



# ADA Transition Plan

Town of Greeneville, Tennessee



## **The Purpose of.....**

the Americans with Disabilities Act (ADA) Transition Plan is to develop policies and practices for implementing improvements within the public right of way of the Town of Greeneville, TN.

## **The goal is.....**

to optimize the pedestrian experience, to provide safe and compliant public facilities for all citizens, enhance the services and programs provided and maintained by the Town, and to assure compliance with all federal, state, and local regulations and standards.

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## **FACILITY EVALUATIONS-FINDINGS-ACTIONS**

**The Town has used the official ADA Checklists for Facilities based on the 2010 ADA Standards for Accessibility. The evaluations, findings, and actions provide the details including the planned budget year and the estimated cost of completion.**

**The list of facilities is listed below. Some of them have more than one document, which will be listed in parenthesis.**

AIRPORT FBO - GREENEVILLE

ANDREW JOHNSON COMPLEX (3)

BOARDROOM – GREENEVILLE LIGHT & POWER

FIRE DEPT. – FIRE STATION #1

FIRE DEPT. – FIRE STATION #2 (pending construction)

FIRE DEPT. – FIRE STATION #3

FIRE DEPT. – FIRE STATION #4

LIBRARY – GREENEVILLE/GREENE COUNTY (2)

LIBRARY (T. ELMER COX GENEALOGY) – GREENEVILLE/GREENE COUNTY

PARKS & RECREATION

BOYS & GIRLS CLUB

DOGWOOD PARK

EASTVIEW RECREATIONAL CENTER (3)

GINNY KIDWELL AMPITHEATER

GREENE COUNTY SPORTS COMPLEX

GREENEVILLE TENNIS CENTER

HARDIN PARK – HIGH SCHOOL BASEBALL-SOFTBALL FIELD

HARDIN PARK – KIWANIS PAVILLION

HARDING PARK – OPTIMIST FIELD

HARDIN PARK – OPTIMIST PAVILLION

HARDIN PARK – PAVILLION #5

HARDIN PARK – POOL-BATHHOUSE

HARDIN PARK – SKATE PARK

PARK & RECREATION CONTINUED

HARDIN PARK – SOFTBALL FIELD PAVILLION

HARDING PARK – TENNIS COURT PAVILLION

LEGION FIELD

LIONS FIELD – DEARSTONE FIELD

VETERAN’S PARK

POLICE DEPARTMENT

PUBLIC WORKS

PUBLIC WORKS – LANDFILL-GREENEVILLE/GREENE COUNTY

PUBLIC WORKS - SIDEWALKS

ROBY SENIOR CENTER (3)

TOWN HALL – MAIN (2)

TOWN HALL – POLICE

# INTRODUCTION

## *Town of Greeneville*

### **ADA Statement**

*The Town of Greeneville does not discriminate based on disability in admission to, access to, or operations of its programs, services, or activities. The Town of Greeneville does not discriminate based on disability in its hiring or employment practices.*

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation and telecommunications. The Town of Greeneville has undertaken a comprehensive evaluation of its policies, programs and facilities to determine the extent to which individuals with disabilities may be restricted in their access to Town services, activities and facilities.

The following document seeks to implement a plan that benefits the citizens of the Town of Greeneville. This plan describes the process developed to complete the evaluation of Greeneville's activities, provides policy and program recommendations and presents a Transition Plan for the modification of facilities, public rights-of way and programs to ensure accessibility.

This document will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the Town's ongoing commitment to the development and maintenance of policies, programs and facilities that include all citizens.

## **DECLARATION OF COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT**

The Americans with Disabilities Act (ADA) requires organizations serving the public make their goods, services and facilities accessible to people with disabilities. Furthermore, the Town of Greeneville requires that all its Contractors comply with their ADA obligations and verify such compliance by signing this Declaration of Compliance.

The Contractor certifies that it will comply with the Americans with Disabilities Act by:

- Adopting policies, practices and procedures that ensure non-discrimination and equal access to Contractor's goods, services and facilities for people with disabilities;
- Providing goods, services and facilities to individuals with disabilities in an integrated setting, except when separate programs are required to ensure equal access;
- Making reasonable modifications in programs, activities and services when necessary to ensure equal access to individuals with disabilities, unless fundamental alteration in the nature of the Contractor's program would result;
- Removing architectural barriers in existing facilities or providing alternative means of delivering goods and services when removal of barriers is cost-prohibitive;
- Furnishing auxiliary aids to ensure equally effective communication with persons with disabilities; and
- If contractor provides transportation to the public, by providing equivalent accessible transportation to people with disabilities.

*The undersigned authorized representative hereby obligates the Contractor to the above stated conditions under penalty of perjury.*

Town of Greeneville  
200 North College Street  
Greeneville, TN 37745  
423-639-7105

Mayor W. T. Daniels

Date

## Section I – ADA FEDERAL REQUIREMENTS & DEFINITIONS

The Department of Justice published revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 “ADA” in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design “2010 Standards” or “Standards”. The 2010 Standards set minimum requirements – both scoping and technical --for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities.

Adoption of the 2010 Standards also establishes a revised reference point for Title II entities that choose to make structural changes to existing facilities to meet their program accessibility requirements; and it establishes a similar reference for Title III entities undertaking readily achievable barrier removal.

The Department has assembled an online version of the official 2010 Standards to increase its ease of use. This version includes:

1. 2010 Standards for State and Local Government Facilities Title II
2. 2010 Standards for Public Accommodations and Commercial Facilities Title III

The Department has assembled into a separate publication the revised regulation guidance that applies to the Standards. The Department included guidance in its revised ADA regulations published on September 15, 2010. This guidance provides detailed information about the Department's adoption of the 2010 Standards including changes to the Standards, the reasoning behind those changes, and responses to public comments received on these topics. The document, **Guidance on the 2010 ADA Standards for Accessible Design**, can be downloaded from [www.ada.gov](http://www.ada.gov).

For More Information about the ADA, including the revised 2010 ADA regulations, please visit the Department's website [www.ADA.gov](http://www.ADA.gov); or for answers to specific questions, call the toll-free ADA Information Line at 800-514-0301 (Voice) or 800-514-0383 (TTY).

