



STEWART COUNTY TENNESSEE

Americans with Disabilities Act Self-Evaluation and Transition Plan December 2020

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List of Abbreviations/Acronyms

AA – Affirmative Action
AASHTO – American Association of State Highway and Transportation Officials
ABA – Architectural Barriers Act of 1968
ADA – Americans with Disabilities Act of 1990
ADAAG – Americans with Disabilities Act Accessibility Guidelines
CDBG – Community Development Block Grant
CFR – Code of Federal Regulations
DOJ – U.S. Department of Justice
DOT – U.S. Department of Transportation
EEOC – Equal Employment Opportunity Commission
EMS – Emergency Medical Services
FHWA – U.S. DOT Federal Highway Administration
FTA – U.S. DOT Federal Transit Administration
GIS – Geographic Information System
HR – Human Resources Department
HTML - Hyper Text Markup Language
ISA – International Symbol of Accessibility
IT – Information Technology Department
NCA – National Center on Accessibility
PDF – Portable Document Format
RA – Rehabilitation Act of 1973
ROW – Right-of-Way
RTF – Rich Text Format
SETP – Self-Evaluation and Transition Plan
TDOT – Tennessee Department of Transportation
TDD – Telecommunications Devices for Deaf Persons
TTY – Teletypewriter
UFAS – Uniform Federal Accessibility Standards

Executive Summary

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

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

In performing this self-evaluation, only areas open to the public were assessed at the following County facilities:

- Stewart County Courthouse
- Stewart County Mayor’s Office
- Stewart County Archives
- Stewart County Veterans Service Office
- Stewart County Election Office
- Stewart County Juvenile Court
- Stewart County Health Department
- Stewart County Library
- Stewart County Visitor’s Center
- Stewart County Athletic Complex
- Stewart County Senior Citizens Center
- Stewart County Jail
- Stewart County Highway Department
- Stewart County Riding Club

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of County facilities, or entire facilities, restricted to employees does not eliminate the need of the County to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

In addition to County facilities, the self-evaluation reviewed existing County policies and procedures within each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department. It is the goal of the County to make facilities for all services, programs and activities fully accessible within 43 years, though this will be largely dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that would necessitate additional improvements to County facilities. The County has committed to provide training for staff on

the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the County is fully compliant with ADAAG standards.

The results of the self-evaluation identified a number of barriers at County-owned facilities. The estimated cost to correct these deficiencies is \$1,062,120. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as "high", "important", "moderate", or "low". "High" priority includes findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat. "Important" priority includes findings that would remove barriers to the greatest number of people to goods and services. "Moderate" priority includes findings that have a high financial impact on the entity in relationship to the degree of access provided. "Low" priority includes findings that are technically violations but provide a moderate to low increase in accessibility compared to the financial impact on the entity. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.



1 - Introduction

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

Title I - Employment (all Title II employers and employers with 15 or more employees.)

Title II - Public Services (state and local government including public school districts and public transportation)

Title III - Public Accommodations and Services operated by Private Entities

Title IV - Telecommunications

Title V - Miscellaneous

Stewart County is classified as a “public entity” pursuant to Title II of the ADA. The County is also required to comply with Title I, which requires state and local government to practice nondiscrimination in all parts of the employment process.

The DOJ is the lead agency that oversees the ADA.

Purpose

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent areas subject to Federal regulation. The CFR is updated yearly.

Relative to the ADA, on July 26, 1990 the DOJ issued rules implementing Title II. Title II requires state and local governments to make programs and services accessible to those with disabilities. The requirement extends beyond physical access at government facilities and includes policy changes to ensure that all people can take part in, and benefit from the programs and services of state and local governments.

The ADA regulations require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the evaluation is to identify problems before they occur. Title II of the ADA states that the County is required to perform six administrative responsibilities:

1. Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance.
2. Administer and write self-evaluation of the programmatic barriers in services offered by the local government.
3. Publicize and inform applicants, participants, and beneficiaries of the County’s policy of nondiscrimination on the basis of disability related to County services, program, and activities.
4. Establish a complaint/grievance procedure to respond to complaints of noncompliance from the public.
5. Develop a transition plan if structural changes are necessary for achieving program accessibility.
6. Retain the self-evaluation and provide it for public inspection for three years.

Stewart County is committed to complying with the regulations of Title II of the ADA of 1990, and all other Federal and State regulations to make our services accessible for all of the citizens. The ADA self-evaluation and transition plan (SETP) establishes a measurable benchmark for compliance and identifies a plan to remove barriers within the County.

Self-Evaluation and Transition Plan Overview

In 2019, Stewart County was made aware of issues related to non-compliance with certain requirements of the ADA by the Tennessee Department of Transportation (TDOT). TDOT found that the County did not have a SETP in place that included an evaluation of all County facilities, programs, policies, services, and activities. The County responded by contracting A2H, Inc. to assist in preparing a SETP.

