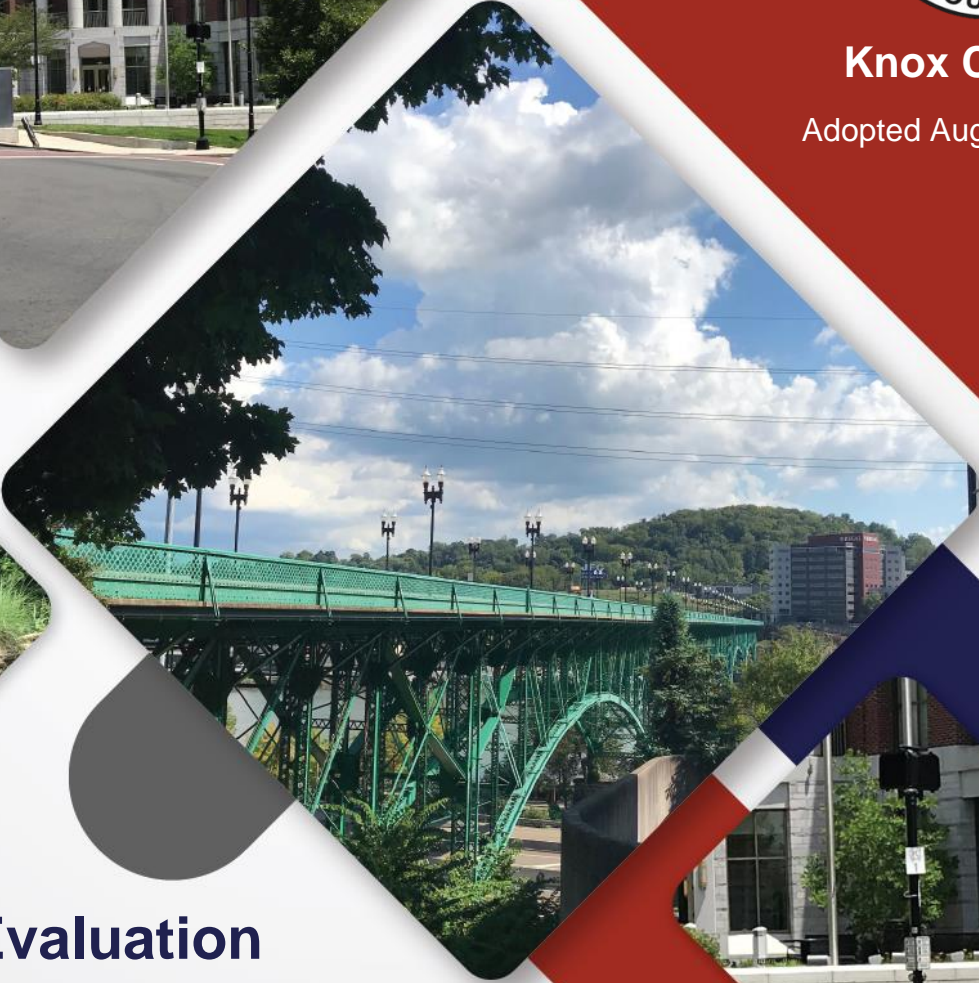




Knox County

Adopted August 2019



ADA Self-Evaluation and Transition Plan

Prepared by:

Kimley»Horn

214 Oceanside Drive Nashville, TN 37204

In Association with:





Table of Contents

Abbreviations.....	vi
1.0 Introduction.....	1
1.1 Legislative Mandate.....	1
1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process	1
1.3 Discrimination and Accessibility.....	1
1.3.1 Physical Barriers	2
1.3.2 Programmatic Barriers	2
1.3.3 Ongoing Accessibility Improvements	2
1.3.4 Knox County Approach	2
1.3.5 Definitions.....	3
2.0 Public Outreach	5
2.1 Disabilities Advisory Group.....	5
2.2 Public Meeting.....	5
3.0 Self-Evaluation and Summary of Findings	7
3.1 Programs, Procedures, and Policies Review.....	7
3.1.1 Departmental Surveys and Interviews.....	8
3.1.2 Department-Specific Information.....	9
3.1.3 ADA/504 Coordinator (Title I / Title II)	40
3.1.4 Roles and Responsibilities of the ADA/504 Coordinator	40
3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act.....	41
3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form.....	42
3.1.7 Service Animal Guidance.....	43
3.1.8 ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act.....	44
3.1.9 Retaliation or Coercion Policy	45
3.1.10 Non-Discrimination Language.....	45
3.1.11 Public Notice Under the ADA.....	46
3.1.12 Title II/504 ADA Assurances	47
3.1.13 Alternate Format Policy, Procedure, and Request Form.....	47
3.1.14 Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos.....	48
3.1.15 Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I)	48
3.1.16 ADA Compliance Team.....	48
3.1.17 Employment Practices Review.....	49
3.1.18 Job Description Review.....	53
3.1.19 Emergency Management Plan Review	54
3.1.20 County Ordinance Review	56
3.1.21 Previous ADA Complaints (Title I & II) Review.....	59
3.2 Programs, Services, and Activities Review.....	60
3.2.1 Boards, Commissions, Committees, and Councils Review.....	60
3.2.2 Documents, Forms, and Videos Reviewed	62
3.2.3 Cursors Website Review.....	63



3.2.4	Non-Discrimination Language for Contracts, Agreements, and Waivers	64
3.2.5	Design Standard Review.....	64
3.2.6	Effective Communication Efforts and Policy.....	65
3.3	Facilities Review	66
3.3.1	Buildings.....	66
3.3.2	Parks.....	67
3.3.3	Greenways.....	67
3.3.4	Signalized Intersections	68
3.3.5	Sidewalk Corridors.....	70
3.4	Maintenance Versus Alterations	73
3.5	FHWA Guidance on Closing Pedestrian Crossings.....	74
3.6	Prioritization.....	75
3.6.1	Prioritization Factors for Facilities	75
3.7	Conclusion.....	83
4.0	Facility Costs	85
4.1	Facilities Cost Projection Overview	85
4.2	Implementation Schedule	86
4.3	Funding Opportunities	86
4.3.1	Federal and State Funding.....	86
4.3.2	Local Funding.....	89
4.3.3	Private Funding.....	89
4.4	Next Steps.....	89



Appendix 91

Appendix A: Departmental Survey and Interview Finding Summaries

Appendix B: Grievance Procedure

Title I Grievance Procedure

Title I Grievance Form

Title II Grievance Procedure

Title II Grievance Form

Appendix C: Programs, Services, and Activities Review

Public Notice

Roles and Responsibilities of the ADA/504 Coordinator

Job Description Review

Equivalent Language Guidance

Documents, Forms, and Videos Review

Cursory Website Review

Alternate Format Policy, Procedure, and Request Form

Sample Accessibility Checklist for Tours and Events

Appendix D: Facility Lists

Libraries

Senior Centers

PBA Managed / Other Facilities

Solid Waste Centers

Elementary Schools

Middle Schools

High Schools

Non-Traditional Schools

Other Programs / Department Facilities

Parks

Greenways

Signalized Intersections

Appendix E: Facility Maps

Libraries

Senior Centers

PBA Managed and Other Facilities

Solid Waste Centers

Schools

Other Programs and Department Facilities

Parks

Greenways

Signalized Intersections

Sidewalk Corridors

Appendix F: Facility Reports

Libraries

Library Buildings

Library Sidewalks

Library Unsignalized Intersections

Senior Centers

Senior Center Buildings

Senior Center Sidewalks



Senior Centers Unsignalized Intersections
PBA Managed / Other Facilities
PBA Managed / Other Facilities
PBA Managed / Other Facility Sidewalks
PBA Managed / Other Facility Unsignalized Intersections
Solid Waste Centers
Solid Waste Center Buildings
Solid Waste Center Sidewalks
Solid Waste Center Unsignalized Intersections
Schools
School Buildings
School Sidewalks
School Unsignalized Intersections
Other Programs / Department Facilities
Other Programs / Department Facilities
Other Programs / Department Facility Sidewalks
Other Programs / Department Facility Unsignalized Intersections
Parks
Park Amenities
Park Sidewalks
Park Unsignalized Intersections
Greenways
Greenway Amenities
Greenway Sidewalks
Greenway Unsignalized Intersections
Public Rights-of-Way
Signalized Intersections
Public Rights-of-Way Sidewalk
Public Rights-of-Way Unsignalized Intersections

Appendix G: ADA Action Log



List of Tables

Table 1. Summary of Buildings Reviewed	66
Table 2. Summary of Curb Ramp Issues at Signalized Intersections	69
Table 3. Summary of Push Button Issues.....	70
Table 4. Summary of Curb Ramp Issues at Unsignalized Intersections	72
Table 5. Prioritization Factors for Buildings/Parks/Greenways	76
Table 6. Prioritization Factors for Signalized and Unsignalized Intersections.....	77
Table 7. Prioritization Factors for Sidewalk Corridors	78
Table 8. Prioritization Summary Signalized Intersections	79
Table 9A. Prioritization Summary for Building Sidewalk	79
Table 9B. Prioritization Summary for Park Sidewalk.....	80
Table 9C. Prioritization Summary for Greenway Sidewalk.....	80
Table 9D. Prioritization Summary for Public Rights-of-Way Sidewalk Corridors	80
Table 10A. Prioritization Summary for Building Unsignalized Intersections	81
Table 10B. Prioritization Summary for Park Unsignalized Intersections	81
Table 10C. Prioritization Summary for Greenway Unsignalized Intersections.....	82
Table 10D. Prioritization Summary for Public Rights-of-Way Unsignalized Intersections.....	82
Table 11. Summary of Facility Costs.....	85
Table 12. Implementation Schedule	86
Table 13. Funding Opportunities	88

List of Figures

Figure 1. Maintenance versus Alteration Projects.....	74
---	----



Abbreviations

ADA – Americans with Disabilities Act

AFF – Above Finish Floor

ASTM – American Society for Testing and Materials

CFR – Code of Federal Regulations

CIP – Capital Improvement Projects

DOJ – United States Department of Justice

EITA – Electronic and Information Technology Accessibility

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices

PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Program, Services, and Activities

WAVE – Web Accessibility Evaluation Tool



1.0 Introduction

1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

Knox County has undertaken a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

Knox County is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the County and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title II has the broadest impact on the County. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of Knox County's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 40 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the County's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.

1.3 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.



The following are examples of elements that should be evaluated for barriers to accessibility:

1.3.1 Physical Barriers

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.3.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for County sponsored events

1.3.3 Ongoing Accessibility Improvements

County PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the County's website for review and consideration by the public.

1.3.4 Knox County Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to Knox County's programs, services, and activities within a reasonable timeframe. The County's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Knox County residents seek to enjoy, and guides future improvements. This Plan has been prepared after careful study of all the County's programs, services, activities, and evaluations of a select number of County facilities.

Knox County should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the County can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. Knox County will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.



1.3.5 Definitions

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

Auxiliary Aids and Services

Auxiliary aids and services include:

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

Disability

The term disability means, with respect to an individual:

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

Complaint

A complaint is a claimed violation of the ADA.

Physical or Mental Impairments

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

The following conditions are not physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

Regarded as Having a Disability

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



Reasonable Modification

If an individual's disability prevents him or her from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable this individuals to perform the essential functions of the program or activity.

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

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

Modification includes making existing facilities and equipment used by individuals readily accessible and by individuals with disabilities. Modification applies to known disabilities only. Modification is not required if it changes the essential nature of a program or activity of the person with a disability, it creates a hazardous situation, adjustments or modifications requested are primarily for the personal benefit of the individual with a disability, or it poses an undue burden on the County.

Substantial Limitation of Major Life Activities

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

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

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

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

Qualified Individual with a Disability

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



2.0 Public Outreach

2.1 Disabilities Advisory Group

Knox County recognizes the importance of obtaining feedback on the ADA Advisory Plan. As part of that process DAGWould? will be the operating name of the group. The Dagwood sandwich is known for its size, number of meats, cheeses and condiments. The sandwich is always topped with an olive that has a toothpick inserted in it. Like the Dagwood sandwich, this ADA Transition Plan is complex in that it has many parts and priorities. It will take a long time to implement this plan as the costs are quite high. The olive with the toothpick represent the top priorities. For this group, the DAG is simply “Disabilities Advisory Group”. The “Would?” completes the question of “What would the Disabilities Advisory Group advise?” Below is the proposed logo.



DAGWould?

Knox County has been making contacts with various local disability organizations to find people who will be willing to serve on DAGWould? It is Knox County’s intent to have nine (9) members in the advisory group who are appointed by the Mayor, subject to approval by Knox County Commission. Each of the nine (9) members will have submitted information regarding the organization they represent; the disability/population they represent; their years of experience with disability; and a statement about why they would like to serve.

2.2 Public Meeting

Findings from both program, services, and activities reviews and the facility reviews will be presented to the Knox County Commission in Summer 2019. As always, Knox County Commission meetings are both advertised and public. Knox County will take steps to ensure that this meeting topic will be well advertised.



[Page intentionally left blank]



3.0 Self-Evaluation and Summary of Findings

Knox County's Americans with Disabilities Act (ADA) Transition Plan reflects the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The review identifies programmatic barriers to individuals with disabilities interested in accessing the programs, services, and activities offered by the County.

3.1 Programs, Procedures, and Policies Review

Under the ADA, Knox County is required to complete a Self-Evaluation of the County's facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the County's programs, services, and activities, as well as the policies and practices the County uses to implement its various programs and services.

