



CITY OF LANCASTER
AMERICANS WITH DISABILITIES ACT
self-evaluation and transition plan



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ADA Self-Evaluation and Transition Plan

April 24, 2015 Public Review Draft



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1.0 Introduction

1.1 Executive Summary

This Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is being prepared to partially fulfill the requirements set forth in Title II of the Americans with Disabilities Act. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This report will assist the City of Lancaster to identify policy, program, and physical barriers to accessibility and to develop barrier removal solutions that will facilitate the opportunity of access to all individuals.

Title II of the ADA emphasizes the accessibility of programs, activities and services. This Plan addresses these issues by providing recommendations for action steps based on a comprehensive review of current practices including an on-line questionnaire that was completed by City staff regarding the delivery of services to the public. This process included every department that provides services to the public.

As noted in Section 2.0, many City staff members report making modifications to City practices and procedures to assist people with disabilities in receiving the services provided by the City including providing materials in alternate formats, and holding meetings in accessible locations to ensure that people with disabilities have an opportunity to participate in civic life. A review of the City of Lancaster Municipal Code and other planning documents was also completed.

When it is not feasible to provide accessible City programs, activities and services by relocating these activities to accessible facilities or providing auxiliary aids and services, the ADA requires that the City complete a Transition Plan describing the physical modifications to facilities that will support accessible programs.

The Transition Plan described in Section 3.0 is the result of a detailed evaluation of all City of Lancaster municipal facilities where programs, activities and services are available to the public. Municipal facilities include City buildings, parks, public rights-of-way adjacent to City facilities, and City owned and managed facilities that are leased to organizations. Facilities that are not addressed in this ADA Title II Plan include private businesses and offices, private schools, County, State or Federal facilities, places of worship or private clubs.

The facility evaluations were conducted using the most current accessibility standards. The resulting facility reports are available under separate cover through the City's ADA Coordinator. Each facility report lists potential barriers, provides information about the relevant State and Federal codes, includes a planning level cost estimate to remove the barrier, and indicates a barrier removal priority. These reports are a snapshot in time of the conditions observed during

the evaluation period. The information contained in these reports has been transferred to a Microsoft Excel barrier analysis workbook. The workbook is the living Transition Plan document and is the City's on-going record of the remediation of barriers.

The Transition Plan is intended to provide a framework for the continuous improvement of City facilities for people with disabilities. Barriers in City facilities will be removed systematically, based on established program priorities. It is the intent of the City to address and remove barriers to accessibility in public facilities based upon on the immediate necessity of programmatic access, degree of complexity, and overall cost.

A table contained in Section 3.0 describes the schedule for barrier removal in public facilities owned by the City of Lancaster. This preliminary schedule represents a 15-year plan for barrier removal. It is the City's intent to review all barriers during the first three years of the implementation of this Plan and address those barriers that can be resolved through programmatic modifications and maintenance.

The City of Lancaster has designated an ADA Coordinator. The ADA Coordinator is responsible for coordinating the efforts of the City to comply with Title II and for investigating any complaints that the City has violated Title II of the ADA. The ADA Coordinator is also responsible for coordinating the efforts of the City to comply with all other applicable State and Federal physical and program accessibility requirements.

A public workshop was held on October 13, 2014 to introduce the project and receive questions and comments related to the ADA Self-Evaluation and Transition Plan. The meeting materials for all community meetings related to the project are located in Appendix A. After the draft plan was internally reviewed by staff, the Draft Plan was shared with the public on April 28th, 2015. A public open house was held on May 4, 2015 to provide an opportunity for the public to ask questions and to comment on the Plan. After the incorporation of public comments the Plan went before Council for adoption on June 9, 2015.

1.2 Legislative Mandate

The American with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.

The development of a Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds

make their programs available without discrimination toward people with disabilities. The Act, which has become known as the "civil rights act" of persons with disabilities, states that:

No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504)

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act.

Specifically, the City may not, either directly or through contractual arrangements, do any of the following:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services. This report and certain documents incorporated by reference, establishes the City's ADA Self-Evaluation and Transition Plan.

1.3 Discrimination and Accessibility

This section provides an overview of physical and programmatic accessibility and the basic methods of providing access. There are two kinds of accessibility:

- Program accessibility; and
- Physical accessibility

Absence of discrimination requires that both types of accessibility be provided. Program accessibility includes physical accessibility, but also entails all of the policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Physical accessibility requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility may be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of aides to beneficiaries, and provision of services at alternate sites.

Programs offered by the City to the public must be accessible. Accessibility includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

The City may achieve program accessibility by a number of methods:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aides; and
- Providing services at alternate accessible sites.

It is required that when choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City must provide equality of opportunity.

1.4 ADA Self-Evaluation and Transition Plan Requirements and Process

The ADA Self -Evaluation and Transition Plan is intended to provide a framework for the continuous improvement of the City programs and facilities for people with disabilities. The Transition Plan is a living document that is regularly updated as programs and services change, and as barriers are removed, and new facilities come under ownership or control of the City. Programs, activities, and services offered by the City of Lancaster to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of a programs or services provided by the City, including:

- Accessible/Adaptive Equipment;
- Customer Service;
- Emergency Evacuation Procedures;
- Facilities;
- Notice Requirements;
- Printed Information;
- Program Eligibility and Admission;
- Public Meetings;
- Public Telephones and Communication Devices;
- Special Events on Public Properties;
- Televised and Audiovisual Public Information;
- Tours and Trips;
- Training and Staffing;
- Transportation Services;
- Use of Consultants for Delivering Program Services; and
- Website.

The ADA Self-Evaluation for programmatic access identifies and makes recommendations to correct those policies and practices in the above mentioned programs and services that are inconsistent with Title II requirements and result in limitations on access for persons with disabilities. As part of the Self-Evaluation¹, the City:

- Identifies the City's programs, activities, and services;
- Reviews the policies, practices, and procedures that govern the administration of the City's programs, activities, and services;
- Provides opportunity for public comment;
- Makes the report available to the public; and
- Correct any programs, activities, and services that are not consistent with the requirements.

A Transition Plan is a document that outlines a strategy for the City to progress toward compliance with the Americans with Disabilities Act. The Transition Plan identifies barriers for persons with disabilities and a schedule to remove those barriers over time and must include:

¹ Department of Justice, Title II Regulations Subpart D § 35.105

- A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II;
- Provide opportunity for the public to provide comment on the Transition Plan; and
- The name of the individual responsible for the plan's implementation.

1.5 Self-Evaluation

In 2014, the City of Lancaster evaluated its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. Questionnaires were distributed and received from the following Departments:

- Administration;
- Development Services;
- Finance Department;
- Housing & Neighborhood Revitalization;
- Human Resources;
- Parks, Recreation & Arts; and
- Public Safety Department.

Findings for the City's programs, activities, and services can be found in Section 2.0 of this Plan.

1.6 Facility Assessments

In the winter of 2014, the City completed a physical audit of facilities to identify potential facility barriers and identify recommendations and alterations in order to meet state and federal accessibility standards. The list of facilities surveyed included:

- City-owned parks;
- City-owned buildings; and
- City-owned public-rights-of-way adjacent to City-owned facilities.

At the time of the facility evaluations, the ADA 2010 Standards, 2013 California Building Code (CBC), and the 2014 California Manual on Uniform Traffic Control Devices for Streets and Highways (CAMUTCD) were used to identify barriers at City facilities. Building codes are revised every few years. The barrier evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future barrier removal.

1.7 Undue Burden

The City is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or activity, would create a hazardous condition resulting in a direct threat to the participant or others, or would represent an undue financial and administrative burden.

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

1.8 Safe Harbor Provisions

The 2010 ADA regulations introduced the concept of “safe harbor”, which allows facilities built prior to March 15, 2012 that comply with the 1991 ADA Standards to remain as-is until the structural feature is altered. For example, the 1991 Standards allowed a 54 inches maximum for a side reach range, and the 2010 Standard lowered the side reach range to 48 inches maximum. Items positioned at the 54 inch height would fall under safe harbor if built before March 15th 2012² until the time of an alteration.

The exception applies to elements that might otherwise have to be modified under: 1) the program access requirement for public entities; 2) the readily achievable barrier removal requirement for places of public accommodation; or 3) the path of travel requirement for any alteration that affects the usability of a primary function area in any covered facility³.

In addition to the exceptions, Title II Regulations specify structural elements not previously included in the 1991 ADA Standards that do not fall under the safe harbor provision:

§ 35.150(b)(2)(ii) The safe harbor provided in § 35.150(b)(2)(i) does not apply to those elements in existing facilities that are subject to supplemental requirements (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards). Elements in the 2010 Standards not eligible for the element-by-element safe harbor are identified as follows—

² § 35.150 Existing facilities (b)(2)(i) Safe harbor. Elements that have not been altered in existing facilities on or after March 15, 2012, and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101–19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards.

³ ADA Safe Harbor Provisions, Evan Terry Associates, August 22, 2013

- (A) Residential facilities dwelling units, sections 233 and 809.*
- (B) Amusement rides, sections 234 and 1002; 206.2.9; 216.12.*
- (C) Recreational boating facilities, sections 235 and 1003; 206.2.10.*
- (D) Exercise machines and equipment, sections 236 and 1004; 206.2.13.*
- (E) Fishing piers and platforms, sections 237 and 1005; 206.2.14.*
- (F) Golf facilities, sections 238 and 1006; 206.2.15.*
- (G) Miniature golf facilities, sections 239 and 1007; 206.2.16.*
- (H) Play areas, sections 240 and 1008; 206.2.17.*
- (I) Saunas and steam rooms, sections 241 and 612.*
- (J) Swimming pools, wading pools, and spas, sections 242 and 1009.*
- (K) Shooting facilities with firing positions, sections 243 and 1010.*
- (L) Miscellaneous.*
 - (1) Team or player seating, section 221.2.1.4.*
 - (2) Accessible route to bowling lanes, section. 206.2.11.*
 - (3) Accessible route in court sports facilities, section 206.2.12.*

1.9 Construction Tolerances

The ADA and California Building Code reflect the need for small variations between the standards and the resulting constructed feature. The California Building Code states that all dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.

Application of conventional industry tolerances must be on a case-by-case, project-by-project basis. Predetermined guidelines for construction tolerances could unnecessarily encourage contractors and others to deviate from the access regulations found in the CBC and may wrongfully be viewed by some to have the effect of law.

Conventional building industry tolerances include those for field conditions and those that may be a necessary consequence of a particular manufacturing process. Recognized tolerances are not intended to apply to design work.

The barrier reports available under separate cover through the City do not reflect the application of construction tolerances. The City will evaluate the application of construction tolerances on a case by case basis when alterations or barrier remediation actions are undertaken.

1.10 Public Outreach

A public meeting was held on October 13, 2014 to introduce the project and receive questions and comments related to the ADA Plan. Presentation materials for all community meetings related to the project are located in Appendix A.

After the draft plan is internally reviewed by staff, the Plan will be presented to the Public for comment. A public meeting to is scheduled for May 4, 2015 to share the Plan with the public, collect public comment, and answer questions. The Final Plan will be presented to the City Council for adoption on June 9, 2015.

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2.0 Self-Evaluation of Policy and Programmatic Accessibility

Programs, activities, and services offered by the City of Lancaster to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

This section details the review of current Citywide policies, services, programs, and activities based on City staff and responses to the program accessibility questionnaire. The seven participating departments include the following:

- Administration
- Development Services
- Finance Department
- Housing & Neighborhood Revitalization
- Human Resources
- Parks, Recreation & Arts
- Public Safety Department

The findings and recommendations contained in this section will serve as a basis for the implementation of specific improvements for providing access to City programs as required by the ADA. The questionnaire administered to City staff is included in Appendix B and detailed department summaries can be found in Appendix C.

2.1 Programmatic Modifications

The ADA Coordinator, or designee, will follow-up with each department to review the recommendations contained in this Self-Evaluation Report. In those situations where a policy, program, or procedure creates a barrier to accessibility that is unique to a department or a certain program, the ADA Coordinator, or designee, will coordinate with the department head or program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

2.2 Findings and Recommended Actions - Citywide Programs, Activities and Services

This section is organized into categories based on the requirements of Title II of the ADA.

- Accessible/Adaptive Equipment
- Customer Service
- Notice Requirements
- Printed Information
- Televised and Audiovisual Public Information
- Website
- Public Telephones and Communication Devices
- Training and Staffing
- Program Eligibility and Admission
- Public Meetings
- Transportation Services
- Tours and Trips
- Use of Consultants for Delivering Program Services
- Emergency Evacuation Procedures
- Facilities
- Special Events on Public Properties

Actions are listed as required or recommended based on the Americans with Disabilities Act. Some actions are always required, such as posting a non-discrimination notice in City offices, while other actions are only required when requested, such as providing alternative formats such as large print agendas. In many cases, the City has many alternatives in selecting methods for providing accessible programs, activities and services.

Accessibility/Adaptive Equipment

Adaptive aids are devices, controls, appliances, or items that make it possible for persons with disabilities to improve their ability to function independently and participate in programs, services, and activities offered by the City. For example, a pen, note pad and clip board provided to a person with a hearing or speech impairment to write notes on or accessible electronic equipment such as an accessible computer station.

Self-Evaluation Findings:

Five departments reported providing adaptive aids such as adjustable worktables, accessible counter space, pen, paper, and clipboards.

Required or Recommended Actions:

1. It is required to provide and maintain in working order accessible equipment for people with disabilities when the public is allowed or required to use equipment such as computers, copy machines, telephones or other technologies.
2. It is recommended to collaborate with community organizations that serve people with disabilities to develop and maintain a current resource list of assistive technology equipment and sources.
3. It is recommended to establish and maintain a “Resources Toolkit” of adaptive aids and human resources that should be available for use by individuals participating in City programs. Include information about the availability of specific equipment and/or individuals who are available to provide special services (e.g., ASL translation) in public information materials such as brochures and the City’s website.
4. It is recommended to include accessibility as a criterion for purchasing. Whenever possible, evaluate furniture and building material purchases for compatibility with a wide range of disabilities and sensitivities. Select items that are easily adjustable or can be modified to accommodate a variety of physical and ergonomic needs when purchasing items such as furniture, site furnishings, and office systems. Consultation with disability organizations and persons with disabilities will assist in this task.

Customer Service

In-person interaction with the public is one of the primary functions of most City departments.

Self-Evaluation Findings:

Three departments reported that they tracked accessibility requests. Providing accessible programs is an obligation of the City and it is not allowed to ask the person with a disability to incur the costs of providing accessible services. Two departments indicated that they have a

partnership with an outside organization that provides services to assist people with disabilities. Five departments have a formal procedure to make changes to standard operating procedures.

Required or Recommended Actions:

1. It is required to continue to make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service.
2. In order to meet this requirement it is recommended that the City develop criteria for determining reasonable modifications to provide program accessibility, which may include acquisition or redesign of equipment, assignment of aides to persons with disabilities, and provision of services at alternative accessible sites. An approach should include:
 - Requests for reasonable modification in programs or services should be made to the department responsible for the program or service.
 - The department offering the program or service should meet with the individual with a disability to identify which aspects of the program limit participation and what modifications can be made.
 - The department offering the program or service should consult with the relevant program or service staff to determine the reasonable modification. The department offering the program or service may also consult with the City's ADA Coordinator or other resources providing services or information regarding persons with disabilities as appropriate.
 - The department offering the program or service should document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation should be filed with the City ADA Coordinator's office. All accessibility requests should be tracked. The ADA requests should be analyzed periodically to look for global issues that can be addressed and problems that can be solved proactively.
 - If individuals with a disability are not satisfied with the results of this process, they should be directed to the City's ADA Grievance Procedure.
3. It is required that the City continue the policy of not charging an additional fee to the person requesting accommodation for their disability for program modifications or alternative formats.
4. It is recommended that the City:
 - Assess the composition and needs of the population of people with disabilities, and take the necessary steps to improve communication and outreach to increase the

effective participation of community members with disabilities in all City programs and activities.

- Create partnerships with organizations that provide services to people with disabilities to assist in communicating about accessible City programs. Keep programs up-to-date through increased community involvement and partnerships with organizations that offer services to persons with disabilities.
- Publicize efforts to increase participation by persons with disabilities, which might include activities such as distributing program brochures to members of the disability community.

Notice Requirements

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities.

Self-Evaluation Findings:

Five departments reported that they are aware that the City has a nondiscrimination statement that includes persons with disabilities. One department reported posting a nondiscrimination statement in a location that maximizes public exposure. Three departments reported knowing the procedure for filing a disability discrimination complaint.

Required or Recommended Actions:

1. It is required that the City include the following or similar notice regarding the City's commitment to providing accessible services in all City publications that provide information about City services, programs, or activities. The notice should also be placed in all City departments in a location that will maximize public exposure.

In accordance with the Americans with Disabilities Act and California Law, it is the policy of the City of Lancaster to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact department staff. Advance notification within this guideline will enable the City to make reasonable arrangements to ensure accessibility. The City ADA Coordinator can be reached at (661) 723-6013 or by email: bgamlowski@cityoflancafterca.org.

2. It is required to provide non-discrimination language on both hard copies and documents posted on the web. Include the following or similar notice regarding the

City's non-discrimination policy in all City publications that provide general information about City services, programs, or activities.

POLICY ON NON-DISCRIMINATION ON THE BASIS OF DISABILITY

The City of Lancaster does not discriminate on the basis of disability in the admissions or access to its programs or activities. An ADA Coordinator has been designated to coordinate compliance with the non-discrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. 12131), which prohibits discrimination on the basis on disability by public agencies.