The planning team at A2H, Inc. assessed County-owned and operated facilities for compliance with ADA and to complete the ADA SETP. This work plan included:

- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Conduct Public Input meeting
- Facility audit (interior and exterior)
- Prioritize facilities improvements for accessibility
- Provide Opinions of Probable Construction Costs for identified ADA improvements
- Establish a schedule in conjunction with the County staff for implementing the identified ADA improvements
- Develop written transition plan
- Adoption of the transition plan

While the self-evaluation was on-going, the County has continued its standing policy on improving county owned facilities to be ADA-compliant. A public input meeting was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for solutions to facilitate access to all individuals are subject to review, revision, and approval of the County Board and appropriation of funding to implement the improvements.

This transition plan is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes or when existing accessibility guidelines change or new guidelines are

established. In its efforts to maintain compliance, the County has several mechanisms in place to provide for an ongoing update of the transition plan:

- Implementation activities will be part of the County's annual Capital Improvement Plan
- Training of staff

Legislative Background & Framework

For more than 40 years, Stewart County has been subject to many of the nondiscrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the Architectural Barriers Act of 1968 (ABA) and Section 504 of the Rehabilitation Act of 1973 (RA).

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

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

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

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by the public.

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- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- The ADA also addresses standards for outdoor recreation (i.e. boating and fishing facilities, swimming pools, stadiums, etc.)

The primary focus of this report is to assess the compliance of the County-owned facilities related to Title II of the ADA. Title II of the ADA was effective on January 26, 1992.

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

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

Facility Access versus Program Access

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be physically accessible. Individuals with disabilities cannot

be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant. The ADA requires all County programs, but not all County buildings, to be accessible.

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

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

- Provide equal access to programs, services, and activities as provided to other members of the community.
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity.
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters.
- Allow a person with a disability to participate in a program, service or activity regardless of disability.
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity.
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities
- Furnish auxiliary aids and services when necessary to

ensure effective communication.

- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities.
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location.
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities.

Undue Burden

The County does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the County must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

County-owned Buildings and Associated Public Spaces Audit

Also, in the fall of 2020, audits of the County-owned and operated facilities were performed by A2H, Inc. staff. This review identified physical barriers and provided recommendations to comply with Federal accessibility requirements.

The list of County-owned Buildings and Associated Public Spaces that received an accessibility audit included:

- Stewart County Courthouse
- Stewart County Mayor's Office
- Stewart County Archives
- Stewart County Veterans Service Office
- Stewart County Election Office
- Stewart County Juvenile Court
- Stewart County Health Department
- Stewart County Library
- Stewart County Visitor's Center
- Stewart County Athletic Complex
- Stewart County Senior Citizens Center
- Stewart County Jail
- Stewart County Highway Department
- Stewart County Riding Club

Photographs of all amenities were taken for the record and are located in Appendix A. The specific County-owned Buildings and Park improvements recommended to remove barriers and improve accessibility are listed in Appendix A.

Public Input Meeting & Special Interest Outreach

A2H, Inc. facilitated a public input meeting on December 1, 2020 to educate the public on the requirements of the ADA, to introduce the project goals and objectives, and to take comments on the progress of the self-evaluation. The meeting was advertised in the local newspaper (Stewart County Standard) on November 17th per the County's public notice policy. A survey was also distributed for public input. Special interest groups were also contacted for their input regarding access in Stewart County. Meeting Information can be found in Appendix B. Public comments should be considered in future planning corrections for County projects related to the removal of barriers within County-owned buildings.

Department Self-Evaluation

As part of this self-evaluation, the County distributed an internal memo to all County departments requesting information about their respective departmental policies

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regarding ADA compliance. A2H staff corresponded with many of the departments to discuss the intended use of the questionnaire. All policies, programs, activities, and services were evaluated and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Chapter 4 - Self-Evaluation of County Policies, Services, Activities, and Programs.

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2 - Definitions

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

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

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

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

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

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

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

telecommunications.

ADA Accessibility Guidelines (ADAAG): scoping and technical requirements to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulation issued by Federal agencies including the DOJ and the Department of Transportation (DOT).

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

Covered Entity: under the ADA, "covered entity" is an entity that must comply with the law. Under Title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities and public transportation systems.

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

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

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

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

Discrimination on the basis of disability:

means to:

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

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

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

Major Life Activity: term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working.

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

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

Physical or Mental Impairment: a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental health problems; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs. The following conditions are not physical or mental impairments: transvestism, illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

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

Readily Achievable: easily accomplished and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include cost of action, overall financial resources and effect on expenses, safety requirements, impact on a site, overall financial resources needed.

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

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

Undue Burden: means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the County. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the Stewart County, the County shall attempt to identify another modification. If cost causes the undue burden, the County must consider whether funding for the modification is available from another source. If there is no available source to pay for the modification the County must give the person with disability the opportunity to fund the modification.

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

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

U.S. Department of Transportation: Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and para transit, as well as privately

operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

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3 - Self-Evaluation and Transition Plan - Project Approach & Requirements

Data Collection and Methodology

All facilities were evaluated based on the most current standards (2010 ADA Guidelines). ADA guidelines do allow some lenience on items built before this time (i.e. - light switches, fire alarms pulls, bathroom stall sizes). The completed reports shows the cost to bring each facility up to the most current standard although some items would be allowed to be grandfathered in.