Patsy Fuller, ADA Coordinator

## **2010 ADA Standards**

The enclosed Transition Plan and Self-Survey for the Town of Greeneville was completed in accordance with the Department of Justice's 2010 ADA Standards. This document contains scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements to the extent required by regulations issued by Federal agencies under the Americans with Disabilities Act of 1990 (ADA).

For your convenience, please find a synopsis of the 2010 ADA Standards starting on the next page. Please refer to the full text of both regulations and seek advice from the Town Administrator or the Human Resources Director (ADA Coordinator and Title VI Coordinator) before instituting any corrective actions, as prescribed under this plan.

Patsy Fuller, ADA Coordinator

# **2010 ADA Standards – A Synopsis**

## **CHAPTER 1: APPLICATION & ADMINISTRATION**

Purpose (101) – Dimensions for Adults and Children (102) – Equivalent Facilitation (103) – Conventions (104) – Referenced Standards (105) – Definitions (106)

## **CHAPTER 2: SCOPING REQUIREMENTS**

Application (201) – Existing Buildings & Facilities (202) – General Exceptions (203) – Protruding Objects (204) – Operable Parts (205) – Accessible Routes (206) – Accessible Means of Egress (207) – Parking Spaces (208) – Passenger Loading Zones and Bus Stops (209) – Stairways (210) – Drinking Fountains (211) – Kitchens, Kitchenettes, and Sinks (212) – Toilet Facilities and Bathing Facilities (213) – Washing Machines & Clothes Dryers (214) – Fire Alarm Systems (215) – Signs (216) – Telephones (217) – Transportation Facilities (218) – Assistive Listening Systems (219) – Automatic Teller Machines & Fare Machines (220) – Assembly Areas (221) – Dressing, Fitting, & Locker Rooms (222) – Medical Care & Long-Term Care Facilities (223) – Transient Lodging Guest Rooms (224) – Storage (225) – Dining Surfaces & Work Surfaces (226) – Sales & Service (227) – Depositories, Vending Machines, Change Machines, Mail Boxes, and Fuel Dispensers (228) – Windows (229) – Two Way Communication Systems (230) – Judicial Facilities (231) – Detention Facilities & Correctional Facilities (232) – Residential Facilities (233) – Amusement Rides (234) – Recreational Boating Facilities (235) – Exercise Machines & Equipment (236) – Fishing Piers & Platforms (237) – Golf Facilities (238) – Miniature Golf Facilities (239) – Play Areas (240) – Saunas & Steam Rooms (241) – Swimming Pools, Wading Pools & Spas (242) – Shooting Facilities w/Firing Positions (243)

## **CHAPTER 3: BUILDING BLOCKS**

General (301) – Floor & Ground Surfaces (302) – Changes in Level (303) – Turning Space (304) – Clear Floor or Ground Space (305) – Knee & Toe Clearance (306) – Protruding Objects (307) – Reach Ranges (308) – Operable Parts (309)

## **CHAPTER 4: ACCESSIBLE ROUTES**

General (401) – Accessible Routes (402) – Walking Surfaces (403) – Doors, Doorways, & Gates (404) – Ramps (405) – Curb Ramps (406) – Elevators (407) – Limited Use/Limited Application Elevators (408) – Private Residence Elevators (409) – Platform Lifts (410)

## **CHAPTER 5: GENERAL SITE & BUILDING ELEMENTS**

General (501) – Parking Spaces (502) – Passenger Loading Zones (503) – Stairways (504) – Handrails (505)

## **CHAPTER 6: PLUMBING ELEMENTS & FACILITIES**

General (601) – Drinking Fountains (602) – Toilet & Bathing Rooms (603) – Water Closets & Toilet Compartments (604) – Urinals (605) – Lavatories & Sinks (606) Bathtubs (607) – Shower Compartments (608) – Grab Bars (609) – Seats (610) – Washing Machines & Clothes Dryers (611) – Saunas & Steam Rooms (612)

## **CHAPTER 7: COMMUNICATION ELEMENTS & FEATURES**

General (701) – Fire Alarm Systems (702) – Signs (703) – COMMUNICATION Telephones (704) – Detectable Warnings (705) – Assistive Listening Systems (706) – Automatic Teller Machines & Fare Machines (707) – Two Way Communication Systems (708)

## **CHAPTER 8: SPECIAL ROOMS, SPACES & ELEMENTS**

General (801) – Wheelchair Spaces, Companion Seats, & Designated Aisle Seats (802) – Dressing, Fitting & Locker Rooms (803) – Kitchens & Kitchenettes (804) – Medical Care & Long-Term Care Facilities (805) – Transient Lodging Guest Rooms (806) – Holding Cells & Housing Cells (807) – Courtrooms (808) – Residential Dwelling Units (809) – Transportation Facilities (810) – Storage (811)

## **CHAPTER 9: BUILT-IN ELEMENTS**

General (901) – Dining Surfaces & Work Surfaces (902) – Benches (903) – Check Out Aisles & Sales and Service Counters (904)

## **CHAPTER 10: RECREATION FACILITIES**

General (1001) – Amusement Rides (1002) – Recreational Boating Facilities (1003) – Exercise Machines & Equipment (1004) – Fishing Piers & Platforms (1005) – Golf Facilities (1006) – Miniature Golf Facilities (1007) – Play Areas (1008) – Swimming Pools, Wading Pools, and Spas (1009) – Shooting Facilities W/Firing Positions (1010)

## **Federal Accessibility Requirements**

The development of a transition plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Act, which has become known as the “civil rights act” of persons with disabilities, states that: Not otherwise qualified [disabled] individual in the United States shall, solely by reason of [disability], 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. 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. This legislative mandate, therefore, prohibits the Town from, either directly or indirectly through contractual arrangements:

Denying 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 Town offers permissibly separate or different activities.

The Town of Greeneville completed its initial ADA Transition Plan February 18, 1993. This 2019 Plan is the replacement of any previous plans and will be the original self-evaluation document.

### **Title II Requirements**

The Town of Greeneville is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs and services; any parts of Titles IV and Title V that apply to the Town and its programs, services or facilities; and all requirements specified in the Americans with Disabilities Act Access Guidelines of 2004 (ADAAG) that apply to facilities and other physical holdings.