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3. It is required that the ADA Coordinator is able to communicate with a person with hearing impairment using a TTY system. As an interim solution, consider using the 711 California Relay Service.
4. It is required that a statement regarding the availability, upon request, of alternative formats and auxiliary aids is included on announcements for City programs, and applications, including:
 - The notice of non-discrimination;
 - The department's text telephone (TTY) number and/or California Relay Service information, and the phone number and email address of the person who can provide assistance in meeting special needs; and
 - A notice that requests for alternative formats or auxiliary aids is required with 72 hours notice.
5. It is recommended that the City increase outreach to persons with disabilities and the organizations that serve them. The City should inform the public of the possible modifications that can be provided to make services, programs, and activities accessible.

Printed Information

In order to meet the ADA's communication standards, City departments must be able to provide information, when requested, in alternative formats such as using easy-to-understand language, Braille, large-print format, audiotape or CD, computer disk, or other formats as requested.

Self-Evaluation Findings:

All departments produce printed information made available to the public. All departments reported that they provided printed materials in alternative formats upon request. Two departments reported including pictures of people with disabilities in their printed materials, as recommended by the ADA. Five departments reported that they provide materials in easy to understand language for people with learning disabilities.

Required or Recommended Actions:

1. It is required that the City provide alternative formats to printed information, when requested (for example, enlarged print format for persons with visual disabilities or in simple language for persons with cognitive disabilities).
2. It is required that the City address all requests for other alternative formats or lengthy documents on an individual basis.
3. It is recommended that the City provide instruction to each department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner.
4. It is required that any additional costs for alternative forms of communication are not assigned to the person with a disability requesting the alternative format.
5. It is required to include the following notice on materials printed by the City that are made available to the public:

This publication can be made available in alternative formats, such as Braille, large print, audiotape, or computer disk. Requests can be made by calling the ADA Coordinator at (661) 723-6013 (Voice) or by using the 711 California Relay Service. Please allow 72 hours for your request to be processed.

6. It is required to provide programmatic changes (e.g., staff assistance), upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.
7. It is recommended that when photos are part of a brochure or publication photos of persons with disabilities are included.

Televised and Audiovisual Public Information

Televised and audiovisual information is a means for disseminating public information through presentations produced by City departments. All televised and audiovisual information must be accessible to persons with disabilities. As more and more communication is being done remotely via the rapidly changing internet, it will be increasingly important that all communication tools maintain accessibility as technology changes.

Self-Evaluation Findings:

Three departments reported preparing audiovisual or televised presentations for the public, utilizing accessibility options such as captioning, transcription and headphones. One department reported showing pictures of people with disabilities in their audiovisual presentations.

Required or Recommended Actions:

1. It is required that the City provide, when requested, alternatives to audio presentations for City programs and for audiovisual presentations produced by the City (including videos, films, and City Council, and Planning and Transportation Commission meetings) in order to ensure that persons with hearing impairments can benefit from these presentations. Closed captioning is not required.
2. It is recommended that when presenting PowerPoint or other visual presentations that the presenter read the slides and describe the graphics. This will allow people who are blind or visually impaired to receive the information being presented.
3. It is recommended that when photos are part of an audio visual presentation, images of persons with disabilities are included.

Website - City and Department Websites

As people turn to the Internet as their primary source of information regarding services, programs, activities, and facilities, the City's website <http://www.cityoflancafterca.org/> takes on increased importance as a communications tool.

Providing public access to City publications online is an effective means of reaching persons with disabilities. New accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible.

Self-Evaluation Findings:

All departments provide information about their programs online, either on their own or the City's website. Three departments reported including information about access for people with disabilities, such as locations of accessible parking and restrooms. Two departments noted that their web pages are accessible to people with visual impairments that use speaking browsers. No department ensured that the documents provided on the website for download were accessible to people with visual disabilities. Content is managed by both the departments themselves and others.

Required or Recommended Actions:

1. It is required that the City's website is accessible to people with disabilities, including those with visual impairment.
2. It is required that the City publish the Policy of Non-Discrimination, including on the Basis of Disability, on the City's website.
3. It is recommended that the City:
 - Increase outreach to persons with disabilities by having the website include more information about the City's commitment to providing accessible services.
 - Continually improve the accessibility of web pages through the use of web accessibility analysis to meet and/or exceed Section 508 of the Rehabilitation Act guidelines for accessibility of electronic information. Acquire the technological resources necessary to create accessible PDF and graphics files as described in ADA standards for electronic and information technology.
 - Assign one department the authority to provide standards and oversight for outside vendors who create pages and for departments who post their own documents. This will support consistent and accessible web pages. Monitor web pages for continued compliance with accessible web page standards.
 - Provide training to City staff members in creating accessible PDF and other electronic files for posting on City or departmental websites.
 - Use services that help web page authors provide an accessible website by identifying and repairing barriers to access for individuals with disabilities.

Public Telephones and Communication Devices

Self-Evaluation Findings:

All departments reported communicating by telephone with members of the public with hearing or speech disabilities. Three departments reported using TTY services and two reported using the California Relay Service or 711, to communicate with people with hearing and/or speech impairments. Four departments publish their TTY or CRS numbers and only one provides training on how to communicate with people with hearing and/or speech impairment.

Required or Recommended Actions:

1. It is required that staff members are able to use TTY equipment or other means of communicating over the telephone with a person with a hearing or speech impairment, such as the California Relay Service (CRS) – 711, or are able to direct member of the public to knowledgeable staff.

2. It is required that publications that list phone numbers also include information on how people with hearing and/or speech impairment can communicate with departments by phone.
3. It is recommended that City staff become familiar with Video Remote Interpreting Services (VRI) for communicating with people with hearing and/or speech impairment. There are many situations where a live interpreter is required, such as in medical situations, but RVI is a convenient, flexible, lower-cost alternative to live interpreters.

Training and Staffing

Self-Evaluation Findings:

All departments reported that their staff members have contact with the public. Only two departments reported that their staff receives regular training for interacting with persons with a disability.

Required or Recommended Actions:

1. It is required that City staff is knowledgeable in providing accessible services, programs and activities for the public and that accessible facilities are maintained in working order
2. It is recommended that the City:
 - Provide all City staff members with on-going awareness and sensitivity training.
 - Provide training to City staff members who have contact with the public about how to provide modifications and use assistive devices to make their programs, activities, and services accessible. Ensure that customer service training includes information about communicating with and providing modifications for persons with a variety of disabilities. Include program-specific adaptations, assistive devices, and modifications in each department's accessibility policy manual.
 - Develop a comprehensive disability access training program. Educate all City staff about their responsibilities under the ADA. The City's ADA Coordinator and department supervisors should be responsible for ensuring that staff members receive training. Reference materials that address special modifications should be included in this training.
 - Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the City's policy on inclusion and non-discrimination, and staff members should receive training in using the guidelines effectively.
 - Consider offering training to employees who wish to learn basic American Sign Language (ASL) communication skills for staff who have contact with the public and depending on operational needs. This training should emphasize basic

communication skills and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.

- Train Maintenance Services staff with respect to accessibility compliance and building codes to maintain facilities in an accessible condition.
- Provide City staff members with training in general building evacuation procedures for assisting persons with hearing, speech, visual, mobility, and learning disabilities in an emergency.
- Designate one manager in each department to serve as the department's Disability Access Liaison. The Liaison will be required to complete a training program and attend periodic retraining regarding accessibility issues.

Program Eligibility and Admission

The public must be able to access all programs, service, and activities, regardless of disability. Admission criteria, ability to complete forms and participation in interviews must be available to all members of the public by providing reasonable accommodations.

Self-Evaluation Findings:

No departments reported having limitations or ratio requirements for the number of people with disabilities who can participate in their program. Some departments noted that they have eligibility requirements. These requirements were physical or mental performance standards for staff based on performance requirements and safety standards.

A few departments require an interview prior to participation in City programs activities and practices. Two departments use both criteria and forms in the admissions process. Three departments reported that their forms contain a nondiscrimination statement.

Required or Recommended Actions:

1. It is required that individuals with disabilities are not excluded from regular programs or are required to accept special services or benefits.
2. It is required to include individuals with disabilities in regular programs to the maximum extent possible.
3. It is required that the City modify standard policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program, result in an undue financial or administrative burden, or create a hazardous situation for the participant or others.
4. It is required that when specific policies that would exclude or limit the participation of persons with disabilities are necessary for the safe operation of programs, those

requirements are based on real risks, not on speculation, stereotypes, or generalizations.

5. It is required that a non-discrimination statement is included on application or registration forms.
6. When interviews are required for program participation, it is required that the meetings are held in an accessible location and that alternative formats or auxiliary aids are provided upon request.

Public Meetings

Self-Evaluation Findings:

Most departments hold public meetings and most of them require meetings to be held in accessible locations. All departments reported that American Sign Language (ASL) interpreters, readers or adaptive equipment were provided when requested for meetings, interviews and conferences.

Required or Recommended Actions:

1. It is required that public meetings are held in accessible facilities in order to accommodate the participation of people with mobility disabilities. An accessible location includes, but is not limited to, the following: wheelchair accessible path-of-travel to the meeting room, accessible restrooms, accessible parking, an accessible route from transit and parking to the meeting facility, temperature control, signage, and the ability to provide access to fresh air for persons with chemical sensitivities.
2. It is recommended to continue to schedule public meetings at accessible locations.
3. It is recommended to prepare a list of accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
4. It is required to display a notice on meeting agendas indicating the availability of accessibility modifications.
5. It is required to provide agendas and other meeting materials in alternative formats, when requested.
6. It is required to provide flexibility in the time limit on speaking for individuals with communication difficulties.
7. It is required to have assistive listening devices available at public meetings.
8. It is recommended for the City to maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
9. It is recommended to provide instruction to City staff on the types of modification requests that may be made by persons with different types of disabilities including auxiliary aids such as different types of assistive listening systems, sign language

interpreters, readers, descriptive services, and other assistive technologies like "real-time captioning." Provide guidance in the layout of the room, sign-in table and refreshments table, to insure that these features are accessible.

10. Consider assigning a staff member to be a greeter at public meetings and events. Identify the staff member as a resource for persons who may require assistance.
11. It is recommended to develop a checklist for creating accessible meetings and selecting accessible meeting spaces, and make the list available to all City departments and programs who conduct public meetings.
12. It is recommended to move disability-related agenda items to the beginning of agendas when possible. Some people with disabilities are unable to stay late at meeting because they use para-transit, or have fixed schedules, and/or need to use personal care attendants.

Transportation Services

Self-Evaluation Findings:

One department reported providing transportation services to the public, and also reported having procedures to make transportation accessible to persons with disabilities.

Tours and Trips

Self-Evaluation Findings:

Five departments reported that they provide tours and trips to the public. Of these, one department reported having procedures to make tours and trips accessible to persons with disabilities.

Required or Recommended Actions:

1. It is required that the City modifies tours and trips, when requested, to enable people with mobility, visual, speech, hearing and cognitive disabilities to participate. Tour or trip registration materials must enable a person who may need accessibility accommodation to communicate the requested modification. Provide information to participants in advance of a tour or trip regarding the destination, transportation, and other characteristics of the event so that informed requests for accommodations can be made.
2. It is recommended that the City evaluate the destination of the tour or trip and the means of transportation in order to determine its accessibility and any accommodations or modifications that may be required. If a tour route or a portion of a route is not accessible, the City will continue the practice of rerouting the tour or providing alternate

accommodation (e.g., photographs, close-captioned videos, etc.) that will allow the tour to be experienced if requested.

Use of Consultants for Delivering Program Services

Self-Evaluation Findings:

Five departments reported the use of consultants for delivering program services. Two of these departments reported that they ensure that consultants are aware of their obligations to facilitate participation of individuals with disabilities in programs.

Required or Recommended Actions:

1. Ensure consultants are aware of their obligation to make city programs and activities are accessible.
2. Monitor programs and activities to ensure continued accessibility.

Emergency Evacuation Procedures

Self-Evaluation Findings:

Four departments reported that they notify individuals with disabilities of emergencies and evacuation procedures.

Required or Recommended Actions:

1. It is required that the City develop guidelines and a plan for the evacuation of persons with disabilities in various types of emergency situations. These plans should:
 - Address what to do when an alarm is triggered;
 - Establish meeting places for assistance and evacuation chairs;
 - Provide direction on what to do if assistance is not available; and
 - Establish floor captains.
2. Specific suggestions for evacuation plans and procedures can be found through the US Access Board website at <http://www.ada.gov/emergencyprepguide.htm> and the Emergency Procedures for Employees with Disabilities in Office Occupancies document published by FEMA and the US Fire Administration.
3. It is required to train City staff regarding emergency evacuation procedures with periodic drills, both announced and unannounced.
4. It is recommended that the City:
 - Review existing procedures dealing with emergencies to ensure that persons with disabilities can be alerted and that they can alert emergency service providers.
 - Work with disability organizations to explore the use of other technologies such as audible exit signs for orientation and direction and vibrating paging systems.

- Provide training for public safety personnel to enable them to communicate in basic American Sign Language in the event that there is an emergency condition and the area is being evacuated. For example, this training would be provided to police, firefighters, lifeguards, and building inspectors involved in post-disaster emergencies.
- Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in their communities who may require special assistance in the event of an emergency.
 - Provide American Sign Language interpreters at emergency facilities, on an as-needed basis. To accomplish this, form a pool of interpreters as a resource from which to draw upon (see Section 6).

Facilities

Self-Evaluation Findings:

One department reported that they had requests for improving accessibility in their department's programs and facilities.

Required or Recommended Actions:

1. It is recommended that the City provide information about facility accessibility on department publications including the department's website.
2. It is recommended that requests relating to facility access be recorded and monitored. Accessibility requests should be analyzed periodically to look for global issues that can be addressed and problems that can be solved proactively.

Special Events on Public Properties

Self-Evaluation Findings:

Four departments reported that they offer special events on City property. Two of these departments reported that they ensure both private entities and staff are aware of their obligations to facilitate participation of individuals with disabilities in these special events.

Required or Recommended Actions:

1. It is recommended that in situations where private organizations sponsor events in City facilities, the City inform the organizer about applicable ADA requirements.
2. It is recommended that the City provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA.

2.3 Policy Review

This review was completed using the online versions of the City of Lancaster Municipal Code, the City of Lancaster General Plan 2030 and the City of Lancaster General Plan Housing Element in September of 2014.

City Municipal Code

Overall Recommendations:

- It is recommended to replace references of the terms “handicapped” and “invalid person” with the word “disabled” or “person with a disability”.

Codes: 2.56.100 Discrimination prohibited— Affirmative action.

5.34.040 Operator's permit.

5.44.120 Group home operational requirements.

8.56.080 Exemptions.

11.12.020 Definitions.

11.12.030 Application and relocation impact report—Data on mobile home owners and park residents—Duty to file.

11.12.050 Application for change of use—Public hearing—Findings.

12.24.040 Standards and specifications.

15.56.030 Transportation demand and trip reduction.

15.04.090 Board of appeals.

17.12.070 Uses subject to director's review and approval.

17.40.160 Definitions.

- It is recommended to provide exemptions for all service animals regardless of disability.

Codes: Title 6 Animals

12.04.340 Animals.

- It is recommended to add language or reference to ADA requirements and standards.

Codes: 12.12.050 Curbs, gutters, sidewalks, streetlights and paving required.

16.20.010 General requirements.

16.20.100 In general.

16.20.235 Perimeter treatment along arterials for rural residential subdivisions.

17.10.070 Design and performance standards.

17.20.160 Design and performance standards.

- It is recommended to change language from “disabled person parking spaces,” “disabled person spaces,” “handicap spaces” and “handicap parking” to “accessible parking spaces” and “accessible parking.”

Codes: 17.08.090 Density bonus.

17.08.330 Electric Vehicle Charging Stations.

17.12.660 Signs—General provisions.

17.12.690 Off-street parking.

17.12.880 Off-street parking.

17.12.890 Design and performance standards.

17.16.210 Off-street parking.

17.16.220 Design and performance standards.

Other Recommendations

1.08.010 Code enforcement.

- C. *Authority to Issue Notice to Appear. In any case in which a person is arrested pursuant to subsection A of this section and the person arrested does not demand to be taken before a magistrate, the public office or employee making the arrest shall prepare a written notice to appear and release the person on his promise to appear in accordance with Penal Code Section 853.6 et seq. as it currently exists and may be amended.*

Recommended action: Provide written notices in alternative formats when requested.

1.16.070 Service of citation.

A. *Service of an administrative citation may be accomplished as follows:*

1. *Personal service. The enforcement officer may obtain the signature of the responsible party to establish personal service of the citation. If the responsible party refuses or otherwise fails to sign the administrative citation, the lack of signature shall in no way affect the validity of the citation or the proceedings.*

2. *The enforcement officer may post the citation by affixing the citation to a surface in a conspicuous place on the property. Conspicuous posting of the citation is not required when personal service is accomplished or when conspicuous posting poses a hardship or is excessively expensive. Failure of a posted notice to remain in place after posting shall in no way affect the validity of the citation or the proceedings.*

3. *The enforcement officer may serve the citation by first class mail as follows:*

a. The administrative citation shall be mailed to the responsible party or property owner(s) by first class mail, postage prepaid, with a declaration of service under penalty of perjury.

b. A declaration of service shall be made by the person mailing the administrative citation showing the date and manner of service by mail and reciting the name and address of the citation addressee.

c. The failure of any responsible party to receive a properly addressed citation shall not affect the validity of the notice.

d. Service of the administrative citation in the manner described above shall be effective on the date of mailing.

