



Americans with Disabilities Act Self-Evaluation and Transition Plan

DRAFT

2012 Update

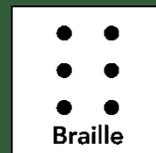


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INTRODUCTION & BACKGROUND

The Americans with Disabilities Act Self-Evaluation and Transition Plan establishes the City of Vancouver's ongoing commitment to providing equal access to all its public programs, services and activities for citizens with disabilities. To develop this plan, the City of Vancouver has undertaken a comprehensive evaluation of its facilities and programs to determine what types of access barriers exist for individuals with disabilities.

This plan replaces previous self-evaluation and transition plans developed by the City and its departments, and will be used to help guide future planning and implementation of necessary accessibility improvements. The City will update the plan once per year and public comments will be accepted through March 2015.

FEDERAL REQUIREMENTS

This document is being developed in accordance with federal requirements outlined in Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1992.

Section 504 of the Rehabilitation Act of 1973

Often referred to as the civil rights act for people with disabilities, the Rehabilitation Act requires that all organizations receiving federal funding make their programs available to people of all abilities. It states:

No 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.

City departments or divisions that receive federal funding must identify a Section 504 coordinator on its staff who will ensure that the program, service or activity receiving the funding meets the requirements of the law, and respond to any complaints from citizens or requests for information from a funding agency (see Appendix G).

Americans with Disabilities Act (ADA) – Titles I and II

The U.S. Congress signed the ADA in 1990, and it went into effect in 1992. The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in access to jobs, public accommodations, government services and programs, public transportation and telecommunications.

Title I of the ADA prohibits private employers, state and local governments, employment agencies and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The City of Vancouver is an Equal Employment Opportunity (EEO) employer and adheres to the requirements of Title I. For more information about the City's EEO program, visit this website: www.cityofvancouver.us/hr.asp?deptID=10422&itemid=11187.

Title II of the ADA adopts the general prohibitions against discrimination contained in Section 504 of the Rehabilitation Act of 1973, but applies to all state and local governments, regardless of whether or not they receive federal funding. It prohibits the City from denying persons with disabilities the equal opportunity to participate in its services, programs or activities, either directly or indirectly through contractual arrangements.

The administrative requirements contained in Title II that apply to the City are:

- Designation of an ADA Coordinator responsible for overseeing Title II compliance;
- Development of an ADA grievance/complaint procedure;
- Completion of a self-evaluation of facilities, programs and services; and
- Development of a transition plan if the self-evaluation identifies any accessibility deficiencies.

The City is also required to comply with the requirements of **Title VI of the Civil Rights Act of 1964**, which prohibits discrimination based on race, color, national origin or gender. This Act does not pertain to discrimination based on disability and, therefore, is *not* included in this transition plan.

ADA Coordinator

The Director of the City's General Services Department was designated as the ADA Coordinator in 2011. This position is responsible for ensuring that all programs, services and activities of the City of Vancouver are accessible to and usable by individuals with disabilities. He/she reports to the City Manager. The City's ADA Coordinator is:

Tim Haldeman
City of Vancouver
General Services
415 W. 6th St.
P.O. Box 1995
Vancouver, WA 98668-1995
Email: Tim.Haldeman@cityofvancouver.us
Phone: (360) 487-8495, or 711 (WA Relay)
Fax: (360) 487-8496

Requesting Accommodation or Alternate Formats

Instructions about how to request accommodations (e.g. translator, barrier removal, etc.), or documents/materials in alternate formats may be included in a letter, email, newsletter or website used to announce, invite or promote the City program, service or activity. If this information is not provided, please contact the City's ADA Coordinator to make your request (see contact information above). Please make requests for accommodation at meetings or events at least one week in advance.

Requests for **accommodation** at a City meeting or event should include:

- The requestor's name, address, email and telephone number (if any)
- A description of the program, service or activity where the accommodation is required
- The location of the program, service or activity
- A brief description of why the accommodation is needed

Requests for materials in **alternate formats** should include:

- The requestor's name, address, email and telephone number (if any)
- The name or description of the City document or materials to be reformatted
- What type of format is desired (e.g. Braille, audio recording, computer disk, etc.)
- A brief description of why the alternate format is needed

The City ADA Coordinator or the responsible City department will respond to the request within 15 calendar days or in advance of a scheduled meeting or event. If the response does not satisfactorily resolve the issue, the requestor may file a formal grievance with the City. All requests for accommodations and alternate formats will be kept on file for at least three years.

Filing a Grievance

The City of Vancouver has a formal grievance procedure in place to provide citizens a means to file complaints regarding:

- City of Vancouver policies or its provision of services, activities and programs to persons with disabilities;
- Alleged violations of Title II of the ADA or Section 504 or the Rehabilitation Act of 1973 by the City of Vancouver, its departments or employees; and
- Structural and parking accessibility issues on City-owned or controlled property.

The ADA Coordinator is limited to the funding already available for capital improvement projects when responding to grievances that request barrier removal or structural modifications. In the event that the available funds are insufficient or already expended on other projects, improvements will be prioritized and scheduled in subsequent fiscal years.

The availability and use of this grievance procedure does not preclude filing a complaint of discrimination with any appropriate state or federal agency. Use of this grievance procedure is not a prerequisite in the pursuit of other remedies.

Step 1: To file a grievance, please send a letter or an email to the ADA Coordinator (see contact information on page 2) that includes the following information:

- Your full name, address and telephone number;
- The full name of the person who was discriminated against (if someone other than yourself);
- The name and address of the program, service, activity or facility where the incident took place;
- A description of the incident, the date(s) it occurred and the name(s) of any city employees involved (if known); and
- Other information that you believe necessary to support your complaint. Please send us copies of any relevant documents, but keep the originals for your own records.

The ADA Coordinator will notify the complainant in writing if any additional information is needed. If the requested information is not provided, the ADA Coordinator shall close the complaint.

Step 2: The ADA Coordinator will meet with or contact the complainant within 15 days of receipt of the grievance to discuss possible solutions.

Step 3: Within 15 calendar days of that meeting or discussion, the ADA Coordinator will respond in writing or in a format accessible to the complainant, explaining the position of the City of Vancouver and offering options for resolution of the complaint.

If the response does not satisfactorily resolve the issue, the complainant may appeal the decision to the City Manager within 15 calendar days after receiving the response. Steps 1-3 will then begin again, this time with the City Manager or an appointed representative as the primary contact. Complainants should also provide an explanation about why the City's initial response was not satisfactory.

All formal grievances received by the ADA Coordinator, appeals to the City Manager and responses from the ADA Coordinator and City Manager, will be kept on file for at least three years.

ADA Self-Evaluation and Transition Plan Process

The Self-Evaluation is the City's internal assessment of the accessibility of its facilities, programs, services and activities. It included site assessment surveys of all public facilities, parks and roads owned by the City of Vancouver, and a written survey of all City departments about the accessibility of their programs, services and activities.

According to the requirements of the ADA, a Transition Plan must include a list of necessary improvements to be made based on the results of the Self-Evaluation, including estimated time frames and costs for each. This information is available on page 15 of this document.

The City should update the Transition Plan once per year to reflect completed accessibility projects or other changes.

Public Outreach

Previous versions of this plan have been available on the City's website since 2003. This current update has also been posted on the City's website. Key stakeholder groups and the general public are invited to review and provide input on it for at least three years. Comments can be directed to the ADA Coordinator (contact information on page 2).

The City will update the plan and its associated improvement project lists once per year to reflect completed improvement projects, or additions or changes suggested by the public, as appropriate.

ADA Program Web page: www.cityofvancouver.us/ADA.asp

Identified Stakeholder Groups

- General public
- City and county citizen advisory boards or committees
- The ARC of Clark County
- WA State School for the Deaf
- WA State School for the Blind
- Vancouver-Clark Parks and Recreation's Access to Recreation Steering Committee
- Clark County ADA Advisory Committee
- Southwest WA Center for the Deaf and Hard of Hearing
- ALS Association
- Alzheimer's Association
- Epilepsy Foundation
- Polio Outreach of Washington
- Columbia River Mental Health Services
- Clark County Commission on Aging (future)

STATE & LOCAL REQUIREMENTS

The State of Washington officially adopted the International Building Code (IBC) as its building code in 2004 (RCW 19.27 and 70.92). The IBC includes provisions ensuring that public facilities are accessible to and usable by persons with disabilities.

Pursuant to requirements of RCW 19.27, the City of Vancouver also adopted the IBC as its building code in 2004.