**Title II** has the broadest impact on the Town. A self-evaluation is required and intended to examine programs, activities and services, identify problems or physical barriers that may limit accessibility by the disabled and describe potential compliance solutions.

Included in Title II are administrative requirements for all government entities employing more than fifty (50) people. These administrative requirements are:

- Designation of a person who is responsible for overseeing Title II compliance;
- Development of an ADA complaint procedure;
- Completion of a self-evaluation; and
- Development of a transition plan if the self-evaluation identifies any structural modifications necessary for compliance.

## **ADA Coordinator**

In March 2017, the Town Administrator recommended to the Board of Mayor and Aldermen to designate the Town HR Director as the ADA Coordinator. This was passed by Ordinance #1712.

This position is responsible for ensuring that all programs, services and activities of the Town of Greeneville are accessible to and usable by individuals with disabilities. See ADA Coordinator Job Description (Appendix A)

Patsy Fuller, ADA Coordinator

Town of Greeneville

200 N. College Street

Greeneville, TN 37745

[pfuller@greenevilletn.gov](mailto:pfuller@greenevilletn.gov)

Phone: 423-639-7105

Fax: 423-639-0093 or HIPAA Fax 423-402-9998

To request an ADA accommodation, file an ADA grievance, or make a recommendation, please contact the ADA Coordinator or follow the established procedures as outlined on the following pages.

## **ADA ACCOMMODATION AND GRIEVANCE PROCEDURE**

### **ADA Auxiliary Aids & Services or Barrier Removal Request**

A person who requires an accommodation, an auxiliary aid or service to participate in a Town program, service, or activity or who requests a modification of policies or procedures should submit a Request for Accommodation or Barrier Removal Form (Appendix B) to the ADA Coordinator. The Request Form should be submitted as far in advance as possible before the scheduled event. The best effort to fulfill the request will be made.

An individual may also submit a Request for Accommodation or Barrier Removal Form when seeking the removal of a physical barrier to gain or improve access. Request forms and other information are available from the Town of Greeneville, ADA Coordinator, 200 N. College Street, Greeneville, TN 37745, during regular business hours (9:00AM – 4:00PM Monday through Friday), via fax, mail, or electronic mail. Other arrangements for submitting a request, such as personal interviews or tape recordings, as well as assistance in completing the form, are available by contacting the ADA Coordinator.

The Town will review the request and notify the requesting party of the Town's proposed resolution. The Town's notification will be in writing or a reasonable alternative format if requested. If an individual feel that the Town's response is unsatisfactory, he or she may submit a formal complaint here:

### **Formal Complaint Procedures**

The Town has adopted a formal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Title II of the ADA and state disability rights. The following is designed to meet requirements of both §504 of the Rehabilitation Act of 1973, as amended, and Title II of the ADA. This procedure is available for any individual who wishes to file a complaint alleging discrimination by the Town based on disability, regarding access to the government services, programs, and facilities of the Town. It is unlawful for the Town of Greeneville to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

The availability and use of this grievance procedure via submission of the ADA Complaint Form (Appendix C) does not preclude filing a complaint of discrimination with any appropriate state or federal agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.

A complaint may be in writing, tape recording, or any other device, containing the name, address and telephone number of the person filing it (the Complainant). The complaint shall state the problem or action alleged to be discriminatory and the remedy or relief sought by the complainant.

There is a separate complaint procedure for ADA issues relating to employment issues. Please contact the Human Resources Director for further information regarding employment issues.

## **Grievances shall be processed in the following manner**

### **Step 1: Submission of Complaint**

The complaint should contain as much information as possible about the alleged discrimination. The Complainant or his/her representative should file the ADA Complaint Form with the ADA Coordinator no later than thirty (30) calendar days from the date of the alleged discrimination. The Town of Greeneville ADA Complaint Form is available at the end of this document "Appendix C", at Town Hall during regular business hours of 8:00am to 5 pm, via fax, mail, or e-mail. Other arrangements for submitting a request, such as personal interviews or tape recordings, as well as assistance in completing the form, are available by contacting the ADA Coordinator.

The ADA Coordinator will notify the Complainant in writing of any additional information that is needed to complete the complaint. If the Complainant fails to complete the grievance form, the ADA Coordinator shall close the complaint without prejudice.

### **Step 2: Consideration of Complaint**

The ADA Coordinator will oversee the investigation of the complaint. Within thirty (30) calendar days of the receipt of the complaint, the ADA Coordinator or his/her designee will respond to the complaint in writing or a reasonable alternative format, if requested. The response will explain the position of the Town with respect to the complaint and offer options for a reasonable solution.

### **Step 3: Appeals**

If the response of the ADA Coordinator does not satisfactorily resolve the issue, the Complainant, or his/her designee, may appeal the decision to the Town Administrator. The request for appeal must be made within fifteen (15) calendar days of the date of the ADA Coordinator's decision.

Within thirty (30) calendar days after receipt of the request for appeal, the Town Administrator (or his/her designee) will conduct a hearing to consider the appeal. Within thirty (30) calendar days of the hearing, the Town Administrator (or his/her designee) will issue a final determination of the complaint. The decision on the appeal will be in writing and, when requested, in a reasonable alternative format.

## **SUMMARY**

The Town of Greeneville is dedicated to ensuring that all Town programs, benefits, activities, and facilities are fully accessible to and useable by persons with disabilities. The ADA Coordinator is here to serve the community, coordinate, and ensure equal access for all. Any questions or concerns about accessibility issues regarding Town programs and services should be directed to the Town of Greeneville ADA Coordinator.

### **Accommodation and Grievance Response**

In responding to request(s) for structural improvement brought through the ADA Accommodation and Grievance process, the ADA Coordinator and Town Management are limited to the funds in established Capital Improvement Projects and other miscellaneous funds. In the event that these allocated funds are insufficient or already spent, subsequent improvements will be prioritized and scheduled in subsequent fiscal years. Please review our current self-assessments with priorities and planned budget year for completion in Section II.

## ADA Self-Evaluation & Transition Plan

The Self-Evaluation is the Town's assessment of its current policies, practices and procedures. It identifies and corrects those policies and practices that are inconsistent with the requirements of Title II of the ADA.