To comply with requirements of the plan, the County must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

- (1) Relocation of programs to accessible facilities;
- (2) Modifications to existing programs so they are offered in an accessible manner;
- (3) Structural methods such as altering an existing facility;
- (4) Policy modifications to ensure nondiscrimination; and
- (5) Auxiliary aids provided to produce effective communication.

When choosing a method of providing program access, the County should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

Programs, services, and activities offered by the County to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the County does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator and/or an authorized designee of the County, such as the County Mayor or his designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the County must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.



3.1.1 Departmental Surveys and Interviews

The interactive survey process was conducted following the review of the County's website. Programs, services, and activities questionnaires were submitted to each County department. The questionnaires were tailored to the PSAs offered by each department and used to finalize the determination of ADA compliance for each department's PSA. The responses were reviewed and possible solutions for issues identified have been integrated throughout the ADA Transition Plan. See **Appendix A** for copies of the completed Departmental Survey and Interview Findings Summaries in their entirety.

Survey of All Departments: Self-Evaluation Findings

- Most department contacts are aware that ADA obligations exist. However, they were not aware of the specific requirements.
- Department contacts were unaware of a County-wide ADA grievance policy and procedure. However, all County staff were aware of the County's general grievance policy and procedure, which does not specifically address ADA Title I or Title II.
- Most department contacts were unsure if the County has a reasonable accommodation policy and procedure.
- Most department contacts were unsure if the County has a process on how to obtain alternate formats of County documents or the types of formats available.
- Most department contacts were unsure if the County has a public notice under the ADA. This notice is required by all Title II entities regardless of their size and is required to be publicized on an ongoing basis.
- ADA specific training is not a common practice throughout the County.
- Departments do not have an ADA Liaison, and departments are not aware of ADA obligations. ADA Liaisons should attend annual ADA training so they are aware of their roles and responsibilities in their department.
- Department contacts were unaware of policies and procedures or guidelines in place regarding ADA compliant purchasing and procurement.
- Most department contacts indicated they do not use ADA checklists to ensure ADA compliance.
- Most department contacts were unaware of a County-wide non-discrimination statement that is required to be included in all information distributed by the County.
- The County has an emergency management plan for the public. However, it is unknown if they have an emergency evacuation plan for employees and visitors.

Survey of All Departments: Possible Solutions

The possible solutions associated with each of the departmental surveys and interviews have been incorporated into **Sections 3.1.2 – 3.2.5** of this document, as applicable for all County programs, policies, and procedures.



3.1.2 Department-Specific Information

During the departmental survey and interview process, additional information was gathered for each department. A discussion of additional programmatic elements found during the research and evaluation process for each department is included in the following section.

Air Quality Management Division

Air Quality Management Division: Self-Evaluation Findings

- Training regarding ADA was provided for one supervisor in the Division. However, all Division employees have not received ADA training.
- The Department does not currently have an alternate format policy and procedure in place.

Air Quality Management Division: Possible Solutions

- Division employees should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Division should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.

Benefits Department

Benefits Department: Self-Evaluation Findings

- The Department provides new employee orientation upon hire. Department staff works with contracted benefit providers to help identify any special services an employee may need, but ADA specific information is not provided.
- The Department uses an Employee Assistance Program to provide work-life balance services. However, the Knox County Employee Manual does not provide information on the ADA services the program offers.
- The Department contracts with Humana/Go365 for the County's wellness program. The contract with Humana/Go365 contains ADA requirements. Employees receive individualized wellness plans based on their needs and can obtain the highest level of benefits, including preferred insurance premiums, from the program without completing any physical requirements. However, information on how to request an accommodation for the wellness program is not readily accessible.



Benefits Department: Possible Solutions

- The Department should integrate ADA specific information into the new employee orientation program. This training should include information regarding the Employee Assistance Program ability to assist with ADA services and information on Humana/Go365's accommodations process. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would provide guidance to employees regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. The new employee orientation program should also include policies and procedures developed from this Transition Plan process within the Knox County Employee Handbook. For possible solutions regarding these personnel rules, see **Section 3.1.17 Employment Practices Review**.
- The Department should include information in the Employee Assistance Program section of the Knox County Employee Handbook that the program can provide ADA resources for employees.
- The Department should add information to the Knox County Employee Handbook regarding the County's wellness program. Information should include details about the program including contact information for requesting accommodations.

Codes

Codes Office: Self-Evaluation Findings

- Some staff have received training on code compliance as it relates to ADA and two staff members have attended ADA training with the City of Knoxville Disability Services. However, all Division employees have not received ADA training.
- The Office does not use ADA checklists when conducting plan reviews or inspections.
- The Office does provide assistance to citizens when needed. However, they do not have an alternate format policy and procedure.
- The Office manages complaints using the constituent records management system. However, there is not a formal process to report any ADA related complaints to the County's ADA/504 Coordinator.

Codes Office: Possible Solutions

- Division employees should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The County should develop ADA specific requirements for design consultants to follow when working on a project that include ADA elements. These requirements should include training on PROWAG requirements and County expectations. While this is not an ADA specific requirement, this is recommended to ensure that consultants take responsibility and are designing ADA elements within the County in ADA compliance.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.



Codes Office: Possible Solutions (cont.)

The Division should develop a procedure to refer any complaints received by the constituent records management system or any other method to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II)**.

Communications Office

Communications Office: Self-Evaluation Findings

- The Office does not have an alternate format policy and procedure in place.

Communications Office: Possible Solutions

- The Communications Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.

Community Development Office

Community Development Office: Self-Evaluation Findings

- The Community Development Office defers to the Mayor's Office for all policies and procedures and does not have formal ADA policies and procedures in place. This includes an alternate format policy and procedure, reasonable modification policy and procedure, non-discrimination statement, and ADA grievance policy and procedure.
- The Office advertises and offers interpreters for Spanish-speaking citizens. However, they do not have a formal policy to offer sign-language interpreters for individuals with disabilities.
- The Office oversees and monitors all HUD housing or rehabilitation projects for ADA accessibility. However, they rely on the Codes Office for ensuring ADA compliance elements. Staff completing inspections have not received ADA training.
- The Office holds Fair Housing Training and other community-wide housing events, but they do not have guidelines in place regarding special events to address ADA compliance.

Community Development Office: Possible Solutions

- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**, the County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**, and the County-wide reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.



Community Development Office: Possible Solutions (cont.)

- The Office should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.

Constituent Services Office

Constituent Services' Office: Self-Evaluation Findings

- The Office does maintain a log for constituent concerns. However, not all issues that relate to ADA are logged and there is no formal tracking of ADA issues as they are addressed.
- The Office holds community-wide outreach meetings but does not have guidelines in place regarding special events to address ADA compliance.

Constituent Services' Office: Possible Solutions

- The Office should develop a procedure to log all constituent concerns and to refer any ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.
- The Office should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.

County Clerk's Office

County Clerk's Office: Self-Evaluation Findings

- Training on ADA was conducted for the Clerk's Office supervisors and managers. However, this training occurred more than three years ago and did not include the entire Clerk's Office staff.
- The Office does not have a standardized ADA non-discrimination statement that is used on all publications including council meeting minutes and agendas.
- The Office does not have an alternate format policy and procedure in place.
- The Office is responsible for creating and maintaining their employee handbook, employment practices, and job descriptions.

County Clerk's Office: Possible Solutions

- The Knox County Clerk's Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.



County Clerk's Office: Possible Solutions (cont.)

- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Office should update and maintain their employee handbook and job descriptions in accordance with ADA standards. For possible solutions regarding the Clerk's Office employment practices and job descriptions, see **Section 3.1.17 Employment Practices Review** and **Section 3.1.18 Job Description Review**.

Knox County's Clerk Employee Handbook Review: Self-Evaluation Findings

- The Clerk's Equal Employment Opportunity Policy does contain a non-discrimination statement. However, it should reflect the County's non-discrimination statement.
- The Equal Employment Opportunity Grievance Procedure – This section is a general grievance procedure and is not specific to an ADA grievance policy and procedure for Title I.
- The Americans with Disability Act – This section mentions reasonable accommodations. However, it does not specify the actual reasonable accommodation policy and procedure.
- Promotions, Transfers, and Reassignments – This section mentions filling job vacancies on an equal opportunity basis, but it does not provide a non-discrimination statement.
- Alcohol and Drugs – This section outlines the Clerk's perspective on alcoholism and drug addictions as illnesses, but it does not provide information on requesting reasonable accommodations.
- No service animal guidance was found.
- No retaliation or coercion policy was found.
- No consistent County-wide non-discrimination statement was found.
- Knox County Hotline – This section provides contact information for employees and the general public to report fraudulent activity. However, no Text Telephone (TTY) contact information is provided.

Knox County's Clerk Employee Handbook Review: Possible Solutions

- The Knox County Clerk's Employee Handbook should be updated upon adoption of new County ADA policies and procedures from this transition plan process.
- The existing non-discrimination statement should be amended to reflect the Knox County non-discrimination statement. See **Section 3.1.10 Non-Discrimination Language**.
- Equal Employment Opportunity Grievance Procedure – This section should also reference the ADA grievance policy, procedure, and form for Title I. An ADA Grievance Policy, Procedure, and Form with Appeals process for Title I was developed as a part of this project. See **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.



Knox County's Clerk Employee Handbook Review: Possible Solutions (cont.)

- The Office should adopt the County's reasonable accommodations policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- Promotions, Transfer, and Reassignments – The Office should include the County's non-discrimination statement. See **Section 3.1.10 Non-Discrimination Language**.
- Alcohol and Drugs – The Office should add information on the County's reasonable accommodation policy to this section. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should adopt the County's guidance regarding service animals. See **Section 3.1.7 Service Animal Guidance**.
- The Office should adopt the County-wide retaliation and coercion policy. See **Section 3.1.9 Retaliation or Coercion Policy**.
- The Office should adopt the County-wide non-discrimination statement policy for Title I and Title II. See **Section 3.1.10 Non-Discrimination Language**.
- Knox County Hotline – The Office should add information on how to contact the hotline using a TTY number.

Courts

Courts: Self-Evaluation Findings

- It does not appear that the Court's employees have received ADA training and are not familiar with the County's ADA policies and procedures.
- The Courts do not appear to have an alternate format policy and procedure in place.
- The Courts do not appear to have a reasonable accommodation or modification policy and procedure in place.
- The Courts do not appear to have an ADA complaint policy and procedure in place for Title I or Title II.
- The Circuit Court and General Sessions Court appear to use a variation of a non-discrimination statement. However, the Courts do not appear to use a consistent County-wide non-discrimination statement.
- It does not appear that the Courts maintain logs of ADA issues, nor do they have a policy and procedure in place to track complaints and report issues to the County's ADA/504 Coordinator.
- It is not clear if the Courts have ADA language in their contracts, agreements, and waivers used for their programs, services, and activities.
- The Courts are responsible for administering their volunteer program. It is not clear if volunteers attend an orientation program or are provided ADA information on their rights and responsibilities.



Courts: Self Evaluation Findings (cont.)

- It is not clear if the Courts are responsible for their hiring practices which include all aspects of employment, onboarding of employees, job evaluations, etc.

Courts: Possible Solutions

- Staff should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Courts should adopt the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Courts should adopt the County-wide reasonable accommodation and modification policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Courts should adopt the adopted County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- The Courts should adopt the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Courts should maintain a log for all concerns or complaints. They should develop a procedure to refer any ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.
- The Courts should work with the Law Director to develop guidelines regarding the reviewing of County contracts, agreements, and waivers for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Courts should integrate ADA specific training into the volunteer process. This training should include information regarding volunteer rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would provide guidance to volunteers regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- The Office should ensure their employment practices align with ADA standards. For possible solutions regarding the employee practices, see **Section 3.1.17 Employment Practices Review**.

District Attorney's Office

District Attorney's Office: Self-Evaluation Findings

- Office staff have not received ADA training and is not familiar with the County's ADA policies and procedures.
- The Office does not have an alternate format policy and procedure in place.



District Attorney's Office: Self-Evaluation Findings (cont.)

- The Office does not have a reasonable accommodation or modification policy and procedure in place.
- The Office does not have an ADA complaint policy and procedure in place for Title I or Title II.
- The Office maintains a separate version of a non-discrimination statement. However, it is not consistent with the County's non-discrimination statement and is not used for information distributed to the public and employees.
- The Office is responsible for their hiring practices which include all aspects of employment, onboarding of employees, job evaluations, etc. The County employees that work for this Office attend the benefits orientation provided by the Knox County Human Resources Department in addition to the Offices' orientation. However, ADA information is not incorporated in the hiring or orientation process.
- The Office is a State of Tennessee office that employs both State and County employees. Most of the Office's job descriptions are established by State Statutes. However, they do not maintain job descriptions for support staff.
- The Office has an internship program. All interns are required to complete an application. They are provided the Knox County District Attorney's Intern Orientation Packet at orientation. The orientation and packet do not include ADA information.

District Attorney's Office: Possible Solutions

- The Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Office should defer to the adopted County-wide reasonable accommodation and modification policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should defer to the adopted County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- The Office should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Office should ensure their employment practices, including the hiring process and employee onboarding, incorporates ADA policies, procedures, and practices adopted in this plan. For possible solutions regarding the employee practices, see **Section 3.1.17 Employment Practices Review**.
- The Office should maintain job descriptions in accordance with ADA standards. For possible solutions regarding the position descriptions, see **Section 3.1.18 Job Description Review**.