RELATIONSHIP TO OTHER PLANS

This Transition Plan pertains only to City-owned or administered facilities, programs, services and activities. Clark County and other cities and towns are responsible for developing and implementing their own self-evaluation and transition plans. Clark County's ADA Transition Plan is available on the Web here: www.clark.wa.gov/ada/.

The Vancouver-Clark Parks and Recreation Department developed its own Transition Plan because it is a consolidated department serving both the City and Clark County (Appendix C).

FUNDING SOURCES

The primary sources of funding for accessibility-related improvement projects on City property is the General Fund, real estate excise taxes, the Utility Fund, and grants. However, the ongoing economic recession has resulted in significant reductions to most of these funding sources in recent years. Due to reduced tax revenue for the City's General Fund and real estate excise taxes, reduced support for grant programs and competing priorities, the City of Vancouver is experiencing a limited ability to fund accessibility improvement projects. However, it should be noted that over the past five years, the City has successfully resolved most of its previous accessibility issues by renovating existing facilities or relocating City services to new, ADA compliant buildings.

Accessibility improvements that can be made through general maintenance of City facilities (e.g. signage, clear pathways, relocation of restroom fixtures, etc.), or as part of the regular administrative duties of department staff (e.g. providing documents in alternate formats, training, website improvements, etc.) will typically be completed first; with larger capital improvement projects being completed when necessary funding is available.

UNDUE BURDEN

According to the ADA, the City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. This determination can only be made by the ADA Coordinator, department head, or 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 City must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

PROGRAMS, SERVICES & ACTIVITIES

SELF-EVALUATION SURVEY: FINDINGS

In early 2012, the City surveyed all its departments to learn how they communicate with the public and what tools and techniques they use to ensure that people with disabilities have equal access to programs, services and activities. Most City Departments felt that they currently provided full and equal access to all its services, programs and activities for people with disabilities. However, the responses to specific questions indicated a need for some improvements. The following is a summary of the citywide improvements that are recommended in this transition plan. A full list of the identified improvement projects is included in this plan, starting on page 15.

CUSTOMER SERVICE (walk-in, telephone & letters/emails)

The City has done an excellent job addressing physical accessibility problems at its facilities identified in previous transition plans through renovation of existing facilities and relocation of key departments and services to compliant buildings. In addition, the City has fully embraced and encouraged use of electronic communications tools, like the Internet and email, to interact with and provide information to its customers. Recommendations of this Transition Plan are:

- Provide at least one TTY text telephone.
- Publicize the City TTY number in all email signature blocks, letterhead, phone books or Web pages that include the City's main information telephone number (360-487-8600).
- For departments that use automated phone menu systems on their main, public line (i.e. press 1 for...), ensure there is an easy one-step way to bypass the message and reach a live person during regular business hours. If lack of staffing makes this impossible, ensure there are other ways for people to reach your staff (e.g. email addresses posted on your Department's Web page, allow in-person drop-in visits, etc.).
- Publicize the state Relay service number used by the City (711) in all email signature blocks, letter head, phone books or Web pages that include an individual employee or department's regular voice telephone numbers.
- Ensure that pathways are clear of temporary or permanent barriers such as tables, chairs, coat racks, easels, signs, equipment or boxes.
- Ensure that all permanent directional and room identification signage use large fonts, high contrast colors, non-reflective materials, raised lettering and Braille translations where appropriate, and are clear of visual or physical obstructions.
- Install signage at any non-accessible entrance to a public facility with directions to the nearest accessible entrance.
- Include the following information beneath the signature line of every letter or email sent to a customer:

To request other formats, please contact [your department or division name here].
Voice: xxx-xxx-xxxx | TTY: xxx-xxx-xxxx (if any) | Relay: 711
Email: xxxxx@cityofvancouver.us

Or, you can include the above contact information in your signature line and simply add this (or similar) sentence to your email or letter:

Please contact me to request this document or its attachments in another format, such as Braille, audio recordings or text-only documents.

- Whenever possible, make sure that any documents sent to a customer as an attachment to an email are in an accessible format (i.e. a PDF that was created using Adobe Acrobat, NOT a document that was scanned electronically and converted to PDF or TIF).
- Post a Notice of Program and Service Accessibility flyer in the lobby or public reception area of each department or facility clearly stating the City's intent to provide equal access to all services, programs and activities (see Appendix F).

PUBLIC MEETINGS/HEARINGS & EVENTS

The City works hard to ensure its public meetings, hearings and events are open and accessible to all citizens, regardless of disability. In addition, the Special Events office works directly with community event organizers to help ensure events using City streets, parks or other resources are compliant with the ADA. Recommendations of this Transition Plan are:

- All departments that host public meetings, hearing or other public events must be able to provide accommodations to people with disabilities, as requested. This includes providing American Sign Language interpreters, providing additional wheelchair seating and providing additional disabled parking spaces close to the entrance(s). Instructions about how to accommodate these requests should be provided to all employees, with reminders sent out once a year.
- Ensure that doorways and primary paths of travel at a meeting or event location are clear of obstructions or barriers, such as signs, boxes, chairs and electrical cords.
- Locate and inventory all assistive listening devices/FM transmitters and create a system for making them available to all departments (e.g. Outlook calendar checkout system), and include step-by-step operating instructions for use with each device. Verify that devices are operational once per year or in advance of any requested use, and replace/repair devices promptly.
- Include the following statement (or something similar) at the end of any email, news release, advertisement or mailed invitation sent out about a City-sponsored meeting or event:

To request reasonable accommodations at this (meeting/event), please contact (name of event contact, phone #, TTY # - **if any**, Relay: 711, Email: xxx@cityofvancouver.us) by (insert date – usually 1-2 weeks before the event, depending on when the notice is sent out).

PRINTED MATERIALS

The City produces a variety of informational and promotional materials for public use, including maps, brochures, forms, newsletters, fact sheets, reports, plans and the Senior Messenger newspaper. Recommendations of this Transition Plan are:

- All departments must be able to provide documents and other printed materials in alternate formats, as requested. This includes Braille, audio recordings, enlarged print and computer disks at no charge to the individual making the request. Instructions about how to provide these alternate formats should be provided to all employees, with reminders sent out once a year.
- The only Braille printer owned by the City is located at the Luepke Senior Center. A system by which all departments may use this printer should be developed to include reimbursement for staff time and materials, or additional Braille printers should be made available at key public facilities (e.g. City Hall, Firstenburg Community Center, Water Resources Center, etc.) for use by all staff in those buildings.

- Include the following information (or similar) on the all printed materials provided to the public, including brochures, fact sheets, handouts, flyers, maps, plans, forms, reports and newsletters:

To request other formats, please contact [your department or division name here].
Voice: xxx-xxx-xxxx | TTY: xxx-xxx-xxxx (if any) | Relay: 711
Email: xxxxx@cityofvancouver.us

Note: If a document is going to be used for more than one year without updates, please select a generic customer service telephone number and email address for your department, if available.

WEBSITE (www.cityofvancouver.us)

In 2012, the City of Vancouver will complete a comprehensive redesign of its website. The new design will include a variety of accessibility-related improvements, including text size and color, providing alternate text on photos and other graphics consistently, and providing accessible PDF documents. Recommendations of this Transition Plan are:

- Ensure that all fillable electronic forms are accessible by computer screen reading software for those with sight limitations. The Webmaster may want to purchase screen reading software like that used by people with such disabilities, in order to test the accessibility of certain key Web pages, forms and documents.
- Post links to PDF documents only if they were created using Adobe Acrobat from the original, editable document.
 - Do not use TIF or JPG formats for documents with text unless another link to an accessible PDF or text-only document is provided along with it.
Example: 2011 Project Fact Sheet ([PDF](#) | [JPG](#))
 - Do not use a document scanner to create a PDF or TIF for your Web pages unless you also provide a text version of the document along with it.
Example: 2011 Project Fact Sheet ([TIF](#) | [HTML/TEXT ONLY](#))

CLARK-VANCOUVER TELEVISION (CVTV)

CVTV does not close-caption any of its produced programming. The station plans to start captioning the Vancouver City Council meetings, Clark County Board of Commissioners hearings and local election coverage both on its broadcast station and on videos posted on the CVTV Web page by 2014, at a cost of \$25,000 a year. CVTV's total operating budget is under \$500,000, and providing captions for all 600 hours of its annually produced programming would be prohibitively expensive (\$60,000-\$95,000 a year).

Shorter CVTV videos posted on YouTube by the City can be captioned automatically by the viewer using software provided by YouTube. City departments may request that promotional videos produced by CVTV be captioned at an extra cost.

The only recommendations of this Transition Plan for CVTV are to take advantage of any computer-based real-time captioning software programs that may be developed in the future, and take advantage of any grant opportunities that might arise to help provide more complete captioning services. It should be noted that CVTV has already committed to doing so.

