



City of Munford, Tennessee
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Americans With Disabilities Act (ADA)

Self-Evaluation and Transition Plan

December 2017

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A. Introduction

The purpose of this document is to address Americans with Disabilities Act (ADA) considerations for City of Munford public right-of-way and City facilities.

This document describes the steps already taken and an inventory-based self-evaluation of pedestrian areas in public right-of-way, and City owned buildings and parks.

B. Overview of the ADA Act

The Americans with Disabilities Act (ADA) is a wide-ranging civil rights law that prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities. It is a law that was enacted by the U. S. Congress in 1990. It was signed into law on July 26, 1990, by President George H. W. Bush. On July 23, 2010, Attorney General Eric Holder signed final regulations revising the Department's ADA regulations, including its ADA Standards for Accessible Design. These final rules went into effect on March 15, 2011, but were not required until March 15, 2012. There are five (5) separate Titles (or sections) of the Americans with Disabilities Act (hereafter referred to as "ADA") as follows:

- Title I – Employment
- Title II – Public Services and Transportation
- Title III – Public Accommodations
- Title IV – Telecommunications
- Title V – Miscellaneous



Self Evaluation Checklist



Transition Plan

Pursuant to Title II of the ADA, public entities are prohibited from discriminating on the basis of a disability. All programs, services and activities offered by the public entity must be accessible to persons with disabilities. In order to accomplish this, the Department of Justice developed regulations requiring the City to conduct a Self-Evaluation of the accessibility of its programs and services to determine whether issues of accessibility could be addressed through changes in the way such programs and services are provided.

As a long-term goal, the City would like to remove physical barriers to accessibility when program changes cannot ensure access to services, programs, and activities in existing facilities. Realizing that structural changes would take time and money to provide, the Department of Justice Regulations, Federal Register 28 CFR Part 35, states that "in the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop a Transition Plan setting forth the steps necessary to complete such changes." Additionally, "if a public entity has responsibility or authority over streets, roads, or walkways, its Transition Plan shall include a schedule for providing curb ramps or other sloped



areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act.”

The law also reads that:

“(a) A public entity” (without qualifying by number of employees or any other measurement) “shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.

(b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.”

At a minimum, a Transition Plan must:

1. Identify an ADA Coordinator
2. Identify Barriers to Access
 - a. Within the Public Right-of-Way - Priorities for areas of City:
 - State and local government offices
 - Places of public accommodation (parks, schools, Depot Square, etc.)
 - Other areas of City (older residential neighborhoods)
 - b. To City-owned facilities
 - Develop list of City-owned facilities
 - List those facilities that are used by the public
 - Assess from parking lot to inside the building (meeting rooms, restrooms, etc.)
 - c. To City programs, services and activities
 - Board meetings
 - Public meetings
 - Communication
3. Develop a Complaint Process
4. Develop/Adopt Design Standards
5. Identify Public Involvement Opportunities
6. Identify Plan (time and budget) to Remove Barriers
7. Reevaluation Schedule

C. City's Current ADA Program

1. Responsible Official

An Americans with Disabilities Act (ADA) Compliance Coordinator has been designated by the Mayor as the person responsible for the development and implementation of the City's ADA Transition Plan.

This person is Neal Hunter. Mr. Hunter is an experienced City manager and he has attended the certified Tennessee Transportation Assistance Programs training in ADA Self-Assessment/Transitions Plan and Overview of Elements of Public Right-Of-Way Accessibility.

As the responsible official, Mr. Hunter is also designated to receive and review any ADA-related complaints filed with the City of Munford. This is posted on the ADA page of the City's website, and posted on the public Bulletin Board at Munford City Hall.

2. Advisory Team

The City Administrator will appoint an Americans with Disabilities Act (ADA) Advisory Team which will include the City's ADA Compliance Coordinator and other City staff, along with (as applicable) disabled City residents and representatives of agencies or organizations that offer programs or services to those with disabilities

This group will be an advocate for those with disabilities, and will develop policies and procedures to be adopted by the City. It will review and evaluate policies, procedures, programs, services, plans and other aspects of all City functions to determine if the needs of the disabled community are being addressed. This group will meet periodically as needed, and the meetings will be open to the public.

The Advisory Team welcomes the opportunity to learn how it can better serve the disabled community. The public may give input and comment on matters related to the ADA to a City staff person, elected officials and ADA Advisory Team members. However, the City recommends that all comments be directed to the ADA Compliance Coordinator. Reports may be made verbally to City Hall or Public Works, or in writing by mail or by e-mail.