Recommended action: Provide citations in alternative formats when requested.

2.52.020 Posting of agenda for meetings.

Notwithstanding the provisions of Senate Bill 1333 (1990 Stats. Ch. 459), at least seventy-two (72) hours before a regular meeting of the city council, redevelopment agency, planning commission, parks, recreation and arts commission, and other official commissions, boards and committees of the city, an agenda containing a brief description of each item of business to be transacted or discussed at the meeting shall be posted in a location that is freely accessible to members of the public. No action shall be taken on any item not appearing on the posted agenda except under the conditions set forth in Government Code Section 54954.2(b).

Recommended action: Provide agendas in alternative formats or in electronic copy on the City's website.

2.56.100 Discrimination prohibited— Affirmative action.

No person in the competitive service, or seeking admission thereto, shall be employed, promoted, demoted, discharged or in any way favored or discriminated against because of political opinions or affiliations, or because of race, color, ancestry, national origin, religious belief, sex, age, or because of the exercise of rights under Section 3502-3502.5 of the Government Code. The personnel officer shall provide for the establishment of programs, including trainee programs designed to attract and utilize persons possessing minimum qualifications, with a potential for development, to provide career development

opportunities among members of such disadvantaged groups as handicapped persons, returning veterans, women, or other minority group representatives as may be designated by the personnel officer. Such programs may provide for regular appointment upon satisfactory completion of the training period and satisfactory completion of an open competitive examination.

Recommended action: Change “handicapped” to “disabled.” Strengthen discrimination language to include disabled persons.

10.04.050 Parking restrictions.

Recommended action: Include section restricting use of disabled parking spaces for those displaying the appropriate placard.

12.08.040 Application for permit and contents.

Any person desiring to hold, manage or conduct a parade, shall file with the city manager, or his/her designee, a verified application on a form furnished by the city manager, or his/her designee, no less than ten (10) working days before the date on which it is proposed to conduct such a parade. The application shall set forth the following information:

Recommended action: In permit application materials, include information on alternative routes for persons with disabilities that may be affected by the parade.

15.56.030 Transportation demand and trip reduction

B.2. Nonresidential development of fifty thousand (50,000) square feet or more shall comply with subsection (B)(1) of this section and shall provide all of the following measures to the satisfaction of the city:

a. Not less than ten (10) percent of employee parking area shall be located as close as is practical to the employee entrance(s), and shall be reserved for use by potential carpool/vanpool parking vehicles, without displacing handicapped and customer parking needs. This preferential carpool/vanpool parking area shall be identified on the site plan upon application for building permit, to the satisfaction of city. A statement that preferential carpool/vanpool spaces for employees are available and a description of the method for obtaining such spaces must be included on the required transportation information board. Spaces will be signed/striped as demand warrants; provided that at all times at least one space for projects of fifty thousand (50,000) square feet to one hundred thousand

(100,000) square feet and two spaces for projects over one hundred thousand (100,000) square feet will be signed/striped for carpool/vanpool vehicles.

B.3. Nonresidential development of one hundred thousand (100,000) square feet or more shall comply with subsections (B)(1) and (2) of this section, and shall provide all of the following measures to the satisfaction of the city:

a. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers;

b. Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

Recommended action: Change language from “handicapped” to “disabled.” Add specific requirements for disabled parking and sidewalk/pathway treatments and specifications. Include a reference to ADA standards.

17.40.580 Standards.

When commercial coaches are used as temporary offices, they shall be reviewed by the director and shall meet the following standards:

A handicap access ramp shall be provided to all commercial coach offices.

Recommended action: Replace “handicap” with “curb” ramp.

General Plan 2030

Overall Recommendations:

It is recommended to change the language in the General Plan Index to reflect the forthcoming recommendations.

- It is recommended to replace references of the terms “handicapped” and “invalid person” with the word “disabled” or “person with a disability”.

Codes: Specific Action 12.2.3(a)

Objective 13.1

Policy 13.1.2

Specific Action 14.4.1(c)

Other Recommendations:

Population and Housing

There is a need to provide for special needs populations, such as the elderly, female-head-of-households, handicapped households, large family households, minority households, military households, farm worker households, and the homeless. The needs of these populations require special consideration, as they often experience difficulty in obtaining housing.

Recommended action: Replace the term “handicapped households” with “households with a person with a disability”.

Pedestrian, Equestrian, and Bicycle Trails

A multi-purpose urban and rural trails system has been requested by residents for many years. This continues to be an important community priority, as indicated by residents in recent surveys for both the Parks Master Plan and General Plan Update. A proposed trails plan is needed to incorporate pedestrian, bicycle, and equestrian trails. The purpose of the trails system is to provide various means of exercise and relaxation, and to provide alternative modes of transportation. These trails would link recreational facilities, schools, commercial areas and places of local employment within the City together, and link the City and its sphere of influence to regional trails systems.

Recommended action: Include language about accessible trails and paths. Assembly Bill 1358, which took effect on January 1, 2009, requires municipalities to identify how the jurisdiction will provide for the routine accommodation of all users of the roadway including motorist, pedestrians, bicyclists, individuals with disability, seniors, and users of public transportation.

Policy 10.2.1

Establish and maintain a Master Plan of Trails which designates trail status and approximate locations, providing for the following types of trails:

- *Urban Trails: multi-purpose pedestrian/ bicycle trails which connect residential areas to other residential areas, regional and community parks, schools, and commercial and industrial employment areas.*

Recommended action: Make specific mention of accessibility, especially in urban trails.

Specific Action 10.2.3(a)

Incorporate the following guidelines into trail location and construction, wherever feasible:

Where community trails cross local streets provide street crossings at grade with appropriate striping and signing, where warranted. In cases of heavy equestrian usage, textured paving is desirable.

Where community trails cross expressways and major arterials, provide grade separated crossings, where feasible.

Recommended action: Include standards for accessible crossings.

Specific Action 13.1.2(e)

Incorporate handicapped ramps in curb and sidewalk designs within the City of Lancaster, and require that Building Code provisions related to accessibility for the handicapped are enforced.

Recommended action: Change “handicapped ramps in curb and sidewalk designs” with “accessible curb and sidewalk designs.” Replace “handicapped” at end of sentence with “disabled.”

Specific Action 14.4.2(c)

Through the Capital Improvement program, implement maintenance and improvement programs to improve bus stop facilities.

Recommended action: Include specific mention of the accessibility of bus stop facilities.

General Plan Housing Element

Overall Recommendations:

- It is recommended to replace references of the terms “handicapped” and “invalid person” with the word “disabled” or “person with a disability”.

Codes: Goal 8

Objective 8.1

G. Housing Constraints Analysis

Other Recommendations:

G. Housing Constraints Analysis

5. Constraints – Housing for Persons with Disabilities

Lancaster also enforces the requirements of the 2010 California Building Codes and the applicable amendments of the City of Lancaster set forth in Ordinance

No. 890. The City's Building and Safety Department requires plans with fully dimensioned details indicating compliance with disabled access requirements, including:

Disabled unit(s) and disabled adaptable unit(s)

Disabled parking spaces

Paths of travel from disabled parking spaces to building entrance

Building entrance and paths of travel within the building

Disabled access to facilities within the building, including restrooms, telephones, drinking fountains, and counters

For the purpose of considering appeals to the standards of Title 24, Part 2 of the California Code of Regulations regarding accommodations for the physically handicapped, the City established the Physically Disabled Access Appeals Board, which consists of the members of the City Council. The Board considers appeals filed relating to requirements for physically disabled access and authorize reasonable alternatives to physically disabled access requirements imposed by Title 24 of California Code of Regulations. The City has yet to receive any appeals relating to disabled access requirements.

Recommended action: Change language from "disabled parking spaces" to "accessible parking spaces." Change language from "handicapped" to "disabled."

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3.0 ADA Transition Plan

Title II of the ADA requires that public entities having responsibility for or authority over facilities, streets, roads, sidewalks, and/or other areas meant for public use to develop a Transition Plan to make their facilities meet the standards for Program Accessibility. Program Accessibility means that a program, activity and/or service are accessible when viewed in its entirety. Simply put, a Transition Plan transitions inaccessible facilities into environments that are accessible to and functional for individuals with disabilities.

This Transition Plan combines the findings of the facility and public rights-of-way evaluations, policy assessments, and program evaluations. Specific policy and program recommendations are found in Section 2.0. The specific structural modifications required to make programs accessible are listed in the City of Lancaster Facility Barriers Analysis Tool, which is an Excel workbook of barriers identified during the facility evaluations. The workbook details a complete list of structural barriers and barrier removal actions for each of the City's facilities. Not all of these barriers must be removed in order to provide program access. The first priority is to remove those barriers limiting access to programs.

This Transition Plan is organized into two parts; facilities, which includes buildings, parks, and their related grounds, and the public rights-of-way around these facilities, which includes sidewalks, curb cuts, and signalized intersections that fall within the City's area of responsibility.

In compliance with the requirements of the ADA, the City will maintain in working order equipment and features that are required to provide access to individuals with disabilities.

3.1 Facilities

The ADA evaluations were completed in 2014, and included an evaluation of all portions of the interior and exterior features of the City's facilities used by the public. At the time of the facility evaluations, the ADA 2010 Standards, 2013 California Building Code (CBC), and the 2014 California Manual on Uniform Traffic Control Devices for Streets and Highways (CAMUTCD) were used to identify potential barriers at City facilities. Building codes are revised every few years. The evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future actions.

The site evaluations were accomplished using a team of accessibility assessors equipped with measuring devices, facility diagrams and evaluation checklists. Diagrammatic sketches of each site were annotated during the evaluation process and were included with the facility reports to the City. These resulting reports are available under separate cover from the City, however these reports are a snapshot in time of the conditions observed during the evaluation period. The information contained in these reports has been transferred to a Microsoft Excel barrier

analysis workbook. The workbook is the living Transition Plan document and is the City's ongoing record of the remediation of barriers. The tracking tool will be updated over time as the City either removes barriers or finds programmatic solutions to barriers. The record is maintained by the City's ADA Coordinator. For the most current status of the remediation of barriers, contact the City of Lancaster ADA Coordinator.

A. Transition Plan for Facilities

The Transition Plan for the removal of structural barriers to program access must contain the following information:

- Identification of the barriers to program access;
- Identification of the specific barrier removal action(s);
- Identification of a schedule for barrier removal; and
- Identification of responsibility for ensuring barrier removal.

The facility reports, available under separate cover from the City provided the identification of potential barriers and a feasible barrier removal actions for each facility. This information has been translated into the barrier analysis workbook which is the most current information on the status of remediation.

The City will accomplish barrier removals based on two strategies: policy and procedure modifications to remove programmatic barriers; and maintenance and construction projects to remove structural barriers. The responsibility for ensuring barrier removal will reside with the City of Lancaster's ADA Coordinator.

B. Priorities for Barrier Removal within Facilities

The following prioritization process is referenced in the ADA Title II Regulations. The principle is to ensure basic access to facilities and amenities, access to activities, and allowing alternatives to structural modifications when appropriate. Translating these priorities into action plans must be accomplished using a programmatic approach. The following guidelines were used to prioritize barriers found within City facilities:

Priority One

Removing barriers that impede accessibility at the main entrance of a facility, or improving a path of travel to the portion of the facility where program activities take place. Examples:

- Connection to the public rights-of-way
- Parking and passenger loading
- Entrance walks
- Entrance ramps
- Entrance stairs

- Entrance doors

Priority Two

Removing barriers that impede access to program use areas. Examples:

- Transaction counters
- Recreation environments/features
- Public offices
- Public restrooms

Priority Three

Removing barriers that impede access to amenities serving program areas. Examples:

- Drinking fountains
- Public telephones
- Site furnishings
- Vending machines

Priority Four

The fourth priority addresses features that are not required to be modified for accessibility because no public programs are located in this area, or there are nearby duplicate accessible features.

The priorities listed above are associated with each of the potential barriers identified at a City facility. The priorities are modifiable and are maintained by the City within the barrier analysis workbook. The priorities within facilities can change over time as programs at facilities change, alternative program solutions are identified, or alterations occur at facilities.

C. Program Barrier Removal Priorities

In order to develop a phasing schedule for the removal of barriers at each of the City's facilities, a prioritization meeting was conducted with City staff on March 31, 2015. All facilities in which the City provides programs, activities, and services were reviewed and ranked based on the following criteria. Each of these criteria is deemed by the City to have importance with no single criteria having priority over another:

- **Level of use by the public:** Facilities that have a high level of public use can be assigned a higher priority;
- **Program uniqueness:** Some programs are unique to a building, facility, or park and cannot occur at another location. Seasonal availability and programs that emphasize health and wellness can be assigned a higher priority;
- **Geographic distribution:** Selecting a range of facilities that are distributed throughout the City, and considering the proximity of these facilities to public transportation help provide maximum accessibility for all residents;
- **Critical nature of the service provided:** Facilities that provide services related to accessibility, health, safety, and the administration of essential City services such as permitting and licensing can be assigned a higher priority; and
- **Identified complaints:** Facilities that have a history of citizen complaints related to accessibility can be assigned a higher priority.

As part of the prioritization process City staff reviewed the facilities and the programs, activities, and services provided to the public at each location. Each facility was evaluated using the criteria listed above. The prioritization of the facilities has resulted in a phasing schedule for the removal of barriers contained in the following section.

D. Phasing Schedule for Facilities

Barriers identified at the City's facilities will be removed systematically based on established program priorities. It is the intent of the City to address and remove barriers to accessibility at City facilities based on the need for programmatic access, degree of complexity, and overall cost.

The City of Lancaster reserves the right to modify barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, and funding opportunities and constraints. It is the goal of this Transition Plan to provide access to the programs, activities, and services provided by the City. Interim measures will be explored and implemented in order to provide programmatic access to the public pending the implementation of physical barrier removal projects.

The barrier removal strategy for the next 15 years incorporates flexibility in the process and allows the City to respond to new opportunities as they arise. It is the City's intent to review all barriers during the first three years of Plan implementation and address those barriers that can be resolved through programmatic modifications and maintenance tasks. The City will then revise the schedule for removal of the remaining barriers. It is also assumed that as facility barriers will be evaluated in greater detail as part of future projects and complaints, a

percentage of the barriers will fall within the "safe harbor" provisions, as previously explained in Section 1. The "safe harbor" status will help to reduce the inventory of work to be done. The City will then revise and update the inventory of barriers, and when applicable revise the Transition Plan schedule for the removal of remaining barriers on a regular basis.

The following tables describe the schedule priorities for barrier removal in public facilities owned by the City of Lancaster. This preliminary schedule represents a 15-year plan for barrier removal. The City intends to complete maintenance projects involving access barriers within the next one to three years.

Public Works Transition Plan Schedule

Location	Years 1-3	Years 4-6	Years 7-10	Years 11-15
Cedar Street Complex	•	•		
City Hall	•			
City Maintenance Yard	•		•	
Lancaster Community Shelter	•		•	
Lancaster Performing Arts Center	•			
Lancaster Small Business Incubator	•		•	
Museum of Art & History	•			
Western Hotel	•	•		

Parks Transition Plan Schedule

Location	Years 1-3	Years 4-6	Years 7-10	Years 11-15
American Heroes Community Building	•		•	
American Heroes Park	•	•		
Deputy Pierre Bain Park	•		•	
Eastside Pool	•		•	
El Dorado Park	•	•		
Forrest E. Hull Park	•			
Jane Reynolds Park	•		•	
Lancaster City Park/Big 8 Softball Complex	•			•
Lancaster Municipal Stadium	•	•	•	•
Lancaster National Soccer Center	•			•
Mariposa Park	•		•	
Prime Desert Woodland Preserve	•			
Rawley Duntley Park	•			•
Skytower Park	•		•	
Tierra Bonita Park	•			•
Webber Pool	•	•		
Whit Carter Park	•			

E. City Facilities and Historic Preservation

A qualified historical building or structure is any structure or collection of structures, and their associated sites deemed of importance to the history, architecture or culture of an area by an appropriate local or state governmental jurisdiction. This includes structures on existing or future national, state or local historical registers or official inventories, such as the National Register of Historic Places, State Historical Landmarks, State Points of Historical Interest, and city or county registries or inventories of historical or architecturally significant sites, places, historic districts or landmarks. The City of Lancaster has two locations that fall under this category of facility: the Cedar Street Complex and the Western Hotel. The Cedar Street Complex is listed in the National Register of Historic Places (NRHP No. 93001017) and the Western Hotel is listed as a California Historical Landmark (CHL No. 658).

U.S. Department of Justice-Historic Facilities

The U.S. Department of Justice has specified the actions a City needs to take in addressing accessibility in historically significant facilities.

Historically significant facilities are those facilities or properties that are listed or eligible for listing in the National Register of Historic Places or properties designated as historic under State or local law. Structural changes to these facilities that would threaten or destroy the historical significance of the property or would fundamentally change the program being offered at the historic facility need not be undertaken. Nevertheless, a city must consider alternatives to structural changes in these instances -- including using audio-visual materials to depict the inaccessible portions of the facility and other innovative solutions.

If alterations are being made to a historically significant property, however, these changes must be made in conformance with the ADA Standards for Accessible Design, ("the Standards"), 28 C.F.R. Part 36, § 4.1.7, or the Uniform Federal Accessibility Standards, ("UFAS") § 4.1.7, to the maximum extent feasible. If following either set of standards would threaten or destroy the historical significance of the property, alternative standards, which provide a minimal level of access, may be used. This decision must be made in consultation with the appropriate historic advisory board designated in the Standards or UFAS, and interested persons should be invited to participate in the decision-making process. 28 C.F.R. §§ 35.150(b)(2); 35.151(d); Standards § 4.1.7; UFAS § 4.1.7. If these lesser standards would threaten or destroy historically significant features,

then the programs or services conducted in the facility must be offered in an alternative accessible manner or location⁴.

