process of obtaining an alternate format and utilizing the City's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted City-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The City should develop a disclaimer statement to communicate the City's perspective on ADA compliance regarding content on another entity's site, links, forms, documents, and videos that are represented on the City's website. This statement should be posted on the web and publicized in common areas that are accessible to all employees and areas open to the public. See **Section 3.1.14 Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos**.



Documents, Forms, and Videos Reviewed: Possible Solutions (cont.)

- The City should develop guidelines to assist staff in providing closed captioning for videos that are available to all employees and the public. These guidelines shall include the process to add closed captioning or utilize the vendor database to purchase closed captioning services.
- The City should develop a consistent City-wide non-discrimination statement policy. This policy should provide a non-discrimination statement that specifically states that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under employment activities and in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator regarding an accommodation, modification or alternate format. See **Section 3.1.1 Non-Discrimination Policy**.

3.2.3 Links to Other Websites

The City website provides various links to other websites that are available to the public.

Links to Other Websites: Self-Evaluation Findings

The City does not have a disclaimer statement or a pop-up warning that states the City is not responsible for ADA compliance regarding the content beyond this point.

Links to Other Websites: Possible Solutions

The City should develop a disclaimer statement to communicate the City's perspective on ADA compliance regarding content on another entity's site, links, forms, documents, and videos that are represented on the City's website. This statement should be posted on the web and publicized in common areas that are accessible to all employees and areas open to the public. See **Section 3.1.14 Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos**.

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

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

Various contracts, agreements, and waivers were reviewed. For a complete list of documents reviewed, see **Appendix D**.

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

All contracts, agreements, and/or waivers that were reviewed did not contain ADA language that would clarify ADA responsibilities and obligations.



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

The City should develop guidelines to assist the appropriate staff in writing non-discrimination language to be included in all City contracts and agreements. This non-discrimination language would need to be assessed by legal counsel on a case-by-case basis. These guidelines shall include language that clarifies responsibilities regarding ADA maintenance, alterations, and construction. In addition, this language shall also include information stating that the City ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any and all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. The statement should also include contact information for the ADA/504 Coordinator.

3.2.5 Effective Communication efforts and policy

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

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

- Sign Language Interpreters
- Written materials
- Closed Captioning
- Real-time captioning
- Audio recordings
- Materials and displays in braille
- Large print materials
- Accessible electronic and information technology
- Assistive listening devices and systems

Effective Communication: Self-Evaluation Findings

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

Effective Communication: Possible Solutions

The City should develop guidelines regarding effective communication efforts. These efforts should be effective by providing auxiliary aids and services to individuals who have communication disabilities.

3.2.6 Design Standard Review

The City of Norman Design Criteria and General Construction Standards were reviewed for compliance with the 2010 Standards for Accessible Design and the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).



Standard Construction Details

The following standard design documents were reviewed for consistency with the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG):

- Engineering Design Criteria
- General Construction Standards
- Storm Drain Standards
- Street Standards
- Utility Location Standards
- Water Standards

Design Standard Review: Self-Evaluation Findings

A complete list of issues is provided in **Appendix E**.

Design Standard Review: Possible Solutions

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

3.3 Facilities Review

3.3.1 Buildings

Three (3) buildings within the City of Norman were evaluated as part of this project. All buildings included in the evaluation are listed on a map included in **Appendix F**.

Table 1. Summary of Buildings Reviewed

Buildings	
1. Municipal Complex - Building A	201 W. Gray St
2. Municipal Complex - Building B	201 W. Gray St
3. Municipal Complex - Building C	201 W. Gray St

Buildings: Self-Evaluation Findings

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

- Non-compliant transaction counters
- Knob style door hardware
- Non-compliant signage
- No accessible toilet compartments
- Non-compliant lavatories
- Lack of clear floor space at accessible urinals
- Non-compliant door maneuvering clearance
- Non-compliant breakroom sinks and counters



Buildings: Possible Solutions

A complete list of possible solutions can be found in the building facility reports provided in **Appendix G**.

3.3.2 Parks

Three (3) parks within the City of Norman were identified and evaluated as part of this project. All parks included in the evaluation are listed on a map included in **Appendix F**.

Table 2. Summary of Parks Reviewed

Parks	
1. Andrews Park	201 W. Daws St
2. Lions Park	450 S. Flood Ave.
3. Westwood Park	2400 Westport Dr.