District Attorney's Office: Possible Solutions (cont.)

- The Office should integrate ADA specific training into the internship onboarding process. This training should include information regarding intern's rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would provide guidance to interns regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance.

District Attorney's Office Policy Manual Review: Self-Evaluation Findings

- No specific ADA grievance policy and procedure for Title I was found.
- The Americans with Disability Act – This section mentions reasonable accommodations. However, it does not specify the actual reasonable accommodation policy and procedure.
- No service animal guidance was found.
- No retaliation or coercion policy was found.
- No consistent County-wide non-discrimination statement was found.

District Attorney's Office Policy Manual Review: Possible Solutions

- The District Attorney's Office Policy Manual should be updated upon adoption of new County-wide ADA policies and procedures from this transition plan process.
- The Office should adopt the County's ADA grievance policy, procedure, and form for Title I. An ADA Grievance Policy, Procedure, and Form with Appeals process for Title I was developed as a part of this project. See **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- The Office should adopt the County's reasonable accommodations policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should adopt the County's guidance regarding service animals. See **Section 3.1.7 Service Animal Guidance**.
- The Office should adopt the County's retaliation and coercion policy. See **Section 3.1.9 Retaliation or Coercion Policy**.
- The Office should adopt the County-wide Non-Discrimination Statement Policy for Title I and Title II. See **Section 3.1.10 Non-Discrimination Language**.

Engineering Department

Engineering Department: Self-Evaluation Findings

- Some of the Department staff have received ADA training provided by the City of Knoxville. However, they have not received training on ADA obligations under Title I and Title II.



Engineering Department: Self-Evaluation Findings (cont.)

- The Department is aware of the Joint Technical Assistance Memo regarding Title II of the ADA requirements to provide curb ramps when streets, roads, or highways are altered through resurfacing. However, the County has not developed guidelines nor do they plan to implement this memo.
- Department does maintain a complaint log (e-codes) that tracks complaints and resolutions. However, there is no procedure in place to ensure complaints impacting access, such as broken sidewalks, are relayed to the County's ADA/504 Coordinator.
- Knox County has not adopted the Proposed Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG).
- The Department uses TDOT design standards but does not have a policy to ensure consultants and contractors are also referencing the same standards.
- The County does not have ADA specific requirements for design consultants.

Engineering Department: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Department should use the Joint Technical Assistance Memo regarding Title II of the ADA requirements (https://www.fhwa.dot.gov/civilrights/programs/doj_fhwa_ta.cfm) to provide curb ramps when streets, roads, or highways are altered through resurfacing. This guidance from the U.S. Department of Justice should be incorporated into County operations and existing or adopted policies and procedures to ensure past and present projects are being altered in ADA compliance.
- The Department should develop a process to ensure all complaints impacting access are referred to the County's ADA/504 Coordinator. See **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process** and **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.
- While the PROWAG has not yet been finalized, it is recommended that the County formally adopt the PROWAG as a County standard practice and develop ADA specific guidance about PROWAG. This guidance should be used Department-wide and throughout the County, as needed. While adopting PROWAG is not specifically an ADA requirement, it is strongly recommended to ensure ADA compliance within the public rights-of-way.
- The County should develop ADA specific requirements for design consultants to follow when working on a project that includes ADA elements. These requirements should include training on PROWAG requirements and County expectations. While this is not an ADA specific requirement, this is recommended to ensure that consultants take responsibility and are designing ADA elements within the County in ADA compliance.
- The Department should develop policies and procedures or guidance for Department staff to use regarding maintenance of ADA elements within the public rights-of-way. (e.g., snow and ice removal and removal of obstructions from the pedestrian path, etc.) While these policies and procedures or guidelines are not a specific ADA requirement, it is strongly recommended to ensure clarity of responsibility and ensure ADA compliance.



Finance Department

Finance Department: Self-Evaluation Findings

- The Department has not received any ADA training.
- The Department's primary customer base is Knox County, auditors and outside parties requesting information. Information is primarily communicated electronically or by phone. However, they do not have an alternate format policy and procedure in place.

Finance Department: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.

Fire Prevention Bureau

Fire Prevention Bureau: Self-Evaluation Findings

- Bureau staff attend training when it is available. However, training is not provided on a consistent basis, it is not ADA specific, and it is focused on rescues only.
- The Bureau, in partnership with local fire departments, offers facility tours and special events. Currently, the Bureau completes a pre-event site visit to ensure tours and events are as inclusive as possible, but they do not use checklists that ensure ADA compliant events.
- The Bureau does not have guidance in place for staff to use to ensure the Bureau is providing ADA accessible community programs, services, and activities.

Fire Prevention Bureau: Possible Solutions

- Bureau staff should attend annual ADA specific training. This training should include assisting individuals with disabilities, a review of adopted County ADA policies and procedures, service animals, handling the property of persons with disabilities, etc. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees on their rights under the ADA and provide the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- The Bureau should develop and use specific ADA checklists or guidance to ensure that all tours and events are ADA compliant. These checklists or guidance should include information regarding tour operations and facility compliance. While this is not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities and this guidance would provide staff with the necessary tools to ensure ADA compliance. Sample guidance for tours and events can be found at <https://adata.org/publication/temporary-events-guide>.



Fire Prevention Bureau: Possible Solutions (cont.)

- The Bureau should adopt policies and procedures developed from this Transition Plan process to develop specific ADA guidance for staff to use when planning the Bureau's programs, services, and activities. The guidance should include County-wide adopted ADA policies such as providing alternate formats, reasonable accommodations, etc. While this is not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities and this guidance would provide staff with the necessary tools to ensure ADA compliance.

Health Department

Health Department: Self-Evaluation Findings

- The Department has not received ADA specific training. However, the staff is required to take Limited English Proficiency (LEP) training on an annual basis. This training contains information on the Department's procedure to obtain interpreter services for the deaf and hearing impaired.
- The Department does not have a standardized ADA non-discrimination statement that is used on all publications and documents distributed to the public.
- The Department has State of Tennessee compliance information that includes non-discrimination information posted in the lobby of each health department facility. However, they do not have an ADA grievance policy and procedure, a reasonable accommodation/modification policy and procedure, or an appeals process in place.
- The Department does not have guidance in place for staff to use to ensure that the Department is providing ADA accessible community programs, services, and activities.
- The Department has a volunteer and internship program. All volunteers and interns are required to complete an application. They are provided the Knox County Health Department Student Information Packet at orientation. However, the orientation and packet do not include ADA information.

Health Department: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Department should defer to the adopted County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**, and the County-wide reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.



Health Department: Possible Solutions (cont.)

- The Department should use policies and procedures developed from this Transition Plan process to develop specific ADA guidance for Department staff to use to ensure that the Department is providing ADA accessible programs, services, and activities. Guidance should include information on providing alternate formats, providing equal access to Department services or events, etc. While this is not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities and this guidance would provide the Department staff with the necessary tools to ensure ADA compliance.
- The Department should integrate ADA specific training into the volunteer and internship onboarding process. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide volunteers and interns regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.

Human Resources Department

Human Resources Department: Self-Evaluation Findings

- The Department provides new employee orientation upon hire. During the orientation process, new employees are not provided ADA specific training, information regarding their rights and obligations under the ADA, or contact information for the County's ADA/504 Coordinator for Title I or Title II. For self-evaluation findings regarding the employment practices, see **Section 3.1.17 Employment Practices Review**.
- The Department does not provide annual ADA training for employees regarding Title I and Title II.

Human Resources Department: Possible Solutions

- The Department should integrate ADA specific training within the new employee orientation program. This training should include information regarding employee's rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. The new employee orientation program should also include policies and procedure developed from this Transition Plan process within the Knox County Government Employee Handbook. For possible solutions regarding these personnel rules, see **Section 3.1.17 Employment Practices Review**.
- The Department, in conjunction with County's ADA/504 Coordinator for Title I and Title II, should administer annual ADA training for employees. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees regarding their rights under the ADA and the tools needed to ensure ADA compliance.



Information Technology Department

Information Technology Department: Self-Evaluation Findings

- The Department has not received ADA training on County policies or website accessibility. They also do not provide training to County staff regarding website ADA accessibility.
- The Department does not have a disclaimer statement or policy regarding other entities content on the Knox County website.
- The Department does not have a policy regarding Section 508 of the Rehabilitation Act, which requires all electronic and information technologies be accessible. See **Section 3.1.8 ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act**

Information Technology Department: Possible Solutions

- The Department should attend training on website accessibility standards. They should also provide training to all applicable County staff regarding ADA accessible websites. This training should establish guidelines for developing and maintaining ADA compliant department web pages. While training is not a specific requirement of the ADA, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees regarding the ADA and Section 508 of the Rehabilitation Act, as well as the tools needed to ensure ADA compliance.
- The Department should develop a disclaimer statement and policy regarding other entities content on the Knox County website. See **Section 3.1.14 Responsibility/Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos.**
- The Department should develop a Section 508 of the Rehabilitation Act policy, procedure, and form. See **Section 3.1.8 ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act.**

Internal Audit Department

Internal Audit Department: Self-Evaluation Findings

- The Department has not received any ADA training.
- The Department receives allegations for investigation by web submission or phone call. Phone calls are through a third-party administrator, and no Text Telephone (TTY) option is available.
- Only the Department's final reports are subject to public records. However, the Department does not have an alternate format policy and procedure in place to produce records.

Internal Audit Department: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review.**



Internal Audit Department: Possible Solutions (cont.)

- The Department should work with the Law Director and Procurement Office to develop guidelines regarding the reviewing of County contracts for ADA language and obligations such as providing a TTY line for allegations received by phone. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.

KGIS Department

KGIS Department: Self-Evaluation Findings

- KGIS is a tri-party agreement with Knox County, City of Knoxville, and Knoxville Utilities Board in which Knox County oversees all KGIS employees. Employees have been made aware of the ADA provisions for employees outlined in the Knox County Employee Manual, but they have not received any ADA training.
- The tri-party agreement does not contain ADA language that outlines ADA responsibilities.
- KGIS does provide records upon request, but they do not have an alternate format policy and procedure.
- KGIS does maintain a log of application issues with the GIS system and the resolution. However, they do not maintain a formal log for accessibility issues with resolution.

KGIS Department: Possible Solutions

- KGIS staff should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The KGIS tri-party agreement should be revised to include ADA Language and responsibilities. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department should maintain a log for all concerns and complaints as well as develop a procedure to refer any access or ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.



Law and Justice Department

Law Director: Self-Evaluation Findings

- The Law Director reviews County contracts and agreements for ADA language. However, there are no guidelines in place on how to conduct these reviews.
- The Department defers to Knox County or the Courts for all policies and procedures and does not have formal ADA policy and procedure in place. This includes an alternate format policy and procedure, reasonable modification policy and procedure, non-discrimination statement, and ADA grievances policy and procedure.
- The Department does maintain a log if issues that relate to the Office of Civil Rights occur, but there is no process in place to provide the County's ADA/504 Coordinator information on cases involving ADA compliance.

Law Director: Possible Solutions

- The Law Director should develop guidelines regarding the reviewing of County contracts for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Department should adopt the County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**, the County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**, and the County-wide reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Department should develop a process to relay case information involving ADA Compliance to the County's ADA/504 Coordinator, maintain a log for all concerns, and develop guidelines regarding the reviewing of County contracts for ADA language. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.

Jury Coordinator: Self-Evaluation Findings

- Jury summons for all the courts does not contain ADA information.
- Jurors are not provided information on ADA policies including reasonable modifications. However, Circuit Court jurors are advised during orientation that equipment is available for jurors that are hearing impaired.

Jury Coordinator: Possible Solutions

- The Office should add the County-wide Non-Discrimination Statement to all jury summons. See **Section 3.1.10 Non-Discrimination Language**.
- The Office should develop a reasonable modification policy, procedure, and form for Title II. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.



Knox County Probation: Self-Evaluation Findings

- The Department oversees the court-ordered probation program in which some programs have physical requirements to participate. They do not have a reasonable accommodation/modification process in place. However, every effort is made to accommodate everyone referred to their office.
- The Department requires clients to sign waivers before participating in any probation program. However, the waivers do not contain ADA language. Also, the Department does not have contracts, agreements, or waivers with probation program providers that clarifies ADA obligations of the County and provider.

Knox County Probation: Possible Solutions

- The Department should adopt the County-wide reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Department should work with the Law Director to review County contracts, agreements and waivers for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.

Public Defender: Self-Evaluation Findings

- The Public Defender's Office is a State of Tennessee office that employs both State and County employees.
- Office staff have not received ADA training and is not familiar with the County's ADA policies and procedures.
- The Office does not have an alternate format policy and procedure in place.
- The Office does not have a reasonable accommodation or modification policy and procedure in place.
- The Office does not have an ADA complaint policy and procedure in place for Title I or Title II.
- The Office maintains their version of a non-discrimination statement. However, it is not consistent with the County's non-discrimination statement and is not used for information distributed to the public and employees.
- The Office is responsible for their hiring practices which include all aspects of employment, onboarding of employees, job evaluations, etc. The County employees that work for this Office attend the benefits orientation provided by the Knox County Human Resources Department in addition to the Offices' orientation.
- Most of the Office's job descriptions are established by State Statutes. However, they do not maintain job descriptions for support staff.
- The Office has a volunteer program. All volunteers are required to complete an application. They are provided with an orientation program, but the program does not include ADA information.
- The Office has an internship program. All interns are required to complete an application. They are provided with an orientation program, but the program does not include ADA information.