Currently, the Advisory Team consists of:

Neal Hunter, ADA Compliance Coordinator
Mark Walker, Director of Public Works
Griff Fisher, Director of Parks and Recreation

3. Self-Evaluation

The City has begun a Self-Evaluation of City facilities, programs, services and activities to ensure that they are accessible to and usable by persons with disabilities. The ADA Compliance Coordinator worked with the ADA Advisory Team and other City staff to complete the Self-Evaluation process.

Based upon the results of this Self-Evaluation, an Action Plan is being developed listing specific modifications. The Action Plan will later be enhanced to include target dates by which those modifications may be made, subject to the availability of appropriate funding.

4. Complaint Process

The City has developed a disabled access Complaint Process for individuals who have an ADA issue with regard to program or facility access within the City. The Compliant Process is posted on the ADA section of the City's website and also posted on the public Bulletin Board at Munford City Hall. See Appendix A for more information on this process.

D. Inventory and Self-Evaluation

- 1. City-Owned Buildings:** Table 2A lists the City-owned facilities and identifies the deficiencies of each regarding ADA accessibility. Eight of the ten City buildings have no significant accessibility deficiencies. The remaining two buildings are Public Works and Police headquarters, both of which have special security considerations. For all City buildings except Public Works HQ, accessible parking spaces are designated, with appropriate signage denoting the location of the accessible parking.
- 2. City Parks:** Table 2B lists the City parks. All City Parks have accessible parking spaces designated, with appropriate signage denoting the location of the accessible parking. But not all parks provide accessible ramps. Other than Valentine Park, the City parks do not provide public restroom facilities. Valentine Park's restroom does not provide ADA accessible access.
- 3. Pedestrian Intersections and Sidewalks:** Table 3A is a list of primary pedestrian intersections in Munford, denoting whether sidewalks and ramps are present, and indicating the availability and timing of crosswalk push buttons at the intersections with ramps. For the eight (8) intersections with pedestrian facilities, most have no ramps and none have audible crosswalk signals. Table 3B lists the intersections in reasonably close proximity to sidewalk-related "areas" within the city limits.
- 4. Streets & Intersections:** Table 4 is a list of streets within the city limits. Many of these streets are built to rural standards (i.e., no curb & gutter or sidewalk) and therefore do not have curb ramps.
- 5. Sidewalk age and characteristics:** The City currently has ownership and maintenance responsibility for sidewalks within the public right of way. The vast majority of sidewalks in Munford have been built within the past 25 years, either as part of the development of new subdivisions, or as part of road construction projects. In many cases, the sidewalks were not built in compliance with current ADA standards.

Checklist for facilities in the Public ROW:

Table 1 Accessibility Barriers Checklist

ISSUE	POSSIBLE BARRIERS
Sidewalk and Pathway Clear Width	Narrow, Below Guidelines
Sidewalk and Pathway Cross Slope	Steepness, Irregularity, Variability, Warping
Landings Along Sidewalks and Pathways	Less Than 4 feet by 4 feet
Sidewalk and Pathway Grade	Steepness, Angle Points
Materials and Finishes	Deterioration of Surfaces, Deterioration of Markings, Appropriateness of material (ex. Cobblestones)
Gratings	Grating Type, Grate Opening Orientation
Discontinuities	Missing Sections, Gaps, Drops, Steps
Detectable Warning System	Missing, Inappropriate Materials, Inadequate Size, Wrong Location
Obstructions	Signs, Mail Boxes, Fire Hydrants, Benches, Telephones, Traffic Signal Poles, Traffic Signal Controller Boxes, Newspaper Boxes, Drainage Structures, Tree Grates, Pole Mounted Objects, Standing Water, Snow or Ice
Traffic Signal Systems	Lack of Provision for the Visually Impaired such as APS, Inadequate Time Allowed, Inoperable Buttons, Inaccessible Buttons
Curb Ramp	Missing, Does not Fall within Marked Crosswalk, Doesn't Conform to Guidelines
Curb Ramp Flares	Missing Where Required, Too Steep

Source: NCHRP Report 20-7 (232), *ADA Transition Plans: A Guide to Best Management Practices*, National Academy of Sciences, National Cooperative Highway Research Program, May 2009.