Upon completion of the County-owned buildings and associated spaces, the data collected was compiled into data sheets for each data collection point or location. Each location was reviewed for compliance within the required guidelines. A priority ranking based on usage and hazard was then established as well as an estimated cost to modify or reconstruct to achieve required accessibility.

ADA Self-Evaluation and Transition Requirements

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

In accordance with the Title II requirements for self-evaluation, the County:

1. Identified all of the public entity's programs, activities, and services.
2. Reviewed all the policies and practices that govern the administration of the County's programs, activities, and services.

If structural changes are identified to provide program

accessibility as part of the self-evaluation, the ADA identifies specific elements to be included in the transition plan.

At a minimum, the elements of the transition plan are:

1. A list of the physical barriers in the County's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities.
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible.
3. The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period.

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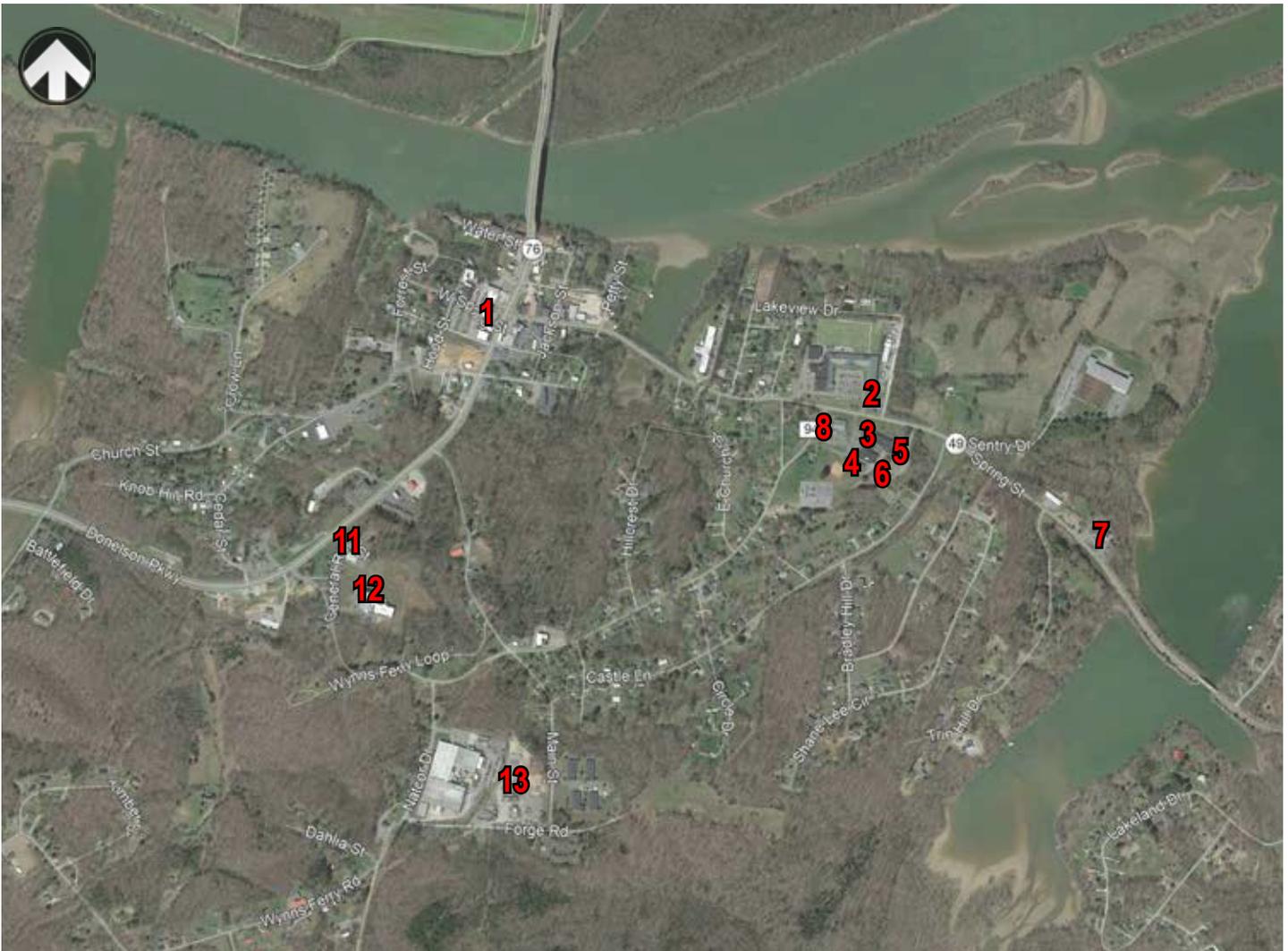
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ADA Self-Evaluation and Transition Plan