Parks: Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains, and restrooms. A complete list of issues can be found in the facility reports provided in **Appendix G**. Common issues found include:

- Lack of fully compliant accessible parking
- No accessible route to park amenities
- Non-compliant entrance into sporting areas
- Non-compliant picnic tables
- No companion seating at benches
- Non-compliant access to playgrounds
- Non-compliant playground surfaces
- Non-compliant drinking fountains
- Non-compliant restrooms
- Knob style door hardware
- Non-compliant signage

Parks: Possible Solutions

A complete list of possible solutions can be found in the park facility reports provided in **Appendix G**.

3.3.3 Signalized Intersections

Twenty (20) signalized intersections within the City of Norman were identified and evaluated as part of this project. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

All signalized intersections included in the evaluation and plan review are listed on a map included in the **Appendix F**.



Signalized Intersections: Self-Evaluation Findings

Common curb ramp issues included excessive flare cross slopes, no flush transition to the roadway, curbed sides less than 90 degrees, and missing or non-compliant texture contrast. Table 3 provides a summary of the curb ramp issues at signalized intersections.

About one percent (1%) of valid pedestrian crossing at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. These were typically locations where “No Pedestrian Crossing” signs were present, but the existing sidewalk, curb ramp, or crosswalk orientations created a valid pedestrian crossing. Pedestrian push buttons and signal heads were recommended to be installed at all valid signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included excessive push button clear floor running slopes and cross slopes, push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance, and no presence of clear space or no access to the clear space. Table 4 provides a summary of the push button issues.

Signalized Intersections: Possible Solutions

A complete list of possible solutions can be found in the signalized intersection reports provided in **Appendix G**.

Table 3. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Issue	Number Evaluated	Number Compliant	Percent Compliant
Ramp does not land in crosswalk	117	117	100.0%
No ramp where ramp is needed	125	120	96.0%
Ramp counter slope > 5%	117	110	94.0%
No 48” crosswalk extension	72	67	93.1%
No landing	117	107	91.5%
Traversable sides	85	74	87.1%
Ramp width < 48”	117	99	84.6%
Landing cross slope > 2%	103	79	76.7%
Ponding in ramp, landing, or flares	117	89	76.1%
Ramp cross slope > 2%	117	82	70.1%
Landing running slope > 2%	103	69	67.0%
Ramp running slope > 8.3%	117	72	61.5%
Obstruction in ramp, landing, or flares	117	69	59.0%
No color contrast	117	52	44.4%
No texture contrast	117	51	43.6%
Curbed sides < 90°	85	37	43.5%
No flush transition to roadway	117	49	41.9%
Flare cross slope > 10%	32	10	31.3%



Table 4. Summary of Push Button Issues

Push Button Issue	Number Evaluated	Number Compliant	Percent Compliant
Push button diameter not 2"	136	136	100.0%
Push button orientation not parallel	136	135	99.3%
Missing pedestrian head where pedestrian head is needed	170	168	98.8%
Missing push button where push button is needed	170	168	98.8%
Push button height > 48"	136	132	97.1%
No clear floor space or no access	136	112	82.4%
Push button offset from curb > 10'	136	107	78.7%
Push button offset from crosswalk > 5'	136	104	76.5%
Clear floor space cross slope > 2%	112	67	59.8%
Clear floor space running slope > 2%	112	60	53.6%

3.3.4 Sidewalk Corridors

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel, which includes the sidewalk, railroad crossings, curb ramps, pedestrian crossings at driveway openings, pedestrian crossings at unsignalized intersections with cross streets, and pedestrian bridges in parks. Approximately 11.4 miles of sidewalk were evaluated as part of this project. The included sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. A map of the evaluated sidewalk corridors is included in **Appendix F**.

Sidewalk Corridors: Self-Evaluation Findings

Common issues along the sidewalk corridors were excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of Norman may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at unsignalized intersections along the sidewalk corridors included no presence of color contrast or texture contrast, excessive flare cross slopes, and no flush transition to the roadway. A summary of the unsignalized intersection curb ramp issues is provided in Table 5. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized interactions were recommended to be removed and replaced.



Sidewalk Corridors: Self-Evaluation Findings (cont.)

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

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

Sidewalk Corridors: Possible Solutions

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

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

A complete list of possible solutions can be found in the sidewalk, unsignalized intersection, and railroad crossing facility reports provided in **Appendix G**.