Public Defender: Possible Solutions

- The Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Office should defer to the adopted County-wide reasonable accommodation and modification policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should defer to the adopted County-wide ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- The Office should defer to the adopted County-wide non-discrimination statement policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Office should ensure their employment practices align with ADA standards. For possible solutions regarding the employee practices, see **Section 3.1.17 Employment Practices Review**.
- The Office should maintain job descriptions in accordance with ADA standards. For possible solutions regarding the position descriptions, see **Section 3.1.18 Job Description Review**.
- The Office should integrate ADA specific training into the volunteer onboarding process. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide volunteers regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- The Office should integrate ADA specific training into the internship onboarding process. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide interns regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.

Mayor's Office

Mayor's Office: Self-Evaluation Findings

- The Mayor's Office has not received ADA training nor or they aware of ADA specific programs.

Mayor's Office: Possible Solutions

- The Mayor's Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.



Parks and Recreation Department

Parks and Recreation Department: Self-Evaluation Findings

- Some of the Department staff have received ADA training as it related to barrier removal and ADA policy practices at conferences. However, they have not received training on ADA obligations under Title I and Title II.
- The Department currently defers to the County-wide for ADA grievances for Title I and Title II. However, the Department does not currently have an ADA grievance policy, procedure, and form with an appeals process in place for Title II.
- The Department currently defers to the County-wide for reasonable accommodation policy, procedure, and form for Title I. However; the Department does not currently have a reasonable modification policy, procedure, and form in place for Title II.
- The Department does not have an alternate format policy and procedure in place but defers to the County-wide policy and procedure.
- The Department does not currently have an out-of-order policy and procedure or guidelines in place.
- The Department uses playground inspectors to check playgrounds on a regular basis, and they have a web-based work order system for employees to report issues. However, they do not have a maintenance policy and procedure or guidelines in place.
- The Department does not currently have guidelines in place regarding special events to address ADA compliance.
- The Department has received barrier complaints in the last five (5) years. However, they do not maintain complaint logs that track complaints.
- The Department offers a volunteer program. However, there is not a formal orientation or handbook, and they are not provided ADA information regarding rights and obligations or contact information for the County's ADA/504 Coordinator for Title I or Title II.
- The Department does not have ADA language in their contracts, agreements, and waivers used for their programs, services, and activities.

Parks and Recreation Department: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- For the Department ADA grievance policy, procedure, and form with appeals process for Title I and Title II see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- For the Department reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.



Parks and Recreation Department: Possible Solutions (cont.)

- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department should develop an out-of-order policy and procedure or guidelines to assist County staff in ensuring that ADA elements are repaired and maintained in working condition. While this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the County is obligated to ensure all ADA elements are in working order and are readily accessible. This policy and procedure or guidelines provide guidance to employees and the tools needed to ensure ADA compliance.
- The Department should develop a maintenance policy and procedure or guidelines to assist County staff in maintaining ADA elements in ADA compliance. While this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the County is obligated to ensure all ADA elements are maintained in an accessible manner and are readily accessible. This policy and procedure or guidelines would provide guidance to employees and the tools needed to ensure ADA compliance.
- The Department should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would guide employees and provide the tools needed to ensure ADA compliance.
- The Department should maintain a log for all concerns and complaints as well as develop a procedure to refer any access or ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.
- The Department should integrate ADA specific training into the volunteer onboarding process. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide volunteers regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance.
- The Department should work with the Law Director to develop guidelines regarding the reviewing of County contracts, agreements, and waivers for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.

Procurement

Procurement: Self-Evaluation Findings

- The Division has not received ADA training.
- The Division does use a non-discrimination statement for documents and materials that they produce. However, this statement contains language that is considered discriminatory.
- The Knox County Procurement Regulations do contain the National Institute of Governmental Purchasing Code of Ethics non-discrimination language. However, the regulations do not contain Knox County's non-discrimination statement.



Procurement: Self-Evaluation Findings (cont.)

- The Division currently includes the following statement in County bids and proposals for construction and related projects. However, Section VIII of the Knox County Procurement Regulations does not include this statement or information on the County's expectations for ADA design standards.
- ADA Standards: Proposing parties are advised that all new construction, additions, and alterations to existing facilities must be designed, constructed or altered in strict compliance with Americans with Disabilities Act Accessibility Guidelines (ADAAG) for buildings and facilities.
- The Division does not currently use a procurement policy and procedure or guidance that reviews information and technology purchases for ADA compliance before purchase.

Procurement: Possible Solutions

- The Division should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Division should amend their non-discrimination statement to use the word "disabled" instead of "handicap". See **Section 3.1.10 Non-Discrimination Language**.
- The Division should incorporate the adopted County-wide Non-Discrimination Statement Policy into the introductions section of the Knox County Procurement Regulations. See **Section 3.1.10 Non-Discrimination Language**.
- The Division should incorporate the County's expectations for ADA design standards in Section VIII of the Knox County Procurement Regulations.
- The Division, in conjunction with the Information Technology Department, should develop a procurement policy and procedure or guidelines for County staff to use that reviews information and technology purchases for ADA compliance before purchase. While this policy and procedure is not a specific ADA requirement, it is recommended the County develop this policy and procedure to combine with information and technology policies and procedures to ensure ADA compliance with Section 508 of the Rehabilitation Act.

Property Assessor

Property Assessor: Self-Evaluation Findings

- The Office has not received ADA training.
- The Office does not have an alternate format policy and procedure in place to produce records.

Property Assessor: Possible Solutions

- The Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.



Public Library

Public Library: Self-Evaluation Findings

- The Library has not received any ADA training and is not aware of who is the Knox County ADA/504 Coordinator.

Public Library: Self-Evaluation Findings (cont.)

- The Library does not have or use an ADA non-discrimination statement that is used for publications and documents distributed to the public.
- The Library does not review contracts and agreements for ADA language that clarifies obligations under the ADA.
- The Library holds several special events throughout the year. However, they do not have guidelines in place to ensure events are ADA compliant.
- The Library does have a volunteer program. All volunteers are required to complete an application and attend orientation. Training is provided at specific locations but does not include ADA information.

Public Library: Possible Solutions

- The Library staff should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Library should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Library should work with the Law Director to develop guidelines regarding the reviewing of County contracts, agreements, and waivers for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Library should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.
- The Library should integrate ADA specific training into the volunteer onboarding process. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide volunteers on their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.

Public Library Policies and Procedure Manual: Self-Evaluation Findings

- Page 3 contains a policy and procedure to address ADA requests and complaints. However, the Knox County ADA/504 Coordinator's contact information, the County's reasonable modification policy, procedure, and request form, and the County's ADA grievance policy, procedure, and form is not referenced in the manual.



Public Library Policies and Procedure Manual: Self-Evaluation Findings (cont.)

- Page 4 prohibits animals in the library with the exception of service animals. However, a service animal policy is not referenced.
- Page 43 addresses the quality of customer service and includes a list of protected classes including “physical limitation.” This is not the recommended non-discrimination statement that should be used.
- Page 55 contains the Library’s employment policies. This section does not contain a non-discrimination statement nor information on requesting accommodations during the hiring process.

Public Library Policies and Procedure Manual: Possible Solutions

- The Library should add the Knox County ADA/504 Coordinator’s contact information, the County’s reasonable modification policy, and ADA grievance policy and procedure on page 3. See **Section 3.1.3 ADA/504 Coordinator, Section 3.1.5 ADA Grievance Policy, Procedure, and Forms with Appeals, and Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Form.**
- The Library should add reference to their service animal policy and procedure located on page 128 of the Knox County Public Library Policies and Procedure Manual. The service animal sections should also reference Knox County’s policy on services animals. See **Section 3.1.7 Service Animal Guidance.**
- The Library should include the adopted County-wide Non-Discrimination Statement Policy on page 43 and 55. See **Section 3.1.10 Non-Discrimination Language.**

Records Management

Records Management: Self-Evaluation Findings

- The Center has not received ADA training and is not aware of the County’s ADA policies or ADA/504 Coordinator.
- The Center does not have an alternate format policy and procedure in place to produce records. They also do not maintain a list of vendors to assist in producing alternate formats.

Records Management: Possible Solutions

- The Center should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review.**
- The Center should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form.**



Regional Forensic Center

Regional Forensic Center: Self-Evaluation Findings

- The Center has not received any ADA training and is not aware of Knox County's ADA policies or ADA/504 Coordinator.
- The Center does not have an alternate format policy and procedure in place to produce records. They also do not maintain a list of vendors to assist in producing alternate formats.
- The Center does not have a standardized ADA non-discrimination statement that is used on all key publications including training documents, employment information, etc.
- The Center offers a Residency and Fellowship program in which participants attend an orientation and receive a handbook. However, the orientation and handbook do not contain ADA information regarding rights and obligations or contact information for the County's ADA/504 Coordinator for Title I or Title II.

Regional Forensic Center: Possible Solutions

- The Center should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Center should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Center should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.
- The Center should integrate ADA specific training within the Residency and Fellowship orientation program. This training should include information about rights and obligations under the ADA and information regarding the ADA/504 Coordinator. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would provide guidance to program participants regarding their rights under the ADA, as well as the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.

Register of Deeds

Register of Deeds: Self-Evaluation Findings

- It does not appear the Office has received ADA training, is not aware of Knox County's ADA policies or who the County's ADA/504 Coordinator.

Register of Deeds: Possible Solutions

- The Office should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Office should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.



Register of Deeds: Possible Solutions (cont.)

- The Office should defer to the adopted County-wide Non-Discrimination Statement Policy. See **Section 3.1.10 Non-Discrimination Language**.

Retirement Department

Retirement Department: Self-Evaluation Findings

- The Retirement Department has not received any specific ADA training except for the few employees who attend the Retirement Board's Orientation. The Retirement Board's orientation does contain some ADA components.
- The Department does not have an alternate format policy and procedure in place. However, they do assist employees and retirees as needed to ensure access to information and will produce records in alternate formats when reasonable.
- The Department does maintain contracts with retirement vendors such as USI. It is unclear if the contracts contain ADA language that clarifies the County's and vendor's ADA obligations. The vendor, USI, does not have contact with employees or retirees.
- The Department does hold special events, such as the retiree luncheon, but no guidelines or checklists are in place regarding special events to address ADA compliance.

Retirement Department: Possible Solutions

- The Retirement Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department should work with the Law Director and Procurement Office to develop guidelines regarding the reviewing of County contracts for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.
- The Department should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.

Senior Services

Senior Services: Self-Evaluation Findings

- Department staff has not received ADA training.
- The Department currently defers to the County-wide for ADA grievances for Title I. However, the Department does not currently have an ADA grievance policy, procedure, and form with appeals process in place for Title II.



Senior Services: Self-Evaluation Findings (cont.)

- The Department currently defers to the County-wide for reasonable accommodation policy, procedure, and form for Title I. However; the Department does not currently have a reasonable modification policy, procedure, and form in place for Title II.
- The Department does not have an alternate format policy and procedure in place.
- The Department does not have an out-of-order policy and procedure or guidelines in place.
- The Department does not currently have a maintenance policy and procedure or guidelines in place.
- The Department does not currently have guidelines in place regarding special events to address ADA compliance.
- The Department is not aware of receiving ADA complaints in the last five years. However, they do not maintain complaint logs that track complaints.
- The Department does not have ADA language in their contracts, agreements, and waivers used for their programs, services, and activities.

Senior Services: Possible Solutions

- The Department should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- For the Department ADA grievance policy, procedure, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- For the Department reasonable accommodation policy, procedure, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Department should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Department should develop an out-of-order policy and procedure or guidelines to assist County staff in ensuring that ADA elements are repaired and maintained in working condition. While this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the County is obligated to ensure all ADA elements are in working order and are readily accessible. This policy and procedure or guidelines provide guidance to employees and the tools needed to ensure ADA compliance.
- The Department should develop a maintenance policy and procedure or guidelines to assist County staff in maintaining ADA elements in ADA compliance. While this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the County is obligated to ensure all ADA elements are maintained in an accessible manner and are readily accessible. This policy and procedure or guidelines would provide guidance to employees and the tools needed to ensure ADA compliance.



Senior Services: Possible Solutions (cont.)

- The Department should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.
-
- The Department should maintain a log for all concerns and complaints as well as develop a procedure to refer any access or ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.
- The Department should work with the Law Director to develop guidelines regarding the reviewing of County contracts, agreements, and waivers for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.

Sheriff's Office

The Knox County Sheriff's Office is an independently elected office with independent hiring processes through the Knox County Merit System Council. Any policies adopted by this office are the responsibility of the Sheriff not the County.