Table 2
CITY-OWNED FACILITIES

A. BUILDINGS

Building	HC Signs	HC Parking	HC Ramp	HC Accessible Entrance	HC Accessible Restrooms
City Hall	Y	Y	Y	Y	Y
Public Works Headquarters	N	N	N	Y	Y
Fire Department	Y	Y	Y	Y	Y
Police Department	Y	Y	Y	Y	Y
Parks and Recreation HQ	Y	Y	Y	Y	Y
Tipton Plaza	Y	Y	Y	Y	Y
Library	Y	Y	Y	Y	Y
Visitors Center	Y	Y	Y	Y	Y
Band Room Event Center	Y	Y	Y	Y	Y
Veterans Center	Y	Y	Y	Y	Y

B. PARKS

Parks	HC Parking	HC Parking Signs	HC Ramps	HC Accessible Entrance	HC Accessible Restrooms
City Park	Y	Y	N	Y	N
Valentine Park	Y	Y	N	Y	N
Centennial Park	Y	Y	Y	Y	N
Poplar Park	Y	Y	N	Y	N
Hope Park	Y	Y	N	Y	N

**Table 3A
PRIMARY PEDESTRIAN
INTERSECTIONS STATUS**

LOCATION	SIDEWALK	HC RAMP	ACCESSIBLE PUSH BUTTON	PUSH BUTTON TIME	COMMUNICATION	DEFICIENCIES
Munford Ave & Park Street	Y	Y	N	N/A	N/A	
Munford Ave & Beaver Road	Y	N	N	N/A	N/A	
Munford Ave & College Street	Y	N	N	N/A	N/A	
Munford Ave & S. Tipton St.	Y	N	N	N/A	N/A	
Munford Ave & S. Main St.	Y	N	N	N/A	N/A	
Munford Ave & Tabb Drive	N	N	N	N/A	N/A	
Munford Ave & Doctors Drive	N	N	N	N/A	N/A	
Munford Ave & Birchwood	Y	N	N	N/A	N/A	

**Table 3B
SIDEWALK INVENTORY BY AREA**

Munford Town Center	Sidewalk	Comments
S. Tipton St. and Munford Ave	Yes	
S. Tipton St. and E. Main St.	Yes	
College St. and Munford Ave.	Yes	
S. Tipton St. and Douglas Ave.	No	
S. Tipton St. and Crigger St.	No	
S. Tipton St. and Brick Ave.	No	
S. Tipton St. and Wooten Ave.	No	
S. Tipton St. and Ridgecrest Dr.	Yes	
S. Tipton St. and Charles Ave.	No	
Beaver Rd. and Munford Ave.	Yes	
Munford Ave. and Water St.	Yes	
Munford Ave. and Barnes St.	Yes	
College St. and Douglas	Yes	
College St. and Parkside Cove	Yes	

Munford East	Sidewalk	Comments
Munford Ave. and Park St.	Yes	Multimodal pending
Munford Ave. and Birchwood St.	Yes	Multimodal pending
Munford Ave. and Doctors Dr.	No	Multimodal pending
Munford Ave. and Lindsey Ln.	No	Multimodal pending
Munford Ave. and Hwy 51	No	Multimodal pending
Munford Ave. and Tabb Drive	No	Multimodal pending
Hwy 51 and Tabb Drive	No	Multimodal pending

Munford Northeast	Sidewalk	Comments
Beaver Road and Bass St.		
Beaver Road and Reeder Ave.		
Reeder Ave and Brenda Dr.		
Reeder Ave and Park St.		

Munford school district	Sidewalk	Comments
Park St and Raphael Court	Yes	
Park St and Gabriel Court	Yes	
Park St and McLaughlin Dr.	Yes	
McLaughlin Dr. and School St.	Yes	
McLaughlin Dr. and Doctors Dr.	Yes	
Park St and Cottonwood Dr.	Yes	
Park St and Beachwood Dr.	Yes	
Park St and Parkwood Ln.	Yes	

Glenview Estates	Sidewalk	Comments
Inventory in progress		

Simmons Place	Sidewalk	Comments
Inventory in progress		

Table 4: STREETS INVENTORY

STREET	SIDEWALK
ADAM ROAD	N
ADKINS	N
ADKINS CIR	N
ALLEN	N
ALLEN COVE	N
ANDREA CIRCLE	N
BALTIC AVE	N
BARNES	N
BASS	N
BEAVER	PARTIAL
BEECHWOOD	N
BILLY	N
BIRCHWOOD DR	N
BLACKHAWK	N
BLOOMFIELD	N
BOARDWALK	N
BRENDA	N
BRICK	N
BRYANNA COVE	N
BRYANNA LANE	N
BURKHARDT DR	N
CAMPBELL LANE	N
CARLYLE PLACE	N
CENTER	N
CHANCE	N
CHARLES STREET	N
CHARLES PLACE	N
CHRISTIE	N
COLE	N
COLLEGE	PARTIAL
COLONIAL	N
COLONIAL HEIGHTS	N
CONNECTICUT	N
CORBITT DRIVE	N
COTTONWOOD DRIVE	N
CRIGGER STREET	N
CULLUM	N