Table 5. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Issue	Number Evaluated	Number Compliant	Percent Compliant
Ramp does not land in crosswalk	318	318	100.00%
No 48" crosswalk extension	304	303	99.67%
Traversable sides	298	296	99.33%
No landing	318	314	98.74%
Ponding in ramp, landing, or flares	318	306	96.23%
No ramp where ramp is needed	460	435	94.57%
Ramp counter slope > 5%	318	299	94.03%
Obstruction in ramp, landing, or flares	318	272	85.53%
Ramp width < 48"	318	255	80.19%
Landing running slope > 2%	311	232	74.60%
Landing cross slope > 2%	311	212	68.17%
Curbed sides < 90°	298	190	63.76%
Ramp running slope > 8.3%	318	190	59.75%
Ramp cross slope > 2%	318	162	50.94%
No flush transition to roadway	318	125	39.31%
Flare cross slope > 10%	20	5	25.00%
No texture contrast	318	66	20.75%
No color contrast	318	64	20.13%

3.3.5 Railroad Crossings with Pedestrian Accommodations

To the best knowledge of City staff, the City of Norman is not responsible for the maintenance of pedestrian facilities within the railroad right-of-way. BNSF railway was contacted on April 26, 2018 to confirm what responsibility the City has for pedestrian facilities within the railroad right-of-way; however, no response has been received to-date from BNSF.

Railroad Crossings with Pedestrian Accommodations: Self-Evaluation Findings

Eight (8) at-grade railroad crossings along the evaluated sidewalk corridors were evaluated for compliance with the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) to understand how these railroad crossings affect the pedestrian path of travel along sidewalks within Norman. Elements evaluated included transitions to and from adjacent sidewalk, flangeway gap width, and detectable warning surfaces. The rail type (freight or non-freight) affects the compliance threshold for flangeway gaps. All tracks at evaluated pedestrian crossings were assumed to be for freight rail, but the City is waiting for BNSF to confirm.



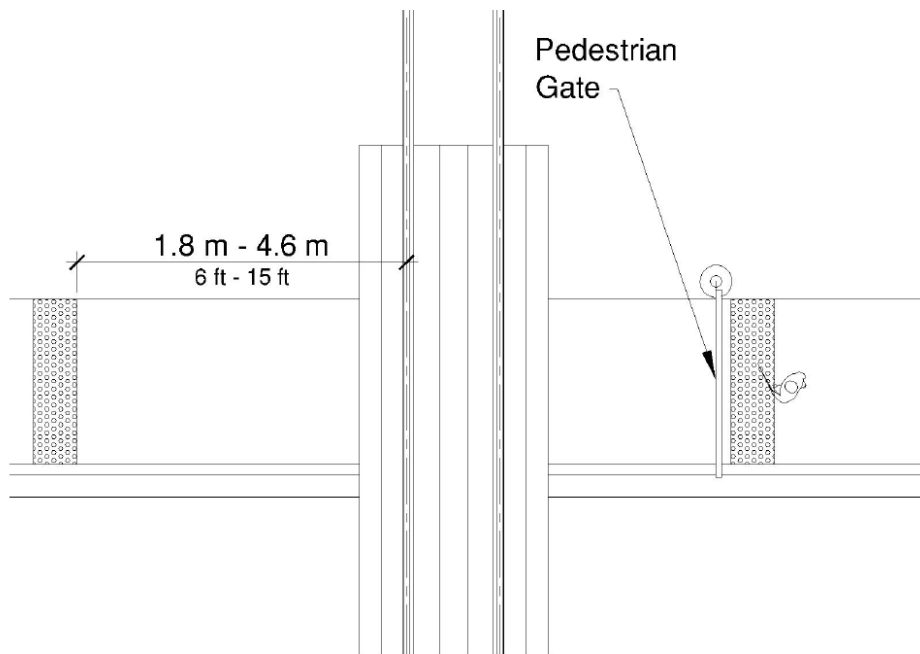
Table 6. Summary of Issues at Railroad Crossings

Railroad Crossing Issue	Number Evaluated	Number Compliant	Percent Compliant
No concrete panel present at rail crossing	8	8	100.0%
No detectable warning surface in advance of track crossing	8	2	25%
No flush transition to/from adjacent sidewalk	8	0	0%
Flangeway gap > 3 inches (freight) or flangeway gap > 2.5 inches (non-fright)	8	0	0%

Railroad Crossings with Pedestrian Accommodations: Possible Solutions

Railroad crossing issues and possible solutions are provided in **Appendix G**. Table 6 provides a summary of the issues identified for the evaluated railroad crossings.