California Historic Building Code

The California Historic Building Code (CHBC): Alternative Accessibility Provisions and Title 24, Part 8, Chapter 6: Accessibility, are building codes that guide the intent to preserve the integrity of qualified historical buildings and properties while providing access to and use by persons with disabilities.

The purpose of the CHBC is to provide alternative regulations to facilitate access and use by persons with disabilities to and throughout facilities designated as qualified historical buildings or properties. The CHBC does not apply to new construction or reconstruction/replicas of historical buildings.

The regular code for access for people with disabilities (Title 24, Part 2, Vol. 1, Chapter 11B) is required to be applied to qualified historical buildings or properties unless strict compliance with the regular code would threaten or destroy the historical significance or character-defining features of the building or property.

The regulations are unique in that they are performance oriented rather than prescriptive. This allows the enforcing agency the discretion to accept alternatives they feel do not compromise the health and safety of the public.

The alternative provisions for access may be applied provided the following conditions are met:

1. The provisions are applied only on an item-by-item or a case-by-case basis.
2. Documentation is provided, including meeting minutes or letters, stating the reasons for the application of the alternative provisions. Such documentation is to be retained in the permanent file of the enforcing agency.

The alternative provisions are contained in CHBC Part 8, Chapter 6. The application of the provisions are contained in CHBC Appendix, Chapter 8-6, Table 1 – Provision Applicability. It describes the applicability of the provisions as they apply to ADA Title II entities (Public entities such as the City of Lancaster); Title III entities (Private entities — stores, businesses, etc.), and Title III Barrier Removal projects (projects that consist only of voluntary accessibility upgrades).

⁴ U.S. Department of Justice, Civil Rights Division, Disability Rights Section, The ADA and City Governments: Common Problems, <http://www.ada.gov/comprob.htm>

For the City of Lancaster, the Title II column would apply. It includes alternatives for:

- Entries;
- Power-assisted doors;
- Toilet rooms;
- Exterior and interior ramps and lifts;
- Equivalent facilitation is an alternate means of complying with the literal requirements of the standards and specifications that provides access in terms of the purpose of the standards and specifications; and
- Not allowed for Title II entities are the exceptions for door widths.

Building officials are also allowed to accept less restrictive requirements on a case by case basis for qualified and non qualified historic buildings. Some cities have established “Administrative Bulletins” which allow the plan checker to review alternatives to the regular code on a case by case basis. These include alternatives for qualified historic buildings and specific items similar to those listed in the CHBC.

In terms of the 2010 ADA Standards, alternatives are allowed where the State Historic Preservation Officer (SHPO) or Advisory Council on Historic Preservation (a Federal entity) determines that compliance with the requirements for accessible routes, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the exceptions for alterations to qualified historic buildings or facilities for that element shall be permitted to apply. In terms of meeting this requirement of the ADA for currently enforced procedures being practiced by the SHPO in regards to this ADA requirement contact:

Carol Roland-Nawi, Ph.D
State Historic Preservation Officer
Telephone: (916) 445-7050

The intent of the CHBC is to save California's architectural heritage by recognizing the unique construction problems inherent in historical buildings and by providing a code to deal with these problems. Common sense solutions that provide a balance between providing access and preserving a community's cultural heritage is the goal.

3.2 Pedestrian Facilities in the Public Rights-of-Way

A. Overview of the PROW

The ADA addresses accessible pedestrian rights-of-way (PROW) where sidewalks are provided by the City of Lancaster. The ADA does not mandate the installation of sidewalks, but does require curb ramps at intersections where existing sidewalks are provided on both sides of the roadway.

In 2002, the United States Court of Appeals for the Ninth Circuit, whose jurisdiction includes California, held for the first time that sidewalks constitute a service, program or activity of a city, and sidewalks are therefore subject to the ADA's program accessibility regulations⁵. Before the Barden decision, the law was unclear whether municipalities' transition plans should address barrier removal from sidewalks. When originally written, the ADA specifically addressed curb ramps, subsequently the Courts have added sidewalks.

Under Title II of the ADA, a City is not necessarily required to construct curb ramps at every point where a sidewalk intersects a curb. Traffic safety considerations may make construction of ramps at some locations undesirable. Alternative routes to buildings that make use of existing curb ramps may be acceptable under the concept of program accessibility in the limited circumstances where individuals with disabilities need only travel a marginally longer route. In addition, the undue financial or administrative burden limitation recognized by Title II of the ADA may limit the number of curb ramps that the City is required to provide.

B. Evaluation of PROW Conditions

The evaluation of public rights-of-way facilities included curb ramps, sidewalks, crossings and pedestrian signals. The facilities were evaluated using the 2010 ADA, 2013 CBC, 2014 CAMTUCD accessibility standards. This Plan addresses the public rights-of-way facilities adjacent to City-owned facilities. The Transition Plan for the remaining City rights-of-way are is under development by the City's Engineering Department.

C. Pedestrian Rights-of-Way Prioritization

Under Title II Regulation § 35.150(d)(2) the criteria for prioritizing barriers within the public rights-of way are identified.

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, including State and local government offices

⁵ Barden v. City of Sacramento, 292 F.3d 1073 (9th Cir. 2002)

and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

With this Plan the City of Lancaster has addressed the first priority under the Title II Regulations; locations serving government offices and public facilities. The remaining priorities of locations serving transportation; commercial districts and employers; and locations serving other areas is being addressed as part of the City's Transition Plan for the public rights-of-way managed by the City's Engineering Department.

D. Time Period for Pedestrian Rights-of-Way Improvements

Funding improvements for pedestrian facilities is costly and competitive for State and Federal funding sources. Pedestrian improvements are often paired with other roadway improvements, Safe routes to School projects and Capital Improvement Projects. The ADA Title II regulations states that if a Transition Plan will take more than one year to fully implement, it must contain interim steps that will be done to provide program accessibility. The City is addressing the schedule of public rights-of-way improvements associated with public facilities as part of the Transition Plan schedule contained in Section 3.1. Opportunities for funding PROW improvements can include:

- Capital projects for new construction;
- Capital projects for roadway alterations;
- Maintenance and repair projects and programs; and
- Dedication of a fund for ADA barrier removal.

E. Roadway Alterations and Maintenance: Triggers for Barrier Removals

The Department of Justice, in coordination with the U.S. Department of Transportation, specifies that public agencies are required to provide curb ramps or upgrade curb ramps whenever roadways are altered. An alteration is a change that affects or could affect the usability of all or part of a building or facility⁶. Alterations of streets, roads, or highways include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and effect⁷. Maintenance activities on streets, roads, or highways, such as filling potholes, are not alterations⁸. The following list distinguishes between roadway alterations versus maintenance activities.

⁶ Title II Regulation § 35.151(b)(1)

⁷ 2010 ADA Standards, 106.5

⁸ July 8, 2013 Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing.

ALTERATION

- Addition of new layer of asphalt
- Cape seals
- In-place asphalt recycling
- Microsurfacing and thin-lift overlay
- Mill and fill / mill and overlay
- New construction
- Open-graded surface course
- Rehabilitation and reconstruction
- Resurfacing of a crosswalk

MAINTENANCE

- Chip seals
- Crack filling and sealing
- Diamond grinding
- Dowel bar retrofit
- Fog seals
- Joint crack seals
- Joint repairs
- Pavement patching
- Painting or striping
- Scrub sealing
- Slurry seals
- Spot high-friction treatments
- Surface sealing

F. Safe Harbor Provisions

If pedestrian facilities such as curb ramps and transit stops were built or altered in the past 20 years to become compliant with the 1991 ADA Standards, no further changes to those elements are mandated until the structural feature is altered even though the 2010 standards have different requirements. However certain exceptions to "safe harbor" do exist, roadway alterations as described in the *Roadway Alterations and Maintenance Triggers for Barrier Removals* section of this section are required to bring all of the curb ramps up to the current standard and "safe harbor" does not apply.

Pedestrian signals are not included in the 1991 or 2010 ADA Standards, but are addressed in the both the United States Access Boards 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way and the 2014 California Manual on Uniform Traffic Control Devices. Unlike the "safe harbor" concept contained within the 2010 ADA Standards, the proposed guidelines do not require modifications to existing facilities.

All newly constructed facilities, altered portions of existing facilities, and elements added to existing facilities for pedestrian circulation and use located in the public right-of-way shall comply with the requirements in this document⁹.

⁹ United States Access Board, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way , Scope R201.1

4.0 ADA Policy and Complaint Procedure

If a public entity has 50 or more employees, it is required to:

- Designate at least one responsible employee to coordinate Americans with Disabilities Act (ADA) compliance; and
- Develop and publish grievance procedures to provide fair and prompt resolution of complaints under Title II of the ADA at a local level¹⁰.

The City has a designated ADA Coordinator for coordinating the efforts of the City to comply with Title II and for investigating any complaints that the City has violated Title II of the ADA. The Coordinator also is responsible for coordinating the efforts of the City to comply with all other applicable State and Federal physical and program accessibility requirements.

ADA Grievance Procedure

The City currently has a Grievance Procedure on Section 504 and Reasonable Accommodation Policy which addresses employers and organizations that receive financial assistance from any Federal department or agency. The Section 504 Grievance Procedure is included in Appendix D of this Plan.

The ADA under, Title II requires that a grievance procedure be established for any program, service or activity offered by the City, whether federally funded or not. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include. However, the Department of Justice has developed a model grievance procedure that is included in this section. The grievance procedure should include:

- A description of how and where a complaint under Title II may be filed with the government entity;
- If a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- A description of the time frames and processes to be followed by the complainant and the government entity;
- Information on how to appeal an adverse decision; and
- A statement of how long complaint files will be retained.

¹⁰ ADA Best Practices Tool Kit for State and Local Governments, <http://www.ada.gov/pcatoolkit/chap2toolkit.htm>

Sample ADA Grievance Procedure:

City of Lancaster, California
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 **[name of public entity]**. The **[e.g. State, City, County, Town]**'s Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as 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:

[Insert ADA Coordinator's name]
ADA Coordinator [and other title if appropriate]
[Insert ADA Coordinator's mailing address]

Within 15 calendar days after receipt of the complaint, **[ADA Coordinator's name]** or **[his/her]** designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, **[ADA Coordinator's name]** or **[his/her]** designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the **[name of public entity]** and offer options for substantive resolution of the complaint.

If the response by **[ADA Coordinator's name]** or **[his/her]** designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the **[City Manager/County Commissioner/ other appropriate high-level official]** or **[his/her]** designee.

Within 15 calendar days after receipt of the appeal, the **[City Manager/County Commissioner/ other appropriate high-level official]** or **[his/her]** designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the **[City Manager/County Commissioner/ other appropriate high-level official]** or **[his/her]**

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 **[name of ADA Coordinator]** or **[his/her]** designee, appeals to the **[City Manager/County Commissioner/ other appropriate high-level official]** or **[his/her]** designee, and responses from these two offices will be retained by the **[public entity]** for at least three years.

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5.0 Definitions

The following is a summary of many definitions found in the ADA. Please refer to the Americans with Disabilities Act¹¹ for the full text of definitions¹² and explanations.

5.1 Auxiliary Aids and Services

The term *auxiliary aids* and services include:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments; and
- Acquisition or modification of equipment or devices; and other similar services and actions.

5.2 Complaint

A *complaint* is a claimed violation of the ADA.

5.3 Disability

The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having such impairment.

5.4 Discrimination on the Basis of Disability

Discrimination on the basis of disability means to¹³:

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

¹¹ ADA.gov United States Department of Justice Civil Rights Division, <http://www.ada.gov/>

¹² Title II Regulations. 28 C.F.R. § 35.104 Definitions.

¹³ Title II Regulations. 28 C.F.R. § 35.130 General prohibitions against discrimination.

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

5.5 Having a Record of Impairment

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

5.6 Physical or Mental Impairments

Physical or mental impairments may include, but are not limited to¹⁴: vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; Hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

The following conditions are not physical or mental impairments: transvestitism; 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.

5.7 Qualified Individual with a Disability

A *qualified individual* with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

¹⁴ Title II Regulations. Appendix B 28 C.F.R. Test C—Being regarded as having such an impairment.

5.8 Reasonable Program Modifications

If the individual's disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable an individual to perform the essential functions of the program or activity¹⁵.

Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;
- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to:

- All decisions and to the application or registration process;
- All services provided in connection with the program or activity; and
- Known disabilities only.

Modification is not required if:

- It changes the essential nature of a program or activity of the person with a disability;
- It creates a hazardous situation;
- Adjustments or modifications requested are primarily for the personal benefit of the individual with a disability; or
- It poses an undue burden on the City.

5.9 Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

¹⁵ Title II Regulations. 28 C.F.R. § 35.130 General prohibitions against discrimination. Subpart B—General Requirements

5.10 Substantial Limitations of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

5.11 Undue Burden

The City of Lancaster shall not provide an accommodation that imposes an undue burden on the operation of the City's business.

Undue burden means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the City.

Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of Lancaster, the City shall attempt to identify another modification that would not pose such a burden. If cost causes the undue burden, the City must consider whether funding for the modification is available from an outside source. If no such funding is available, the City must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden.

The following factors shall be considered in determining whether a program modification would create an undue burden: the nature and cost of the modification; the financial resources of the City available to make the modification; the impact the expense of the accommodation will have on the affected City operation; and the permanence of the alterations affecting the site.

6.0 Program Accessibility Guidelines, Standards and Resources

6.1 Introduction

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

6.2 Federal Accessibility Standards and Regulations

There are both State and Federal regulations for accessible facilities. Below are resources for both the State of California and Federal facility regulations.

U.S. Department of Justice

The U.S. Department of Justice provides many free ADA materials including the Americans with Disability Act (ADA) text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, Braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the Department of Justice website (<http://www.ada.gov/>).

- ADA Regulation for Title II: This publication describes Title II of the Americans with Disabilities Act, Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination. http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm
- Title II Technical Assistance Manual (1993) and Yearly Supplements. This 56-page manual explains in lay terms what state and local governments must do to ensure that their

services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance. <http://www.ada.gov/taman2.html>

- Accessibility of State and Local Government Websites to People with Disabilities. A 5-page publication providing guidance on making state and local government websites accessible. <http://www.ada.gov/websites2.htm>
- ADA Information for Law Enforcement. This page contains compliance assistance materials to help state and local law enforcement officers understand how to interact with victims, witnesses, suspects, and others who have disabilities. <http://www.ada.gov/policeinfo.htm>

U.S. Access Board Publications

The full texts of federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded or ordered by completing a form available on the Access Board's website (<http://www.access-board.gov/>). In addition to regular print, publications are available in: large print; disk; audiocassette; and Braille.

Communications & IT

Access to information and communication technology (ICT) is addressed by Board standards and guidelines issued under Section 508 of the Rehabilitation Act and Section 255 of the Telecommunications Act.

- Section 508 Standards:
<http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards>
Refresh of the Section 508 Standards and the Telecommunications Act Guidelines:
<http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh>
Telecommunications Act Accessibility Guidelines : <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-telecommunications-act-guidelines>

Buildings & Sites

Standards issued under the Americans with Disabilities Act (ADA) address access to buildings and sites nationwide in new construction and alterations.

- 2010 ADA Standards for Accessible Design: This document contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations

issued by federal agencies, including the Department of Justice and the Department of Transportation, under the ADA. This document must be used in conjunction with Title 24 of the California Building Code (see State of California Accessibility Standards and Regulations).

- 2010 ADA Standards:
<http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards>

Recreation Facilities

Access to recreation facilities, including play areas, swimming pools, sports facilities, fishing piers, boating facilities, golf courses, and amusement rides is addressed in the ADA and ABA standards. New provisions will cover access to trails, picnic and camping sites, and beach access routes.

- Recreation Facilities:
<http://www.access-board.gov/guidelines-and-standards/recreation-facilities/about-recreation-facilities>
- Outdoor Developed Areas:
<http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas>

Streets and Sidewalks

New guidelines the Board is developing will cover access to public rights-of-way, including sidewalks, intersections, street crossings, and on-street parking. The Board is also addressing access to shared use paths providing off-road means of transportation and recreation.