Sheriff's Office: Self-Evaluation Findings

- Staff is not required to attend annual ADA specific training.
- The Office of Professional Standards investigates all complaints of misconduct. However, the Office does not have a specific ADA grievance policy, procedure, and form for Title I and Title II.
- The Office does maintain a log of all complaints and misconduct. However, they do not have a policy and procedure to report ADA compliance issues to the ADA/504 Coordinator.
- The Office does not have a written reasonable accommodation and modification policy, procedure, and form.
- The Office does not have a written alternate format policy and procedure in place.
- The Office does post an ADA Public Notice and other ADA information in their Personnel Office and the break room. However, the public notice is outdated and does not contain recommended language.
- The Office does not have written guidelines in place regarding ADA compliance for special events.
- The Office administers a volunteer program to provide specific services to the community. This program provides a volunteer orientation, but ADA specific training is not provided. This orientation does provide volunteers with the Office's General Orders. However, these policies and procedures do not contain information regarding volunteer's rights and obligations under the ADA, information regarding the ADA/504 Coordinator for Title I and Title II, or training guidance to assist individuals with disabilities.
- The Merit System Council is the initial contact agency for hiring in the Knox County Sheriff's Office. Only after being placed on the Council's eligibility list are applicants eligible for hire into the Sheriff's office.



Sheriff's Office: Self-Evaluation Findings (cont.)

- The Office is in the process of hiring their own ADA/504 Coordinator.

Sheriff's Office: Possible Solutions

- Staff should attend annual ADA specific training. This training should include how to deal with individuals with disabilities, adopted ADA policies and procedures, service animals, handling the property of individuals with disabilities, etc. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees regarding their rights under the ADA and the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- For the ADA grievance policy, procedure, and form with appeals process for Title I and II see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeal Process**.
- The Office should update their ADA Public Notice to reflect the notice adopted by the County. See **Section 3.1.11 Public Notice Under the ADA**.
- The Office should develop a policy and procedure to report ADA related complaints to the ADA/504 Coordinator.
- The Office should develop a written Office-specific reasonable accommodation and modification policy, procedure, and form for Title II. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The Office should develop a written alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Office should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the Office is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.
- The Office should integrate ADA specific training within the volunteer program. The program should also include policies and procedure developed from this transition plan process. This may include providing information regarding volunteer's rights and obligations under the ADA, and contact information for the ADA/504 Coordinator for Title I and Title II. While this is not a specific ADA requirement, the Office is obligated to provide equal access to programs, services, and activities and this guidance would provide volunteers with the knowledge of their rights and the tools needed to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- The Merit System Council should review and update their hiring practices to ensure ADA compliance. See **Section 3.1.17 Employment Practices Review**.
- The Office's ADA/504 Coordinator should be well versed in all ADA matters, see **Section 3.1.4 Roles and Responsibilities of the ADA/504 Coordinator**, and they should be included and introduced during the onboarding process of Office employees and volunteers. See **Section 3.1.17 Employment Practices Review**.



Sheriff's Employee Manual and General Orders Review: Self-Evaluation Findings

- The Knox County Sheriff's Employee Manual and General Orders were reviewed. However, no specific ADA information was included.
- Employee Manual Chapter 1, Sub-Section A - Recruitment and Selection: This section does not contain a non-discrimination statement.
- Employee Manual Chapter 2 Sub-Section F – Disability and Chapter 3 Sub-Section B – Personal Equipment: These sections do not provide a written reasonable accommodation policy and procedure.

Sheriff's Employee Manual and General Orders Review: Self-Evaluation Findings

- Employee Manual Chapter 6 Subsection F - Grievance Procedure: This section is a general grievance procedure and is not specific to an ADA grievance policy and procedure for Title I.
- Page 60 of the Employee Handbook contains a Tennessee Discrimination Statement. However, it does not provide the contact information to file a complaint.
- No service animal guidance was found.
- No retaliation or coercion policy was found.
- No consistent non-discrimination statement was found.

Sheriff's Employee Manual and General Orders Review: Possible Solutions

- The Office should update the existing Employee Manual and General Orders to include all adopted ADA policies and procedures from this transition plan process. While updating the manual and general orders are not a specific ADA requirement, the Office is obligated to provide equal access to programs, services, and activities. The manual and general orders would guide employees regarding their rights under the ADA and the tools needed to ensure ADA compliance.
- The Office should develop a non-discrimination statement and incorporate in the Employee Manual Chapter 1, Sub-Section A - Recruitment and Selection. See **Section 3.1.10 Non-Discrimination Language**.
- The Office should develop a reasonable accommodations policy, procedure, and request form for incorporation into the Employee Manual Chapter 2 Sub-Section F – Disability and Chapter 3 Sub-Section B – Personal Equipment. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- Employee Manual Chapter 6 Sub-Section F – Grievance Procedure – This section should also reference the ADA grievance policy, procedure, and form for Title I. An ADA Grievance Policy, Procedure, and Form with an Appeals process for Title I was developed as a part of this project. See **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- Page 60 of the Employee Manual should be updated to include anon-discrimination statement and contact information.



Sheriff's Employee Manual and General Orders Review: Possible Solutions (cont.)

- The Office should adopt guidance regarding service animals. See **Section 3.1.7 Service Animal Guidance**.
- The Office should adopt a retaliation and coercion policy. See **Section 3.1.9 Retaliation or Coercion Policy**.
- The Office should adopt a non-discrimination statement policy for Title I and Title II. See **Section 3.1.10 Non-Discrimination Language**.

Stormwater Management

Stormwater Management: Self-Evaluation Findings

- The Stormwater Management Division has not attended ADA training. However, the plans review staff are scheduled to attend an ADA training.
- The Division does not have an alternate format policy and procedure in place.
- The Division does not currently have guidelines in place regarding special events to address ADA compliance.
- The Division does maintain a log for work orders and asset management issues. However, there is no formal process to track ADA issues or to forward issues to the County's ADA/504 Coordinator.

Stormwater Management: Possible Solutions

- Division employees should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Division should defer to the adopted County-wide alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Division should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would guide employees and provide the tools needed to ensure ADA compliance. Sample guidance for tours and events has been developed and included in Appendix C.
- The Division should maintain a log for all concerns and complaints as well as develop a procedure to refer any access or ADA complaints received to the County's ADA/504 Coordinator. See **Section 3.1.21 Previous ADA Complaints (Title I & II) Review**.



Trustee

Trustee: Self-Evaluation Findings

- The Trustee's Office has not received ADA training, is not aware of Knox County's ADA policies, or the ADA/504 Coordinator.
- The Office does maintain contracts with various financial institutions for receiving citizens' tax payments. The Office is unaware of the contracts containing ADA language that clarifies the County's and vendor's ADA obligations.

Trustee: Possible Solutions

- The Center should attend annual training regarding ADA compliance for Title I and Title II. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The Department should work with the Law Director and Procurement Office to develop guidelines regarding the reviewing of County contracts for ADA language. See **Section 3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers**.

Veteran's Services

Veteran's Services: Self-Evaluation Findings

- Department staff has not attended ADA specific training.
- Department staff is not aware of who is the County's ADA/504 Coordinator.
- Most of the Department's events are held at the Knox County Senior Centers. However, they do not have guidelines in place regarding ADA compliance for special events.

Veteran's Services: Possible Solutions

- Department staff should attend ADA specific training. This training should include how to deal with individuals with disabilities, adopted County ADA policies and procedures, service animals, etc. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. This training would guide employees regarding their rights under the ADA and the tools needed to ensure ADA compliance.
- The Department should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would guide employees and provide the tools needed to ensure ADA compliance.



3.1.3 ADA/504 Coordinator (Title I / Title II)

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

ADA/504 Coordinator: Self-Evaluation Findings

Knox County has appointed Cindy Pionke as ADA/504 Coordinator for Title I and Title II. Below is her contact information. However, this information is not published on the County's website or in other County's documents:

Cindy Pionke, P.E.
Strategic Facilities Engineer and ADA/504 Coordinator
Knox County Department of Human Resources
400 Main Street, Suite 360
Knoxville, TN 37902
Phone: 865-215-3641
TTY: 865-215-2497
Email: Cindy.Pionke@knoxcounty.org

ADA/504 Coordinator: Possible Solutions

Cindy Pionke was recently appointed as the Title I and Title II ADA/504 Coordinator. This information should be prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator contact information must be included in all materials that are distributed from the County. This includes posting this information on the website.

3.1.4 Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA Coordinators that are recommended by U.S. Department of Justice:

- Familiarity with the entity's structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

Roles and Responsibilities of the ADA/504 Coordinator: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA/504 Coordinator is provided on the County's website or in County documents.



Roles and Responsibilities of the ADA/504 Coordinator: Possible Solutions

The County should document the roles and responsibilities of the ADA/504 Coordinator. These roles and responsibilities should be consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>). This was developed as a part of this project. See **Appendix C** for a copy of the Roles and Responsibilities for the ADA/504 Coordinator.

3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act

Title I

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 ADA covers employers with 15 or more employees based on an entity-wide employee total count, including state and local governments.

The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the County level, rather than require the complainant to resort to resolution at the federal level.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Self-Evaluation Findings

- A general grievance policy and procedure was found in the Knox County Government Employee Handbook. However, the County does not have an ADA-specific grievance policy, procedure, and form with appeals process for Title I.
- No ADA grievance form was found.
- No ADA complaint log was provided by the County.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Possible Solutions

- An ADA grievance policy, procedure, and form with appeals process for Title I was developed as a part of this project. These documents should be adopted County-wide, posted on the County's website, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix B** for a copy of the policy, procedure, and form.
- The County should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and specifics regarding the resolution.



Title II

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II): Self-Evaluation Findings

- An ADA grievance policy and procedure with appeals process was found not on the County's website.
- No ADA grievance form was found.
- No ADA complaint log was provided by the County.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II): Possible Solutions

- An ADA grievance policy, procedure, and form with appeals process for Title II was developed as a part of this project. These documents should be adopted County-wide, posted on the County's website, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix B** for a copy of the policy, procedure, and form.
- The County should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.

3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form

Title I

The reasonable accommodation request process plays a very important role when ensuring that Knox County does not discriminate based on a disability. A reasonable accommodation is any modification to a job, the work environment, or the way things are usually done that allows an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits available to other individuals in the workplace.

Reasonable Accommodation Request Policy, Procedure, and Request Form (Title I): Self-Evaluation Findings

- References to a reasonable accommodation policy and procedure was found in the Knox County Employee Handbook. However, no reasonable accommodation request policy, procedure, and form were found on the County's website.
- The County provided the Request for Accommodation Questionnaire form. This form is used by employees to request an accommodation. Employees must contact their supervisor or Human Resources to obtain this form. Also, the form does not contain the ADA/504 Coordinator's information, nor does it ask for the requestor's contact information.



Reasonable Accommodation Request Policy, Procedure, and Request Form (Title I): Possible Solutions

- The County should develop a reasonable accommodation request policy and procedure. This policy and procedure should describe reasonable accommodation process, such as providing details on how to file a request and participate in the interactive process. The Equal Employment Opportunity Commission provides enforcement guidance for reasonable accommodation and undue hardship under the ADA at: <https://www.eeoc.gov/policy/docs/accommodation.html>
- The County's Request for Accommodation Questionnaire form should be updated to include the requestor's contact information and the ADA/504 Coordinator's contact information.

Title II

The reasonable modification request process allows an individual from the public to request a modification that will provide equal access to any County program, service, and/or activity. A public entity must reasonably modify its policies, practices, or procedures to avoid discrimination unless the modification will fundamentally alter the nature of its program, services, or activity.

Reasonable Modification Request Policy, Procedure, and Request Form (Title II): Self-Evaluation Findings

No information regarding a reasonable modification request policy, procedure, and form was found on the County's website or in County-provided documents.

Reasonable Modification Request Policy, Procedure, and Request Form (Title II): Possible Solutions

The County should develop a reasonable modification request policy, procedure, and request form. This policy and procedure should describe reasonable modifications, provide details on how to file a request and participate in the interactive process. The request form should include the requestor's contact information, type of modification being requested, specific details regarding the specific County program, services, or activity needing a reasonable modification. The U.S. Department of Justice provides guidance for reasonable modifications at: <https://www.ada.gov/taman2.html>.

3.1.7 Service Animal Guidance

A reasonable accommodation is any modification or adjustment to a job or the work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. A reasonable accommodation also includes any modification or adjustment to a provided program, service, or activity that the entity provides to ensure accessibility for the public. A reasonable accommodation may also include the use of a service animal. Service animals are used for a variety of reasons, so each accommodation request and modification may be different.

Service Animal Guidance: Self-Evaluation Findings

No information was found regarding service animal guidance for requests for reasonable accommodations or modifications from qualified applicants, employees, or the public.



Service Animal Guidance: Possible Solutions

The County should develop County-wide guidance for staff to reference when dealing with service animals as reasonable accommodations or modifications for applicants, employees, and the public. Each County Department should integrate this guidance into their Department-specific standard operating procedures. In doing so, this policy and procedure should be customized to fit each Department's situations and provide guidance as to when a service animal is an effective reasonable accommodation or modification.

- The U.S. Equal Employment Opportunity Commission created enforcement guidance for Reasonable Accommodations and undue hardship under the ADA (<https://www.eeoc.gov/policy/docs/accommodation.html>).
- The U.S. Department of Justice created a publication providing guidance on service animals and the ADA: U.S. Department of Justice Service Animal Guidance (https://www.ada.gov/service_animals_2010.htm).

3.1.8 ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act

Section 508 of the Rehabilitation Act of 1973 requires that all electronic and information technologies developed and used by any federal government agency must be accessible to individuals with disabilities. This includes websites, video and audio tapes, electronic books, televised programs, and other such media. Individuals with disabilities may still have to use special hardware and/or software to access the resources. This law pertains to the federal government. However, each state can adopt these regulations for state use. The State of Tennessee has adopted these technology requirements; therefore, Knox County should comply.

ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act: Self-Evaluation Findings

No information was found regarding the County's Section 508 of the Rehabilitation Act policy, procedure, and form with appeals process.

ADA Grievance Policy, Procedure, and Form with Appeals Process for Section 508 of the Rehabilitation Act: Possible Solutions

- The County should develop an ADA grievance policy, procedure, and form with appeals process for Section 508 of the Rehabilitation Act. The form should include the complainant's contact information, description of the electronic and information technology in question, and specific details regarding the non-conforming aspects and remedy that is being requested. Details regarding the Tennessee Electronic and Information Technology Accessibility law (EITA), along with accessibility tools, training, and related resources can be found at: <https://www.tn.gov/web-policies/accessibility.html>
- The policy, procedure, and form with appeals process should be adopted County-wide, posted on the County's website, and publicized in common areas that are accessible to all employees and the public.
- The County should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and details regarding the resolution.



3.1.9 Retaliation or Coercion Policy

Individuals who exercise their rights under the ADA, or assist others in exercising their rights, are protected from retaliation. The prohibition against retaliation or coercion applies broadly to any individual or entity that seeks to prevent an individual from exercising their rights or to retaliate against individuals for having exercised their rights.

Retaliation or Coercion Policy: Self-Evaluation Findings

No information regarding a retaliation and coercion policy was found on the County's website or in County-provided documents.

Retaliation or Coercion Policy: Possible Solutions

The County should draft and adopt a County-wide retaliation and coercion policy that is accessible to all employees and the public. U.S. Equal Employment Opportunity Commission guidance on retaliation and related issues can be found at: <https://www.eeoc.gov/laws/guidance/retaliation-guidance.cfm>.

3.1.10 Non-Discrimination Language

All public entities must ensure that no qualified individuals with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

To do so, public entities must develop two (2) separate policies:

1. Non-Discrimination Statement Policy, which documents the requirement to include a non-discrimination statement in any County publication or document distributed to employees or to the public.
2. Non-Discrimination Clause Policy, which documents the requirement to include a non-discrimination statement in all funding agreements that the County employs to pass federal funds to other agencies, entities, or municipalities, but not contractors.

Non-Discrimination Statement Policy

Non-Discrimination Statement Policy: Self-Evaluation Findings

Several different variations of non-discrimination statements were found. However, none of the statements found are consistent or used County-wide.

Non-Discrimination Statement Policy: Possible Solutions

- The County should develop consistent County-wide non-discrimination statements for Title I - employment activities and Title II - programs, services, and activities administered by the County. These statements should include language that provides contact information for the ADA/504 Coordinator regarding an accommodation, modification, or alternate formats. While these statements are not a specific ADA requirement, the U.S. Department of Justice (DOJ) requires that all Title II entities adopt and distribute a public notice about the relevant provisions of the ADA to all people who may be interested in its programs, services, and activities. It is recommended to put a non-discrimination statement in all information distributed by the County to comply with 28 CFR 35.106: https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35106.



Non-Discrimination Statement Policy: Possible Solutions (cont.)

- The County should incorporate both non-discrimination statements into a stand-alone policy that guides County staff on the application of non-discrimination statements for Title I and Title II. This policy should be accessible to all employees and used in County materials that are distributed by the County.
- An ADA Grievance policy, procedure, and form with the appeal process for Title I was developed as part of this project. The grievance form contains a copy of the non-discrimination statement for Title I that was developed as a part of this transition plan process. See **Appendix B** for a copy of the Title I form as an example.

Non-Discrimination Clause Policy

Non-Discrimination Clause Policy: Self-Evaluation Findings

Information regarding a non-discrimination contract clause was found in several County contracts in agreements. However, the non-discrimination contract clause contains wording that could be considered discriminatory.

Non-Discrimination Clause Policy: Possible Solutions

- The County should revise the non-discrimination contract clause to remove the discriminatory language. This clause should include language within applicable County contracts that would ensure that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in all County programs, services, or activities. While this clause is not a specific ADA requirement, the U.S. Department of Justice (DOJ) requires that all Title II entities adopt and distribute a public notice about the relevant provisions of the ADA to all people who may be interested in its programs, services, and activities. It is recommended to put a non-discrimination statement in all information distributed by the County to comply with 28 CFR 35.106: https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35106.
- The County should develop staff guidance regarding the application of a non-discrimination contract clause. This policy would only be accessible to applicable County staff who may initiate federally funded contracts or any joint use agreements with other entities.

3.1.11 Public Notice Under the ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary.

Public Notice Under the ADA: Self-Evaluation Findings

No information regarding a public notice under the ADA was found on the County's website or in County-provided documents.



Public Notice Under the ADA: Possible Solutions

A Public Notice Under the ADA was developed as part of this project. This notice should be adopted by the County, posted on the web, and publicized in common areas that are accessible to all employees and areas open to the public. See **Appendix C** for a copy of the Public Notice Under the ADA.

3.1.12 Title II/504 ADA Assurances

Every applicant for federal financial assistance shall provide a written assurance stating that all programs, services, and activities are being conducted or operated in compliance with all laws and regulations. As a recipient of federal funds, the County must include a written Title II/504 ADA Assurance in all funding agreements and joint use agreements to receive federal financial assistance. In turn, the County must require that any sub-recipient who receives federal financial assistance from the County provide an annual written Title II ADA/504 Assurance. This includes funding agreements and all joint use agreements with other agencies, entities, or municipalities.

Title II/504 ADA Assurances: Self-Evaluation Findings

No information regarding Title II/504 ADA Assurances was found on the County's website or in County-provided documents.

Title II/504 ADA Assurances: Possible Solutions

The County should develop a Title II/504 ADA Assurance in accordance with the Code of Federal Regulations (49 CFR 27.9). The Code of Federal Regulations can be found at: https://www.ecfr.gov/cgi-bin/text-idx?SID=b9b8a3d54d526545fd69ad3de5742ec9&mc=true&tpl=/ecfrbrowse/Title49/49cfr27_main_02.tpl

3.1.13 Alternate Format Policy, Procedure, and Request Form

Under the ADA, a public entity is responsible for providing ADA accessible communications. This includes any documents or information that is distributed by Knox County. If a request for an alternate format is received, the County must have an action plan to accommodate the request. For example, the Department of Justice does not expect entities to have Braille copies of all documents; however, Braille copies are expected to be readily available. Readily available means that once a request is received, a policy and procedure is in place to make a reasonable accommodation or modification to the document or information requested. This document must be provided to the requestor in a reasonable amount of time. A "reasonable" amount of time is not defined but the County should have a list of local resources to minimize the time needed to produce alternative formats such as Braille documents.

Alternate Format Policy, Procedure, and Request Form: Self-Evaluation Findings

No information regarding an alternate format request policy, procedure, and form was found on the County's website or in County-provided documents.

Alternate Format Policy, Procedure, and Request Form: Possible Solutions

The County should develop an alternate format request policy, procedure, and form. This policy and procedure shall guide staff regarding the process of obtaining an alternate format and utilizing the County's vendor database to obtain vendor information for alternate formats, if applicable. This policy and procedure should be adopted County-wide and should be accessible to all employees and the public. The request form should include the requestor's contact information, existing document information, and type of alternate format being requested. An alternate Format Policy, Procedure, and Request form has been developed and included in Appendix C.



3.1.14 Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos

Under the ADA, a public entity is responsible for providing ADA accessible alternate formats, including any documents or information that is distributed by Knox County obtained from another entity. For example, there is a link to an external site on County's website that leads to additional information. However, it may not be feasible for the County to obtain the original from the source for the purpose of creating an alternate format. Therefore, the County should add a disclaimer where external sources are referenced stating that Knox County is not responsible for ADA compliance of external content and any requests for alternate formats of external content should be directed to the source entity.

Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos: Self-Evaluation Findings

No information or policy regarding an ADA-specific disclaimer was found on the County's website or in County-provided documents.

Responsibility / Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos: Possible Solutions

The County should develop a disclaimer statement to communicate the County's perspective on ADA compliance regarding the content of another entity's site, links, forms, documents, and videos that are represented on the County's website. This statement should be posted on the website and publicized in common areas that are accessible to all employees and areas open to the public.

3.1.15 Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I)

Tracking ADA Transition Plan updates and corrections for Title I is important in showing progress toward barrier removal and should be done so using a systematic approach to ensure all updates and corrections are documented.

Policies and Procedure for ADA Transition Plan Updates and Corrections (Title I): Self-Evaluation Findings

No policies and procedures for ADA transition plan updates and corrections for Title I were found on the County's website or in County-provided documents.

Policies and Procedure for ADA Transition Plan Updates and Corrections (Title I): Possible Solutions

The County should develop customized policies and procedures for ADA transition plan updates and corrections for Title I. While this is not a specific ADA requirement, these policies and procedures would provide County staff guidance through the internal process for updating and correcting issues found during the ADA transition plan process.

3.1.16 ADA Compliance Team

The ADA Compliance Team is comprised of representatives from each County department. These individuals work closely with the ADA/504 Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinator works closely with the ADA Compliance Team to coordinate the implementation of plans, programs, policies, and procedures.



ADA Compliance Team: Self-Evaluation Findings

Knox County has established an ADA Compliance Team which is comprised of personnel from the departments that have the most to implement to complete this Transition Plan. Ben Sharbel of the Knox County Procurement Office identified contacts in the following departments: Engineering and Public Works; Finance; Human Resources; Information Technology; KGIS; Libraries; Parks and Recreation; Public Building Authority; Risk Management; Sheriff; and Schools. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator regarding all ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log shall be shared with the ADA/504 Coordinator and shall be retained for at least three (3) years.

ADA Compliance Team: Possible Solutions

The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and areas open to the public. This includes posting this information on the County website.

3.1.17 Employment Practices Review

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity, including employment. Public entities must provide an equal opportunity for employment.

The Knox County Personnel Rules and Regulations, County policies and procedures, employment, training and orientation processes, volunteer programs, forms, and documents were reviewed, and additional information was obtained from the Departmental survey process. This information was reviewed for consistency with current accessibility requirements and standards.

Knox County Employee Handbook (2017) Review: Self-Evaluation Findings

- The Equal Employment Opportunity Grievance Procedure – This section is a general grievance procedure and is not specific to an ADA grievance policy and procedure for Title I.
- The Americans with Disability Act – This section mentions reasonable accommodations. However, it does not specify the actual reasonable accommodation policy and procedure.
- Knox County Hotline – This section provides contact information for employees and the general public to report fraudulent activity. However, the section does not provide TTY contact information.
- Promotions, Transfers, and Reassignments – This section mentions filling job vacancies on an equal opportunity basis, but it does not provide the County's EEO/non-discrimination statement.
- Alcohol and Drugs – This section outlines the County's perspective on alcoholism and drug addictions as illnesses, but it does not provide information on requesting reasonable accommodations.
- No service animal guidance was found.



Knox County Employee Handbook (2017) Review: Possible Solutions

- No retaliation or coercion policy was found.
- No consistent County-wide non-discrimination statement was found.
- The Knox County Employee Handbook shall be updated upon adoption of new ADA policies and procedures from this transition plan process.
- Equal Employment Opportunity Grievance Procedure – This section should also reference the ADA grievance policy, procedure, and form for Title I. An ADA Grievance Policy, Procedure, and Form with Appeals process for Title I was developed as a part of this project. See **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**.
- The County should develop a reasonable accommodations policy, procedure, and request form. See **Section 3.1.6 Reasonable Accommodation Request Policy, Procedure, and Request Form**.
- Knox County Hotline – The County should add information on how to contact the hotline using a TTY number.
- Promotions, Transfer, and Reassignments – The County should incorporate their County-wide non-discrimination statement. See **Section 3.1.10 Non-Discrimination Language**.
- Alcohol and Drugs – The County should add information on the County's reasonable accommodation policy to this section. See **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**.
- The County should develop guidance regarding service animals. See **Section 3.1.7 Service Animal Guidance**.
- The County should develop a County-wide retaliation and coercion policy. See **Section 3.1.9 Retaliation or Coercion Policy**.
- The County should develop a County-wide Non-Discrimination Statement Policy for Title I and Title II. See **Section 3.1.10 Non-Discrimination Language**.

Knox County Employee Handbook (2017) Review: Completed Actions

- In October 2018, the County began updating their Employee Handbook to address the Self-Evaluation Findings noted for this element. The updated version of the Employee Handbook will be published once the related updates have been completed.

Knox County's Hiring, Testing, and Recruitment Information Review: Self-Evaluation Findings

- The Human Resources Department administers the hiring process for most Departments. The offices that manage their department's hiring process include the Knox County Clerk's Office, District Attorney's Office, Public Defender's Office, and Sheriff's Department.
- The Human Resources Department does not provide alternate formats of applications for employment, nor does the website provide information on how to obtain alternate formats.



Knox County's Hiring, Testing, and Recruitment Information Review: Self-Evaluation Findings (cont.)

- The provided non-discrimination statements are not consistent County-wide and are not what is recommended.