Stewart County - Inventory Map of County-owned Buildings and Associated Spaces

Legend

1. Stewart County Courthouse - 225 Donelson Parkway, Dover, TN
2. Stewart County Mayor's Office - 226 Lakeview Drive, Dover, TN
3. Stewart County Archives - 110 Natcor Drive, Dover, TN
4. Stewart County Veterans Service Office - 110 Natcor Drive, Dover, TN
5. Stewart County Election Office - 110 Natcor Drive, Dover, TN
6. Stewart County Juvenile Court - 110 Natcor Drive, Dover, TN
7. Stewart County Health Department - 1021 Spring Street, Dover, TN
8. Stewart County Library - 102 Natcor Drive, Dover, TN
9. Stewart County Visitor's Center - 117 Visitor Center Lane, Dover, TN
10. Stewart County Athletic Complex - 1182 Highway 79, Dover, TN
11. Stewart County Senior Citizens Center - 111 General Rice Street, Dover, TN
12. Stewart County Jail - 314 Cedar Street, Dover, TN
13. Stewart County Highway Department - 135 Forge Road, Dover, TN
14. Stewart County Riding Club - 245 Sandy Road, Dover, TN

Stewart County - Inventory Map of County-owned Buildings and Associated Spaces



Donelson Parkway in Dover, TN



Hwy 79 - North of Dover, TN



4 - Self-Evaluation of County Policies, Services, Activities, and Programs

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

Program Evaluation Interdepartmental Memo

The self-evaluation of the County's services, programs, and activities required and involved the participation of every County department. The County evaluated its policies, procedures and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A2H distributed a memo to all department heads to determine the level of ADA compliance. This memo requested department staff to provide the following:

- A list of any ADA training that has been attended, performed or is planned to be done
- A list of current services/programs that the department provides to the public
- A list, including any supporting documentation of policies and practices in place for interacting/communicating with persons that have disabilities
- A contact person who can provide answers to inquiries about ADA compliance in the department
- Provide background on how that department has interacted with anyone with a disability and what actions were taken to assist meeting that person's needs
- A list of any suggestions for modifications to the department's service, policies, and procedures that may better serve persons with disabilities



Overall Findings – General Policies and Practices

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

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Equally Effective Communication
- Alternate Communication Formats
- Information and Signage
- Staff Training

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



Public Information

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

Self-Evaluation General Findings:

- Public notices, public meeting agendas, and other information published by the County do have an ADA compliance statement included within.
- Signage directing visitors to County buildings along an accessible routes is lacking and the International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances.

Recommended Action:

- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other County activities. The County should attempt to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- Signage directing visitors to County buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.

Designation of ADA Coordinator

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

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Self-Evaluation Findings:

- The County has a named an ADA Coordinator, Betsy Vanvolkinberg, 226 Lakeview Drive, Dover, Tennessee, 37058, 931-232-5371.

Recommendations:

- Information regarding the identity of the County's ADA Coordinator should continue to be provided to staff, posted at all County locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the County website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the County.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.

Grievance/Uniform Complaint Procedures

A public entity that employs 50 or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA

(28 CFR 35.107 (b)).

Self-Evaluation Findings:

- The County has posted their Grievance Procedure on the County Website. Grievance Procedure Information can be found in Appendix C.

Recommendations:

- Administrative policies and procedures should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.
- The County should make efforts to inform County staff and the general public of the name of the County's ADA Coordinator, grievance procedures, the steps for handling grievances, and the County policies for remediation of grievances.

Public Meetings

Public meetings are routinely held by various County departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to



use both structural and nonstructural methods to achieve accessibility to programs, services, and activities (28 CFR 35.150 (a)(1); (b)(1)).

Self-Evaluation Findings:

- The County holds meetings at various times and places that can be attended by anyone. Meetings usually occur at the Visitor's Center which is easily accessible by all.
- The County does have procedures in place for obtaining and providing auxiliary aids such as assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies.

Recommendations:

- The County should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Provide meeting agendas in alternative formats when requested.
- The County should assemble a list of readily accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
- The County should create a simple checklist for creating accessible meetings and selection of

accessible meeting spaces. This checklist should be utilized and available to all County departments for their programs and events.

Accommodations to Access Programs, Services, and Activities

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

Self-Evaluation Findings:

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to County programs, services, or activities.
- County staff stated public meetings are generally held in locations that are thought to be accessible to persons with mobility impairments and had no recollection of any previous complaints of issues.
- Staff in most departments noted circumstances where they have improvised to achieve satisfactory solutions to remove barriers to the best of their ability.

Recommendations:

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas. All County departments and divisions should be provided with the County's ADA compliance statement for accommodations.
- The County should provide additional and ongoing

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training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.

- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The ADA Coordinator should continue to monitor programmatic access.

Equally Effective Communication

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

Auxiliary Aids and Services

Self-Evaluation Findings:

- The County has assisted customers with disabilities by modifying procedures to provide alternate means to complete transactions and offered assistance to complete County forms.

Recommendations:

- The County should provide staff training and

information regarding auxiliary aids and effective communication.

- The County should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc.

Interpreter Services

Self-Evaluation Findings:

- The County has a contact for qualified sign language interpreters for departments to select from.

Recommendations:

- The County should explore the viability of providing qualified sign interpreters from a remote location and transmitting the disabled participant's response to the interpreter in accordance with 28 CFR 35.160(d).