- Public Rights-of-Way:
<http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way>
- Shared Use Paths:
<http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths/about-this-rulemaking>

6.3 Title II: U.S. Department of Justice Publications

Title II Technical Assistance Manual | Supplement

A 56-page manual that explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. (1993) <http://www.ada.gov/taman2.html>

The ADA and City Governments: Common Problems | PDF

A 9-page document that contains samples of common problems shared by city governments of all sizes, provides examples of common deficiencies and explains how these problems affect persons with disabilities. (2000) <http://www.ada.gov/comprob.htm>

ADA Guide for Small Towns | PDF

A 21-page guide that presents an informal overview of some basic ADA requirements and provides cost-effective tips on how small towns can comply with the ADA. (2000) <http://www.ada.gov/smtown.htm>

Accessibility of State and Local Government Websites to People with Disabilities | PDF

A 5-page publication providing guidance on making state and local government websites accessible. (2003) <http://www.ada.gov/websites2.htm>

ADA Checklist for Polling Places | PDF

A 39-page checklist used as a self-help survey for voting officials to determine whether a polling place has basic accessible features needed by most voters with disabilities. (2004) <http://www.ada.gov/votingchecklist.htm>

An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities | PDF

An 11-page illustrated publication that provides guidance on preparing for and carrying out emergency response programs in a manner that results in the services being accessible to people with disabilities. (2006) <http://www.ada.gov/emergencyprep.htm>

Access for 9-1-1 and Telephone Emergency Services | PDF

A 10-page publication explaining the requirements for direct, equal access to 9-1-1 for persons who use teletypewriters (TTYs). (1998) <http://www.ada.gov/911ta.htm>

Commonly Asked Questions About the ADA and Law Enforcement

A 12-page publication providing information for law enforcement agencies in a simple question and answer format. (2006) http://www.ada.gov/q&a_law.htm

Communicating with People Who Are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers | PDF

An 8-panel pocket guide providing basic information for officers about ADA requirements for communicating effectively with people who are deaf or hard of hearing. (2006) <http://www.ada.gov/lawenfcomm.htm>

Model Policy for Law Enforcement on Communicating with People Who Are Deaf or Hard of Hearing | PDF

A 4-page document serving as a model for law enforcement agencies to adopt policies on effective communication with people who are deaf or hard of hearing. Agencies are encouraged to download and adapt the policy to suit their needs. (2006) <http://www.ada.gov/lawenfmodpolicy.htm>

Questions and Answers: The ADA and Hiring Police Officers

A 5-page publication providing information on ADA requirements for interviewing and hiring police officers. (1997) <http://www.ada.gov/copsq7a.htm>

6.4 State of California Accessibility Standards and Regulations

Title 24, California Building Code

The State of California has also adopted a set of design guidelines for accessible facilities, which can be found in the California Code of Regulations, Title 24, Part II, California Building Code (CBC). CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment. Although California has adopted most of the ADAAG requirements, there are some differences. In general, the more restrictive requirement (whether federal or state) should be applied when designing accessible facilities. The complete Title 24 or any of its parts is available for purchase from the International Code Council (ICC), 5360 Workman Mill Road, Whittier, CA 90601, (800) 423-6587, (<http://www.iccsafe.org>) or at various bookstores that carry technical books.

Since the CBC is updated every three years, the City should have an ongoing program of regularly reviewing these changes and updating policies and procedures related to accessibility to keep them current.

Division of State Architect

The Division of State Architect (DSA) also provides information and resources for accessible or universal design. Publications available for downloading at DSA's website (<http://www.dgs.ca.gov/dsa>) include:

- DSA's 2011 California Access Compliance Reference Manual: The purpose of this book of regulations and statutes together is to clarify the obligations for architectural accessibility in California.

For further technical assistance contact DSA's Access Compliance Program at 1102 Q Street, Suite 5100, Sacramento, California 95811 (916) 445-8100.

Resources for Providing Accessible Programs and Facilities

- ADA Document Portal: This website provides links to an ADA Collection consisting of more than 7,400 documents on a wide range of topics. The ADA Document Portal is supported by the ten ADA & IT Technical Assistance Centers (<http://www.adaportal.org/>).
- American Association of Museums: Accessible exhibit design publications are available for purchase from AAM's website, including Everyone's Welcome (available in a variety of formats), which addresses museum programs and the ADA, The Accessible Museum, which offers model programs of accessibility for older people and people with disabilities, and What Museum Guides Need to Know to provide access to blind and visually impaired visitors (<http://www.aam-us.org>).
- Beneficial Design: Beneficial Designs works toward universal access through research, design, and education. Beneficial Designs develops assistive and adaptive technology, performs rehabilitation research, contract design, legal consultation, standards development, and serves as a rehabilitation information resource. Contact Beneficial Designs, Inc. at 2240 Meridian Blvd, Suite C, Minden, NV 89423-8628, (775) 783-8822, (<http://www.beneficialdesigns.com/>).
- California State Parks Accessibility Guidelines: A State outdoor recreation resource: (<http://www.parks.ca.gov>)
- DisabilityInfo.Gov: A one-stop interagency portal for information on Federal programs, services, and resources for people with disabilities, their families, employers, service providers, and other community members.
- National Center on Accessibility: The Center is a cooperative project between the National Park Service and Indiana University to provide information and technical assistance, primarily on recreation access. The NCA website also has information on campground accessibility, accessible picnic tables, access to beaches, and inclusion of people with disabilities in aquatic venues. (<http://www.ncaonline.org/>)
- National Center on Physical Activity and Disability: The Center provides information and resources on physical activity to help people with disabilities find ways to become more active and healthier. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps, and health and leisure services (<http://www.ncpad.org/>).
- Smithsonian Institution: The Accessibility Program has developed the Smithsonian Guidelines for Accessible Exhibition Design (1996), which are available for downloading from their website: (<http://accessible.si.edu>).

Further information is available from the Smithsonian Accessibility Program at the Arts and Industries Building, Room 1239 MRC 426, Washington, D.C. 20560 (202) 786-2942.

Resources for Assistive Technologies (General)

The City should utilize the many disability-related resources available through the Internet.

AbleData

The National Institute on Disability and Rehabilitation Research of the U.S. Department of Education maintains a national web-based service which provides up-to-date links to assistive technologies and disability-related resources (<http://www.abledata.com/>).

California Assistive Technology System (CATS)

CATS is a statewide project of the California Department of Rehabilitation that promotes access to assistive technologies, related services, and information to enable people with disabilities to be successful, independent, and productive. CATS maintain several directories on their website (<http://www.atnet.org>) including:

- On-site and remote real-time captioning services
- American Sign Language (ASL) Interpreters
- Ergonomic office equipment vendors
- Augmentative and assistive communications manufacturers and vendors
- Organizations that provide low-cost and donated computers for organizations that provide services to people with disabilities
- Assistive technology vendors and service providers for:
 - Hard of Hearing/Deaf
 - Learning Disabled
 - Mobility/Physical/Orthopedic
 - Speech/Language
 - Visually impaired/Blind

Alternative Format Communication

Resources to produce standardized publications such as applications and registration forms in Braille, audiotape, large-print text, and accessible electronic media will be assembled. Information regarding Braille Services and other accommodations for people with visual disabilities is available by contacting:

- American Council of the Blind: ACB (<http://www.acb.org/>) is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired, which is available online, in regular print, large print, Braille, or on cassette

- tape. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800) 424-8666 or by email at info@acb.org.
- National Center on Accessibility: NCA publishes 'What are Alternative Formats? How Do They Apply to Programs and Services?' which is available for downloading from their website (<http://www.ncaonline.org/>).
 - National Center for Accessible Media: NCAM is a research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces, and communities. Developers of Web- and CD-ROM-based multimedia need an authoring tool for making their materials accessible to persons with disabilities. NCAM has developed two such tools, version 1.0 and 2.01 of the Media Access Generator (MAGpie), for creating captions and audio descriptions for rich media. Media Access Generator (MAGpie) is available for downloading from NCAM's website (<http://ncam.wgbh.org>).

American Sign Language Interpreters

A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a twenty-four-hour basis to handle emergency procedures.

The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, certain circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality.

You may want to contact each agency in advance of a need for services to determine their rates so that you are prepared to cover the communication expenses, should the need arise.

You should always request RID certified interpreters. Only in the event that certified interpreters are unavailable should you rely on non-certified interpreters.

Individuals who are hard of hearing generally do not use ASL interpreters. Always ask the individual requesting an accommodation what type of accommodation works best for them. Determining what accommodation(s) will be provided is an interactive process. Depending on the situation, accommodating an individual who is hard of hearing may include note writing, use of assistive listening devices, and/or provision of Computer Assisted Real-Time (CART) captioning.

Assistive Listening Systems and Devices

Systems and devices to amplify sound for persons with hearing disabilities should be available for public meetings and events. Various technologies exist for these devices. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals.

- See the on-line directory of augmentative and assistive communications manufacturers and vendors available at the California Assistive Technology System website (<http://www.atnet.org>).
- See also the Assistive Listening Systems Technical Bulletins available on the U.S. Access Board's website (<http://www.access-board.gov/>).

Closed Caption Machine

To the extent practical, City departments should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.

- See the on-line directory of On-site and remote real-time captioning services available at the California Assistive Technology System website (<http://www.atnet.org>).

Optical Readers

Equipment that can translate printed information into an audio format should be available to the City programs.

Text Telephone (TTY)

City programs should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.

- TDI: TDI's (formerly known as Telecommunications for the Deaf, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI's on-line resources include information about telecommunications access such a TTY, pagers, telephony, VoIP, and more (<http://tdiforaccess.org/>).
- See the Text Telephones Technical Bulletin available on the U.S. Access Board's website (<http://www.access-board.gov/>).

Video Relay Services (VRS)

Video Relay Service (VRS) is a form of Telecommunications Relay Service (TRS) that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the VRS user with a TRS operator – called a “communications assistant” (CA) – so that the VRS user and the CA can see and communicate with each other in signed conversation. Because

the conversation between the VRS user and the CA flows much more quickly than with a text-based TRS call, VRS has become a popular form of TRS (www.fcc.gov/guides/video-relay-services).

- Hands on Video Relay Service: (877) 467-4877 English or (877) 467-4875 Spanish
- Sorenson Video Relay: Using a standard telephone, simply call the toll-free number 1-(866)-327-8877. Have the contact information of the deaf or hard-of-hearing individual (i.e. name, videophone number or IP address) ready. Remain on hold until the call is answered by the next available interpreter.
- Sprint VRS Directions: (877)709-5776 or website www.sprintvrs.com

Enlarging Printed Materials

A copy machine capable of enlarging printed materials should be available for staff.

Guide to Disabilities and Disability Etiquette

A guide to disabilities and disability etiquette should be assembled and distributed to staff and volunteers. The guide will ensure that staff and volunteers are familiar with a variety of types of disabilities and that they are sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

- Disability Etiquette:
Interacting with People with Disabilities is available on-line at the County of Long Beach's website: (http://www.longbeach.gov/hr/ada/disability_etiquette.asp).

Lending Library of Assistive Technology Equipment

The City should establish a "Resources Toolkit" of adaptive aids and resources that will be available for use by staff and volunteers without the means to assemble their own. It is recommended that the City explore local sources of assistive technology.

- DisabilityInfo.gov's online resources for High School: Guidelines for Accessing Alternative Format, inclusion materials, educational technology, a comprehensive list including college preparatory materials, transition issues for children with special needs and more (<https://www.disability.gov/education>).
- Accessibility Connections Community Map: A Directory of Bay Area Assistive Technology Services is an on-line service available at (<http://www.cforat.org/BARD/>).
- American Association of People with Disabilities: The American Association of People with Disabilities is the largest nonprofit, nonpartisan, cross-disability organization in the United States (<http://www.aapd.com/>).

- American Foundation for the Blind: The American Foundation for the Blind is committed to improving accessibility in all aspects of life—from cell phones to ATMs, on web sites and in workplaces. Services include assistance in making products and services accessible to people with visual impairments. AFB offers expert consulting services and accessible media production. AFB provides objective product evaluations of adaptive technologies through its assistive technology product database (<http://www.afb.org/>). Local assistance is available through the American Foundation for the Blind-West, 44 Montgomery Street, Suite 1305, San Francisco, CA 94040 (415) 392-4845 or by email at sanfran@afb.net.
- Adaptive Environments: This educational non-profit organization is committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages and abilities. Adaptive Environments provides education and consultation to public and private entities about strategies, precedents and best practices that go beyond legal requirements to design places, things, communication and policy that integrate solutions to the reality of human diversity (<http://www.adaptenv.org/>).
- The Arc: The Arc (formerly Association for Retarded Citizens of the United States) is the country's largest voluntary organization committed to the welfare of all children and adults with mental retardation and their families (<http://www.thearc.org>). Local information is available from Arc Alameda County, 14700 Doolittle Drive, San Leandro, CA 94577, (510) 357-6619 or by email via the website (www.arcalameda.org) and The Arc San Francisco, 1500 Howard Street, San Francisco, CA 94103, (415) 255-7200 or by email via the website (www.thearcsf.org).
- Disability Resources, Inc.: Disability Resources, Inc. is a national nonprofit organization that provides information about resources for independent living. DRI maintains an on-line directory of assistive technology resources (<http://www.disabilityresources.org/>).
- Environmental Health Network: EHN's focus is on issues of access and developments relating to the health and welfare of the environmentally sensitive and to promote public awareness of environmental sensitivities and causative factors. EHN provides information environmental and chemical sensitivities at EHN, P.O. Box 1155, Larkspur, California, 94977-1155 (415) 541-5075 and on its website (<http://ehnca.org/>).
- National Association of the Deaf: NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website (<http://www.nad.org/>).
- National Federation of the Blind: NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided on-line resources for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed circuit TV (CCTV's) (<http://www.nfb.org/>).

- National Organization on Disability: The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources (<http://www.nod.org/>).
- Paralyzed Veterans of America: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website: (<http://www.pva.org>) provides information on useful sports publications and a list of contacts.
- State Council on Developmental Disabilities,
1507 21st Street, Ste. 210, Sacramento, CA 95814-5299
Phone: (916) 322-8481
email: scdd@dss.ca.gov or website (<http://www.scdd.ca.gov/>).
- State Office for Deaf Access, Department of Social Services
744 P Street, MS 6-91, Sacramento, CA 95814
Phone: (916) 653-8320.
email: deaf.access@dss.ca.gov or website (<http://www.dss.cahwnet.gov>)
- State Office of Services to the Blind, Department of Social Services
744 P Street, MS 6-94, Sacramento, CA 95814
Phone: (916) 657-3327,
email: BlindAccess@dss.ca.gov or website: (<http://www.dss.cahwnet.gov>).
- United Cerebral Palsy Association: UCP's mission is to advance the independence, productivity and full citizenship of people with cerebral palsy and other disabilities, through our commitment to the principles of independence, inclusion and self-determination. UCP's Sports and Leisure Channel is designed for people with disabilities who are interested in sports and other leisure activities and proposes creative ideas for inclusive community recreation programs, including outdoor adventure activities for people with disabilities. Information about the Sports and Leisure Channel is available on UCP's website (<http://www.ucp.org>).
- United Spinal Association: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website (<http://www.unitedspinal.org>).
- World Institute on Disability: WID is an international public policy center dedicated to carrying out research on disability issues. WID maintains an online information and resource

directory on technology, research, universal design, and ADA
(<http://www.wid.org/resources/>).

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Appendix A: Public Outreach Materials

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ADA Accessibility Plan

PUBLIC MEETING

Help Lancaster Develop its ADA Self-Evaluation and Transition Plan

Monday October 13, 2014
6:30 - 8:30 p.m.

American Heroes Park Community Building
642 W. Jackman Street, Lancaster, CA

In order to provide accessible services for all residents and visitors, the City of Lancaster is currently assembling its Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan. As such, the City is in the process of evaluating the accessibility of its facilities, programs and services. We would like to hear from **you**.

During this public meeting you will learn about the evaluation process and what the plan entails. You will have the opportunity to express your concerns regarding the accessibility of City services and facilities. The City will include your input in the final ADA Transition Plan.

Public Transportation

Antelope Valley Transportation Authority (AVTA)

Routes 1, 4, 7 and 11 serve the American Heroes Park Community Building

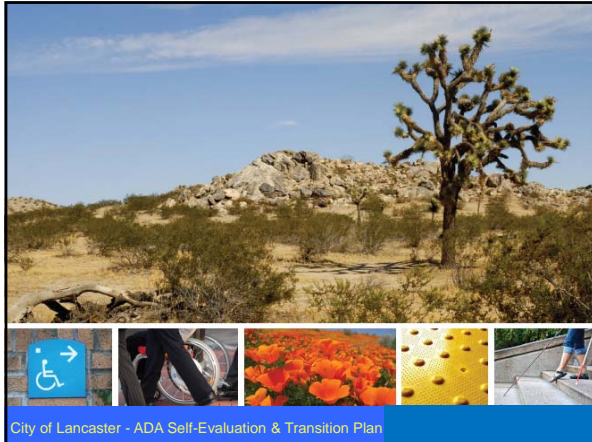
For trip planning information, please visit www.avta.com or call (661) 945-9445.

Meeting Accessibility

The meeting is being conducted in an accessible location. If you require an American Sign Language interpreter, assistive listening device or other accommodation, please contact **Brenda Gamlowski** at bgamlowski@cityoflanasterca.org or call (661) 723-6013 by **October 8, 2014**.

Meeting materials in alternative formats can be made available upon request.

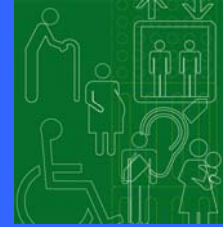




City of Lancaster - ADA Self-Evaluation & Transition Plan

The Americans with Disabilities Act

- The Americans with Disabilities Act (ADA) is a **civil rights law** that mandates equal opportunity for individuals with disabilities.