Where there are multiple tracks at a single location, the detectable warning surfaces should only be installed on the sidewalk leading up to the outside edge of each track. PROWAG Figure R305.2.5 Pedestrian At-Grade Rail Crossings shows a minimum of 6 feet between the detectable warning surface and the outer track. Therefore, the minimum distance between rails of two (2) different tracks would need to be at least 18 feet for additional detectable warning surfaces to be installed between tracks. Detectable warning surfaces should be 2 feet in depth in the direction of pedestrian travel and extend the full width of the sidewalk.



**Figure R305.2.5
Pedestrian At-Grade Rail Crossings**



3.4 Maintenance Versus Alterations

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

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

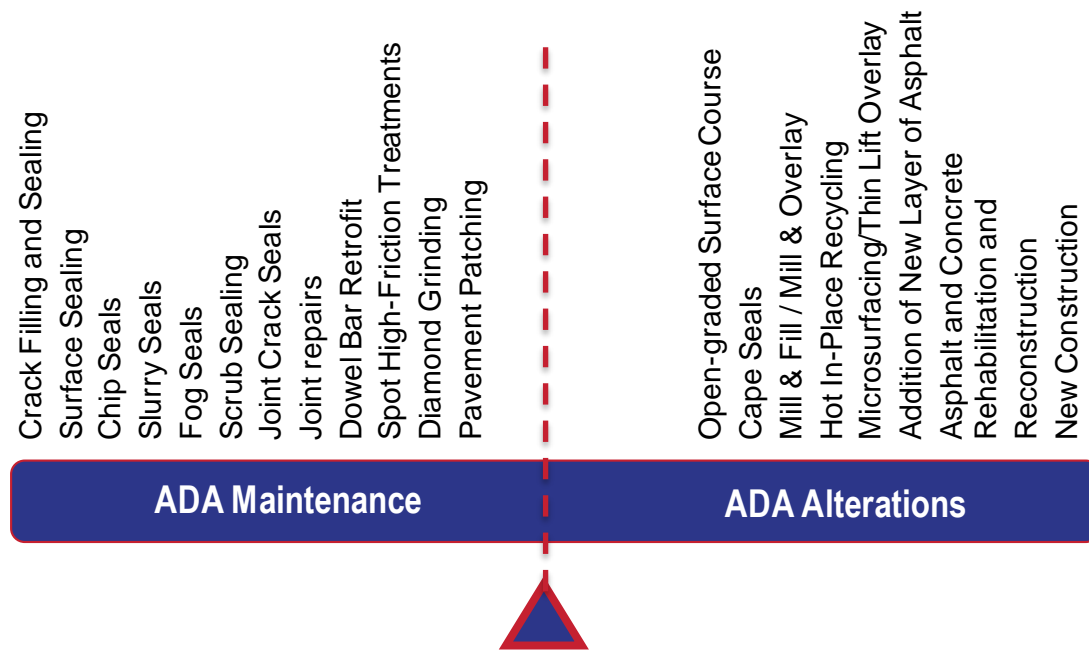
FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

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

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



Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

3.5 FHWA Guidance on Closing Pedestrian Crossings

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

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

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

3.6 Prioritization

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



3.6.1 Prioritization Factors for Facilities

Buildings and parks were prioritized on a 12-point scale, which is defined in Table 7. This prioritization methodology was developed by the Consultant Team to aid the City in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA.

Signalized intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in Table 8. This prioritization methodology was developed by the Consultant Team to aid the City in determining which signalized intersections should be prioritized for improvements over other signalized intersections based on the severity of non-compliance with ADA.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, “Low” based on the severity of non-compliance, which is defined in Table 9. Compliant segments of the sidewalk corridor were given a priority label of “Compliant”.