In keeping with these requirements and as part of the Self-Evaluation, the Town of Greeneville:

- Identified its current programs, activities and services; and
- Reviewed the current policies, practices and procedures that govern the administration of its programs, activities and services.

The ADA also sets forth specific requirements for preparation of an acceptable Transition Plan. At a minimum, the elements of the plan should include:

- A list of the current physical barriers in Town 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 meet the current standards and accessibility regulations;
- A schedule for taking the steps necessary to achieve compliance with Title II of the ADA; and
- The name of the individual responsible for the plan's implementation.

This report and certain documents incorporated by reference establish the ADA Self-Evaluation and Transition Plan Update for the Town of Greeneville.

### DEFINITIONS

As used in this Transition Plan Update, the following terms shall have the meaning ascribed to them in this Section, which are consistent with the provisions of existing federal and state law, including the regulations promulgated there under. Except to the extent expressly stated to the contrary, any term not expressly defined in this Section or elsewhere in this Transition Plan that has an expressly defined meaning in either the ADA or the regulations promulgated there under ("Regulations") shall have the meaning ascribed to it by the ADA or the Regulations, in that order of preference. All other terms shall be interpreted according to their plain and ordinary meaning.

**ADA:** "ADA" means and refers to the Americans with Disabilities Act as contained at 42 U.S.C. §12101 et seq.

**ADAAG:** "ADAAG" means and refers to the Americans with Disabilities Act Access Guidelines of 2004, codified at Appendix A to 28 Code of Federal Regulations Part 36 and at Appendix A to 49

Code of Federal Regulations part 37. “ADAAG Standards” means and refers to physical conditions

that meet the new construction and/or alterations standards set forth in the ADAAG guidelines. Note the Town of Greeneville subscribes to ADAAG and not the Uniform Federal Accessibility Standards (“UFAS”).

**Auxiliary Aids and Services:** The term “auxiliary aids and services” includes, 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.

**Compliance Period:** “Compliance Period” means and refers to the period for which this Transition Plan will be in effect. The Transition Plan shall become effective upon Approval of the Board of Mayor and Aldermen and may remain in effect for up to 30 years. The Town may dissolve the Transition Plan at any time upon a showing that is in full compliance or upon a showing that it has met or exceeded the monetary obligations specified in this Transition Plan. Alternatively, the Transition Plan will remain in effect until it dissolves automatically 30 years after Approval of the Board of Mayor and Aldermen.

**Compliant Curb Ramp:** “Compliant Curb Ramp” means and refers to a curb ramp that is constructed to comply with state and/or federal law (whichever provides the higher access standard) in place at the time of construction. In the case of a location where it is Structurally Impracticable or Technically Infeasible to build a fully compliant curb ramp, or where construction of a fully compliant curb ramp would constitute a Fundamental Alteration of a service, program, or activity of the Town or an Undue Burden on the Town, a curb ramp that complies with access standards, or was constructed to the standards existing at the time of construction, or to the maximum extent feasible, will constitute a Compliant Curb Ramp if the requirements set forth in this Transition Plan for justifying the reasons for the Town to avoid full compliance are met.

**Curb Ramp:** “Curb Ramp” is used interchangeably with “curb cut.”

**Detectable Warnings:** “Detectable Warnings” means and refers to truncated domes which provide a tactile surface at the transition between the curb and the street or other hazardous vehicular crossings, assisting pedestrians with Vision Disabilities in determining when there may be the threat of vehicular traffic.

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

**Discrimination on the Basis of Disability:** “Discrimination on the Basis of Disability” means to, limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status

because of the person's disability; limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability; participate in a contract that could subject a qualified citizen with a disability to discrimination; use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability; deny equal benefits because of a disability; fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the Town'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.

**Fundamental Alteration:** "Fundamental Alteration" means and refers to an action that, if taken by the Town, would result in a fundamental alteration in the nature of the service, program or activity of the Town. If the Town claims that any action otherwise required by this Transition Plan would constitute a Fundamental Alteration, the Town shall have to demonstrate that such alteration would result. The decision that an action would constitute a Fundamental Alteration must be made by the ADA Coordinator and Town Engineer, or his or her designee, after considering all funds and alternatives available and must be accompanied by a written statement of the reasons for reaching that conclusion.

**Mobility Disability:** "Mobility Disability" means and refers, with respect to an individual, to any physical or mental impairment or condition that substantially limits an individual's ability to move his or her body or a portion of his or her body and includes, but is not limited to, orthopedic and neuromotor disabilities and any other impairment or condition that limits an individual's ability to walk, maneuver around objects, ascend or descend steps or slopes and operate controls. An individual with a Mobility Disability may use a wheelchair or motorized scooter for mobility or may be Semi-Ambulatory.

**Pedestrian Rights-of-Way:** "Pedestrian Rights-of-Way" (PROW) means and refers to all sidewalks over which the Town of Greeneville has responsibility or authority as well as all Curb Ramps and crosswalks serving such sidewalks and any other pathways used by pedestrians along public rights-of-way, including pedestrian pathways through public parking lots.

**Physical or Mental Impairments:** "Physical or mental impairments" may include, but are not limited to, 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/conditions; 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.

**Qualified Individual with a Disability:** “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 Town.

**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.

**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 exist.

**Statutory Defenses:** “Statutory Defenses” means and refers to the Town’s right to assert under this Transition Plan that removal of any barrier or installation of a Compliant Curb Ramp is not required because such barrier removal or curb ramp installation would be Technically Infeasible, or Structurally Impracticable, or that it would constitute an Undue Burden or Fundamental Alteration.

**Structurally Impracticable:** “Structurally Impracticable” means and refers to circumstances in which the unique characteristics of terrain prevent the incorporation of accessibility features. If it is structurally impracticable to provide full access at any location along pedestrian rights-of-way, the Town shall comply with access requirements to the extent that it is not structurally impracticable to do so. (See ADAAG § 4.1.1(5)(a)).

**Substantial Limitations of Major Life Activities:** An individual is disabled if she or he has a physical or mental impairment that (a) renders her/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 others. Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. In determining whether a 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.

**Technically Infeasible:** “Technically Infeasible” means, with respect to an alteration of a building, facility or Pedestrian Rights-of-Way, that it has little likelihood of being accomplished

because existing physical or site constraints or a lack of public right of way prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility. (See ADAAG § 4.1.6(1)(j)).