City of Lancaster - ADA Self-Evaluation & Transition Plan

The ADA Applies to:

- Title I:** Employment
- Title II:** Public Transportation and State and Local Government Services
- Title III:** Places of Public Accommodations
- Title IV:** Telecommunications
- Title V:** Miscellaneous



City of Lancaster - ADA Self-Evaluation & Transition Plan

Equality in Access

The primary responsibility of public agencies with regard to the ADA is to provide equal access to **PROGRAMS, SERVICES, & ACTIVITIES**



City of Lancaster - ADA Self-Evaluation & Transition Plan

ADA Title II Requirements

- Complete a Self-Evaluation of policies and programs
- Designate a person who is responsible for overseeing Title II compliance; and
- Develop a Transition Plan if the Self-Evaluation identifies any structural modifications necessary for compliance

City of Lancaster - ADA Self-Evaluation & Transition Plan

Project Goals

- Document existing conditions
- Establish priorities and action plans
- Provide effective planning tools
- Produce a useable document



City of Lancaster - ADA Self-Evaluation & Transition Plan

Policy and Program Evaluation

1. Review City policies including City Codes
2. Review the current level of access to programs and activities using a detailed questionnaire completed by City staff
3. Analyze policies, programs, and activities with recommendations for improvements

City of Lancaster - ADA Self-Evaluation & Transition Plan

Evaluation of City Facilities



City of Lancaster - ADA Self-Evaluation & Transition Plan

Data Collection



City of Lancaster - ADA Self-Evaluation & Transition Plan

Survey Report

Community Hall

Floor 1	
8-1	Door/Gate
	Priority: 1
	Install or modify permanent room signs
	\$250
Notes: Braille and tactile EXIT sign is not provided.	
State: -	
Federal: 1011.3	
8-2	Door/Gate
	Priority: 2
	Provide additional strike edge clearance
	\$5,000
Notes: Womens Restroom. Strike edge clearance on the swing side of the door is 17-1/2" (18" min.)	
State: 1133B.2.4.2	
Federal: 404.2.4.1	
	Adjust door closer
	\$100
Notes: Operating effort is 9lbs. (5 lbs. max.)	
State: 1133B.2.5	
Federal: 404.2.9	

City of Lancaster - ADA Self-Evaluation & Transition Plan

Survey Report

Grand Park	
3-1	Provide an hourly accessible access station
	\$1,000
Notes: There is no station for the access site on the passenger side of the square. The square 761 (24428207) are not parked in the access site.	
State: 1133B.2.1	
Federal: -	
3-2	Install and parking sign
	\$500
Notes: "Van accessible parking is not provided"	
State: -	
3-3	Provide accessible waiting area
	\$1,000
Notes: Concrete waiting is not provided where walk adjacent a vehicle area.	
State: 1133B.2.1	
Federal: -	
4-1	Provide accessible restroom
	Priority
Notes: 1) existing restroom location is not provided.	
State: 1133B.2.1	
Federal: 201.2	
	Increase or provide accessible or other floor area
	\$2,000
Notes: A "Solid" (one-way) space is provided. (Solid) (one-way) required.	
State: 1133B.2.2	
Federal: 201.206	



City of Lancaster - ADA Self-Evaluation & Transition Plan

Accessible Services in Existing Facilities

Options:

1. Make needed alterations to the facility
2. Provide the same City service in another accessible location
3. Provide auxiliary aides or services to assist the individual

City of Lancaster - ADA Self-Evaluation & Transition Plan

**Lancaster Citywide
Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan**

**October 13, 2014
Public Meeting**

COMMENT CARD

Please list your concerns regarding accessibility of the programs, services and activities offered by the City of Lancaster

Please return this card to the meeting facilitators or
mail to the address on the back of this page or
email to heatherb@migcom.com

TAPE HERE

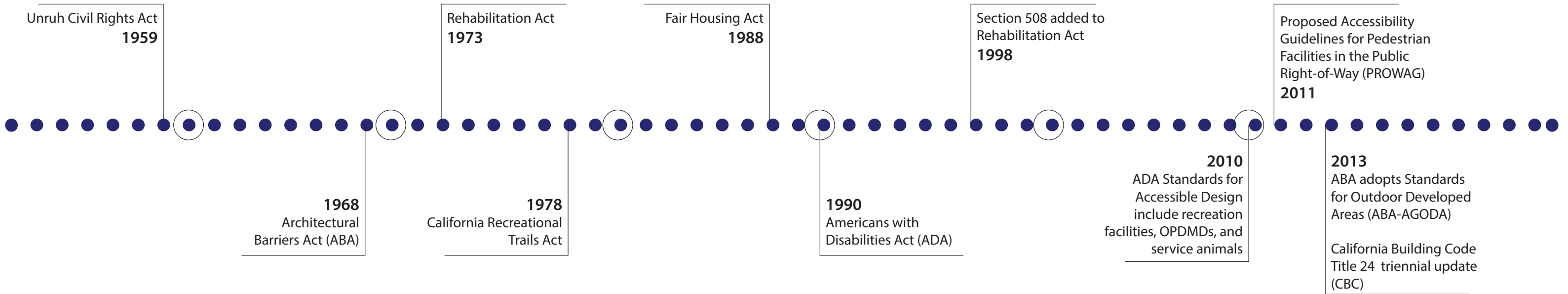
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**Place
Stamp
Here**

**Heather Buczek
Lancaster Citywide
ADA Self-Evaluation and Transition Plan
c/o MIG
815 SW 2nd Ave, Suite 200
Portland, OR 97204**

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LEGISLATIVE HISTORY

Congress passed the Americans with Disabilities Act on July 26, 1990. This Civil Rights legislation was a critical milestone for creating more inclusion and access for persons with disabilities. Title II of the ADA covers programs, activities, and services of public entities and civic life.

The Department of Justice’s Title II regulation adopted the general prohibitions of discrimination established under Section 504 of the Rehabilitation Act of 1973 and incorporated specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those previously provided by the nondiscrimination provisions of Title V of the Rehabilitation Act.

Specifically, the City, and other public entities, may not, either directly or through contractual arrangements, do any of the following:

- Deny persons with disabilities equal opportunity to participate as members of advisory boards and commissions.
- Deny persons with disabilities equal opportunity to participate in services, programs, or activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

Title II of the ADA provides that the City and other public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity’s programs, activities, and services.



Americans with Disabilities Act TITLE II SELF-EVALUATION AND TRANSITION PLAN



TRANSITION PLAN

Title II of the ADA requires that public entities having responsibility for or authority over facilities, streets, roads, sidewalks and/or other areas meant for public use to develop a Transition Plan to make their facilities meet the standards for Program Accessibility.

Program Accessibility means that a program, activity and/or service are accessible when viewed in its entirety. Simply put, a Transition Plan transitions inaccessible facilities into environments that are accessible to and functional for individuals with disabilities.

A final Transition Plan combines the findings from the facility evaluations, public rights-of-way evaluations, policy assessments and program evaluations. Each facility evaluation results in a complete list of architectural barriers and barrier removal actions. Not all of these barriers must be removed in order to provide program access. The first priority is to remove those barriers limiting access to programs.

In compliance with the requirements of the ADA, the City will maintain in working order equipment and features that are required to provide access to individuals with disabilities.

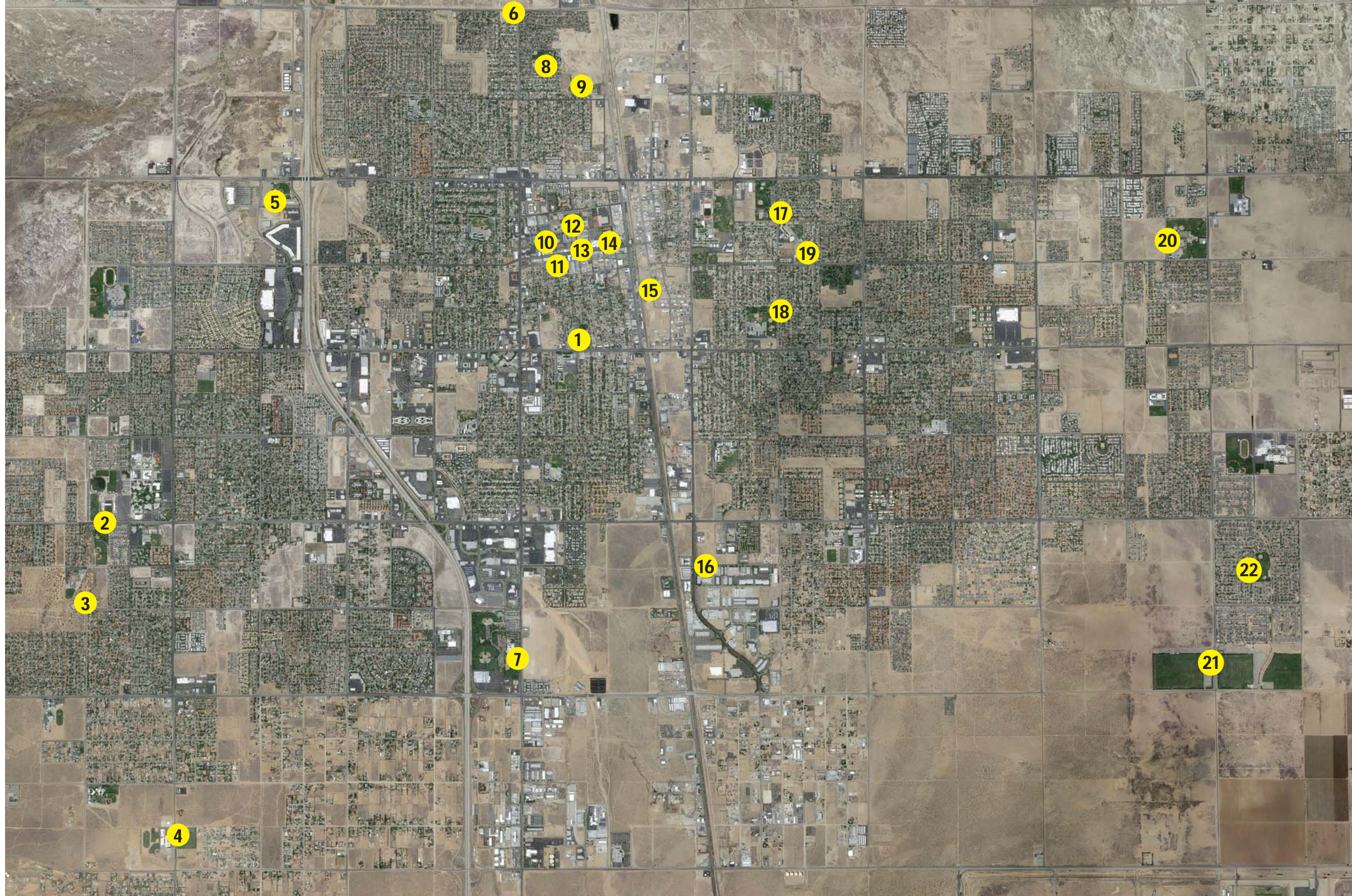
The ADA Title II Technical Assistance Manual states “when choosing a method of providing program access, a public entity must give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities”. City staff and stakeholders considered the following criteria to prioritize facilities for removal of architectural barriers:

- **Level of use by the public:** Facilities that have a high level of public use and seasonal availability and hours/days of operation can be factored into this criteria;
- **Program uniqueness:** Some programs are unique to a building, facility, or park and cannot occur at another location;
- **Geographic distribution:** Selecting a range of facilities are distributed throughout the City, and the proximity of these facilities to public transportation help provide maximum accessibility for all residents;
- **Identified complaints:** Facilities that have a history of citizen complaints related to accessibility.



Americans with Disabilities Act

TITLE II SELF-EVALUATION AND TRANSITION PLAN



LEGEND

#	Facility Name
01	Jan Reynolds Park/ Webber Pool
02	Rawley Duntley Park
03	Prime Desert Woodland Preserve
04	Forrest E. Hull Park
05	Lancaster Municipal Stadium
06	City Maintenance Yard
07	Lancaster City Park / Big 8 Softball Complex
08	Mariposa Park
09	Whit Carter Park
10	City Hall
11	Lancaster Performing Arts Center
12	American Heroes / Community Building
13	Museum of Art & History
14	Western Hotel
15	Lancaster Community Shelter
16	Incubator
17	Deputy Pierre Baine Park/ Eastside
18	El Dorado Park
19	Cedar Street Complex
20	Tierra Bonita Park
21	Lancaster National Soccer Center
22	Skytower Park



Americans with Disabilities Act

TITLE II SELF-EVALUATION AND TRANSITION PLAN

City-wide ADA Self-Evaluation and Transition Plan

Background Information:

ADA 28 CFR Part 35.150(d) states all public entities with 50 or more employees must create a “transition plan” that sets forth the steps necessary to ensure compliance with ADA and its implementing regulations for all government facilities, public spaces, public events and meetings, programs and services, procedures and policies, communications, etc.

Explanation of Project:

The City awarded a contract to Moore Iacofano Goltsman, Inc (MIG) to assist the City in evaluating accessibility of all City owned public buildings and spaces including but not limited to roadways, sidewalks, parking and recreation areas. All City policies, procedures, municipal codes and programs will also be evaluated including but not limited to:

- Customer service
- Outreach and printed information
- Communication Devices and mechanisms for communication including the City’s websites
- Training and staffing
- Public meetings/classes/events – including access to ticket sales and registration
- Facility information and signage
- Emergency evacuation procedures

This data will be compared with the ADA Accessibility Guidelines and California Access Codes to determine compliance with State and Federal accessibility standards. The final plan will list all barriers to access (audio, wheelchair, etc.) and prioritize or rate them by impact, as well as propose steps to mitigate, remove, or otherwise address the identified barriers.

This is a year-long project that will involve City staff and public input. The first public input meeting was held on Monday, October 20th at American Heroes Park Community Building from 6:30pm – 8:30pm. If you were not able to attend and wish to provide input about access to the City’s programs or facilities, please visit https://www.surveymonkey.com/s/Lancaster_ADA_Comment . Your participation and comments are appreciated.

Appendix B: Self-Evaluation - Questionnaire

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1. Introduction: Americans with Disabilities Act Programs, Services, and Activ...

BACKGROUND:

The City of Lancaster is preparing an Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan. As part of this process, you are requested to complete a self-assessment questionnaire that addresses the availability of programs, services, and activities for the public. Examples of programs, services, and activities include: obtaining a permit, participating in a City recreational program, or attending a public meeting such as a City Council meeting.

While some of the questions relate to City of Lancaster employee actions and training, the Self-Evaluation does not address employee-related work issues, which are covered in Title I of the ADA. All questions should be answered as they pertain to services, programs, and activities provided to the public.

Topics addressed in the Program Accessibility Questionnaire include:

- Description of Program Activities
- Accessible/Adaptive Equipment
- Customer Service
- Notice Requirements
- Printed Information
- Television and Audiovisual Public Information
- Website
- Public Telephones and Communication Devices
- Training and Staffing
- Program Eligibility Requirements and Admission
- Public Meetings
- Transportation Services
- Tours and Trips
- Use of Consultants
- Emergency Evacuation Procedures
- Facilities
- Special Events and Private Events on City Properties

This survey will take about 20-25 minutes to complete. Please respond to the survey by Monday, June 30, 2014. Responses will be sent directly to MIG. If you have any questions or need further assistance, please contact Heather Buczek at (503) 297-1005 or heatherb@migcom.com.

2. General description of the programs

“Programs” refers to programs, activities and services offered to the public.

Each City department or program that provides direct public service should complete a survey. For example, the Community Development Department would complete one survey for its Planning Division, one for its Building Division and another for its Engineering Division.

If you have questions about how many surveys to complete, please email Heather Buczek at heatherb@migcom.com.

1. Name of Department/Division:

2. Name and title of person completing this questionnaire:

3. Telephone number:

4. Email:

5. Program name(s) and brief description of what your program does:

6. Date program questionnaire filled out:

Date: MM DD YYYY
 / /

3. ACCESSIBLE/ADAPTIVE EQUIPMENT

7. Do you allow members of the public to use electronic equipment such as self-serve copying machines, computers, work stations, etc.?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe the electronic equipment the public is allowed to use:

8. Do you ensure that electronic equipment is accessible to and usable by individuals with disabilities? For example, having the microfiche or self-serve computer located at an accessible workstation.

- Yes
- No
- Don't know
- Not applicable

If yes please describe how you ensure that the equipment is accessible:

9. Are auxiliary aids (such as a moveable light source, adjustable worktable levels, paper and pen, etc.) provided to assist persons with disabilities when requested?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe.

4. CUSTOMER SERVICE

10. Does your department make changes to standard operating procedures to include a person with disabilities? For example, allowing someone to bring a personal attendant with them to a recreation class or moving an event to an accessible location?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe the policy to make changes in standard operating procedures:

11. Is there a formal procedure for making changes to standard operating procedures?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe the procedure.

12. Do you track accessibility requests?

- Yes
- No
- Don't know
- Not applicable

If yes, please list how many requests have you received and what the requests were for.

13. Does your program charge an additional fee to people with disabilities for modifying programs or providing additional services?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe.

14. Does your department consult or work with any outside organizations or groups that assist people with disabilities such as the a Center for Independent Living or Senior Citizen's advocacy group?

- Yes
- No
- Don't know
- Not applicable

If yes, please list the organizations.

15. Does your department have any policies which exclude service animals, such as service dogs for the blind or signal dogs for the hearing impaired?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe your policy on service animals.

5. NOTICE REQUIREMENTS

16. Do you have a non-discrimination statement that includes persons with disabilities?

- Yes
- No
- Don't know
- Not applicable

Comments:

17. Is a non-discrimination statement that includes information about how to reach the ADA coordinator posted in all departments in a location that maximizes public exposure?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe where the non-discrimination statement is posted.

18. Do you know the procedure for filing a disability discrimination complaint?

- Yes
- No
- Don't know

If yes, please describe the procedure for filing a discrimination complaint.

6. PRINTED INFORMATION

19. Does your department produce printed materials that are made available to the public?

- Yes
- No
- Don't know
- Not applicable

Comments:

20. Who manages your printed materials?

- My department manages printed material
- Printed materials are managed centrally
- Both departmental and central management
- Don't know

Comments:

21. How do you make documents and publications available to individuals with visual disabilities? (check all that apply):

- Do not provide any alternative formats upon request
- Don't know
- Audiotape
- Braille
- Electronic Copy
- Large print

Other: please list

22. Do you make the content of documents and publications available in simple, easy-to-understand language for individuals with learning disabilities?