CONTRACTING/PURCHASING

The City currently uses criteria that do not discriminate based on disability when selecting contractors, consultants or vendors for City projects or services. However, federal regulations also require that any outside contractors receiving City funding, or receiving federal funding through the City, comply with the requirements and regulations of Title II of the ADA and Section 504 of the Rehabilitation Act.

Recommendations of this Transition Plan are:

- Include a statement in all Request for Proposals, contracts or other bid solicitation documents or Web pages explaining that businesses, organizations or individuals contracting with the City of Vancouver must comply with Title II of the ADA and Section 504 of the Rehabilitation Act of 1973, and provide links to Web sites or other resources about the ADA and Section 504.
- Require all City contractors, consultants or vendors sign a statement attesting to their intent to comply with Title II of the ADA and Section 504 of the Rehabilitation Act of 1973. This statement can be added to existing contract documents or can be a separate form. For the City's small works roster, make submitting the signed form a requirement for inclusion on the roster.

STAFF TRAINING

A key deficiency revealed by the self-evaluation survey conducted in early 2012 was the need for regular and recurring employee training about a variety of subjects related to the requirements and regulations of the ADA. This information can be provided to employees through written procedures and other self-directed training tools (e.g. PowerPoint presentations, videos, etc.), through online training courses or through formal classroom training. The Northwest ADA Center is a great resource for ADA training (www.dbtacnorthwest.org). The City's training and education needs include:

- Location and use of TTY text telephones (placing and receiving calls)
- Use of the State of Washington third-party Relay telephone system (placing and receiving calls)
- Responding to requests for materials in alternate formats, including accessing Braille printers, getting audio recordings, providing enlarged text, etc.
- Responding to requests for accommodations at public meetings and events, including getting a sign language interpreter, securing additional disabled parking spots, etc.
- Providing accessible Web content (alternate text, fonts, PDFs)
- General information about working with disabled customers (culture and etiquette)
- General information about the ADA and its legal requirements as it pertains to the City
- General information about Section 504 of the Rehabilitation Act of 1973 and its legal requirements
- How both the ADA and Section 504 are different from Section VI of the Civil Rights Act of 1964

In addition to providing this information to all existing employees and new hires, the City should provide all employees with annual reminders about the ADA requirements with links to instructional information. Any changes to the law affecting the City should also be monitored and shared with employees as appropriate. This continuing education effort should occur in coordination with the annual updates that will be made to this transition plan.

CITY FACILITIES, STREETS AND PARKS SELF-EVALUATION SURVEY: FINDINGS

The City of Vancouver owns and either operates or leases a number of municipal and utility buildings, public streets, historic properties, parking lots, community centers, parks, trails, sports fields and lease properties. Some of these properties are not open for public use or do not house public services or programs, but many do.

The City has conducted a variety of site visits, surveys and inventories of its facilities, sidewalks, curb ramps and parks starting after the ADA became law in 1992. Today, the majority of the City’s public facilities are ADA compliant and it continues to make progress on installing curb cuts and sidewalks along its roadways, and providing increased access to its indoor and outdoor parks and recreation facilities. The following is a summary of the currently identified accessibility improvement priorities and needs.

PUBLIC FACILITIES

“Public Facility” is defined here as any building or other facility owned by the City that is open to the public or houses City departments or private businesses that meet with or conduct business with the public from that location. This does not include parks, trails and sports fields, which are addressed separately in this plan (page 13).

The City of Vancouver initially surveyed its public facilities after the ADA went into effect in 1992. Since then, it has regularly updated and maintained these survey results, and conducted an aggressive program of repair, renovation and relocation to correct many identified barriers and deficiencies.

The City of Vancouver adopted the International Building Code as its building code in 2004, which includes provisions ensuring accessibility for people with disabilities. The City also uses the Americans with Disabilities Act Guidelines for Building and Facilities (ADAAG) and the ADA Standards for Accessible Design in the design and construction of its facility improvements and construction projects.

Since the first ADA facility surveys were conducted in the 1990s and early 2000s, the City has made improvements to several of its buildings built before 1992, sold other non-compliant buildings and relocated most of its important public services into ADA compliant buildings.

Public Facilities Owned or Operated by the City of Vancouver (2012)

Name	Location (Vancouver, WA)
Amtrak Station*	1301 W. 11 th St.
Brookside Utilities Complex	2323 NE General Anderson Ave.
Blue Building/Records Warehouse	615 W. Sixth St.
City Hall	415 W. Sixth St.
Clark County Historical Museum*	1511 Main St.
Covington House*	4115 Main St.
Esther Short Building✓	610 Esther St.
Esther Short Commons+	505 W. Eight St., 710 Esther St. & 720 Esther St.
Fire Station #1	900 W. Evergreen Blvd.
Fire Station #2◇	400 E. 37 th St.
Fire Station #3◇	1110 N. Devine Rd.
Fire Station #4	6701 NE 147 th Ave.
Fire Station #5	7110 NE 63 rd St.

Fire Station #6	3216 NE 112 th Ave.
Fire Station #7	12603 NE 72 nd Ave.
Fire Station #8	213 NE 120 th Ave.
Fire Station #9	17408 SE 15 th St.
Fire Station #10	1501 NE 164 th Ave.
Firstenburg Community Center	700 NE 136 th Ave.
Ft. Vancouver Regional Library – Operations	1007 E. Mill Plain Blvd.
Fruit Valley Neighborhood Center	3202 Unander St.
Marine Park Engineering Building	4500 SE Columbia Way
Marshall House*	1101 Officer’s Row
Marshall & Luepke community centers	1009 E. McLoughlin Blvd.
Old Slocum House*	W. Sixth Street & Esther Street
Operations Center	4711 E. Fourth Plain Blvd.
Parking lot #1 – Smith Lot	501 Washington St.
Parking lot #2 – Evergreen & Broadway	915 Broadway St.
Parking lot #5 – Park ‘n Go West Coast Bank	500 Broadway St.
Parking lot #9 – Main Place	1111 Main St.
Parking lot #10 – Riverview Tower	900 Washington St.
Parking lot #11 – 11 th & Broadway	1100 Broadway St.
Parking lot #18 – Park ‘n Go Vancouver Center	601 Columbia St.
Parking lot #20 – Esther Short Building	610 Esther St.
Pearson Field	101 E. Reserve St.
Pearson Air Museum	1115 E. Fifth St.
Police Dept. – East Precinct	520 SE 155 th Ave.
Police Dept. – Headquarters	605 E. Evergreen Blvd.
Police Dept. – West Precinct	2800 Stapleton Rd.
Police Evidence Building	2325 W. Mill Plain Blvd.
Vanco Golf Driving Range	703 N. Devine Rd.
Vancouver Landing amphitheater	100 Columbia St.
Vancouver Tennis Center	5300 E. 18 th St.
Water Resources Education Center	4600 SE Columbia Way
Webber Machine Building	400 Columbia St.
West Side Water Treatment Plant	1800 Kotobuki Way

- * Historic building
- ◇ Limited/emergency only public access
- ✓ Leased to non-City businesses/organizations
- ✚ Owned by the Vancouver Housing Authority
- ✕ Owned by the National Park Service
- ⊙ Owned by Vancouver Public Schools

Of these 46 public facilities, only 14 (30%) have one or more identified ADA deficiencies. These deficiencies are included in this plan, along with estimated completion time frames and costs, starting on page 15.

Project Prioritization

The City prioritizes its ADA facility improvement projects based on how much public use the facility receives and the types of services it houses. The facilities with identified deficiencies that are currently the highest priority are:

- Fire Station #1 (900 W. Evergreen Blvd.)
- Operations Center (4711 E. Fourth Plain Blvd.)
- Vancouver Tennis Center (5300 E. 18th St.)

The City is committed to bringing all its facilities into full compliance with the ADA as soon as possible, based on available funding and other resources.