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Table 7. Prioritization Factors for Buildings/Parks

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	<ul style="list-style-type: none"> Element is more than twice the allowable requirement. No known complaint AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.
3 (high)	<ul style="list-style-type: none"> Element is more than twice the allowable requirement. No known complaint AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.
4 (high)	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
5 (medium)	Issues with access to goods and services (DOJ level 2) – severely out of compliance
6 (medium)	Issues with: <ul style="list-style-type: none"> Access to goods and services (DOJ level 2) – moderately out of compliance; Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR Restrooms (DOJ level 3) – severely out of compliance
7 (medium)	Issues with: <ul style="list-style-type: none"> Access to goods and services (DOJ level 2) – minimally out of compliance; Restrooms (DOJ level 3) – moderately out of compliance; OR Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance
8 (medium)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
9 (low)	Issues with restrooms (DOJ level 3) – minimally out of compliance
10 (low)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
11 (low)	<ul style="list-style-type: none"> Client is a Title II agency; AND Elements out of compliance but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability
12 (low)	Element is fully compliant with an older standard (safe-harbored) but will need to be brought into compliance with current standards if altered



Table 8. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	One curb ramp per corner and another is needed to serve the other crossing direction
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48-inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above



Table 9. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5	3.5 ≥ Value > 2.0	
Width of sidewalk is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0	9.0 ≥ Value ≥ 7.0	7.0 > Value > 5.0
Unsignalized cross street cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Cross street running slope is greater than 5%	Value > 7.0	7.0 ≥ Value ≥ 6.0	6.0 > Value > 5.0
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Elevation change greater than 1/4 inch or gaps greater than 1 inch)	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch)	
Railroad crossing excessive sidewalk vertical discontinuity	Elevation change greater than 1/4 inch or gaps greater than 1 inch)		
Railroad crossing pre-fabricated plate is plastic or does not exist	Yes – Plastic or No		
Railroad crossing flangeway gap is greater than 3 inches	Value > 3.0		
Railroad crossing is missing detectable warning surface(s)	Value > 2.5		



Table 10, Table 11, and Table 12 provide summaries of the prioritization classifications for signalized intersections, sidewalks, and unsignalized intersections, respectively.

Table 10. Prioritization Summary Signalized Intersections

Priority	Number of Intersections
0 (compliant)	-
1 (high)	-
2 (high)	9
3 (high)	-
4 (high)	3
5 (medium)	8
6 (medium)	-
7 (medium)	-
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	-
Total	20

Table 11. Prioritization Summary for Sidewalk Corridors

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalk	1.85	1.68	0.09	6.11	9.74
Driveways	0.19	0.23	0.21	0.29	0.92
Cross Streets	0.02	0.05	0.21	0.41	0.70
Total	2.06	1.96	0.51	6.81	11.36*

*Note: Sidewalk lengths in Table 11 include public right-of way, building, and park sidewalk corridors.



Table 12. Prioritization Summary for Unsignalized Intersections

Priority	Number of Intersections
0 (compliant)	1
1 (high)	-
2 (high)	49
3 (high)	2
4 (high)	-
5 (medium)	76
6 (medium)	6
7 (medium)	-
8 (medium)	-
9 (low)	5
10 (low)	-
11 (low)	-
12 (low)	2
13 (low)	19
Total	160

3.7 Conclusion

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

- 3 buildings;
- 3 parks;
- 20 signalized intersections; and
- 8.1 miles of public right-of-way sidewalk and all unsignalized intersections and driveways along the sidewalk corridors.

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

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

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



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4.0 Facility Costs

4.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated in the initial study were developed for each facility type. To develop these summaries, recent bid tabulations from Oklahoma Department of Transportation (ODOT) construction projects, along with Consultant Team experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an engineering design percentage (15%). All costs are in 2018 dollars. Table 13 provides a summary of the estimated costs to bring each facility into compliance.

Table 13. Summary of Facility Costs

Facility Type	Priority			Total
	High	Medium	Low	
Buildings	\$18,500	\$445,725	\$40,200	\$504,425
Building Sidewalk	\$24,907	\$26,053	\$1,040	\$52,000
Building Unsignalized Intersections	\$49,000	-	\$9,000	\$58,000
Parks	\$56,000	\$208,840	\$24,100	\$288,940
Park Sidewalk	\$157,683	\$115,147	\$29,170	\$302,000
Park Unsignalized Intersections	\$142,000	-	\$2,000	\$144,000
Park Pedestrian Bridges	-	\$129,000	-	\$129,000
Signalized Intersections	\$566,000	\$329,000	-	\$895,000
Public Rights-of-Way Sidewalk	\$478,952	\$431,208	\$126,840	\$1,037,000
Railroad Crossings	\$698,000	-	-	\$698,000
Public Rights-of-Way Unsignalized Intersections	\$266,000	\$771,000	\$57,000	\$1,094,000
City Totals	\$2,457,042	\$2,455,973	\$289,350	\$5,202,365