- Yes
- No
- Don't know

Comments:

23. Does your department include images of people with disabilities in printed materials that include images of people?

- Yes, we include photos of people with disabilities
- No, we include photos of people, but do not show any images of people with disabilities.
- Do not include any photos of people in publications
- Don't know

Comments:

7. TELEVISION AND AUDIOVISUAL INFORMATION

24. Does your department prepare audiovisual or televised presentations or website demonstrations/webinars for the public or make audiovisual presentations to the public?

- Yes
 No
 Don't know
 Not applicable

Comment:

25. How do you make audiovisual or televised or on-line presentations prepared or presented by your department to the public accessible to individuals with disabilities?

Please check all that apply.

- Captioning
 Transcription
 Do not provide alternative formats upon request

Please list other alternative formats:

26. What type of audiovisual presentations (film, videotape, television) does your department provide?

27. If you show people in your audiovisual presentations, do you also portray individuals with disabilities in your audiovisual presentations?

- Yes
 No
 Don't know

Comments:

8. WEBSITE

28. Does your department have a website?

- Yes
- No
- Don't know
- Not applicable

If yes, please list the website:

29. Is information regarding your departments facilities, programs and services created and managed by the department or by others?

- By others?
- By the department?
- A combination?

Please describe.

30. What information is provided on this site?

31. Does your department's website include information about accessibility of facilities (parking, bathrooms, assistive listening devices, etc.) where programs or services are offered?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe briefly what information is provided about accessibility:

32. Does your department ensure that its website is usable by individuals with disabilities, including those who use speaking browsers?

- Yes
- No
- Don't know

If yes, please describe the process for testing website accessibility:

33. Are the documents provided on your website for downloading accessible to persons with visual disabilities?

- Yes
- No
- Don't know

If yes, please describe briefly how downloadable files are tested for accessibility:

9. PUBLIC TELEPHONES AND COMMUNICATION DEVICES

34. Do you communicate by telephone with members of the public with hearing or speech disabilities?

- Yes
 No
 Don't know
 Not applicable

Comments:

35. Do any staff members use a Text Telephone (TTY) to communicate with people with hearing or speech disabilities?

- Yes
 No
 Don't know

If yes, list the location, telephone number, and organization in which the TTY number is listed:

36. Do any staff members use the California Relay Service (711)?

- Yes
 No
 Don't know

Comments:

37. Do you publish your TTY number or California Relay Service numbers in materials where a phone number is listed?

- Yes
 No
 Don't know

Comments:

38. Do you train your staff in operating a TTY or other means of communicating over the telephone with a person with a hearing or speech disability?

Yes

No

Don't know

Comments:

10. TRAINING AND STAFFING

39. Do any staff members have contact with the public?

- Yes
- No
- Don't know
- Not applicable

Comments:

40. How do you inform staff members who have contact with the public of your department's obligations and policies that enable persons with disabilities to participate in programs or activities?

41. Do your staff receive training on interacting with people with disabilities?

- Yes, staff training provided
- Don't know
- No, staff do not receive training

If yes, please describe your staff training process:

11. PROGRAM ELIGIBILITY REQUIREMENTS AND ADMISSION

42. If a program has eligibility requirements for participation by the public, do the eligibility requirements contain any of the following?

For example, your program offers volunteer opportunities available to the public that would require an individual to meet specific physical fitness standards such as lifting 40 lbs or walking up and down stairs.

- There are no eligibility requirements
- Don't know
- Physical fitness standards
- Mental fitness
- Performance requirements
- Safety Standards

If yes, how do you ensure that these policies do not discriminate against people with disabilities?

43. Are there any limitations or ratios for the number of people with disabilities who may participate in or be admitted to any department program? For example exams, testing for level of ability, age requirements, etc.

- Yes
- No
- Don't know
- Not applicable

If yes, please describe the limitations and programs:

44. Does your program use any criteria (for example good health, residency, letters of recommendation) or written and/or oral tests (including level of skill or achievement, or other factor being tested) in the admissions process?

- Yes
- No
- Don't know
- Not applicable

If yes, please list the participation requirements.

45. Are there any forms required for admission to the program (for example, tests and/or the submission of other admissions criteria such as certificates?).

- Yes
- No
- Don't know
- Not applicable

If yes, please send sample forms to heatherb@migcom.com.

46. Do the forms contain a notice that the City does not discriminate against people with disabilities?

- Yes
- No
- Don't know
- Not applicable

Comments:

47. Is an interview required prior to an applicant's entrance into the program?

- Yes
- No
- Don't know
- Not applicable

Comments:

12. PUBLIC MEETINGS

48. Does your department hold public meetings?

- Yes
- No
- Don't know
- Not applicable

Comments:

49. Do you require that public meetings, hearings, and conferences be held in accessible locations?

- Yes
- No
- Don't know

Comments:

50. Are American Sign Language interpreters, readers, or adaptive equipment provided when requested for meetings, interviews, and conferences?

- Yes
- No
- Don't know

If yes, how much advanced notice is required to provide accommodations?

51. Do you ensure that all individuals with hearing disabilities who do not read sign language can participate effectively in meetings, conferences, and hearings via assistive listening devices or other means?

- Yes
- No
- Don't know

Comments:

13. TRANSPORTATION SERVICES

52. Do you provide transportation to volunteers, program participants, visitors, and others who participate in your programs?

- Yes
- No
- Don't know
- Not applicable

Please describe.

53. Do you have procedures to make transportation accessible to persons who have visual, hearing, mobility, cognitive, or other disabilities?

- Yes
- No
- Don't Know

If yes, please describe the procedures.

14. TOURS AND TRIPS

54. Does your department provide facility tours or organize trips for members of the public?

- Yes
- No
- Don't know
- Not applicable

If yes, please list the tours and trips.

55. Do you have procedures to make tours and trips accessible to persons who have visual, hearing, mobility, cognitive, emotional, or other disabilities?

- Yes
- No
- Don't Know

If yes, please describe the procedures.

15. CONSULTANTS

56. Do you use consultants to conduct programs on behalf of your department?

- Yes
- No
- Don't know
- Not applicable

If yes, please list what consultants.

57. Do you ensure that consultants are aware of their obligations to facilitate participation of individuals with disabilities in programs or activities operated on behalf of your department?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe the procedures.

16. EMERGENCY EVACUATION PROCEDURES

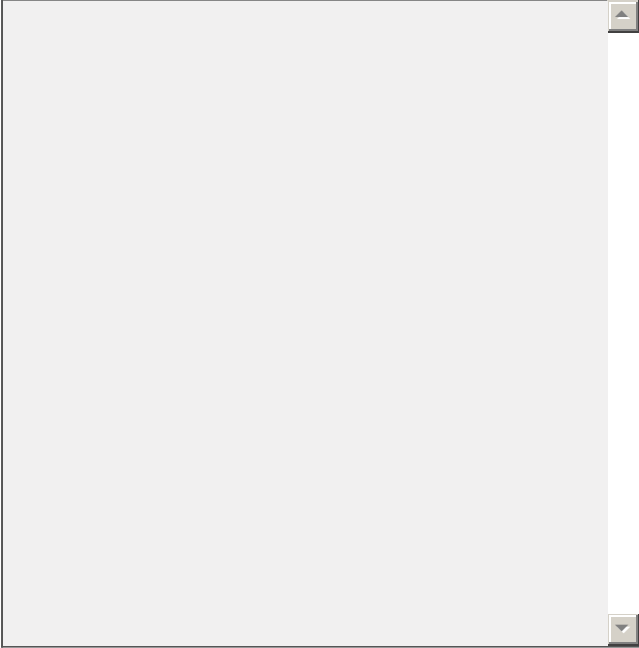
58. Do you notify individuals with visual, hearing, mobility, cognitive, emotional, or other disabilities of emergencies and evacuation procedures?

- Yes
- No
- Don't Know

If yes, describe the equipment and/or procedures do you use to notify individuals with visual disabilities of emergencies and evacuation procedures:

17. FACILITIES

59. List all facilities, or portions of facilities, used for department programs. For each facility, designate the activity for which it is used. (Note: Facilities leased or otherwise used from another person/organization should also be included).



60. Have you had requests for improving accessibility to your department's programs or facilities?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe how many requests and what the requests were for.



18. SPECIAL EVENTS AND PRIVATE EVENTS ON PUBLIC PROPERTIES

61. Does your department organize special events or do you help facilitate private events on City property such as a park or City building?

- Yes
- No
- Don't know
- Not applicable

If yes, please describe briefly the type of event and what types of outside organizations are involved.

62. Do you ensure that both private entities and your staff are aware of their obligations to facilitate participation of individuals with disabilities in these special events or private events held on public property?

- Yes
- No
- Don't Know
- Not applicable

If yes, please describe your department's procedures.

19. LAST QUESTION

63. Thank you for completing this survey. This is the last question on the survey.

Do you have any accessibility questions for us? Please use this box below for any other questions or comments.

When you are done with the survey, please click on the "done" button. Once you click on the "done" button, you will not be able to edit or change your answers to this survey.



Appendix C: Self-Evaluation - Department Summaries

The following are survey summaries based on answers to the Programs, Services, and Activities Questionnaire.

Administration

Program Description

The department is responsible for emergency preparedness, public meetings in City Council chambers and city marketing, promotions and information to the general public.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist people with disabilities upon request.

Customer Service

- The department will make changes to standard operating procedures to include a person with disabilities.
- The department has a formal procedure for making changes to standard operating procedures.
- The department tracks accessibility requests.
- The department consults and works with outside organizations.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement.
- The department staff is aware of the procedure for filing a disability discrimination complaint.

Printed Information

- The department produces and manages printed materials.
- Documents are made available in large print, electronic copy, Braille and audiotape.

Televised and Audiovisual Public Information

- The department does prepare audiovisual, televised or web-based presentations.
- Transcription for presentations is made available.
- The department provides video, television and PowerPoint audiovisual presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes programs, activities and information.
- Information regarding department facilities, programs and services is created and managed by department staff.
- The website provides information about the accessibility of facilities.
- The department ensures that its website is usable by individuals with disabilities.

Public Telephones and Communication Devices

- Department staff does communicate by telephone with members of the public with hearing or speech disabilities.
- The department does publish their TTY number or CRS number in materials.

Training and Staffing

- Department staff has contact with the public.
- Staff members are advised regarding policies and obligations for persons with disabilities.

Program Eligibility and Admission

- The department does not use criteria, tests, interviews or required forms or for admissions to programs.

Public Meetings

- The department's public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested. Assistive listening devices are also available.

Tours and Trips

- The department provides site tours for development.

Use of Consultants for Delivering Program Services

- The department uses consultants for program instructors and camp directors.
- Consultants are made aware of their obligations for program accessibility.

Facilities

- City Hall: meeting rooms and Council Chambers used for public meetings
- Emergency Operations Center: activated by staff in the event of an emergency

Special Events on Public Properties

- The department organizes special events such as safety fairs, press conferences and business grand openings.
- The department ensures special events held on City Property are accessible.

Development Services/Administration

Program Description

The department is responsible for managing the budget and various contracts performed throughout the City boundaries.

Customer Service

- The department will make changes to standard operating procedures to include a person with disabilities.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement.
- The department staff is aware of the procedure for filing a disability discrimination complaint.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.

Televised and Audiovisual Public Information

- The department does prepare audiovisual, televised or web-based presentations.
- The department provides PowerPoint audiovisual presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes general operating information and links to outside resources.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- Department staff does communicate by telephone with members of the public with hearing or speech disabilities

Training and Staffing

- Department staff has contact with the public.
- Training by the HR department informs staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- Forms contain a non-discrimination statement including people with disabilities.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested.

Tours and Trips

- The department provides facility tours.

Use of Consultants for Delivering Program Services

- The department uses consultants.

Facilities

- City Hall
- Maintenance Yard

Developmental Services/Building & Safety

Program Description

The department administers building permits, building plan checks and building inspections.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Customer Service

- The department will make changes to standard operating procedures to include a person with disabilities.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces and manages printed materials.
- Documents are made available in electronic copy.
- Content is simple and in easy-to-understand language.

Website - City and Departmental

- The department does have a website.
- Information available includes descriptions of department services, links to documents pertaining to technical requirements and fee schedules.

Training and Staffing

- Department staff has contact with the public.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.

Facilities

- Public counter at City Hall: most customer transactions
- Construction sites: inspections.

Finance Department

Program Description

The department has full responsibility over all financial matters of the City, servicing both internal and external clients.

Customer Service

- The department has a formal procedure for making changes to standard operating procedures.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces and manages printed materials.
- Documents are made available in electronic copy.

Website - City and Departmental

- The department does have a website.
- Information available includes finance documents, reports and forms.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- Department staff does communicate by telephone with members of the public with hearing or speech disabilities.

Training and Staffing

- Department staff has contact with the public.
- Staff members are advised regarding policies and obligations for persons with disabilities.

Program Eligibility and Admission

- There are no limitations or ratios for the number of people with disabilities who may participate in or be admitted to a program.

Public Meetings

- The department holds public meetings.

Facilities

- City Hall: presentations

Housing & Neighborhood Revitalization/Code Enforcement

Program Description

The department enforces the compliance of the municipal code for residential and commercial properties, including inspections of residential rental properties.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Customer Service

- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Printed materials include images of people with disabilities.

Website - City and Departmental

- The department does have a website.
- Information available includes code enforcement, housing programs and various reports.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- Department staff does communicate by telephone with members of the public with hearing or speech disabilities.

Training and Staffing

- Department staff has contact with the public.
- The department Director informs staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested 72 hours in advance.

Facilities

- City Hall (Public Counter, conference rooms): interacting with citizens

Housing & Neighborhood Revitalization/Housing Division

Program Description

The department facilitates programs and projects such as home buyer assistance programs, rehabilitation of homes, rehab/resale of foreclosed homes and park improvements.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Customer Service

- The department consults with outside organizations.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Printed materials include images of people with disabilities.

Website - City and Departmental

- The department does have a website.
- Information available includes code enforcement, housing programs and various reports.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- The department does publish their TTY number or CRS number on public hearing notices.

Training and Staffing

- Department staff has contact with the public.
- The department Director informs staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested 72 hours in advance. The City Clerk's Office also coordinates services for individuals with hearing disabilities upon request.

Facilities

- City Hall (Public Counter): interacting with citizens
- City Hall (Council Chambers, conference rooms): meetings
- Lancaster Community Shelter

Human Resources

Program Description

The department is responsible for human resources and risk management.

Customer Service

- The department will make changes to the standard operating procedure on a case by case basis to include a person with disabilities.
- The department has a formal procedure for making changes to standard operating procedures.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement that includes information on how to reach the ADA coordinator.

- The non-discrimination statement is posted in all departments in a location that maximizes public exposure.
- The department staff members are aware of the procedure for filing a disability discrimination complaint. Complaints must be filed in writing.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Printed materials include images of people with disabilities.
- Documents are made available in large print when requested.
- Content is simple and in easy-to-understand language.

Website - City and Departmental

- The department does have a website.
- Information available includes the volunteer program, employment opportunities and details of salary and benefits.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities using Text Telephone (TTY) and the California Relay Service.
- The department does publish their TTY number or CRS number in materials.

Training and Staffing

- Department staff has contact with the public.
- Administrative policies and procedures inform staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- Although the department does have eligibility requirements for public participation, requests to lift restrictions can be accommodated upon request and where feasible.
- There are no limitations or ratios for the number of people with disabilities who may participate in or be admitted to any department program.
- Admission forms contain a non-discrimination statement including people with disabilities.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested within 72 hours.

Tours and Trips

- The department provides facility tours.

Use of Consultants for Delivering Program Services

- The department uses consultants.

Emergency Evacuation Procedures

- Emergency evacuation procedures include use of the PA system, evacuation routes and signs.

Facilities

- Soccer Center: conducting written exams.

Special Events on Public Properties

- The department organizes special events such as trainings, health fairs, blood drives, employee breakfasts, holiday celebrations and corporate challenge activities.

Parks, Recreation & Arts/Administration

Program Description

The department is responsible for registration and receipt of payment for City programs by the public.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Content is simple and in easy-to-understand language.

Website - City and Departmental

- The department does have a website.
- Information available includes schedules, rates and locations.
- Information regarding department facilities, programs and services is created and managed by department staff and others.
- The website provides information about the accessibility of facilities.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities using Text Telephone (TTY) and the California Relay Service.
- The department does publish their TTY number or CRS number in materials.
- Staff does receive training to communicate over the telephone with a person with a hearing or speech disability.

Training and Staffing

- Department staff has contact with the public.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested.

Facilities

- Lancaster City Park
- Stanley Kleiner Center
- Jane Reynolds Park
- El Dorado Park
- Eastside Pool
- Pierre Bain Park
- Skytower Park
- Tierra Bonita Park
- Rawley Duntley Park
- American Heroes Park
- Forrest Hull Park
- Lancaster National Soccer Center
- Lancaster Performing Art Center
- Museum of Art and History
- Prime Desert Woodland Reserve
- Cedar Center

Special Events on Public Properties

- The department organizes special events through facility rentals.

Parks, Recreation & Arts/CARES After School Program

Program Description

The department is responsible for meeting the needs of working parents whose children attend schools in the Lancaster School District by promoting the academic, physical, emotional and social development of students.

Customer Service

- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.

Televised and Audiovisual Public Information

- The department does prepare audiovisual, televised or web-based presentations.
- Transcription and captioning for presentations is made available.
- The department provides television audiovisual presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes programming details.
- Information regarding department facilities, programs and services is created and managed by department staff.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities using Text Telephone (TTY).