The City of Vancouver has over 500 miles of public streets and 5,900 intersections to maintain and upgrade. It has been a priority for the City to improve accessibility for pedestrians and the disabled through the expansion of an accessible sidewalk network. The City has implemented several programs and policies, and developed funding mechanisms to address the tremendous system needs for accessibility, including:

- Ensuring all new transportation capital projects include pedestrian access and meet the current ADA design standards and guidelines
- Completing annual updates of the Transportation Street Standards to address changes and clarifications on ADA design from the federal Access Board and to better incorporate pedestrian facilities
- Providing funding in all pavement management overlay projects for building missing, or repairing existing ADA sidewalk ramps and sidewalks
- Requiring that all new developments and site expansions or improvements include ADA facilities
- Creating an on-going funding source for completing projects identified in the system inventory and to address specific citizen requests
- Adopting a revised Comprehensive Plan with policies that strive to meet the requirements of the ADA (1994, 2004 update, 2011 update)
- Continuing to seek a funding program to complete the projects identified in the Capital Facilities Plan

System Inventory

The City continues to work towards completing a full inventory of sidewalks and curb ramps for all streets in Vancouver. A sidewalk inventory was completed in 2001 as part of the development of City Transportation System Plan. This inventory compiled data from several sources to identify which streets had sidewalk on one or both sides. This inventory was then used to create a database and mapping tool to develop a project needs list and project prioritization. With this information, the City completed a full curb ramp inventory in 2007 and plans to complete a full sidewalk assessment when funding allows.

Sidewalk Inventory and Needs

Out of the 500 miles of roadway in the City of Vancouver, close to 60% have sidewalks on at least one side. Approximately 56% of the arterial street system has sidewalk on both sides of the roadway, and another 18% has a sidewalk on one side. Close to 40% of local streets have sidewalk on both sides, and 15% have sidewalk on one side.

While over half of the City's transportation network has sidewalks, there is still a substantial need for more. Arterial sidewalk projects are included in the City's adopted Transportation Capital Facilities Plan. The total cost to complete all the arterial sidewalk projects included in the City's adopted Transportation Capital Facilities Plan equals \$30 million. The estimated cost to upgrading the local street system to include sidewalks is just under \$100 million.

Curb Ramp Inventory

In 2003, the City of Vancouver hired a private consulting firm to complete a curb ramp inventory for all streets in the City. The inventory included all streets with sidewalks on at least one side and covered both arterial and local streets. Over 1,700 intersections and approximately 7,000 corners were inventoried.

For each intersection, data was collected showing whether or not there were any existing curb ramps, and whether or not existing curb ramps met ADA standards, including slope, lip, ramp width and landing area. This data allowed the City to create a list of missing curb ramps and a list identifying what elements of existing curb ramps were out of compliance. The final results showed:

- 160 arterial roadway intersections are missing at least one curb ramp
- 1,472 curb ramps are missing on local streets
- 485 local street intersections are missing at least one curb ramp
- Approximately 4,000 existing curb ramps in some way do not meet ADA standards

Curb Ramp Project Prioritization

Generally, the City’s primary focus is given to intersections on arterial roadways without existing curb ramps. Subsequently, the following criteria are used to help determine which intersections are completed first:

- Proximity to government facilities
- Streets with higher traffic volumes
- Streets with public transit service
- Streets with pedestrian attractors like schools, parks and shopping
- Proximity to medical facilities
- Improved system connectivity

The City does allow exceptions to the criteria if it helps ensure public safety, is more efficient or maximizes the overall benefit. A list of all identified curb ramp projects, along with estimated costs, is available in this plan, starting on page 15.

Funding

The total estimated cost to make all the curb ramp improvements is \$7.8 million, or \$3.1 million just for the arterial roadways. These figures don’t include other related upgrades, like sidewalk repair, driveway replacement or installation of audible crossing signals.

The City allocates \$50,000 each year for curb ramp improvements and completes as many projects as possible with this funding, based on the ranking of the priority list.

The City also continually looks for and has successfully obtained additional funding for these projects from other sources, including grants from local, state and federal programs, the Neighborhood Traffic Safety Real Estate Excise Tax program and the Neighborhood Action Plan (NAP) program.

PARKS, TRAILS & SPORTS FIELDS

Vancouver-Clark Parks and Recreation (VCPRD) is a consolidated department serving both the City of Vancouver and Clark County. In the City, VCPRD is responsible for:

- acquiring, planning, designing and building new parks, trails and sports fields
- operating and making major improvements to existing parks, trails and sports fields
- providing a variety of recreation classes, camps, programs and activities at the Firstenburg Community Center, Marshall/Luepke community centers, the Vancouver Tennis Center and in local parks and sports fields

The City’s General Services Department is responsible for maintaining the three community centers and the buildings and structures in parks (e.g. restrooms, picnic shelters, water features, amphitheaters, etc.). The City’s General Services and Public Works department are responsible for daily maintenance of the parks, trails and sports fields.

VCPRD designs and builds all its new park construction projects and park improvement projects in accordance with the International Building Code, ADAAG, the ADA Standards for Accessible Design, and the Access Board's draft Outdoor Developed Areas Guidelines. Recent examples of the current accessible design standards used in parks include the new picnic shelter and nature play area at Marshall Community Park, Brickyard Neighborhood Park, the new playground at Hidden Neighborhood Park, West Minnehaha Neighborhood Park, Endeavour School Neighborhood Park, LeRoy Haagen Community Park and MyPark Neighborhood Park.

VCPRD surveyed all its City and County-owned parks, trails and sports fields in 2005 and 2009. In 2011-12, VCPRD conducted an additional self-evaluation survey of all its programs, services and activities, and developed a Transition Plan covering all aspects of the department (Appendix C).

The ADA improvement project list for City-owned parks, trails and sports fields are included in this plan, starting on page 15. The ADA deficiencies identified in the three community centers are included in the "Public Facilities" project list in that same section.

Access to Recreation and Inclusion Program

VCPRD operates the Access to Recreation and Inclusion program, which provides both integrated and separate classes, camps and programs for people with physical and mental disabilities. In 2011, the Access to Recreation and Inclusion program made more than 7,000 accommodations to disabled citizens to encourage participation in a variety of recreation programs offered by VCPRD. In addition, VCPRD offered 257 classes, camps and events designed specifically for people with disabilities in 2011.

MAINTENANCE REQUIREMENTS

Section 35.133 of Title II of the ADA states that:

A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

Additionally, Section 3.2.4.3 of the Access Board's "Accessible Rights of Way: A Design Guide" states that:

Public works departments should respond quickly to citizen reports of damaged surfaces along high-priority routes, so that pedestrians with mobility impairments do not have to seek alternate routes.

Because the City does not have the staff or resources to monitor the condition of all its facilities, roadways and parks on a continual basis, it relies on reports from citizens to facilitate its maintenance efforts. Priority will always be given to maintenance needs that impact safety and accessibility.

It should be noted that within the City of Vancouver, it is the responsibility of the abutting property owner to maintain sidewalks free of defects and obstructions. The City is responsible for maintaining sidewalks abutting the properties it owns (page 10).

To report maintenance problems for City-owned buildings, roads/sidewalks, park, trails or sports fields, please contact the Public Works Operations Center at (360) 696-8177 (Relay: 711), or submit an electronic report on the City website at: www.cityofvancouver.us/OnlineServices/default.asp?cat=81732.

IMPROVEMENT PROJECT LISTS

Following are the lists of identified accessibility improvements projects in four key areas:

- Programs, services and activities
- Public facilities
- Curb ramps
- Parks, trails and sports fields

These lists includes estimated time frames for completion and estimated costs. This list will be updated each year to reflect additions to the list or recently completed projects.

DRAFT

APPENDIX A
SELF-EVALUATION SURVEY:
PROGRAMS, SERVICES AND ACTIVITIES

DRAFT

City of Vancouver

2012 Americans with Disabilities Act Self-Evaluation Survey

Q1: Please identify your department. (Required)

City Manager's Office
City Attorney's Office
Community Development
Financial and Management Services
Fire
General Services
Human Resources
Parks and Recreation
Police
Public Works

Q2: If you have elected to fill out one survey for each branch or division within your department, please identify the branch or division this particular survey will cover.

Q3: Please describe the services, programs or activities your department provides to the public.

Q4: Does your department receive federal funding for any of its services, programs or activities, either in whole or in part?

Yes
No

Q4.1: If yes, does your department have an identified Section 504 Coordinator responsible for ensuring that the federally funded program, service or activity does not discriminate against persons with disabilities?

Yes
No

Q4.1.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q4.2: Comments:

Q5: Does your department provide full and equal access to ALL its services, programs or activities, regardless of ability?

Yes
No
NA

Q5.1: If no, please describe the services, programs or activities that are not fully accessible, why they are not accessible and what, if any, options you provide to qualified individuals with disabilities interested in these inaccessible services, programs or activities.

Q5.2: Comments:

Q6: Does your department's main public access number have an automated phone menu system (i.e. press 1 for...press 2 for...)?

Yes

No

NA

Q6.1: If yes, does the system offer a simple, 1-step way for a caller to bypass the menu and speak directly with a staff person during regular business hours?

Yes

No

Q6.1.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q6.2: Comments:

Q7: What tool(s) does your department use to communicate by phone with people with speech or hearing impairments?