Knox County's Hiring, Testing, and Recruitment Information Review: Possible Solutions

- An Alternate Format Policy, Procedure, and Request Form should be adopted in accordance with this transition plan process. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The Human Resources Department's webpage should be revised to include information on how to obtain alternate formats for employment applications, job announcements, and other documents.
- The County should develop a County-wide ADA non-discrimination statement policy for Title I and Title II. See **Section 3.1.10 Non-Discrimination Language**.
- The Human Resources Department should develop testing guidelines. These guidelines should include information on ADA compliant testing in the hiring process and should be available to all Departments who administer testing for their Department. While these guidelines are not an ADA requirement, these guidelines would assist County staff in being consistent in the testing process to achieve ADA compliance. The U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice provide guidance here:
 - <https://www.eeoc.gov/>
 - <https://www.ada.gov/>

Knox County's New Employee Orientation: Self-Evaluation Findings

The County's new employee orientation process was reviewed. The following findings are provided:

- The Human Resources Department provides new employee orientation. This orientation provides guidance on the Knox County Employee Handbook, benefits, and retirement only.

Knox County's New Employee Orientation: Self-Evaluation Findings (cont.)

- The new employee orientation does not include specific County ADA policies and procedures or the ADA/504 Coordinator's name or contact information.
- The County's ADA/504 Coordinator for Title I and Title II are not a part of the new employee orientation process.
- New employees are not provided information regarding their rights and obligations under the ADA.

Knox County's New Employee Orientation: Possible Solutions

- The Human Resources Department should develop new employee orientation guidelines. These guidelines should include a review of employees ADA rights and obligations, introduction to the Title I and Title II ADA/504 Coordinator, as well as typical employment functions and benefits.
- The Human Resources Department should provide new employees with the newly revised Knox County Employee Handbook that includes adopted ADA policies and procedures from this transition plan process.



Knox County's Training Program Review: Self-Evaluation Findings

- No specific annual ADA training program is provided for County staff regarding Title I or Title II.

Knox County's Training Program Review: Possible Solutions

- The County should provide annual ADA specific training to all County staff, including executive staff, volunteers, and County Commission, regarding Title I and Title II. This training should include policies and procedures developed from this transition plan process, employee rights and obligations regarding employment-related training, as well as training for ADA elements within the public rights-of-way. While training is not a specific ADA requirement, as a Title II entity, the County is obligated to provide equal access to programs, services, and activities. Furthermore, this training would provide individuals with the tools needed to ensure ADA compliance.

Knox County's Volunteer Program Review: Self-Evaluation Findings

- Each County department administers their volunteer program. The departments that were identified as having a volunteer program are: General Sessions Court, Health Department, Public Library, Public Defender, Parks and Recreation, and the Sheriff's Department.
- Some departments have specific eligibility requirements, such as maintaining a valid Tennessee driver's license.
- Most departments require volunteers to complete applications. However, the applications do not contain ADA or non-discrimination language.
- Some department provides a volunteer orientation. However, the ADA/504 Coordinator is not involved in the process, and volunteers are not provided information regarding their rights and obligations under the ADA.

Knox County's Volunteer Program Review: Possible Solutions

- The Human Resources Department should oversee the County's volunteer program and develop guidelines for each Department to use to ensure program consistency for ADA compliance as each Department administers their volunteer program. These guidelines should include a review of volunteer manuals, volunteer applications, volunteer's ADA rights and obligations, introduction to the Title I and Title II ADA/504 Coordinator, and County functions.
- The Human Resources Department should develop a County-wide volunteer manual. Each Department should develop inserts for their Department to be incorporated into the volunteer manual. These inserts should include all specific physical and mental eligibility requirements to ensure that volunteers can disqualify themselves from the program, if needed, and include volunteer job descriptions.

Knox County's Internship Program Review: Self-Evaluation Findings

- Each County department administers their internship program. The departments identified as having an internship program are: District Attorney General, Health Department, Public Defender, Public Library, and Regional Forensic Center.



Knox County's Internship Program Review: Self-Evaluation Findings (cont.)

- All departments with internship programs have specific eligibility requirements.
- Most departments provide an internship orientation. However, the ADA/504 Coordinator is not involved in the process, and interns are not provided information regarding their rights and obligations under the ADA.

Knox County's Internship Program Review: Possible Solutions

- The Human Resources Department should oversee the County's internship program and develop guidelines for each Department to use to ensure program consistency for ADA compliance as each Department administers their internship program. These guidelines should include a review of intern manuals; intern's ADA rights and obligations, introduction to the Title I and Title II ADA/504 Coordinator, as well as typical County functions.
- The Human Resources Department should develop a County-wide internship manual. Each Department should develop inserts for their Department to be incorporated into the internship manual. These inserts should include all specific physical and mental eligibility requirements to ensure that interns can disqualify themselves from the program, if needed, and include intern job descriptions.

3.1.18 Job Description Review

The ADA does not require an employer to develop or maintain job descriptions. Nevertheless, employers can certainly benefit from having well-written job descriptions that spell out the "essential functions" for each employment position. When job descriptions are written, they must be non-discriminatory.

A written job description can help employers identify whether an applicant will be able to perform the essential tasks required for a position. During the interview process, employers are not allowed to ask if an individual has a disability that would prevent them from performing certain job tasks. Employers may, however, ask applicants whether they can perform the "essential functions" of a position, such as the ability to meet attendance expectations or to operate a particular machine. If an applicant notifies the employer that he or she is unable to perform an essential job function because of a disability, the employer must then consider whether it is possible to reasonably accommodate the disability.

200 County job descriptions were reviewed. The following section provides a summary of the findings and possible solutions. A complete summary of the job description reviews is provided in **Appendix C**.

Job Description Review: Self-Evaluation Findings

- Some of the County's and County Clerk's job descriptions contained recommended headings for clarification. However, the Sheriff's Office job descriptions do not have recommended headings for clarification.
- Most job descriptions contained discriminatory language. When describing actual job duties, there are some physical demands. However, specific language must be used so that someone with a disability can disqualify themselves.
- Some of the County's job descriptions contain disclaimer language to remind employees and applicants that the description is subject to change. However, none of the County Clerk's or Sheriff's Office job descriptions contain disclaimer language.



Job Description Review: Self-Evaluation Findings (cont.)

- Some job descriptions do not provide physical requirements. These requirements are needed to assist individuals in determining if they are qualified for the position.
- Some job descriptions for the County and County elected offices state that a driver's license is required.
- Job descriptions for the County and County elected offices do not include ADA compliant language ensuring the public entity does not discriminate based on a disability. Descriptions should also include language stating reasonable accommodations are available upon request.

Job Description Review: Possible Solutions

- Job descriptions should separate information under specific headings for better clarification. Under these headings, the County may use as many sub-headings as necessary to cover all aspects of the job description. These recommended headings are Job Title, Job Summary, Essential Functions, Non-Essential Functions, and Job Specifications.
- When listing physical demands in a job description, the wording must be such that someone with a disability can disqualify themselves. ADA compliant equivalent language must be used. For example: Instead of "carry" or "lift," use "move," "transport," "position," "install," "remove," "hoist" and "transfer." See the **Appendix C** for Equivalent Language Guidance.
- The County and County elected offices should include disclaimer language on all job descriptions to remind employees and applicants that the description is subject to change.
- All job descriptions should provide physical requirements to ensure clarity.
- When a driver's license is a requirement, the County must ensure this is a bona fide occupational qualification (BFOQ). If this is not necessary as a part of the essential job functions, this should be revised to require a state-issued identification instead of a state-issued driver's license.
- The County should develop a County-wide Non-Discrimination Statement Policy for Title I to be adopted by all County elected offices and included in every County and County elected office job description and vacancy announcement. See **Section 3.1.10 Non-Discrimination Language**.

3.1.19 Emergency Management Plan Review

Emergency planning and management has become increasingly important today. All community emergency plans and emergency management teams must include the necessary information on how to properly assist citizens in the community who may have a disability. Identifying the citizens with disabilities is paramount to the planning process and rescue operations. Knox County should have an Emergency Management Plan in place that includes details on how to help citizens with disabilities in the event of a local emergency. In addition, the County should develop an Emergency Evacuation Plan that includes details on how to properly help employees and visitors with disabilities in the event of a workplace emergency.

Disabilities manifest themselves in varying degrees and the functional implications of the variations are important for emergency evacuation. A person may have multiple disabilities, while another may have a disability whose



symptoms fluctuate. Everyone needs to have a plan to be able to evacuate a building, regardless of his or her physical condition.

While planning for every situation that may occur in every type of an emergency is impossible, being as prepared as possible is important. One way to accomplish this is to consider the input of various people and entities, from executive management, human resources, and employees with disabilities to first responders and other businesses, occupants, and others nearby. Involving such people in the development of the County's Emergency Management Plan will help everyone understand the evacuation plans and the challenges that businesses, building owners and managers, and people with disabilities face. The Knoxville-Knox County Emergency Operations Plan 2014 was reviewed.

Emergency Management Plan Review: Self-Evaluation Findings

- The County Emergency Management Plan is organized into four (4) parts: The Introduction, the Basic Plan, the sixteen Emergency Support Function (ESF) annexes, and the Appendix. Appendix 1 does mention individuals with disabilities. However, it only states that providing the necessary provisions for persons with disabilities is important, and no other information is provided regarding persons with disabilities or individual needs.
- Page 26 of the plan provides a list of State and Federal references used in the development of the emergency plan. However, the references provided are outdated and does not include FEMA's emergency plan guidance for individuals with disabilities.
- Knox County does not have an emergency evacuation plan for employees and visitors.

Emergency Management Plan Review: Possible Solutions

- The County should update their plan to incorporate FEMA's emergency plan guidance for individuals with disabilities and add a plan regarding individuals with disabilities into each of the sixteen ESF annexes. The U.S. Department of Justice and FEMA provides guidance here:
<https://www.ada.gov/pccatoolkit/chap7emergencymgmtadd1.htm>
https://www.fema.gov/media-library-data/1437608810237-65bce1c81c720e99c260ea740e98901d/Language_Guidelines-Inclusive_Emergency_Preparedness.pdf
- The County should develop a support network with the local disability organizations and include them in the emergency planning process.
- The County should create a volunteer registration process that identifies the location of individuals with disabilities, and the type of disability they have. The registry will help with the planning process for accessible transportation needs.
- The County should ensure they have access to accessible transportation for evacuations or transporting people to a medical clinic. Accessible transportation options can be obtained by working with local or private services, public transportation, or paratransit.
- Evacuation plans should include how to evacuate people with assistive equipment and how to replace equipment if it is lost or destroyed, as well as a plan on how to evacuate people who have service animals.



Emergency Management Plan Review: Possible Solutions (cont.)

- Training should be provided to volunteers as well as all department heads who will be involved in the execution of the Emergency Plan. Training ensures the emergency plan is executed as planned and ensures clear and proper communication to individuals with disabilities. Training should include how to identify people wearing medical alert tags or bracelets, and various ways to communicate with people with visual, hearing, or cognitive impairments.
- The County should prepare alternative ways to help individuals who use medical equipment during a power outage.
- The County should identify the location and availability of more than one facility for dialysis for people who will need dialysis as part of a health maintenance plan or routine or other life-sustaining treatment. In addition, the County should develop a resource list that includes the location of all types of durable medical equipment (DME) available in the County, as well as qualified American Sign Language interpreters, wheelchair repair, therapeutic oxygen, hearing aids and repair, medications, etc. The resource list should be as comprehensive as possible and should be included in the Emergency Planning Manual.
- The County should host an "Emergency Planning Preparedness" class for individuals with disabilities. The class will teach them how to develop a "kit" they can keep for emergencies and allow them to sign up for the emergency registry.
- The County should develop an emergency evacuation plan for employees and visitors. Evacuation plans should consider the impact of internal and external emergencies regarding the County's operations and should be tailored to the workplace environment. The Great Lakes ADA Center provides guidance on Emergency Preparedness and Using Employee Information at: <http://adagreatlakes.org/BusinessToolkit/?section=1&id=6>

3.1.20 County Ordinance Review

Twenty-two (22) applicable ordinances were reviewed for consistency with current accessibility requirements and standards.

County Ordinance Review: Self-Evaluation Findings

Chapter 1: General Provisions

- Definitions and rules of construction do not include definitions related to the ADA.
- No guidance regarding accessibility for meetings or County-wide non-discrimination statement.
- No mention of County-wide ADA policies and procedures.
- No mention of the County's effective communication efforts and policies.

Chapter 2: Administration

- The equal opportunity statement listed in Article III, Division 3, Section 2-108 does not contain disability.
- Article III, Division 11, Section 2-274 does not mention the County-wide non-discrimination statement.
- Article VIII does not contain information on the County's ADA assurances.
- No ADA compliance regarding County procurement is mentioned.
- Article X, Section 2-762 does not mention the County-wide non-discrimination statement.
- No information is included regarding the County's ADA/504 Coordinator for Title I and Title II.



County Ordinance Review: Self-Evaluation Findings (cont.)

Chapter 4: Alcoholic Beverages

- This chapter did not contain ADA-related language, nor was it required.

Chapter 6: Animals

- No guidance or policy and procedure information regarding service animals.

Chapter 10: Building and Building Regulations

- This chapter did not contain ADA-related language, nor was it required.

Chapter 12: Business

- No mention of any guidance from the County regarding the ADA for businesses located within the County.

Chapter 14: Community Development

- This chapter did not contain ADA-related language, nor was it required.

Chapter 18: Courts

- No information included regarding the Court's ADA policies and procedures.

Chapter 22: Emergency Services

- No information is provided regarding Knox County's Emergency Management Plan.

Chapter 26: Environment

- This chapter did not contain ADA-related language, nor was it required.