Table 4: STREETS INVENTORY

STREET	SIDEWALK
DACUS	N
DAVIS WAY	N
DAVIS WAY	N
DEMERY	N
DOUGLAS	N
DRUMMONDS	N
DUNDEE COVE	N
E BUFORD RD	N
EASLEY COURT	N
EAST	N
EASTWOOD DRIVE	N
EDUCATION AVE	N
ELLIS DR	N
ELM COVE	N
ELSBERRY	N
FLEMING DRIVE	N
FOX VALLEY COVE	N
FRANKLIN SQUARE DR	PARTIAL
G LAFONT CIRCLE	N
GABRIEL COVE	N
GEORGE ELLIS CIRCLE	N
GEORGE ELLIS DRIVE	N
GILT EDGE	N
GLENCOE COVE	N
GREAT OAK COVE	N
GREEN HILL COVE	N
GREEN MEADOWS BLVD	PARTIAL
HACKBERRY	N
HARVEY LANE	N
HIGHWAY 51 S	N
HILLARY CHERYL COV	N
HILLVIEW	N
HOLYROOD COVE	N
JAMES DREW	N
JOE JOYNER RD	N
KAREN	N
KATE MCCLANAHAN	N

Table 4: STREETS INVENTORY

STREET	SIDEWALK
KATHLEEN	N
KILKENNY	N
LASHUNDA JONES	N
LAUREL	N
LILLIPUT	N
LINDSEY LANE	N
LINDSEY MARIE LANE	N
LISA LANE	N
LITTLETON WAY	N
LOCHLEVIN	N
LOCUST	N
MAIN	N
MAPLE HILL DR	N
MARGARET PLACE	N
MARSHALL	N
MARY	N
MCCORMICK	N
MCLAUGHLIN	N
MILO	N
MINDY	N
MUNFORD AVE	PARTIAL
MURIEL LANE	N
N ABERDEEN	N
N GRETNA GREEN	N
NANCYE REEDER	N
NEW YORK	N
NOB HILL CV	N
OAK COVE	N
OAKWOOD CIRCLE	N
PARK	PARTIAL
PARKSIDE COVE	N
PARKWOOD	N
PECAN	N
PEGGY STREET	N
PENNSYLVANIA	N
PICKARD LANE	N
PLUM TREE CIRCLE	N

Table 4: STREETS INVENTORY

STREET	SIDEWALK
PLUM TREE COVE	N
RAPHAEL COVE	N
REBEKA DR	N
RED CEDAR	N
REEDER	N
RESA	N
RIDGECREST	N
ROBERT	N
ROBERT L ELLIS DRI	N
RUFFIN PLACE	N
S ABERDEEN	N
S GRETNA GREEN	N
S TIPTON	PARTIAL
SASSAFRAS	N
SHANNON	N
SHORTLINE	N
SIMMONS RD	N
STIMPSON AVE	N
SURREYWOOD DR	N
SWITCHGRASS	N
SYCAMORE	N
TAYLOR STREET	N
TIPTON RIDGE COVE	N
TIPTONVIEW	N
TRALEE	N
VERMONT AVE	N
W BUFORD	N
W KILKENNY	N
W MAIN	N
WALKER FIELD	N
WALNUT	N
WATSON	N
WEST	N
WHARTH LANE	N
WHITE WAY COVE	N
WHITTEN PLACE	N
WILEY	N

Table 4: STREETS INVENTORY

STREET	SIDEWALK
WINDCHASE DRIVE	PARTIAL
WINDY OAKS DRIVE	N
WOOTEN	N
WOOTEN OAKS CIRCLE	PARTIAL
WORDON WAY	N

E. ADA Transition Plan

1. Overview

The goal of the Americans with Disabilities Act (ADA) Transition Plan is to ensure that the City creates accessible public facilities and accessible paths of travel in the public right-of-way for people with disabilities.