Text telephone (TTY/TDD)

Third-party "Relay" system where a trained operator facilitates a conversation between you and the customer

None

Other (please list)

Q7.1: If none, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q7.2: If text telephone, do your staff receive regular and recurring training/refreshers on how to use the text telephone?

Yes

No

Q7.3: If third-party "Relay" system, do your staff know how to place a Relay call to a customer, as well as receive one?

Yes

No

Q7.2: Comments:

Q8: Does your department provide phones the public may use to make outgoing calls when needed?

Yes

No

NA

Q8.1: If yes, is one of the phones TTY/TDD equipped?

Yes

No

Q8.1.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q8.2: Comments:

Q9: Do all printed materials (e.g. forms, newsletters, brochures, calendars, fact sheets, etc.) provided to the public by your department include instructions about how to request alternate formats?

Yes

No

NA

Q9.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q9.2: Comments:

Q10: What types of alternate document formats can your department provide to the public when requested?

Audio recording (cassette tape or digital)

Enlarged print

Braille

Accessible website (high contrast colors, large fonts, no PDFs and alt text for all photos and graphics)

Email (i.e. sending a document or survey to a person directly if they can't access it on the Web or in person)

Computer disk

None

Other (please list)

NA

Q10:1: Comments:

Q11: How long does it take for your department to respond to a request that a document be provided in an alternate format, on average?

24 hours or less (not including weekends/holidays)

2-5 working days

More than 1 week

Don't know (have not responded to such a request before)

Q11.1: Comments:

Q12: Do all printed or electronic materials about department-sponsored/hosted public events, public meetings or public hearings include instructions about how to request accommodations?

Yes

No

NA

Q12.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q12.2: Comments:

Q13: What types of accommodations can your department provide to the public when requested?

American Sign Language interpreters

Assistive listening devices, like FM transmitters

Real-time open captioning

Electronic/computer-based document readers

Call-in/speakerphone capability during meetings

Other (please list)

NA

Q13.1: Comments:

Q14: How long does it take for your department to respond to a request for accommodations, on average?

24 hours or less (not including weekends/holidays)

2-5 working days

More than 1 week

Don't know (have not responded to such a request before)

Q14.1: Comments:

Q15: Does your department charge fees for providing materials in alternative formats or for providing accommodations to customers with disabilities?

Yes
No
NA

Q15.1: Comments:

Q16: Are promotional or public service videos produced for public viewing about your department or its services captioned for deaf or hard of hearing customers?

Yes
No
NA

Q16.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q16.2: Comments:

Q17: Does your department provide information about any of its services, programs or activities to the public on the Internet?

Yes
No
NA

Q17.1: If yes, is the content of these Web pages fully accessible to people with vision or mobility limitations? For example, do you provide "alternate text" descriptions for all photos, charts and graphics; do Web pages use large fonts and high contrast colors; and do you provide "text rich" versions of PDF documents for people who use screen reading software on their computers?

Yes
No

Q17.1.1: If no, please provide an estimated time frame to correct this deficiency on your department's most popular/most visited Web page(s):

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q17.1.1.1: Please provide an estimated time frame to correct this deficiency on the rest of your department's Web pages:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q17.2: Comments:

Q18: Is a “Notice Under the Americans Disabilities Act” flyer posted in the foyer, reception or front office area of your department? (See example: www.ada.gov/adaidatta.htm)

Yes

No

NA

Q18.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q18.2: Comments:

Q19: Is your department’s staff familiar with the city’s ADA grievance/complaint procedures when an incident of disability discrimination is alleged?

(ADA Grievance Web page: www.cityofvancouver.us/ADA.asp?itemID=36836)

Yes

No

NA

Q19.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q19.2: Comments:

Q20: Are contractors that bid on capital projects or other contractual work for your department required to sign a statement attesting to their intent to comply with the ADA?

Yes

No

NA

Q20.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

Q20.2: Comments:

Q21: When selecting contractors or vendors, does the department use criteria that do not discriminate based on disability?

Yes
No
NA

Q21.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q21.2: Comments:

Q22: When hiring temporary or full-time employees, does your department consistently use selection criteria that do not discriminate based on disability?

Yes
No
NA

Q22.1: If no, please describe why the selection criteria for certain positions would discriminate based on disability (e.g. the applicant must be able to apprehend suspects fleeing on foot, drive a vehicle, lift heavy objects, etc.).

Q22.2: Comments:

Q23: Does your department ensure individuals with disabilities are allowed the opportunity to participate as members of any associated citizen advisory boards or committees?

Yes
No
NA

Q23.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

Q23.2: Comments:

Q24: Are individuals with disabilities now serving on any of your department's advisory boards or committees?

Yes
No
NA

Q24.1: Comments:

Q25: Would your department's staff benefit from additional training on how to provide access to your services and programs for people with disabilities?

- Yes
- No
- NA

Q25.1: If yes, what kind of training or technical assistance would be helpful?

- Developing policies or procedures
- How to work with people with disabilities
- Legal requirements
- How to respond to requests for accommodation (e.g. American sign language interpreters, assisted listening devices, etc.)
- How to provide materials in alternate formats (e.g. Braille, audio recordings, etc.)
- Other (please list)

Q25.2: Comments:

Employee Training – Additional Questions

HRQ1: Does the city offer employees training in working with people who have physical, mental or emotional disabilities, including mobility, speech, visual, hearing, cognitive/learning and psychiatric impairments?

- Yes
- No

HRQ1.1: If yes, how often is the training provided?

- At orientation
- Semi-annually
- Annually
- On request
- Other

HRQ1.2: If yes, who receives the training? (check all that apply)

- All staff (full-time, part-time, temporary & seasonal)
- Salaried staff only
- Management/supervisors
- Customer service representatives/receptionists
- Public safety staff
- Other

HRQ1.3: If no, please provide an estimated time frame to correct this deficiency:

- 1-12 months (short-term)
- 1-2 years (medium-term)
- More than two years (long-term)
- Not sure

HRQ1.3: Comments:

HRQ2: Does the city offer employees training in how to provide materials in alternate formats to those with disabilities (e.g. Braille, audio recordings, accessible Web design, etc.)?

Yes

No

HRQ2.1: If yes, how often is the training provided?

At orientation

Semi-annually

Annually

On request

Other

HRQ2.1.1: If yes, who receives the training? (check all that apply)

All staff (full-time, part-time, temporary & seasonal)

Salaried staff only

Management/supervisors

Customer service representatives/receptionists

Public safety staff

Other

HRQ2.2: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

HRQ2.3: Other comments:

HRQ3: Does the city offer employees training in how to provide special accommodations to those with disabilities (e.g. American Sign Language interpreters, assistive listening devices, etc.)?

Yes

No

HRQ3.1: If yes, how often is the training provided?

At orientation

Semi-annually

Annually

On request

Other

HRQ3.2: If yes, who receives the training? (check all that apply)

All staff (full-time, part-time, temporary & seasonal)

Salaried staff only

Management/supervisors

Customer service representatives/receptionists
Public safety staff
Other

HRQ3.3: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

HRQ3.3: Comments:

Facilities – Additional Questions

FQ1: Does the city own or operate any historic buildings?

Yes
No

FQ1.1: If yes, are any public services, programs or activities provided in these buildings?

Yes
No

FQ1.1.1: If yes, are these buildings accessible to people with disabilities, including any public amenities like restrooms and drinking fountains?

Yes
No

FQ1.1.2: If no, are these services or programs also offered in an alternative, accessible location or using an alternative, accessible method (e.g. online information, audio-visual recording, virtual tour, etc.)?

Yes
No

FQ1.1.3: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)
1-2 years (medium-term)
More than two years (long-term)
Not sure

FQ2.2: Comments:

FQ2: Do alterations to historic properties comply, to the maximum extent feasible, with section 4.1.7 of the Americans with Disability Act Accessibility Guidelines for Buildings and Facilities (ADAAG)?

Yes

No

FQ2.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ2.2: Comments:

FQ3: Does the city ensure that repair or renovation of government facilities completed by in-house staff comply with the accessibility requirements the 2010 ADA Standards for Accessible Design and ADAAG?

Yes

No

FQ3.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ3.2: Comments:

FQ4: Does staff receive regular and recurring training on the ADA requirements for the design, construction and maintenance of public facilities?

Yes

No

FQ4.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ4.2: Comments:

FQ5: Does the city currently have policy or procedures to ensure that programs or services relocated from a damaged/disabled facility on a temporary or permanent basis remain accessible to people with disabilities?

Yes

No

FQ5.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ5.2: Comments:

FQ6: Does the city provide signage at all inaccessible facility entrances directing users to an accessible entrance?