Telecommunications Devices for the Deaf

Self-Evaluation Findings:

- TDD/TTY numbers are available for County departments.

Recommendations:

- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The County should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.

Website

Self-Evaluation Findings:

- The County website does have a link related to accessibility issues and provides contact information

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for County ADA Coordinator and grievance and complaint procedures.

- The County is in the process of updating the website to meet current ADA standards.
- Many forms are available in Portable Document Format (PDF). Concerns can be reported on the County website via e-mail.

Recommendations:

- The County's web-master developer should work to develop and refine procedures to design, maintain, update, and monitor website accessibility.
- The County should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, services, or activities.
- The County's website should provide documents in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF.
- The County should list the departments that offer TDD/TTY in the website phone directory.
- The County should work to improve the accessibility of web pages through the use of web accessibility analysis to meet or exceed Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 establishes a minimum level of accessibility for electronic information. Information on the requirements, along with suggestions for making websites accessible can be found at www.ada.gov/websites2_prnt.pdf.
- The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible (www.w3.org/WAI/).
- The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility (www.icdri.org/section508/index.htm).

Alternate Communication Formats

A public entity has a responsibility to provide information

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

Self-Evaluation Findings:

- County staff indicated that they assist with filling out forms, as requested, or when alternative formats are not available.

Recommendations:

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

Information and Signage

A public entity is required to ensure that individuals with disabilities are directed to an accessible entrance to a building and to the location and existence of accessible

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services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility (28 CFR 35.163). Paragraph (b) requires the public entity to provide signage at all inaccessible entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.

Self-Evaluation Findings:

- Most inaccessible entrances do not provide signage directing users to accessible entrances.

Recommendations:

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

Staff and Training

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

Self-Evaluation Findings:

- General ADA training has been provided by the County. Some Departments have made minor adaptations to their programs regarding accessibility.

Recommendations:

- Suggested training topics for ongoing training include, but are not limited to:

- Requirements of the ADA for Stewart County
- Consequences of Non-Compliance
- Acceptable Terminology and Phrases
- Grievance/Complaint Procedures
- Reasonable Accommodations
- Awareness and Sensitivity
- Accessible Locations for Meetings
- Consequences of Non-Compliance
- Barriers to Access – Programmatic and Physical
- Auxiliary Aids and Services
- TDD/TTY
- Building Evacuation Procedures to Assist Persons with Disabilities
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should continue to provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public.

Department Self-Evaluation Findings and Recommendations

A2H prepared and distributed a memo on November 19, 2020 to all County departments that included a request for information about each. This information included six specific items that the departments were requested to provide information to help A2H better understand the policies and procedures of each related to ADA understanding, training, and accommodation. The questions posed, along with the findings and comments of the self-evaluation received from each County Department are reported on the following page. Note that the responses reported are as provided by the Department to illustrate current procedures and policies. Corrections to the information provided for inaccuracies have not been made and, where appropriate, the editor of this report has added notes to clarify or supplement the responses. If a question was left blank or not addressed, it has been noted as “No Response”.

Questions

Q1. Provide a list of any training related to the Americans

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with Disabilities Act that have been attended by any of them or their staff. This would include conferences, seminars, webinars, etc. Include the staff person that attended, who provided the training, date, etc.

Q2. Provide a list of all services that each department provides to the public

Q3. A list of any policies or documents that exist within the County and each department related to dealing with and interacting with individuals with disabilities. This would include policy manuals, memos, legal directives, statements on agendas or other written documents, etc.

Q4. Who would be the person responsible for ADA compliance in each department? Please list the name and contact information.

Q5. If your department has interacted with anyone with a disability, please provide information about the specifics of how you accommodated them to provide them with what they needed from your department.

Q6. Please list any suggestions you would have for your department to provide better service to persons with disabilities.

Mayor's Office

1. All Department Heads and Supervisor's completed County-mandated ADA Training in 2019. Training provided by County Mayor.

2. Open Records compliance, Accounts and Budgets information, Notices of Meetings, answers citizens questions or concerns on county activities, and ensure smooth daily operation of county departments.

3. The county has an ADA Grievance Procedure

4. Betsy Vanvolkinberg, c/o Stewart County Mayor's Office 226 Lakeview Drive, Dover, TN 37058, 931-232-5371

5. Personal assistance is always a focus and a priority.

6. Counter tops in offices could be made handicap accessible by lowering the level to a wheelchair height.

Analysis & Recommended Actions:

The Mayor of a County is generally considered the "go to" person for complaints and issues. As such, the staff in this office must be prepared to handle a variety of issues and individuals coming into their office unannounced. The architectural barriers noted in Appendix A should be

removed or equal accommodation provided elsewhere.

Police Department

1. None

2. Answers calls from county, houses inmates, provides visitation services

3. No policies are currently in place

4. Dale Ward or Kenny Anderson

5. The sheriff's department interacts with people of all abilities and has not had any problems accommodating any needs

6. Training for staff

Analysis & Recommended Actions:

The Police Department is very visible to the residents and has regular interaction. It is recommended that the Police Department receive training on ADA accessibility issues related to their activities (<https://www.ada.gov/policeinfo.htm>). The architectural barriers noted should be removed.