The City evaluated City facilities and pedestrian circulation paths for accessible features as required by the Americans with Disabilities Act (ADA) and its implementing regulations (28 CFR 35) and Section 504 (49 CFR 27). The evaluation included, but was not limited to, buildings, sidewalks, curbs, curb ramps, the portion of the street surface in the crosswalk area and pedestrian signals, and was based on the requirements in the "Public Right of Way Accessibility Guidelines" (PROWAG), dated July 26, 2011. On the basis of this information, this transition plan outlines the steps the City will take to provide new, or upgrade existing, ADA-compliant facilities as required by the ADA and its implementing regulations. The City's facilities will be constructed or reconstructed to meet applicable requirements, effective at the time of bidding or at the time of construction if using City forces.

2. Inventory

The inventory was based on the City's Self-Evaluation of locations where no ADA parking and/or accessible routes are provided to City facilities; where no curb ramps are provided at the intersection of existing sidewalks and public streets; where non-compliant curb ramps, sidewalks, and other features exist; and where existing features are in poor condition. Features may include, but are not limited to, parking, signage, sidewalks, curb ramps, the portion of the street surface in the crosswalk area and pedestrian signals. The evaluation was completed December of 2017 and will be updated every 5 years.

3. Priorities

ADA upgrades and/or additions and other features will be installed or reinstalled in the locations identified in the Self-Evaluation according to the priorities established by an interactive process with the city's elected officials and the public. The current priorities are tentatively set as:

- a. Sidewalks affecting public safety
- b. Local government offices
- c. Local government facilities
- d. Other retrofits as appropriate

4. Funding

The City has budgeted approximately \$45,000 for the next phase of its ADA Program, which is the local share of a TDOT grant-funded Multimodal Project along Munford Ave. The City may subsequently fund (with a small local share) additional sidewalk and intersection improvements along Munford Avenue, as part of the scope of the City's next STP project.

In addition to further yearly budgeted funds, ADA features may be installed as a part of projects that involve new construction, reconstruction, alterations, or maintenance to roadway or pedestrian facilities in the public right-of-way. These pedestrian access route features may be

constructed at the time of the roadway or pedestrian project, even if they are identified as a lower priority in this transition plan. The cost of this work will be paid for using funds allocated for the roadway or pedestrian project.

5. Implementation Plan and Schedule

The City will consider implementation based on the number of items identified in the ADA Self-Evaluation, estimated cost of those features, and funding as it become available and appropriate in the judgment of the Board of Mayor and Aldermen, balanced with other City responsibilities and priorities.

The following is a preliminary list of pending ADA related projects. Note: these plans and estimates are subject to change.

**Table 5
ADA
IMPLEMENTATION
PRELIMINARY PLANS**

Item No.	Location	Description	Cost Estimate	Funding Sources	Priority	Estimated Completion Year
1	Munford Ave. from Birchwood Dr. to Tabb Dr.	Multimodal Sidewalk Project	\$950,000	TDOT and Local	1	2018
2	Munford Ave. from Park St. to College St.	STP Project	\$550,000	TDOT	2	2021

6. Complaint Procedures

The City has defined the complaint procedures to be followed to provide citizens the ability to file a complaint to the City for alleged ADA and Section 504 discrimination. This is included in Appendix A.

7. Public Involvement

Public input is scheduled for review of this transition plan by soliciting comments from the Board of Mayor and Aldermen, and the general public for 30 days, in calendar year 2018. All comments will be reviewed and incorporated as appropriate.

APPENDIX A

Discrimination Complaint Procedures

City of Munford Complaint and Grievance Procedure under The Americans with Disabilities Act

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

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

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

Neal Hunter
ADA Coordinator
1397 Munford Ave.
Munford, TN 38058
Telephone: 901-837-0171
Email: nhunter@munford.com

by hand or other delivery: 1397 Munford Ave.
Munford, TN 38058

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

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

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

All written complaints received by Mr. Hunter or his designee, appeals to the City Manager or his designee, and responses from these two offices will be retained by the City of Munford for at least three years.

Record keeping: The City's shall maintain a log of complaints filed that alleged discrimination. The log shall include:

- a. The name and address of the complainant.
- b. Basis of discrimination complaint.
- c. Description of complaint.
- d. Date filed.
- e. Disposition and date.
- f. Any other pertinent information.

All records regarding discrimination complaints and actions taken on discrimination complaints must be maintained for a period of not less than 3 years from the final date of resolution of the complaint.

Confidentiality: The City's ADA Program Coordinators are required to keep the following information confidential to the maximum extent possible, consistent with applicable law and fair determination of the discrimination complaint.

- a. The fact that the discrimination complaint has been filed.
- b. The identity of the complainant(s).
- c. The identity of individual respondents to the allegations.
- d. The identity of any person(s) who furnished information relative to, or assisting in, a complaint investigation.