Yes

No

FQ6.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ6.2: Comments:

FQ7: Does city display the international symbol for accessibility at each accessible entrance of a facility?

Yes

No

FQ7.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ7.2: Comments:

FQ8: Do all permanent signs in public areas of the city's facilities use large, readable fonts, non-reflective surfaces and high contrast colors (dark text on a light background, or light text on a dark background)?

Yes

No

FQ8.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

1-2 years (medium-term)

More than two years (long-term)

Not sure

FQ8.2: Comments:

FQ9: Are there visual and audible warning signals in all of the city's facilities to notify sight or hearing-impaired people of an emergency?

Yes

No

FQ9.1: If no, please provide an estimated time frame to correct this deficiency:

1-12 months (short-term)

- 1-2 years (medium-term)
- More than two years (long-term)
- Not sure

FQ9.2: Comments:

FQ10: Does the city have a plan or procedures that describe how to evacuate people with disabilities from public buildings during an emergency?

- Yes
- No

FQ10.1: If no, please provide an estimated time frame to correct this deficiency:

- 1-12 months (short-term)
- 1-2 years (medium-term)
- More than two years (long-term)
- Not sure

FQ10.2: If yes, is there staff in each public facility trained to carry out the instructions in the plan or procedures?

- Yes
- No

FQ10.2.1: If no, please provide an estimated time frame to correct this deficiency:

- 1-12 months (short-term)
- 1-2 years (medium-term)
- More than two years (long-term)
- Not sure

FQ10.2.2: If yes, is the evacuation plan or instructions posted in a visible and accessible area of each floor in all public buildings?

- Yes
- No

FQ10.2.2.1: If no, please provide an estimated time frame to correct this deficiency:

- 1-12 months (short-term)
- 1-2 years (medium-term)
- More than two years (long-term)
- Not sure

FQ10.3: Comments:

Public Works – Additional Questions

PWQ1: Does the city have a citywide pedestrian facilities plan related to future development that addresses accessibility issues?

- Yes

No

PWQ1.1: If yes, please provide a copy of the plan to Jilayne Jordan (Jilayne.Jordan@cityofvancouver.us), for inclusion in the transition plan appendix.

PWQ1.2: Comments:

PWQ2: What percentage of the city's public streets have sidewalks?

PWQ3: What percentage of the city's public streets with sidewalks are accessible (with curb cuts, etc.)?

PWQ4: What percentage of the city's right-of-way that are without sidewalks are accessible (i.e. 36-inch-wide+, accessibly surfaced shoulders).

PWQ4: How does the city respond to complaints about inaccessible sidewalks on public streets?

PWQ5: Which public rights-of-way (sidewalks, shoulders, parking lots, etc.) is the city responsible for keeping free of barriers, instead of the adjacent property owner? (Please list all locations or email a separate list to Jilayne Jordan at Jilayne.Jordan@cityofvancouver.us).

APPENDIX B

CITY OF VANCOUVER EMPLOYMENT POLICIES

Section 101: Equal Employment Opportunity (EEO)

Section 116: Managing Diversity

Section 314: Disability Accommodation

DRAFT

101. EQUAL EMPLOYMENT OPPORTUNITY (EEO)

SCOPE: This policy applies to all employees of the City of Vancouver, unless otherwise addressed by a current collective bargaining agreement or public safety policy.

POLICY: The City of Vancouver is committed to providing equal employment opportunities to all individuals. Therefore, the City will not discriminate in any employment practice on the basis of age, sex, race, creed, political or religious affiliation or opinion, color, national origin, marital status, military status, pregnancy, disability, sexual orientation or any other protected status under applicable law.

GUIDELINES:

1. What are equal employment opportunities?

An equal opportunity employer is one that complies with the various antidiscrimination laws by making employment decisions based on job related qualifications rather than an individual's membership in a protected class. Equal employment opportunity does not require an employer to give preferential treatment to protected groups. Instead, the various federal and state laws designed to protect certain classes of individuals from discrimination generally require employers to provide similar treatment to similarly situated individuals.

2. What is an employment practice?

The term employment practice includes all terms, conditions and privileges of employment. For example, the term includes but is not limited to recruitment, hiring, compensation, benefits, promotion, layoff, performance evaluation, discipline, and termination of employment.

3. Does the City encourage diversity in employment?

Yes. The City conducts recruitment and selection efforts which encourage qualified, diverse candidates to apply for employment with the City. In addition the City has developed a committee to address issues of diversity in areas such as recruitment, selection, career development, training, and promotion.

4. What should an employee do if they feel they have received discriminatory treatment related to employment practices?

Employees should report the situation as soon as possible. The report should be made to any supervisor or manager, Human Resources, the department director or the City Manager's office. The City will then review the circumstances of the incident, gather pertinent information and/or perform an appropriate investigation, and develop a plan for protecting the workplace from any discriminatory treatment.

116. MANAGING DIVERSITY

SCOPE: This policy applies to all employees of the City of Vancouver, unless otherwise addressed by a current collective bargaining agreement or public safety policy.

POLICY: At the City of Vancouver we *respect, support* and *value* diversity with our actions, not just our words.

The primary goal of the City's diversity strategy is for respect for diversity to become part of the fabric of the organization and provide meaning to, and recognition of, the value of individual differences.

DEFINITIONS:

Diversity: *At the City of Vancouver, we understand that everyone views the world differently. Diversity is the uniqueness each individual brings to our organization and community based upon their background and identification with various groups, cultures and perspectives.*

When people think about diversity, they usually think about race, ethnicity, gender, age, religion, sexual orientation—those groups that the discrimination laws have deemed protected classes. Those classes or differences are included in this definition. However, differences are not just based on color of skin or gender. This definition is intended to recognize individual differences, whether they are obvious or subtle—not to the point where it takes in every difference, but those differences that matter in the work environment.

Respect for diversity is:

- Seeing differences as an opportunity to learn about others, about the larger world and about ourselves.
- Having consideration and appreciation for others.
- Creating a positive atmosphere for an open exchange of ideas.

Support for diversity is:

- Integrating respect for diversity into the day-to-day business of the City and the programs that are developed.
- Enabling each employee to achieve his or her full potential.
- Creating a work environment that is inclusive, welcoming and comfortable—where employees feel that the ways in which they may be different are understood and accepted.
- Being a leader in addressing diversity issues that face our community.

Value for diversity is:

- Raising consciousness about and understanding of diversity issues within the community and within the workplace.
- Attaching importance to the diversity of ideas and styles within the working environment; and through collaboration, encouragement and assistance utilizing those ideas and styles to reach a common goal.
- Realizing that each individual's needs are different and unique; learning about and exploring the differences and similarities, and taking the differences into consideration in all business decisions and actions.

Harassment and Discrimination:

Harassment and discrimination issues arise when diversity is not managed well and employees respond in an active and extremely negative manner to their diverse coworkers because of their differences. This policy is about managing diversity before serious problems like harassment and discrimination arise. It focuses on integrating individual differences into the workplace and providing a work environment that values, supports and respects those differences. The City has separate policies that define harassment and discrimination and provide mechanisms for dealing with those issues.

PROCEDURES AND GUIDELINES:

1. What are the expectations for employees relating to diversity?

Employees are expected to show support, value and respect for diversity at the City of Vancouver as follows:

- Support City, department and workgroup efforts in the area of diversity.
- Contribute to a work environment that is respectful, supportive and productive.
- Provide quality service for all internal and external customers. Recognize that customer needs and styles may be different and use creative strategies for providing quality service when necessary.
- Hold themselves and others accountable for the guidelines outlined in this policy.

2. What are the expectations for managers and supervisors relating to diversity?

Managers are expected to show support, value and respect for diversity at the City of Vancouver as follows:

- Provide leadership for diversity efforts and the City's diversity strategy in the workplace.
- Use creative and innovative strategies to make diversity a high priority in the workplace.
- Hold themselves and subordinates accountable for the guidelines outlined in this policy by ensure that policies relating to diversity are implemented and responding appropriately to behaviors that may violate the expectations outlined in this policy. (See also number 5 of the Managing Diversity policy.)
- Integrate diversity issues into the strategic planning process, all aspects of day-to-day business and decision-making, and into customer service strategies.
- Create a working environment that is inclusive, welcoming and comfortable – where employees feel that the ways in which they may be different are understood and respected.

3. What should an employee do if he or she observes or experiences behavior that may be a violation of the expectations outlined in this policy?