Library

1. Was unaware of the training at the Visitor's Center

2. Services we provide for our ADA patrons, Books to go for our shut ins, automatic doors at the entrance of library, library patron computers can magnify font and read to patrons, Wheelchair computer station available, Libby App has dyslexia font, Large Print Books, Audio books.

3. Employees assist all patrons equally but individually based on their needs.

4. Tami Morgan, Director, 931-232-3127

5. How the library accommodates patrons/employees with disabilities:

- Employee uses a walker at work- work space is 4ft wide, automatic doors

- Board member is in a wheelchair- uses our Books to go program

- Blind patron uses our audio books

- Elderly uses our large print materials and curbside services

6. I feel the library accommodates all of our patrons with or without disabilities with the utmost respect.

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Analysis & Recommended Actions:

The library has several interactions and provides accommodations to make sure anyone with a disability is served as needed. (Large print materials, braille, audio recordings, etc.) Ongoing staff training should be provided to all employees. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Chancery Court Clerk

1. No training attended.
2. Court Interpreter Program.
3. Administrative Policies and Procedures Tennessee Supreme Court Administrative Office of the Court, Effective Date 11/14/2008.
4. April J. Turner, Clerk and Master 931-232-5665
5. Has not been applicable since I have been in office.
6. No suggestions.

Analysis & Recommended Actions:

The Chancery Court has several interactions and provides several services to the general public. An administrative policy has been adopted that outlines the modifications that the Courts will provide to make sure anyone with a disability is served as required. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Circuit Court Clerk - No Response

Analysis & Recommended Actions:

Circuit Court has several interactions and provides several services to the general public. There are accessibility guidelines that outline the modifications that the Courts will provide to make sure anyone with a disability is served as required. A formal written policy should be adopted. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Stewart County Court - No response

Analysis & Recommended Actions:

Stewart County Court has several interactions and provides several services to the general public. An

administrative policy should be adopted that outlines the modifications that the Courts will provide to make sure anyone with a disability is served as required. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Property Assessor Office

1. General departmental training briefly covers issues related to accommodating people of all abilities
2. Collects and oversees property taxes
3. The department has a employee handbook but can not confirm if there is any wording pertaining to assisting people with disabilities
4. Martha Wallace - (931)232-3093
5. The assessors office is located in the County Courthouse. Individuals in wheel chairs and walkers have visited the office. If needed staff will go out to their car to assist with paying taxes, etc.
6. No suggestions.

Analysis & Recommended Actions:

The Property Assessor's department interacts with citizens via both telephone as well as in person. Ongoing staff training should be provided to all employees. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Highway Department

1. I (Ronnie Sumner, Highway Superintendent) attended a training that the county had on ADA in 2019. Robin Brandon and our county lawyer were in attendance.
2. Our office provides maintenance and repairs to roads and bridges and the right of way's of roads.
3. See attachment of policy
4. Tracy Watson is on the policy for county. But in our department it would be Ronnie Sumner, Highway Superintendent - 931-232-5968 or rsumner@stewartcogov.com
5. We don't have a lot of visitor's from the public come in to our office, we mostly have more phone calls than in person. We have not had any one come in to our knowledge.
6. A handicap parking sign to show where to park to

enter in the office if needed.

Analysis & Recommended Actions:

The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Election Commission

1. No specific ADA training, some general training addresses general accommodations
2. All voting matters for the county
3. State laws lay out policies, Disability Rights of TN, Help America Vote Act, Helping TN vote
4. Daniel Perigo - 931-232-5100
5. Communication Cards, magnifying glass, audio assistance, large print, personal assistance (with documentation), wheel chairs available
6. Doorbell device to help with heavy door operation

Analysis & Recommended Actions:

The Election Commission interacts with people often during election season and must be able to accommodate voters. The department appears to have a good understanding of the need to accommodate individuals with disabilities. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Emergency Management Agency

1. None
2. 911 Dispatching, Planning, mitigation, response, and recovery to all major emergencies within SC.
3. None
4. Clint Mathis – cmathis@stewartcogov.com
5. Our facility is not open to the public to due the nature of the 911 center.
6. N/A

Analysis & Recommended Actions:

A TDD/TTY should be provided in this office and staff trained in how to use the equipment. ADA training for staff members is recommended.

Register of Deeds

1. Derek Earhart attended the Training, attended the year

- of 2019, I believe. Robin Brandon provided the training.
2. Record and maintain all documents that are recordable by law.
3. N/A
4. Derek Earhart, Register of Deeds 931-232-5990
5. N/A
6. No suggestions

Analysis & Recommended Actions:

It is recommended that staff in the Register of Deeds be provided ongoing basic training in how to accommodate various persons with disabilities and on the requirements for the various legal and other publications prepared by this department. The department needs to designate someone within the department to be responsible for ADA compliance for daily business. Verbiage regarding accessibility should implemented on all documentation immediately. The Register of Deeds should have and maintain a list of qualified individuals that can provide services to persons with disabilities if accommodation is requested (signers, interpreters, etc.). The architectural barriers noted should be removed or equal accommodation provided elsewhere in the County Courthouse.