**Third Party Entity:** “Third-Party Entity” means an entity other than the Town of Greeneville that controls certain barriers or elements of barriers in a Pedestrian Rights-of-Way. Transit agencies and local utilities are examples of Third-Party Entities.

**Undue Burden:** “Undue Burden” means and refers to an action that, if taken by the Town of Greeneville, would result in an undue financial and administrative burden. To demonstrate that removal of a barrier would constitute an Undue Burden, the decision must be made by the ADA Coordinator and Town Engineer, or his or her designee, after considering all resources available from various funding sources for removal of barriers and must be accompanied by a written statement of said reasons for reaching that conclusion. In preparing such a statement, the Town may consider the usability of the existing facilities.

## **REVIEW & DEVELOPMENT PROCESS**

The 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.

This update to the Town’s ADA Self-Evaluation and Transition Plan is prepared in fulfillment of the requirements set forth in Title II of the ADA. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This update will assist the Town in identifying current policy, program and physical barriers to accessibility and in developing barrier removal solutions that will facilitate the opportunity of access to all individuals.

This report describes an overview of the process by which policies, programs and facilities were evaluated for compliance with the ADA; presents the findings of that evaluation; and provides recommendations for ensuring accessibility. This part provides an overview of the process and development of the Self-Evaluation and Transition Plan Update.

### **Discrimination and Accessibility**

There are two types of accessibility: physical accessibility and program accessibility. Absence of discrimination requires that both types of accessibility be provided. The ADA establishes requirements to ensure that buildings and facilities are accessible to and usable by people with

disabilities. Design guidelines to achieve accessibility have been developed and are maintained by the U.S. Access Board under the jurisdiction of the ADA. The ADA Accessibility Guidelines (ADAAG) cover a wide variety of facilities (including buildings, outdoor recreation areas and curb ramps) and establish minimum accessibility requirements for new construction and alterations to these facilities. The Town may achieve physical accessibility by ensuring that a facility is barrier-free and meets ADAAG technical requirements and State of California standards, including those found in Title 24. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility.

Programmatic accessibility includes physical accessibility, but also entails all policies, practices and procedures that permit people with disabilities to participate in programs and to access important information. 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. The Town may achieve program accessibility by many methods, both structural and nonstructural:

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

When choosing a method of providing program access, the Town 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 Town provides equality of opportunity but does not guarantee equality of results.

## **Undue Burden**

The Town does not have to take any action that it can demonstrate would result in (i) a fundamental alteration in the nature of a program or activity, (ii) would create a hazardous condition for other people, or (iii) would represent an undue financial and administrative burden. This determination can only be made by the ADA Coordinator and Town Engineer, or his or her designee and must be accompanied by a statement citing the reasons for reaching that conclusion.

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

## **Policies, Procedures and Programs**

In 2016, the Town began an evaluation of 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.

It is the intent of the Town to address Town wide programmatic accessibility barriers by providing policies in the following areas:

- Non-Discrimination on the Basis of Disability;
- Facilities, Programs and Services;
- Public Meetings;
- Communications; and
- Staff Training.

Additionally, when a policy, program or procedure creates an accessibility barrier that is unique to a department or a certain program, the Town's ADA Coordinator will coordinate with the department head or program manager to address the matter in the most reasonable and accommodating manner.

## **Development Process**

Services and programs offered by Greeneville to the public must be accessible. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids and transportation.

The process of making Town facilities and programs accessible to all individuals will be an ongoing one and the Town will continue to review accessibility issues such as resolution of complaints and reasonable modifications to programs.

## **Facilities Transition Plan**

The Town is in process of conducting a complete survey of architectural barriers in its buildings and facilities. An evaluation of these facilities and all new facilities was undertaken as part of this current Self-Evaluation and Transition Plan Update. The surveys have provided the Town an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

## **Development Process: Facility Evaluations**

All Town Departments received an "ADA Checklist for Existing Facilities" on August 30<sup>th</sup> of 2017 for program evaluation. The checklist is a comprehensive evaluation tool produced by Institute for Human Centered Design and is based on the 2010 ADA Standards for Accessible Design.

Originally, the ADA Coordinator and Department Directors started the process to compile the Checklist to be reviewed with the ADA Advisory Committee. It was determined that professionals were needed to assist the Town's team in the Assessment and Evaluations. This is when the Board of Mayor and Alderman approved and committed for an Engineer/Architect (Dave Wright) to assist in facilities using the ADA standards and an Engineering firm (LDA Engineering) evaluate the right-of-way (ROW) and sidewalks to ensure the town's compliance in the timeframe required.

The elements and their related features addressed in the facility assessments include, but not limited to:

Parking Area	Passenger Loading Zone
Curb Ramp	Walk ways
Exterior Ramp	Exterior Stairway
Site Furnishings / fixtures	Swimming Pool
Game and Sports Area	Play Equipment Area
Viewing Area	Drinking Fountain
Telephone	Hazard
Sign	Door
Corridor or Aisle	Building Level
Interior Stairway	Interior Ramp
Multiple User Restroom	Single User Restroom
Bathing Facility	Room
Eating or Dining Area	Dressing or Locker Room
Picnic Area	Sidewalk

## Removal of Architectural Barriers

Recognizing that the Town has limited funds and cannot immediately make all buildings and facilities fully accessible, Town staff will utilize the following criteria as the basis for prioritizing the removal of architectural barriers:

- Quantity and frequency of public use;
- Uniqueness of the facility: Can the programs offered in this facility be shifted to an alternative, accessible location?
- Age or condition of the facility: Age or condition should not be major criteria, but can be factors if the building is scheduled to be vacated or demolished;
- Geographic distribution: Distribution of services throughout the Town.
- Critical nature of the programs offered at the facility: Police, children play areas, etc.

## **Sidewalks and Curb Ramps Transition Plan**

In 2018-2019, the Director of Public Works (Town Engineer) and the Engineering firm (LDA Engineering) began an evaluation of the Town's Right of Way (ROW) Sidewalks, Curbs / Ramps for accessibility. This survey information will be used to bring selected ramps into compliance with ADAAG standards.