Employees should SPEAK UP about concerns or problems that arise relating to diversity issues and/or violation of the guidelines outlined in this policy in one or more of the following ways:

- Speaking directly to the individual(s) involved.
- Obtaining support and assistance from coworkers in any action that you choose to take.
- Speaking to a manager or supervisor about the concern or problem.
- Calling a human resources manager or representative. The human resources staff can act as a liaison between employees and managers to help resolve issues.
- Mediating the concern or problem through the use of City mediation services department or Shared Neutrals.
- Contacting a member of an employee network.
- Sending a message to the MANAGING DIVERSITY mailbox.
- Filing a complaint under the City's Complaint Resolution Policy.

4. What should an employee expect after speaking up about a possible violation of the expectations outlined in this policy?

Employees, supervisors and managers who learn of concerns or problems will take them seriously by:

- Listening to the concern or problem and honoring the employee's point of view.
- Providing answers to general requests for information, as appropriate.
- Exploring possible courses of action for resolving the concern or problem.
- Handling the concern or problem as discreetly as possible. However, the ability to respond depends on the amount of information that the employee is willing to provide.
- Making efforts to assure that there is no retaliation for speaking up about the concern or problem.

5. Does the City Have Any Programs to Promote its Diversity Strategies?

Yes, the City and all departments within the City have formal and informal programs to promote the diversity strategies. For example:

- The Human Resources Department incorporates diversity issues into recruitment and other strategies and assists managers and supervisors to recruit a workforce able to respond to the diverse needs of the community the City serves. However, the city does not have quotas, does not mandate hiring of any specific diverse candidate or applicant from any particular minority group, and does not use diversity as a deciding factor in making hiring decisions. The goal is to hire the candidate who is best qualified for the job.
- The City promotes the retention of all employees, recognizing the different needs and styles of employees.
- The City sponsors Employee Networks. Employee networks are made up of groups of people who share a common characteristic such as race, sexual orientation, religion or disability. The groups meet to discuss work related needs and interests, and provide members a communication channel to senior management.
- The City sponsors regular events or projects relating to diversity issues or designed to recognize different diverse populations.
- The Training and Development program coordinates training on diversity and cultural awareness issues.

6. How will the City assure that the programs outlined in this policy are implemented and remain effective?

The City will regularly review and update diversity projects, policies and guidelines to adapt to the changes within the community and within the workplace, and to assure that the program continues to be effective. This review will be done through:

- A diversity advisory council who will oversee, advise, and assist department diversity committees in the implementation of the City's diversity strategies. The advisory council will establish citywide performance expectations and objectives with annual reviews and updates.
- Individual departments will be responsible for implementation of the objectives established by the advisory council through strategies designed and tailored to fit the unique needs of each respective department.
- Audits will be conducted to assess success of diversity efforts and diversity issues in the workplace.

314. DISABILITY ACCOMMODATION

SCOPE: This policy applies to all employees of the City of Vancouver, unless otherwise addressed by a current collective bargaining agreement or public safety policy.

POLICY: The City of Vancouver is committed to providing a work environment free from discrimination on the basis of disability and provides reasonable accommodations to all qualified applicants and employees with disabilities.

GUIDELINES:

1. Who is a qualified individual with a disability?

A qualified individual with a disability, as defined under state and federal disability discrimination law, is a job applicant or employee who is "qualified" for a job and has a "disability". Qualified means that the individual meets all the necessary requirements for his/her job (such as educational background, job experience, appropriate licensing, etc.) and he/she is able to perform the essential functions of the job with or without reasonable accommodation.

2. What is a disability?

The definition of a disability, as defined under either the state or federal law, is complex. Any questions about what may be defined as a disability should be referred to Human Resources, but in general a disability is defined as follows:

- Disability under the Americans with Disabilities Act (ADA) means that: 1) the individual has a physical or mental impairment and the impairment substantially limits one or more of the individual's major life activities (i.e., ability to read or walk); 2) has a record of such impairment; or 3) is regarded as having such an impairment.
- Disability under the Washington Law Against Discrimination (WLAD) means that the individual has a sensory, mental or physical impairment that is medically cognizable or diagnosable, or exists as a record or history, or is perceived to exist, whether or not it exists in fact.

3. What does it mean to "discriminate"?

To discriminate means to treat someone differently in employment practices on account of his or her disability. Employment practices include, but are not limited to, recruitment, hiring, compensation, benefits, training, promotion, demotion, transfers, layoffs, termination of employment, and any other terms, conditions and privileges of employment.

4. What is a "reasonable accommodation"?

A reasonable accommodation may be provided for a qualified applicant or employee with a disability who is unable to perform essential job functions. A "reasonable accommodation" is any change, modification or adjustment to the manner in which a job or job task is normally performed which enables an employee with a disability to perform the essential functions of the job.

5. Can an applicant or employee request a reasonable accommodation?

Yes. Any applicant or employee who believes that he or she needs a reasonable accommodation because of a disability should submit a request for an accommodation to his/her immediate supervisor, the Department Director or Human Resources either in writing or in person. The City will then engage in an interactive process with the applicant or employee to determine whether a reasonable accommodation should be provided.

6. What will the City do with information obtained during a reasonable accommodation analysis?

Any information obtained during the analysis of whether a reasonable accommodation should be provided to an applicant or employee will be treated as confidential and will be kept in locked medical files and will be shared only with the employee's written authorization or on a need to know basis.

APPENDIX C VANCOUVER-CLARK PARKS AND RECREATION 2012 ADA TRANSITION PLAN

For more information about this transition plan, please visit this Web page:
www.cityofvancouver.us/parks-recreation/whoweare/accessibility.asp.

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**APPENDIX D
VANCOUVER-CLARK PARKS & RECREATION
INCLUSIVE RECREATION POLICY**

DRAFT

INCLUSIVE RECREATION

Under the guidelines of the Americans with Disabilities Act (ADA), it is the intent of the Vancouver Clark Parks and Recreation Department to include people of all abilities in recreation programs and activities of their choice. Every reasonable attempt will be made to accommodate individuals with disabilities to allow them to have a safe, enjoyable experience. Participants are expected to abide by the guidelines in the standard activities behavior policy. All reasonable accommodations will be in accordance with the guidelines of the ADA. Examples of accommodations could be a sign language interpreter, Braille print copies, a staff assistant(mentor), adaptive equipment, etc.

The following steps are necessary when a customer requests special accommodations:

- ❖ Using the parks and recreation brochure as a guide, determine which activity(s) you wish to participate in, contacting a customer service representative at any of the recreation centers if you have questions/want to register or register on line at www.vanclarkparks-rec.org.
- ❖ Request an inclusion form at any parks and recreation office, or online at www.vanclarkparks-rec.org. Fill it out and return it allowing two working weeks to have your request filled.
- ❖ In order to qualify for assistance under ADA guidelines an individual must meet the essential eligibility requirements for participation in recreation services with or without reasonable accommodation. This includes the ability to follow directions.

If accommodations and/or alternative information formats are needed in accordance with the ADA, please call 487-7057 at least 10 working days in advance of the registration deadline or event (whichever is earlier). Individuals using teletype equipment (TTY), call 487-7060. The Vancouver Clark Parks and Recreation Department will make every attempt to provide reasonable accommodations, however, failure to request an accommodation within the specified time frame may limit our ability to complete the request.

Vancouver-Clark Parks and Recreation reserves the right to immediately terminate participation in a program if it is deemed necessary by staff.

There is no charge for accommodations unless you are signing up for drop in programs. Drop in programs such as Child Watch, Fitness, Aquatics, and Teen Zones will cost \$11/hour for us to provide one on one staff assistance. Clients requiring personal care must bring their own caregiver or can choose to pay \$16/hour for us to provide staff assistance. The only exception to this policy is summer camps, where funding has been acquired specifically for personal care.

Inclusion Services can be reached at 360-487-7057 or by email at Inclusion.Services@cityofvancouver.us. You can access our forms online at www.vanclarkparks-rec.org.