Trustee

1. Training- I am not sure if I have had this training or not. I believe I have, but cannot confirm for sure.
2. The Trustee Office is responsible for collecting Property Tax payments from customers and maintains the funds for the County through bank investments and various bank accounts including accounts for payroll and department vendor checks.
 - The trustee office has several different methods available to pay taxes.
 - Online, Over the Phone, Mail, or in office. If a customer chooses to come in the office and any staff member notices any disability what's so ever, we take action and help them. We provide a chair in office for them to sit, while we wait on them. We have met people at their car who say they are unable to walk or come in. We walk people out to their car. Customer Service is a priority in this office and we will go above and beyond to help anyone, especially someone with a noticeable disability.
 - As far as employee disability. I have accommodated

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a pregnant lady with more breaks and whatever she needed to pump or do whatever was asked.

3. Currently there are no written policies in the Trustee Office regarding this Disability Act

4. I would be the person responsible for compliance for the Trustee Office, Laura Crain, 931-232-7026

5. We have numerous people that we help. We had this lady to come in every year who walked with cane and was not steady. We ask her to sit down, we walk over to her and help her. She made payments on her taxes. We would help figure her taxes with the payment she wanted to make. We would write her check for her and let her make sure it was correct and then sign. We provided a receipt with a hand written schedule that she wanted us to do, so she would remember when she needed to pay her taxes. We have some that call when they pull up to the front of the court house so we go out to their car and wait on them. We will do this for any and all customers.

6. The only suggestion I would have is to shorten our counter. Some have problems with that. The lobby is not very wide, but with the pandemic, we do not need more than 2 in the office at any given time. We try to keep our customers spaced out 6 feet or more. We provide clean counters that we clean daily and have hand sanitizer at their reach. Should you have any questions regarding our office, feel free to give me a call or email me at the following: 931-232-7026 or lcrain@stewartcogov.com

Analysis & Recommended Actions:

Staff Training is recommended to ensure the appropriate interactions pertaining to any additional needs someone with a disability may have. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Veteran's Services

1. Annual Training on Title VI, includes PowerPoint and evaluation test, Training is administered by the Stewart County Government, Mayor's Office. Date of training: May/June. A small part of this training covers the ADA. Attendees: Linda Hickey and Kathy Freed.

2. VA Compensation and Pension claims, VA Health Care Enrollment, VA Hardships / Financial Assistances, VA Unemployability, DD 214 and service personnel demand,

Housing grants / VA Home Loans, VA educational programs. Community service appointments. We offer in-person or telephone appointments. If the Veteran is homebound, we do offer to conduct home visits.

3. None

4. Mayor Robin Brandon, 931-232-3100

5. Our office has wheelchairs and walkers available to assist with Veterans. There is a doorbell on the outside of the door in case client needs help with entrance.

6. Replace the front doors of the facility

Analysis & Recommended Actions:

The Veteran's Service Department frequently interacts with people of various disabilities. Ongoing staff training should be provided on how best to serve the veterans and their families. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

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5 - Self-Evaluation of County-owned Buildings and Public Spaces

In the fall of 2020, interior and exterior audits of buildings, facilities, and parks were performed only in those areas open to the public. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The list of facilities that received an accessibility audit included:

- County-owned buildings

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of County facilities, or entire facilities, restricted to employees does not obviate the need of the County to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

The results of the self-evaluation identified a number of barriers at County facilities. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “important”, “moderate”, or “low”. “High” priority includes findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat. “Important” priority includes findings that would remove barriers to the greatest number of people to goods and services. “Moderate” priority includes findings that have a high financial impact on the entity in relationship to the degree of access provided. “Low” priority includes findings that are technical violations but provide a moderate to low increase in accessibility compared to the financial impact on the entity. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.

The specific site and architectural improvements recommended to remove barriers and improve accessibility are listed in Appendix A.

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Chapter 6 - Transition Plan

The Transition Plan describes how the County will be transitioning to compliance with the ADA requirements. The County must provide access for individuals with disabilities and document areas of noncompliance.

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

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

The transition plan reports the findings of the County-owned building audits. The specific improvements required to make the County-owned buildings accessible are listed in Appendix A. Removing barriers limiting access to high priority areas such as publicly accessible County owned offices or those which present a safety hazard should be the County's first priority.

Financial Considerations for Barrier Removal

Within a typical budget, the cost of making these improvements within a specified time frame and with the current economy can be overwhelming. Due to the magnitude of estimated construction costs to modify these existing pedestrian facilities, it will be necessary for the County to make accessibility improvements on a yearly basis. As the County grows more funding should be dedicated to the improvements of County-owned buildings. The County will strive to include an amount of approximately \$25,000 during the annual budget process. These funds will be dedicated to making improvements to accessibility in high priority areas providing the greatest access benefit to buildings.

The number and size of these projects will largely be dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that may necessitate additional improvements to County facilities.

Determination of yearly scope of improvements should include the physical barrier prioritization, consideration of contributing contextual factors and high traffic areas, as well as planned infrastructure improvements. It is recommended that all safety hazards be addressed individually where needed for the safety of all citizens. Complaints received may also help determine the priorities of the improvements. If the County receives complaints about access at a particular location that is not slated for upgrades for several years, they should adjust the Transition Plan to accommodate the implementation of improvements as necessary.