The Transition Plan for Sidewalks and Curb Ramps combines the findings of the review of policies, procedures and design standards regarding sidewalks and curb ramps with the Town's ongoing curb ramp inventory. Although the Town has already instituted many programs to increase pedestrian accessibility via street-related capital improvement projects it will expand these programs where possible to meet its overall goals.

Each Department Director with the City Administrator will establish a plan for correcting such issues based upon a priority system. The plan will be revised as necessary and costs for implementing the plan will be estimated. The plan will be integrated into a timeline for implementation and the ADA Coordinator will facilitate the overall process.

## **DEPARTMENT, SERVICE and PROGRAM SELF-EVALUATION**

### **FINDINGS AND ACTIONS**

The ADA self-evaluation is an on-going, dynamic document that will need periodic review and updating. In its continuing efforts to maintain compliance, the Town has several mechanisms in place to provide for an ongoing update of the self-evaluation. The Town's designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA. Updates and implementation activities will be documented in the Town's ADA Transition Plan by summarizing activities and progress. The Department Directors with the ADA Coordinator as the Facilitator of the process will be responsible for their respective department evaluation (also referred to as the ADA Assessment). The evaluation (Assessment) will be updated by the Directors for inclusion to the plan.

### **Administration of the ADA Assessment**

#### **Town-Wide Programs, Activities and Services Evaluation and General Recommendation**

The Human Resources Director (also, ADA Coordinator) has completed the following Assessment with findings and recommendations for the Town's general programs, activities and services.

## **I. Customer Service**

Policies and practices that ensure that individuals with disabilities can participate in the programs, activities and services provided by the Town including: procedures for program modifications, fees for modifications.

This section addresses general concerns that apply throughout the Town based upon the requirements of Title II and suggest several findings to improve services and accessibility in the Town.

### **Findings:**

In-person interaction with the public is one of the primary functions of many Town departments. The Town as a whole (for most departments) has not established formal procedures for determining reasonable modifications to achieve program accessibility. Town Administration, departments, and employees are constantly finding a way to accommodate all persons regarding our services and accessibility. For example, staff will meet people on the first level of town hall for whatever a person needs that is unable to walk upstairs. Customer Service is a top priority.

### **Actions:**

Make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service. Departments may not charge any additional fees to persons with disabilities for modifying programs.

- Continue to provide accessible facilities such as parking, including van accessible parking, path of travel, entry doors, signage, and transaction counters at the customer service locations. If alternative locations for providing accessible services are required, provide those services in the most integrated setting, without stigmatizing the user.
- Provide standard equipment at each site where programs are administered to facilitate basic communications access using alternative formats. Equipment may include, but not be limited to, paper and pencil, hearing devices, an enlarging copy machine, and access to the Relay service technology.
  - Review Hearing Devices available in meeting and board rooms.
- Allow the use of service animals to assist persons in accessing programs, activities and services in Town facilities and Town offered programs. Since service animals are not always dogs, staff should be aware of the definition of a service animal and the protocol and etiquette for service animals.

- 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 site.

**Our approach:**

- Requests for reasonable accommodations and modifications should be directed to the ADA Coordinator and department responsible for the program or services. Identify which aspects of the program limit participation and what modification can be made.
- The department offering the program or service shall document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation shall be filed with the ADA Coordinator.
- If individuals are not satisfied with the results of this process, they should be directed to the Town’s ADA grievance procedures. (Appendix C).

**II. Notices, Outreach, and Printed Information**

Notices, printed information, televised (when possible) and audiovisual information, the Town and departmental websites, and other means of communication devices.

**A. Notice**

Title II regulations require the Town to inform the public of the rights and protections provided by the ADA.

Findings: Public notifications regarding Town programs, events and registration generally does not include information about available program modifications or non-discrimination language, nor does it always identify a contact person for those persons with disabilities to contact to request modifications.

Actions:

- Increase outreach to persons with disabilities by informing the public of the possible modifications available to provide full participations to all. (Appendix \_\_\_\_\_: ADA Public Notice shall be placed in all Town facilities and near auxiliary aids at public meetings.)
- Include the following notice (or a similar notice) regarding the Town’s commitment to providing accessible services in all Town publications regarding Town services, programs, or activities.

**All documents are available in alternative formats, upon request.**

In compliance with the Americans with Disabilities Act, a person requiring an accommodation, auxiliary aid or service to participate in this program should contact the sponsoring department or ADA Coordinator, Patsy Fuller, 423-787-6189 or [pfuller@greenevilletn.gov](mailto:pfuller@greenevilletn.gov) as far in advance as possible, but no later than 72 hours before the scheduled event. The best effort to fulfill the request will be made.

The following non-discrimination language should appear on hard copies and web-based Town publications that provide general information about Town services, programs, or activities and advertisements for employment, commission and board membership openings:

**POLICY ON NON-DISCRIMINATION ON THE BASIS OF DISABILITY**

The Town of Greeneville does not discriminate on the basis of disability in the admission or access to its programs or activities.

ADA Coordinator, Patsy Fuller has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. §12101 et seq.), which prohibits discrimination on the basis of disability by public agencies. The ADA Coordinator can be contacted at 423-787-6189 or email [pfuller@greenevilletn.gov](mailto:pfuller@greenevilletn.gov)

The Town of Greeneville utilizes the Tennessee Relay system “Call 711” for persons with hearing or speech impairments.

**B. Printed Information**

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

Findings: Most departments produce written materials available to the public, however, many departments are not providing information about obtaining printed materials in alternative formats.

Actions:

- Provide information to staff on how to handle productions of materials in alternative formats and ensure that requests are handled in a uniform and consistent manner.

- Publicize the Town’s commitment to provide program information in alternative formats on an individual basis as requested.
- Include the following notice or similar language on all materials printed by the Town that are made available to the public:
- Provide any Town produced documentation in a variety of formats upon request. Provide staff assistance, upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.

This publication can be made available in alternative formats, such as Braille, large print, audiotape, or computer disk. Requests can be made via the ADA Coordinator, Patsy Fuller, 423-787-6189 or [pfuller@greenevilletn.gov](mailto:pfuller@greenevilletn.gov); TTY Relay 711. Please allow 72 hours for your request to be processed.