Forms: Introduction letter
 Polices and Procedures
 Inclusion/ATR Intake Form
 Inclusion Request Form
 Inclusion Evaluation
 Medical-Medication Hold Harmless Release
 Authorization for Self-Administration of Medication

**APPENDIX E
CITY OF VANCOUVER FACILITIES SNOW REMOVAL
LIST**

DRAFT

CITY OF VANCOUVER FACILITIES SNOW REMOVAL LIST

Operations Center	Walks and parking out front
Brookside	Walks, front of utilities office, parking
Tennis Center	Walks and parking
Police - West Precinct	Walks and parking lot
Police Headquarters	Walks and parking lot
Marshall and Luepke	Walks and parking lot
Luepke	East side for SNAP
Museum	Sidewalks and east entrance for elevator
Lot #1 Smith tower	Walks on 5th and Washington, parking lot
Lot # 2 Evergreen and Broadway	Walks on Evergreen and Broadway, parking lot
Lot # 11 Broadway and 11th	Walks on Broadway and 11th, parking lot
Lot # 16 3rd and Washington	Walks on 3rd st, parking lot
Amtrack Station	Walks and platforms. Need to call BNSF for flaggers. 1-800-832-5432
WREC	Walks and parking lots
Marine Park Engineering	Walks and parking lot
Murdock Air Museum	Walks and entrance steps
Firstenburg Center	Walks and entrances
East police precinct	Walks and entrances

APPENDIX F
NOTICE OF PROGRAM & SERVICE ACCESSIBILITY

DRAFT



Notice of Program & Service Accessibility

All programs, services and activities offered by the City of Vancouver, when viewed in their entirety, shall be readily accessible to individuals with disabilities, in accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973.

Employment: The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: Upon request, the City will provide appropriate aids and services for qualified people with disabilities so they can participate equally in the City's programs, services, and activities. This includes providing qualified sign language interpreters, documents in Braille, TTY/Relay telephone systems, and other ways of making information accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City will make all reasonable modifications to ensure that people with disabilities have an equal opportunity to enjoy City programs, services, and activities. The City will not charge individuals with a disability or any group of individuals with disabilities to cover the cost of providing materials in alternate formats or for providing reasonable accommodations. The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Make a Request: Anyone who wishes to request materials in alternate formats or other accommodations in order to participate in a City program, service, or activity, should contact the responsible department or service provider as soon as possible, but no later than 48 hours before a scheduled event.

Complaints that a City program, service, or activity is not accessible to persons with disabilities should be directed to Tim Haldeman, Phone: 360-487-8495 (Relay: 711), or Email: Tim.Haldeman@cityofvancouver.us.



APPENDIX G
SECTION 504 EMPLOYEE INFORMATION &
GUIDELINES

DRAFT



Section 504 of the Rehabilitation Act of 1973 Employee Information and Guidelines

Any City departments or programs receiving federal funding must comply with Section 504 of the Rehabilitation Act of 1973, in addition to Title II of the Americans with Disabilities Act of 1990. The two laws are similar in content and aim, which is to ensure that people with disabilities are given equal access to public facilities, programs, services and activities.

Section 504, however, applies additional requirements to any organization, agency or program that receives federal funding. This document will explain what these requirements are and how to fulfill them.

24 CFR Part 8 of Section 504 states:

“No otherwise qualified individual with a disability in the United States...shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance or under and program or activity conducted by any Executive agency or by the United States Postal Service.”

Section 504 regulations define “recipient” as any public or private agency, institution, organization or other entity, or any person, to which federal financial assistance is extended for any program or activity, either directly or through another recipient.

Section 504 covers all programs, services and activities of any City department or program that received federal financial assistance, including:

- Outreach and public contact, including contact with program applicants and participants
- Eligibility criteria
- Application process
- Admission to a program
- Tenancy, including eviction
- Service delivery
- Employment policies and practices

Actions Prohibited by Section 504

- Denying a qualified individual with disabilities the opportunity to participate in, or benefit from, the housing, aid, benefit or service.
- Failing to afford a qualified individual with disabilities the opportunity for equal participation and benefit.

- Failing to provide a qualified individual with disabilities a program or service that affords the same opportunity to benefit as that afforded others.
- Providing different or separate housing, aid, benefits or services on the basis of disability unless doing so is necessary to provide housing or benefits that are as effective as that provided to persons without disabilities.
- Providing significant assistance to an agency, organization or person that discriminates on the basis of disability in any aspect of a federally funded activity.
- Denying a qualified individual with disabilities the opportunity to participate as a member of a planning or advisory board associated with the federally funded department or program.
- Providing programs or services to qualified individuals with disabilities in settings that are unnecessarily separate, segregated or restricted.

City of Vancouver departments or programs receiving federal funding shall:

- Take steps to ensure effective communication with applicants, beneficiaries and members of the public.
- Take steps to ensure that employment activities for federally funded or supported jobs, do not discriminate on the basis of disability.
- Ensure all non-housing programs are operated in a manner that does not discriminate on the basis of disability, and that new construction and alterations to non-housing facilities are made accessible in accordance with federal, state and local standards.
- Operate existing housing programs in a manner that does not discriminate on the basis of disability, and take steps, as needed, to ensure that existing housing programs are readily accessible to and usable by persons with disabilities. Develop and implement a transition plan to assure compliance.
- Provide reasonable accommodations necessary for a person with a disability to use or participate in the program, service or activity; unless the recipient can demonstrate that the accommodation will result in an undue financial or administrative burden or a fundamental alteration in the nature of the program, service or activity. Reasonable accommodations include, but are not limited to, modifications to buildings or other facilities, and may also include providing auxiliary aids, such as readers, interpreters and materials in alternate formats.
- Pay for reasonable accommodations needed by an individual with disabilities unless providing that accommodation would be an undue financial or administrative burden or would fundamentally alter the program.
- Ensure that all new construction is readily accessible to and usable by people with disabilities, and meets the requirements of applicable accessibility standards. This could include an accessibility checklist that plan reviewers, designers or construction inspectors must fill out before and after construction.
- Ensure that any improvements made to existing facilities or buildings are readily accessible to and usable by people with disabilities, and meets the requirements of applicable accessibility standards.
- Designate a Section 504 Coordinator if they have 15 or more employees who will ensure the federally funded programs, services or activities meet the requirements of Section 504, adopt a grievance procedure to effect due process standards and prompt and equitable resolutions of complaints.
- Notify participants, beneficiaries, applicants and employees of their nondiscrimination provisions if they have 15 or more employees (i.e. Notice of Program Accessibility statement on Web pages or application materials).

- Maintain records and reports of efforts to meet the requirements of Section 504, and keep these records on file so they are available if a complaint is filed or if a federal funding agency conducts a compliance review.

The Section 504 Coordinator

Any City department or division with 15 or more employees that receives federal funding must designate a Section 504 Coordinator from amongst its staff. This person should be directly involved with the program or activity that receives the federal funding, and have the authority to recommend and implement changes to the way the program or activity is operated or administered, as needed.

Qualifying City departments or divisions shall provide the name and contact information of their Section 504 Coordinator to the City's ADA Coordinator, along with a short description of their federally funded program or activities, within 30 days of receipt of federal funding, or within 30 days of reviewing these guidelines.

Section 504 Coordinator Responsibilities

- Assure that respective departments comply with all grant requirements by developing and implementing appropriate monitoring and review processes.
- Create complaint procedures and ensure that they are communicated to the public, employees and service recipients.
- Ensure that information about the program or service accessibility is provided to all participants, beneficiaries, applicants and employees (Notice of Program Accessibility).
- Assure that sub-recipients comply with all grant requirements and that sub-recipients have complaint and compliance procedures of their own in place.
- Investigate complaints related to their department's federally-funded programs or services, as well as complaints filed against sub-recipients, consultants and contractors.
- Serve as the department/program liaison with granting agencies on compliance issues, including on-site compliance monitoring activities.
- Work with the City ADA Coordinator as needed when a grant requires ADA compliance.
- Maintain all related files and reports.

City ADA Coordinator Responsibilities

- Assist individual department or program Section 504 Coordinators with ADA compliance issues relative to the requirements of a federal grant or funding agency.
- Direct complaints and inquiries regarding federally funded programs or services to the appropriate City department.
- Assist Section 504 Coordinators with complaints and investigations as needed.
- Prepare ADA accessibility surveys and materials for Section 504 inspections.
- Assist with Section 504 inspections when requested.
- Serve as a resource on ADA issues.

Contractor Assurance of Compliance

Contractors, sub-contractors and other entities participating in Section 504 programs will be required to show compliance with the ADA and Section 504 regulations. The City is required to provide contractors with assurance of compliance documentation, including:

- General information about Section 504 and the ADA
- ADA self-evaluation questionnaire
- Checklist for readily achievable barrier removal
- Assurance of compliance form
- Corrective action plan
- Notice to program applicants

Notice to Participants and Applicants

Where possible, Section 504 Coordinators will distribute and post a notice to applicants and participants, that the program, service or activity is federally funded and must meet the mandates of Section 504 and the ADA. This notice may be posted on Web pages/websites for the department or programs, and/or on informational and application materials for the program or service.

Complaints

Persons with disabilities who believe they have been subjected to discrimination may file a complaint with the City department that manages or administers the federally-funded program, the City ADA Coordinator, the U.S. Department of Justice and/or the U.S. Department of Housing and Urban Development (when discrimination in housing is alleged).