4.2 Implementation Schedule

Table 14 details the barrier removal costs and proposed implementation schedule by facility type for all City-owned facilities evaluated as part of this project. This 10-year plan will serve as the implementation schedule for the Transition Plan. The City of Norman reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

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

Table 14. Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget *
Buildings	\$504,425	10	\$50,450
Building Sidewalk	\$52,000	10	\$5,200
Building Unsignalized Intersections	\$58,000	10	\$5,800
Parks	\$288,940	10	\$28,900
Park Sidewalk	\$302,000	10	\$30,200
Park Unsignalized Intersections	\$144,000	10	\$14,400
Park Pedestrian Bridges	\$129,000	10	\$12,900
Signalized Intersections	\$895,000	10	\$89,500
Public Rights-of-Way Sidewalk	\$1,037,000	10	\$103,700
Railroad Crossings	\$698,000	10	\$69,800
Public Rights-of-Way Unsignalized Intersections	\$1,094,000	10	\$109,400
City Total	\$5,202,365		
Total Annual Budget			\$520,250

* Tables values are rounded for simplification.

4.3 Related City Projects

The City of Norman's commitment to improve pedestrian access across the City is exemplified by the work already designated to be completed. Current public works department pedestrian improvement projects are listed below:

- Recurring sidewalks program (annual)
- Sidewalks constructed with bond projects
- Sidewalks installed with new developments
- ODOT Funded Projects



4.4 Funding Opportunities

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

4.4.1 Federal and State Funding

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

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

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

Table 15. Funding Opportunities

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



4.4.2 Local Funding

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

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

4.4.3 Private Funding

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



5.0 Next Steps

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

The City will develop a budget to include the next 10 fiscal years. Projects identified in the ADA Transition Plan will be programmed within the 10-year budget based prioritization provided (see **Section 3.6 Prioritization**) and other factors determined by the City, such as how barrier removal can be incorporated into existing City projects identified for capital improvements.

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

In addition to the public infrastructure improvements identified herein, it is recommended that the City of Norman undertake the following actions over the next three (3) years:

- Complete ADA assessments of all City-owned buildings, including up to 30 facilities in FYE 2019/2020;
- Complete ADA assessments of all City-owned parks, including up to 50 parks in FYE 2019/2020;
- Complete ADA assessments of all City maintained signalized intersections, including up to 50 intersections in FYE 2019/2020;
- Complete the ADA assessments of all City maintained public sidewalks, particularly on major and minor arterial streets, including up to 50 miles of sidewalks in FYE 2019/2020;
- Provide in-depth ADA training to relevant City staff from all City departments; staff who design and manage public infrastructure systems shall receive specific training and certification;
- Consider hiring a full-time ADA Coordinator; and
- Establish a City Council-appointed permanent ADA Citizen Advisory Committee.



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Appendix

Appendix A: Public Outreach

ADA Advisory Committee Meeting Notes

Appendix B: Departmental Survey and Interview Finding Summaries

Appendix C: Grievance Procedure, ADA Public Notice, and ADA Coordinator Roles and Responsibilities

Title I Grievance Procedure

Title I Grievance Form

Title II Grievance Procedure

Title II Grievance Form

ADA Public Notice

ADA Coordinator Roles and Responsibilities

Appendix D: Programs, Services, and Activities Review

Job Description Review

Equivalent Language Guidance

Documents, Forms, and Videos Review

Appendix E: Design Standard Review

Design Standards Review

Appendix F: Facility Maps

Buildings

Parks

Signalized Intersections

Sidewalk Corridors



Appendix G: Facility Reports

Building Combined Cost Projection Summary and Path of Travel Maps

Buildings

Building Sidewalk

Building Unsignalized Intersections

Park Combined Cost Projection Summary and Path of Travel Maps

Parks

Park Sidewalk

Park Unsignalized Intersections

Park Pedestrian Bridges

Signalized Intersections

Sidewalk Corridors

Railroad Crossings

Unsignalized Intersections

Appendix H: ADA Action Log