### **C. General Publicity and Advertisements for Town Programs, Services and Activities**

Public notifications regarding meetings, conferences, and other events includes information regarding reasonable accommodation request which extends beyond auxiliary aids to physical accessibility of meeting locations.

Publicize efforts and take necessary steps to improve communications and outreach to increase effective participation of community members with disabilities by informing of alternative formats. We have completed site reviews to gauge accessibility of meeting facilities and acquiring alternative locations, when necessary.

### **D. Town of Greeneville Website**

The web is a key tool for communicating with community members. It is imperative that all documents found on the Town’s website are downloadable and provide a screen reader for persons with hearing and cognitive disabilities.

*Findings:* The Town’s website has not been upgraded to provide for the accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 which, set forth the technical and functional performance criteria necessary for such technology to be accessible however, in reviewing a sampling of the available pages the screen reader application was unable to determine all available text.

*Actions:*

- The Public Relations Manager (PRM) will complete a review of Town website as requested by the ADA Coordinator 2019-2020.
- Ensure that website pages created independently by Town Departments conform to accessibility standards.

- Ensure Town staff members are creating and attaching accessible PDF and other electronic files for posting on Town website.

Response: HR provided educational information to the PRM regarding the requirements of a Website relating to ADA

#### **E. Televised Public Information**

**ADA Coordinator's Note:** At this time, the cost of offering closed captioning services and detailed audio for all programming would create an undue financial and administrative burden on the Town. The Town is committed to providing equally effective communication for individuals with hearing and vision impairments and will offer auxiliary aids and services for television programming via reasonable accommodations upon request.

#### **F. Public Telephones and Communication Devices**

Findings: The Town does not have a main telephone line (number) since going digital July 2019 for use with a TDD/TTY (telephone communication device) for persons with hearing and/or speech impairments).

#### Actions:

- A compliant alternative has been implemented and provided to all departments and instruct all employees on proper use of the Tennessee Relay Service (TRS) via calling 711.
- The Town also has an account for Language interpretation with a firm in Nashville, TN

Response: HR Director/ADA Coordinator provided flyer of TRS 711 to Department Heads 7/29/19. Will continue to educate and instruct employees on ADA

**G. Training and Staffing** -The current level of experience and training of Town staff with policies and procedures regarding providing services to individuals with disabilities varies.

The ADA Coordinator is providing the employees and management with training to develop knowledge in the different types of reasonable modifications that would make their services accessible.

- Standardized, appropriate procedures for making programmatic accommodations;
- How to acquire or use assistive devices; and
- General evacuation procedures for buildings.
- The Town has provided all Town employees with awareness and sensitivity training.
- Ensure that customer service training includes information about communicating with and providing modifications for persons with a variety of disabilities.
- Educating all Town employees about their responsibilities under the ADA. The Town's ADA Coordinator and Department Director should be responsible for ensuring that staff members receive training.

- Reference materials that address special modifications will be included in this training.

The ADA Coordinator has a PowerPoint presentation available for training. Additional material and resources are in development for this program Sessions to be scheduled and completed by all departments in 2020-2021 (ongoing).

- Depending on operational needs, consider offering training to employees who wish to learn basic American Sign Language (ASL) communication skills. This training should emphasize basic communication skills and should not be viewed as a substitute for employing qualified ASL interpreters when requested.
- Provide Town employees with training in general building evacuation procedures for assisting persons with hearing, speech, visual, mobility, and learning disabilities in an emergency. (ongoing)

## **G. Public Meetings**

Many Town departments are responsible for planning and conducting public meetings.

*Findings:* Generally, public meetings are held in locations that are accessible to persons with mobility impairments. However, most Town departments indicate a need for training on how to respond to requests for other modifications. Generally, staff is not knowledgeable about how to access assistive listening systems.

### Actions:

- Schedule public meetings at accessible locations. 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.
- When a fully accessible site is not available, then make reasonable modification so that an individual with a disability can participate. These modifications may include phone-in participation, video recording, and meeting transcripts.
- Make information available to Town staff on the types of modification requests that may be made by persons with different types of disabilities. Provide information about 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 ensure that these features are accessible.

**ADA Coordinator's Note:** When practical and as required, meetings conducted in other facilities within the Town where auxiliary hearing devices are needed may be relocated to the Board of Mayor and Aldermen meeting room to use devices with direct link to microphone system.

Display a notice on meeting agendas indicating the availability of accessibility modifications.

- Provide agendas and other meeting materials in alternative formats, when requested.
- 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.
- Provide flexibility in the time limit on speaking for individuals with communication difficulties.
- Provide assistive listening devices at public meetings, when requested.
- Maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
- Maintain a checklist for creating accessible meetings and selecting accessible meeting spaces, and make the list available to all Town departments and programs.

## **FACILITY SELF-EVALUATION / ASSESSMENT**

### **FINDINGS AND ACTIONS**

Information collected during the self-evaluation process was reported to the ADA Coordinator by Dave Wright to assist the ADA Coordinator with the individual Department Directors detailing each item found to be in non-compliance with 2010 ADA Standards for Accessible Design.

The criteria listed below is used to determine the priorities for addressing specific barriers in each building, facility and park.

**Priority One:** The highest priority is placed on those barrier removal items that provide accessibility at the main entrance of a facility or improve a path of travel to the portion of the facility where program activities take place; parking, walks, ramps, stairs, doors and corridors. It is the intent to address those items listed as “Priority One” within **1 to 2 years** depending on immediate necessity, degree of complexity and overall cost.

**Priority Two:** A second level priority is placed on those barrier removal items that improve or enhance access to program use areas; meeting rooms, public offices and restrooms. It is the intent to address those items listed as “Priority Two” within **3 to 4 years** depending on immediate necessity, degree of complexity and overall cost.

**Priority Three/Four:** A third level priority is placed on those barrier removal items that improve access to amenities serving program areas; drinking fountains, telephones, site furnishings and vending machines. It is the intent to address those items listed as “Priority Three” within **5 to 6 years** depending on immediate necessity, degree of complexity and overall cost.

It is the intent of the Town to address those items listed as Priority One and Two within a time frame of one to four years depending on immediate necessity, degree of complexity and overall cost. In general, Priority Three/Four items do not inhibit a person’s ability to access or participate in a Town program or event. Therefore, the Town intends to address these items through routine maintenance, a building/facility remodel or improvement, or upon a request from a department director that a modification is necessary.