Stewart County may choose to modify the priorities based on funding levels and changes in County programs activities and services, to have flexibility in accommodating community requests and complaints. All costs noted are 2020 estimates and subject to change based on market conditions, economic conditions, inflation, material selection, etc.

Based on the self-evaluation, a total of approximately \$1,062,120 in improvements would be required (2020 costs) to achieve accessibility at all County-owned facilities. Note that the cost of some improvements is not comprehensive due to lack of information (survey), utility relocation or potential land acquisition, etc. These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, fees, etc. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc.

Any changes to the ADA guidelines after the evaluations were completed are not reflected in these basic cost opinions. Additionally, it is the County's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed infrastructure that is brought up to current ADA standards. At this time, costs are estimated but precise costs cannot be determined and the Transition Plan should be adjusted to reflect this knowledge.

Facilities Priority List

The Facilities Priority List is based on the public use of each facility. Buildings that provide access to the public most often should be top priority. This list is subject to change per the County's recommendations and financial obligations.

1. Stewart County Visitor's Center
2. Stewart County Election Office
3. Stewart County Courthouse
4. Stewart County Library
5. Stewart County Health Department
6. Stewart County Senior Citizens Center
7. Stewart County Veterans Service Office
8. Stewart County Juvenile Court
9. Stewart County Jail
10. Stewart County Mayor's Office
11. Stewart County Athletic Complex
12. Stewart County Riding Club
13. Stewart County Archives
14. Stewart County Highway Department

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Opinion of Probable Cost - County-Owned Facilities Summary

Location:	
Stewart County Visitor's Center:	Estimated Completion Date: 2024
Interior Repairs	\$58,050.00
Exterior Site Repairs	\$38,500.00
	\$96,550.00
Annex - Stewart County Election Office:	
Estimated Completion Date: 2028	
Interior Repairs	\$90,250.00
Exterior Site Repairs	\$9,500.00
	\$99,750.00
Stewart County Courthouse:	
Estimated Completion Date: 2035	
Interior Repairs	\$154,320.00
Exterior Site Repairs	\$20,000.00
	\$174,320.00
Stewart County Library:	
Estimated Completion Date: 2037	
Interior Repairs	\$44,700.00
Exterior Site Repairs	\$10,150.00
	\$54,850.00
Stewart County Health Department :	
Estimated Completion Date: 2041	
Interior Repairs	\$79,375.00
Exterior Site Repairs	\$5,000.00
	\$84,375.00
Stewart County Senior Citizens Center:	
Estimated Completion Date: 2043	
Interior Repairs	\$41,850.00
Exterior Site Repairs	\$5,200.00
	\$47,050.00
Annex - Stewart County Veterans Service Office:	
Estimated Completion Date: 2043	
Interior Repairs	\$1,100.00
Exterior Site Repairs	\$0.00
	\$1,100.00
Annex - Main Entry & Stewart County Juvenile Court:	
Estimated Completion Date: 2048	
Interior Repairs	\$76,675.00
Exterior Site Repairs (General and Court Parking)	\$44,375.00
	\$121,050.00
Stewart County Jail:	
Estimated Completion Date: 2052	
Interior Repairs	\$105,775.00
Exterior Site Repairs	\$0.00
	\$105,775.00
Stewart County Mayor's Office:	
Estimated Completion Date: 2056	
Interior Repairs	\$50,600.00
Exterior Site Repairs	\$39,150.00
	\$89,750.00
Stewart County Athletic Complex:	
Estimated Completion Date: 2058	
Interior Repairs	\$50,650.00
Exterior Site Repairs	\$19,000.00
	\$69,650.00
Stewart County Riding Club:	
Estimated Completion Date: 2060	
Interior Repairs	\$33,450.00
Exterior Site Repairs	\$25,400.00
	\$58,850.00

Annex - Stewart County Archives:	Estimated Completion Date: 2061
Interior Repairs	\$11,400.00
Exterior Site Repairs	\$0.00
	\$11,400.00
Stewart County Highway Department:	Estimated Completion Date: 2063
Interior Repairs	\$21,500.00
Exterior Site Repairs	\$26,150.00
	\$47,650.00
Total Cost of all Building Repairs:	\$1,062,120.00

Phasing of Corrections

A phased implementation plan of the required corrections to remove physical barriers is required. The County has limited funds and cannot immediately make all facilities fully accessible. Priority phasing was developed with 2021 being the first year of construction.

Compliance of all County-owned Facilities (Interior and Exterior)

Locations: 14 (See Facilities Priority List on Page 37)

Estimated Funding for ADA Improvements

Approximately \$25,000 per year but costs will vary

Target Completion Date: 2063

Plan Updates and Enforcement

Improvements eliminating the deficiencies identified should be tracked to show progress in increasing accessibility within the community and to ensure the County is following through on the commitments made herein.

The Transition Plan will be reviewed and updated periodically to ensure the County is continuing to improve the accessibility within their facilities.