Training and Staffing

- Department staff has contact with the public.
- Training informs staff members of the City's policies and obligations for including persons with disabilities.
- Staff receive training on interacting with people with disabilities.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.
- There are no limitations or ratios for the number of people with disabilities who may participate in or be admitted to a program.
- The department does not use criteria, forms or tests for admissions to programs.

Public Meetings

- Meetings are required to be held in accessible locations.

Transportation Services

- The department provides transportation to programs.
- The department has procedures to make transportation accessible to persons with disabilities.

Tours and Trips

- The department provides facility tours.
- The department has procedures to make tours accessible to persons with disabilities.

Emergency Evacuation Procedures

- The department notifies individuals with disabilities of emergencies and evacuation procedures.

Facilities

- Park facilities: classes, special events and sports programs
- School facilities: afterschool program.

Special Events on Public Properties

- The department organizes special events.
- The department ensures special events held on City Property are accessible.

Parks, Recreation & Arts/Community Recreation

Program Description

The department is responsible for special events and youth programming.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Customer Service

- The department will make changes to standard operating procedures to include a person with disabilities.
- The department has a formal procedure for making changes to standard operating procedures.
- The department does not charge an additional fee to modify programs or services for a person with a disability.

Notice Requirements

- The department does have a non-discrimination statement.

Printed Information

- The department produces and manages printed materials.
- Documents are made available in large print and electronic copy.
- Content is simple and in easy-to-understand language.
- Printed materials include images of people with disabilities.

Televised and Audiovisual Public Information

- The department does prepare audiovisual, televised or web-based presentations.
- Transcription and captioning for presentations is made available.
- The department provides television and PowerPoint presentations.
- Audiovisual presentations include portrayals of people with disabilities.

Website - City and Departmental

- The department does have a website.
- Information available includes classes, special events, rental information and special events.
- Information regarding department facilities, programs and services is created and managed by department staff and others.
- The website provides information about the accessibility of facilities.
- The department ensures the website is usable by people with disabilities.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities using Text Telephone (TTY)
- The department does publish their TTY number or CRS number in materials.
- Staff receive training on communicating over the telephone with people with disabilities.

Training and Staffing

- Department staff has contact with the public.
- Training informs staff members of the City's policies and obligations for including persons with disabilities.
- Staff receive training on interacting with people with disabilities.

Program Eligibility and Admission

- There are no limitations or ratios for the number of people with disabilities who may participate in or be admitted to a program.
- Forms contain a non-discrimination statement including people with disabilities.

Public Meetings

- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested. Assistive listening devices are also available.

Tours and Trips

- The department provides facility tours.

Emergency Evacuation Procedures

- The department notifies individuals with disabilities of emergencies and evacuation procedures.

Facilities

- City Hall
- American Heroes Park
- Lancaster City Park
- Lancaster Boulevard

Special Events on Public Properties

- The department organizes special events.
- The department ensures special events held on City Property are accessible.

Parks, Recreation & Arts/Lancaster Performing Arts Center

Program Description

The department is responsible for providing dynamic theatre programs that enrich the local quality of life.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.
- The department allows members of the public to use electronic equipment.
- The department ensures that electronic equipment is accessible to and usable by individuals with disabilities.

Customer Service

- The department tracks accessibility requests.
- The department will make changes to the standard operating procedure on a case by case basis to include a person with disabilities.
- The department has a formal procedure for making changes to standard operating procedures.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement.

Printed Information

- The department produces and manages printed materials.

- Both the department and central management manage printed materials.
- Documents are made available in electronic copy when requested.
- Content is simple and in easy-to-understand language.

Televised and Audiovisual Public Information

- The department provides live theater presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes details about season performances.
- Information available includes ticket purchasing, shows and rentals.
- Information regarding department facilities, programs and services is created and managed by department staff and others.
- The website provides information about the accessibility of facilities.
- The department ensures the website is usable by people with disabilities.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities using Text Telephone (TTY).

Training and Staffing

- Department staff has contact with the public.
- Training informs staff members of the City's policies and obligations for including persons with disabilities.
- Materials and policies inform staff members of the City's policies and obligations for including persons with disabilities.
- Face-to-face conversations inform staff members of the City's policies and obligations for including persons with disabilities.
- Staff receive training on interacting with people with disabilities.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.
- There are no limitations or ratios for the number of people with disabilities who may participate in or be admitted to any department program.
- The department does not use criteria, forms or tests for admissions to programs.

Public Meetings

- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested at least two weeks in advance. Assistive listening devices are also available.

Tours and Trips

- The department provides facility tours.

Emergency Evacuation Procedures

- The department notifies individuals with disabilities of emergencies and evacuation procedures.
- The department has procedures to make tours accessible to persons with disabilities.

Facilities

- The department has received facility improvement requests.
- Main Stage: performances, dinners, weddings and other social engagements
- Black Box: performances, social engagements and meetings
- Lobby: social engagements and patron gathering place
- Community Room: meetings and social engagements
- Backstage
- Dressing rooms

Special Events on Public Properties

- The department organizes special events.
- The department ensures special events held on City Property are accessible.

Parks, Recreation & Arts/Museum of Art and History

Program Description

The department is responsible for strengthening awareness, enhancing accessibility and igniting the appreciation of art, history and culture in the Antelope Valley through dynamic exhibitions, innovative educational programs, creative community engagement and a vibrant collection that celebrates the richness of the region.

Accessible/Adaptive Equipment

- The department ensures that electronic equipment is accessible to and usable by individuals with disabilities.
- Auxiliary aids are available to assist people with disabilities upon request.

Customer Service

- The department will make changes to the standard operating procedure to include a person with disabilities.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Notice Requirements

- The department does have a non-discrimination statement.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Content is simple and in easy-to-understand language.
- Printed materials include images of people with disabilities.

Televised and Audiovisual Public Information

- The department does prepare audiovisual, televised or web-based presentations.
- The department provides television, video and projection presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes general history, community engagement and submission instructions.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Training and Staffing

- Department staff has contact with the public.
- General customer service training informs staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- The department does not use forms for admissions to programs.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.

Tours and Trips

- The department provides facility tours.
- The department has procedures to make tours accessible to persons with disabilities.

Facilities

- MOAH
- Western Hotel Museum (registered historical building)
- MOAH:CEDAR (registered historical building)
- The department has received facility improvement requests for the Western Hotel Museum.

Special Events on Public Properties

- The department organizes special events.
- The department ensures special events held on City Property are accessible.

Parks, Recreation & Arts/Operations

Program Description

The department is responsible for facilities, building maintenance and right of way maintenance throughout the City.

Customer Service

- The department will make changes to the standard operating procedure to include a person with disabilities.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.

Televised and Audiovisual Public Information

- The department provides PowerPoint audiovisual presentations.

Website - City and Departmental

- Information available includes programs, events and classes.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Training and Staffing

- Department staff has contact with the public.

Program Eligibility and Admission

- Forms contain a non-discrimination statement including people with disabilities.

Public Meetings

- Meetings are required to be held in accessible locations.
- Assistive listening devices are available in City Council Chambers.

Transportation Services

- The department provides transportation to programs.

Tours and Trips

- The department provides facility tours or organizes trips as requested.

Facilities

- The department has received facility improvement requests for Eastside and Webber Pools as well as the Performing Arts Center.

Special Events on Public Properties

- The department organizes special events involving City staff, volunteers and patrons.

Parks, Recreation & Arts/Recreation Programs

Program Description

The department is responsible for developing and coordinating community classes and managing the public rental of City facilities such as parks.

Customer Service

- The department will make changes to the standard operating procedure to include a person with disabilities.
- The department does not charge an additional fee to modify programs or services for a person with a disability.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Content is simple and in easy-to-understand language.

Televised and Audiovisual Public Information

- The department does prepare audiovisual or televised presentations including press conferences and web videos.

Website - City and Departmental

- The department does have a website.
- Information available includes events, recreation and sports programs, arts facilities and facility rental info.
- Information regarding department facilities, programs and services is created and managed by department staff and others.

Public Telephones and Communication Devices

- The department does communicate by telephone with members of the public with hearing or speech disabilities

Training and Staffing

- Department staff has contact with the public.
- The policy handbook informs staff members of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- Although the department does have eligibility requirements for public participation, there are options for involvement at varying ability levels.
- The department does not use interviews for admissions to programs.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested.

Tours and Trips

- The department provides facility tours.
- The department has procedures to make tours accessible to persons with disabilities.

Use of Consultants for Delivering Program Services

- The department uses consultants.
- Consultants are made aware of their obligations for program accessibility.

Emergency Evacuation Procedures

- The department notifies individuals with disabilities of emergencies and evacuation procedures.

Facilities

- The department has received facility improvement requests for Jane Reynolds Park and Cedar Center for the Arts.
- Lancaster City Park: classes, sports, rentals and events
- Prime Desert Woodland Preserve: classes, rentals and events
- Hull Park: classes and rentals
- Jane Reynolds Park: classes, rentals and sports
- Tierra Bonita Park: classes, rentals and sports
- Skytower Park: classes, rentals and sports
- American Heroes Park: classes, rentals, sports and events
- Pierre Bain Park: rentals and sports
- El Dorado Park: classes and sports
- LNSC: classes, sports, rentals and events
- Rawley Duntley Park: sports, rentals and events
- Cedar Center: classes, rentals and events
- MOAH: classes, rentals and events
- LPAC: classes, rentals and events

Special Events on Public Properties

- The department organizes special events such as birthday parties, family reunions, dances, awards ceremonies and picnics.

Parks, Recreation & Arts/Special Projects

Program Description

The department is responsible for the Lancaster National Soccer Center, which hosts practices and games throughout the week.

Accessible/Adaptive Equipment

- Auxiliary aids are available to assist persons with disabilities upon request.

Customer Service

- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces printed materials.
- Both the department and central management manage printed materials.
- Documents are made available in large print

Televised and Audiovisual Public Information

- The department provides television audiovisual presentations.

Website - City and Departmental

- The department does have a website.
- Information available includes classes, park site information and city events.
- Information regarding department facilities, programs and services is created and managed by department staff and others.
- The website provides information about the accessibility of facilities.

Training and Staffing

- The Department staff has contact with the public.
- Training informs staff members of the City's policies and obligations for including persons with disabilities.
- Staff receive training on interacting with people with disabilities.

Use of Consultants for Delivering Program Services

- The department uses consultants.
- Consultants are made aware of their obligations for program accessibility.

Facilities

- Lancaster National Soccer Center: soccer events and banquets
- Lancaster City Park: softball and basketball

Special Events on Public Properties

- The department organizes special events.
- The department ensures special events held on City Property are accessible.

Public Safety Department

Program Description

Public Safety is responsible for the Neighborhood Watch and Business Watch programs, parking enforcement, disaster preparedness and communication between residents and the local Sheriff department.

Customer Service

- The department does track accessibility requests.
- The department does not have a policy that would exclude a service animal.

Printed Information

- The department produces and manages printed materials.

- Documents are made available in large print and electronic copy.
- Content is simple and in easy-to-understand language.

Website - City and Departmental

- The department does have a website.
- Information available includes upcoming meetings and general safety information.
- Information regarding department facilities, programs and services is created and managed by department staff.

Training and Staffing

- Department staff has contact with the public.
- Staff members are directly informed of the City's policies and obligations for including persons with disabilities.

Program Eligibility and Admission

- There are no eligibility requirements for participating in department programs.

Public Meetings

- The department holds public meetings.
- Public meetings are required to be held in accessible locations.
- ASL interpreters or adaptive equipment is made available when requested. Assistive listening devices are also available.

Emergency Evacuation Procedures

- The department works with Lancaster CERT to notify individuals with disabilities of emergencies and evacuation procedures.

Facilities

- City Hall Council Chambers: public meetings
- Stanley Kleiner Activity Center: public meetings

Special Events on Public Properties

- The department organizes special events such as National Night Out and the Poppy Festival, involving the Los Angeles County Fire Department, Lancaster Sheriff Department and AMR.

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Appendix D: Section 504 Policies

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City of Lancaster
Housing & Neighborhood Revitalization Department
Lancaster Housing Authority
Reasonable Accommodation For Housing Programs and Projects

POLICY: The City of Lancaster complies with state and federal laws requiring housing providers to make reasonable accommodations or changes to either rules, procedures and housing units or properties, if such changes are necessary to enable a person with a disability to have equal access to and enjoyment of the unit, property, facility or program.

Reasonable accommodations will be made during the application process and during an individual's participation in our programs; provided the accommodation does not present an undue financial or administrative burden. Any accommodation or change must be necessary for the individual to have equal access and enjoyment of the housing and programs, not just be desirable.

The City of Lancaster will consider suggested accommodations from an individual and determine whether the request is reasonable from a financial and administrative point of view. If such accommodation is not reasonable, the City will work with the individual to provide an alternative accommodation that would meet their disability need.

City of Lancaster
SECTION 504 GRIEVANCE PROCEDURES

INTRODUCTION

The purpose of these procedures is to settle any and all grievances which may be raised by disabled employees or residents or persons participating or benefitting from federally funded projects/activities within the City of Lancaster. These procedures are designed to meet the requirements for grievance procedures as set forth in the *Rehabilitation Act of 1973*, -as amended.

INFORMAL SETTLEMENT OF GRIEVANCE

It is the goal of the City of Lancaster is to settle any and all grievance matters with disabled employees or residents in an informal way. Upon receipt of a written grievance by any disabled employee or resident with a grievance involving a disability issue, the grievance will be submitted for review to the appropriate supervisor. This supervisor will then meet with the person complaining (hereinafter “grievant”) at a time, date and place convenient to both parties. The supervisor hearing the grievance must always be someone other than the person who took the action resulting in the grievance. At the informal settlement, both parties shall present any and all evidence and statements pertaining to the current grievance. All statements and evidence shall be held in strictest confidence by both parties. After the meeting for informal settlement, the Section 504 Coordinator will issue a decision within 10 working days in writing. Within the written decision of the informal settlement, the grievant will also be advised that he/she may request a commencement of formal grievance proceeding upon request.

PROCEDURES TO COMMENCE A FORMAL GRIEVANCE HEARING

If the informal procedures fail to satisfy the dispute, the formal hearing process becomes available to all disabled employees or residents who have a grievance concerning a disability issue that may also be the subject of a complaint under *Section 504 of the Rehabilitation Act of 1973*, as amended. The following are the steps to be followed under the formal grievance procedure:

- 1. REQUEST FOR A HEARING:** Within thirty (30) days of receipt of the results of the informal settlement, the person or persons seeking relief from the City of Lancaster may file a written grievance. The letter should state the nature of the grievance and the action or relief sought.

City of Lancaster
SECTION 504 GRIEVANCE PROCEDURES

2. **SELECTION OF A HEARING OFFICER:** The Section 504 Coordinator and the grievant shall jointly select a hearing officer for the adjudication of this dispute. Qualification for being an Officer are as follows:

- No current or former employee of the City of Lancaster is eligible.
- It is preferred that any person or persons selected should have a background in meeting the needs, or working with persons with disabilities. Where possible, a representative of a social service agency representing the particular disability in question is preferred.
- Anyone selected may not have any prior knowledge of this particular grievance.

3. **FAILURE TO REQUEST A HEARING:** Anyone who is covered under this policy waives his or her right to a hearing if he/she has not requested a hearing within the noted time frames in #1. Other rights to file a complaint under the relief granted by the terms of the *1988 Amendments of Fair Housing Act* or *Section 504 of the Rehabilitation Act of 1973*, as amended, are not waived.

4. **HEARING PREREQUISITE:** In order to qualify for a formal 504 Grievance Hearing, the grievant must waive an informal hearing or have participated in the informal settlement procedure outlined above. If the grievant can show just cause why he/she did not participate or request informal settlement under the provisions above, then the Hearing Officer may waive this requirement.

5. **LOCATION AND TIME OF HEARING:** The location and time of the hearing shall be jointly agreed upon by all parties involved. Every effort shall be made to locate the hearing in a fully accessible location. If the grievant seeking relief under this policy need signers or special accommodations, such services will be provided free of charge by The City of Lancaster upon ten (10) days prior notice.

6. **PROCEDURES GOVERNING THE GRIEVANCE HEARING:** All hearing procedures will be held before the Hearing Officer. The grievant or his/her representative shall have the opportunity to examine before the start of proceedings all relevant materials. The grievant shall have the right to secure aid in representation whether of a

City of Lancaster
SECTION 504 GRIEVANCE PROCEDURES

professional nature or otherwise. This would include, but not be limited to, attorneys, health professionals, or any other person beneficial to the presentation of the case. These hearings shall be held in private unless the grievant requests a public hearing. The grievant has the right to present any and all pertinent evidence and cross-examine any and all witnesses. The decision of any and all hearings shall only be based on facts presented at the time of the grievance hearing.

7. FAILURE TO SHOW UP FOR THE HEARING: In the event that the City of Lancaster or its representatives fail to show or if the grievant does not show, the Hearing Officer may postpone the hearing for up to five (5) days or find against the party who failed to show. This determination does not affect the rights to pursue any other legal rights available to the grievant.

8. RECORDS OF PROCEDURES OR TRANSCRIPTS: The City of Lancaster or the grievant may arrange for a transcript of the hearing in advance at the expense of the party requesting the transcript.

9. DECISION OF THE HEARING OFFICER: The hearing officer must issue a written decision within ten (10) working days and furnish a copy to all parties. A copy must be kept on file with the City of Lancaster. A copy of the decision with all names deleted shall be kept on file for future reference by any other party filing a grievance.