The Town of Greeneville reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities and changes in Town programs.

It is the intent of the Town to have its department directors and the town administrator to determine the funding sources for architectural barrier removal projects. Once funding is identified, the town administrator and department directors will coordinate the placement of the projects in the Town's Capital Improvement Plan to be addressed on a fiscal year basis. Department Directors will be responsible for keeping records of all corrections made and providing the ADA Coordinator with a written record memorializing the date, consultants who performed the work and the scope of these corrections.

All of the locations that follow have been completed using the 2010 ADA Standards "ADA Checklists for Facilities". The buildings were surveyed by Dave Wright, Gail Stacy, and Caroline Miller.

## **FACILITIES**

To simplify the viewing of the pdf documents, the facilities are listed in alphabetical order in PDF file format.

**Each Building/Location will begin with a cover page with the following information.**

**Name of the Building**

**Location/Address**

**Date of recent Assessment**

**Director of the Department**

### **LOCATION SUMMARY**

**that provides a general description and some history of the building**

**Person(s) names who are responsible for this section with contact phone and email.**

## **ADA Coordinator - Rehab Act of 1973, Sect 503, 504**

### **Job Description**

#### Responsibilities and Duties

The ADA/504 coordinator's responsibilities include assuring compliance with the Americans with Disabilities (ADA) Act, Sections 503 and 504 of the Rehabilitation Act of 1973, and other federal and state laws and regulations pertaining to persons with disabilities.

The ADA/504 coordinator is responsible for coordinating The Town of Greeneville policies and procedures relating to persons with disabilities, tracking the Town's progress relating to its policies and procedures as well as state and federal laws relating to persons with disabilities, filing all necessary reports, and providing consultative services to employing units and offices.

#### **Planning Responsibilities:**

- Serves as the principal planning coordinator for The Town of Greeneville programs, policies, and procedures relating to the Town's compliance and the promotion of opportunities for persons with disabilities.

#### **Compliance Responsibilities:**

- Ensures that appropriate processes are in place to provide for the prompt and equitable resolution of complaints and inquiries from The Town of Greeneville employees and the public regarding compliance with the ADA and other applicable federal and state laws regarding discrimination based on disability.
- Investigates allegations of discrimination and non-compliance under the ADA and other applicable federal and state laws regarding discrimination based on disability.
- Maintains a record of all disability and accommodation issues and the resolution of each.

#### **Informational Responsibilities:**

- Maintains current information regarding state and federal laws and regulations, as well as, the best practices of the Town's employment policies, practices, and procedures concerning the rights of the public and employees with disabilities; and ways of providing reasonable accommodations to persons with disabilities while maintaining program performance standards.

## **Outreach Responsibilities:**

- Develops and maintains written materials and other informational pieces to broadly disseminate information regarding the ADA and the Town of Greeneville's policies relating to persons with disabilities.
- Designs and participates in the development of presentations for the public and employees on the provision of equal opportunity for persons with disabilities.

Coordinates with various Town departments and the public responsibilities relating to compliance.

Serves as the primary Town liaison with relevant state and federal agencies, as well as other ADA coordinators that may be appointed in other Town departments or the ADA Advisory Board, as needed



**CERTIFICATION: I certify that I have a disability or medical condition that requires reasonable accommodation, which will be met by acquiring the equipment, services, or work adjustments described above.**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

If person needing accommodation is not the individual completing this form, please provide

Representative's Name: \_\_\_\_\_

Address: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

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For more information or assistance in completing the form, please contact

Patsy Fuller, ADA Coordinator at 423-639-7105 or email to [pfuller@greeneviltn.gov](mailto:pfuller@greeneviltn.gov)

**TOWN OF GREENEVILLE**

**ADA COMPLAINT or GREIVANCE FORM**  
**STATEMENT CONCERNING CONFIDENTIALITY**

Pursuant to Tennessee Code Annotated § 10-7-502(a), “all state . . . records . . . shall at all times, during business hours, be open for personal inspection by any citizen of Tennessee, and those in charge of such records shall not refuse such right of inspection to any citizen, unless otherwise provided by state law.” Accordingly, the State cannot and does not guarantee the confidentiality of this document or any notes, files, reports, or other documents, whether created by the State or received from the complainant, accused, or witnesses.

Name of Complainant: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Telephone Numbers of Complainant:

Work: \_\_\_\_\_ Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Person Discriminated Against: \_\_\_\_\_  
(if other than the complainant)

Address: \_\_\_\_\_  
\_\_\_\_\_

Telephone Numbers:

Work: \_\_\_\_\_ Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

Which of the following best describes the nature of your complaint?

Lack of Access to a  Facility  Program  Service  Activity

Name of Person(s) or Department you believe has discriminated:

\_\_\_\_\_

Date of Earliest Occurrence of Event(s): \_\_\_\_\_

How were you discriminated against?

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Explain as clearly as possible what happened, including who did what, where it happened, who was involved, etc. Please attach additional pages if necessary.

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Explain why you believe these events occurred:

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Have efforts been made to resolve this complaint through the internal grievance procedure of the organization?

Yes

No

If you answered yes to the previous question, what is the status of the grievance?

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What do you think would resolve the problem or complaint?

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Has the complaint been filed with another Federal, State, or local civil rights agency or court?

Yes                       No

If Yes:

Agency or Court: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Telephone: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Do you intend to file with another agency or court?

Yes                       No

Agency or Court: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Telephone: \_\_\_\_\_

Additional space for answers:

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Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Return to:

Town of Greeneville  
Human Resources Department  
Patsy Fuller, ADA Coordinator  
200 N. College St.  
Greeneville, TN 37745  
423-639-7105 Phone  
423-639-0093 Fax  
Email [pfuller@greenevilletn.gov](mailto:pfuller@greenevilletn.gov)

**State of Tennessee Guidance - Checklist for ADA compliance:**

- (1) Designate an ADA Coordinator;
- (2) Provide public notice about ADA requirements;
- (3) Establish grievance procedure;
- (4) Develop internal design standards, specifications, and details;
- (5) Develop Self Evaluation and Transition Plan;
- (6) Approve a schedule and budget to implement the Transition Plan; and
- (7) Monitor Progress.