Chapter 27: Parks and Recreation Facilities

- No information included regarding the Department's ADA policies and procedures. This includes an ADA grievance policy and procedure and reasonable modifications.
- No guidance or policy and procedure information regarding service animals.
- No ADA guidance for special events provided.

Chapter 30: Fire Prevention and Protection

- This chapter did not contain ADA-related language, nor was it required.

Chapter 34: Floods

- This chapter did not contain ADA-related language, nor was it required.

Chapter 38: Health and Sanitation

- Section 38-227 (d) Safety (1) allows for the use of certified services animals in interactive water amusement areas. However, the definition of a service animal is not provided.
- Article VIII, Section 38-241 Defines a pet dog as any dog that does not meet the definition of a service animal as defined by the United States Department of Justice. However, the definition of a service animal is not provided.

Chapter 42: Law Enforcement

- Article II of this chapter lists regulations, specific procedures, and policies of the Merit System Council, which oversees the employment of the Sheriff's Department. However, no ADA policies and procedures are included.



County Ordinance Review: Self-Evaluation Findings (cont.)

Chapter 46: Libraries

- This chapter did not contain ADA-related language, nor was it required.

Chapter 48: Manufactured Homes and Trailers

- This chapter did not contain ADA-related language, nor was it required.

Chapter 50: Offenses and Miscellaneous Provisions

- This chapter did not contain ADA-related language, nor was it required.

Chapter 54: Roads and Bridges

- This chapter did not contain ADA-related language, nor was it required.

Chapter 58: Taxation

- This chapter did not contain ADA-related language, nor was it required.

Chapter 62: Traffic and Vehicles

- This chapter should include accessible pedestrian access to public rights-of-way, and reference specific ADA laws and regulations that have been adopted by the County.
- Information regarding maintenance of pedestrian elements within the rights-of-way is not provided and does not clarify who is responsible for maintaining these ADA elements.

Chapter 66: Utilities

- This chapter did not contain ADA-related language, nor was it required.

County Ordinance Review: Possible Solutions

The below County ordinances should be updated as noted in the following section. While these updates are not specifically an ADA requirement, these updates provide information and clarification to the public to ensure ADA compliance.

Chapter 1: General Provisions

- Definitions and rules of construction should be revised to include definitions related to the ADA. This section should be revised in accordance with guidance from the U.S. Department of Justice. See guidance here: <https://www.ada.gov/>
- Information regarding adopted County-wide ADA policies and procedures from the transition plan process should be included.
- The County should include the developed County-wide non-discrimination statement policy for Title II. See **Section 3.1.10 Non-Discrimination Language**.

Chapter 2: Administration

- Information regarding adopted County-wide ADA policies and procedures from the transition plan process should be included in County ordinances.
- Information regarding ADA compliant County procurement should be included. See **Section 3.1.2 Department-Specific Information / Procurement Division**.
- This chapter should be revised to include contact information for the County's ADA/504 Coordinator for Title I and Title II. See **Section 3.1.3 ADA/504 Coordinator (Title I / Title II)**.



County Ordinance Review: Possible Solutions (cont.)

Chapter 6: Animals

- Information should be included regarding the County's stance on service animals, as well as guidance for determining reasonable accommodations or modifications. See **Section 3.1.7 Service Animal Guidance**.

Chapter 12: Business

- The County should reference ADA compliance information for businesses, such as including information from the U.S. Department of Justice. See guidance here:
 - <https://www.ada.gov/smbusgd.pdf>

Chapter 18: Courts

- Information regarding the County's ADA policies and procedures - identified for development in this Transition Plan - should be included.

Chapter 22: Emergency Services

- Information regarding Knox County's Emergency Management Plan should be included. See **Section 3.1.19, Emergency Management Plan Review**.

Chapter 27: Parks and Recreation Facilities

- The County should reference adopted County-wide ADA policies and procedures from the transition plan process. See **Section 3.1.2 Department-Specific Information**.
- Information should be included regarding the County's stance on service animals, as well as guidance for determining reasonable accommodations or modifications. See **Section 3.1.7 Service Animal Guidance**.
- The County should reference adopted County-wide ADA policies and procedures from the transition plan process. See **Section 3.1.2 Department-Specific Information**.

Chapter 38: Health and Sanitation

- The definition of a service animal including the County's stance on service animals should be added to Section 38-227 (d) Safety (1). See **Section 3.1.7 Service Animal Guidance**.
- The definition of a service animal as defined by the United States Department of Justice should be added to Article VIII, Section 38-241. See **Section 3.1.7 Service Animal Guidance**.

Chapter 42: Law Enforcement

- Information regarding adopted County-wide ADA policies and procedures - identified for development in this Transition Plan - should be included.

Chapter 62: Traffic and Vehicles

- Information regarding the prohibition of obstructions in accessible pedestrian paths, and specific ADA laws and regulations adopted by the County should be included.
- Information clarifying responsibilities and timeframes for maintenance of ADA elements within the right-of-way should be included.

3.1.21 Previous ADA Complaints (Title I & II) Review

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

A review of previous ADA complaints from the past five (5) years is necessary to ensure that all complaints have been addressed and updated in the Transition Plan.



Previous ADA Complaints Review (Title I & II): Self-Evaluation Findings

The County is not aware of receiving any Title I or Title II ADA complaints in the past five (5) years.

Previous ADA Complaints Review (Title I & II): Possible Solutions

- The County should maintain confidential complaint/request files and ADA complaint/request logs. However, logs for both Title I and Title II should include detailed information.
 - Logs for Title I shall be confidential and should include an internal complaint number, extensive details about the complaint and process, as well as details regarding the resolution.
 - Logs for Title II shall be confidential and should include an internal complaint number, extensive details regarding the complaint and process, which would include locations and pictures, and details regarding the complaint resolution.

3.2 Programs, Services, and Activities Review

All programs, services, and activities (PSAs) were researched and evaluated for ADA compliance. All PSAs mentioned in **Section 3.1** were integrated into this section (**Section 3.2**). This review was based on what is accessible to the public on the Knox County website, as well as department-specific questions that were submitted to the County.

3.2.1 Boards, Commissions, Committees, and Councils Review

The County website provides various information regarding the County's boards, commissions, committees, and councils. These groups are listed below:

- County Commission
- Election Commission
- Board of Zoning Appeals
- Air Pollution Control Board
- Ethics Committee
- Retirement & Pension Board

Boards, Commissions, Committees, and Councils Review: Self-Evaluation Findings

- Some board, commission, and committee members receive ethics training. However, they do not receive training on ADA compliance.
- Most meetings are open to the public and held in accessible facilities. However, ADA checklists are not used to determine compliance for meetings.
- The Retirement and Pension Board hosts an annual retiree luncheon. However, they do not use special events guidelines or checklists to ensure ADA accessibility.
- Some agendas, meeting minutes, and documents are posted on the County's website. However, they are not available in alternate formats, nor does the County have an alternate format policy and procedure.



Boards, Commissions, Committees, and Councils Review: Self-Evaluation Findings (cont.)

- The County's boards, commissions, and committees do not have a County-wide non-discrimination statement that is used on the documents they distribute, including meeting agendas or minutes.
- The County Commission's meetings are broadcasted live, but closed captioning is not available.
- The disability community does not appear to be included in the member selection process, providing input on meeting locations, or providing input on community issues.

Boards, Commissions, Committees, and Councils Review: Possible Solutions

- Board, commission, and committee members should attend annual training regarding ADA compliance. For possible solutions regarding County training programs, see **Section 3.1.17 Employment Practices Review**.
- The County should develop and use checklists to ensure ADA compliance for ADA compliant meeting locations. While this is not a specific ADA requirement, this checklist would benefit the County by ensuring all meeting locations are accessible to the public. Example checklists can be found at <https://www.adachecklist.org>
- The Retirement and Pension Board should develop ADA specific guidelines for special events. While these guidelines are not a specific ADA requirement, the County is obligated to provide equal access to programs, services, and activities. These guidelines would guide board members and provide the tools needed to ensure ADA compliance.
- The County should develop an alternate format policy, procedure, and request form to be adopted by all boards, commissions, committees, and councils. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**. Also, each board, commission, committee, and council should develop a list of all documents and forms for their area. The list should include the document/form name, location(s) where it can be found (office location, website link) if alternate formats are available, and how the alternate formats can be obtained. This list should be updated continuously as documents and forms are created and revised. The forms should be reviewed for ADA compliance. The Section 508 Compliant PDF Checklist is provided at: <https://508compliantdocumentconversion.com/compliance-regulations/pdf-compliance-checklist/>
- The County's boards, commission, and committees should adopt the County-wide non-discrimination statement policy for Title II and include the statement in all meeting agendas and minutes. See **Section 3.1.10 Non-Discrimination Language**.
- The County should develop guidelines to assist commission staff in providing closed captioning or transcripts for live broadcasts and videos that are available to employees and the public. These guidelines shall include the process to add closed captioning or use the vendor database to purchase closed captioning or transcription services.
- The County should provide opportunities for the disability community to provide input regarding the member selection process, meeting locations, and input on community issues when applicable. This may include seeking input by advertising with local disability organizations. See **Section 2.0 Public Outreach**.



3.2.2 Documents, Forms, and Videos Reviewed

The County website provides various documents, forms, and videos that are available to the public. For a complete listing of documents, forms, and videos reviewed, see **Appendix C**.

Documents, Forms, and Videos Reviewed: Self-Evaluation Findings

- The County does not have alternate formats on hand for frequently accessed documents, forms, or videos.
- The County does not have a policy or procedure in place to address alternate formats. Alternate formats are auxiliary aids, services, or devices that enable effective communication for people with disabilities.
- The County does not have a disclaimer statement to communicate the County's perspective on ADA compliance regarding the content of another entity's site, links, forms, documents, videos, or podcasts that are represented on the County's website.
- The County does not have a County-wide Non-Discrimination Statement Policy for Title II which includes a non-discrimination statement that is included in the information distributed by the County.
- The County does not have a policy and procedure to provide closed captioning or transcripts for videos that are available to employees and the public.

Documents, Forms, and Videos Reviewed: Possible Solutions

- Each Department liaison should develop a list of all documents and forms for their Department. The list should include the document/form name, location(s) where it can be found (office location, website link), if alternate formats are available, and how the alternate formats can be obtained. This list should be updated continuously as documents and forms are created and revised. The forms should be reviewed for ADA compliance. The Section 508 Compliant PDF Checklist is provided here:
<https://508compliantdocumentconversion.com/compliance-regulations/pdf-compliance-checklist/>
- The County should develop an alternate format policy, procedure, and request form. See **Section 3.1.13 Alternate Format Policy, Procedure, and Request Form**.
- The County should develop a disclaimer statement to communicate the County's perspective on ADA compliance regarding the content of another entity's site, links, forms, documents, videos or podcasts that are represented on the County's website. See **Section 3.1.14 Responsibility / Acceptance Disclaimer for Other Entities' Links, Forms, Documents, and Videos**.
- The County should develop a consistent County-wide non-discrimination statement policy. See **Section 3.1.10 Non-Discrimination Policy**.
- The County should develop guidelines to assist staff in providing closed captioning or transcripts for videos that are available to employees and the public. These guidelines shall include the process to add closed captioning or use the vendor database to purchase closed captioning or transcription services.



3.2.3 Cursory Website Review

A cursory review of the County website was completed using the WAVE Accessibility Tool. This review consisted of evaluating various links located on the County website. See below for a listing of 10 key evaluation points that were reviewed.

- Informational images for alternative text
- Decorative images for alternative text
- Video or audio content that does not have captioning
- Forms on website
- Text resizing
- Lynx Browser
- Navigating the website without the use of a mouse
- Site map
- Ensuring link text makes sense out of context
- Automated program
- Audio CAPTCHA Accessibility Criteria

Cursory Website Review: Self-Evaluation Findings

- Informational images for alternative text:
Several images on the County's website did not contain text boxes that provide information on the content of the image.
- Lynx Browser:
The Knox County website does come up in the Lynx browser. However, the navigation to links did not work which leads one to believe the website is not compatible with text based browsers.
- Automated program:
An accessibility evaluation tool that embeds online accessibility feedback into web content. The following was found:
 - 2 Errors (accessibility errors that need to be fixed)
 - 72 Alerts (potential end user issues that should be investigated)
 - 56 Features (identified accessibility features that likely improve accessibility)
 - 83 Structural Elements (identified elements that should be investigated)
 - 8 HTML5 and ARIA (identified elements that should be investigated)
 - 23 Contrast Error (color contrast errors)
- A complete summary of findings is provided in **Appendix C**.

Cursory Website Review: Possible Solutions

- Information images for alternative text:
The County's website should be updated to include text boxes when placing a cursor over images on the website. The text boxes should describe the image and the web pages that are being communicated by the image.



Cursory Website Review: Possible Solutions (cont.)

- **Lynx Browser:**
The County should complete a full website review for ADA accessibility. Usually, if a website makes sense and can be navigated using the Lynx browser, then it is fulfilling many of the web accessibility guidelines.

Based on trends in accessible technology, most persons with disabilities are not browsing by text-only browsers but are using the same browsers as those being used by individuals without disabilities. Lynx can be used as a good tool for providing accessibility feedback on your website. However, it should not be viewed as the determining factor for ADA compliance. By relying on text-only browsers as an accessibility factor, you are limiting support for those individuals who may have visual, hearing or ambulatory impairments.

- **Automated program:**
The automated accessibility evaluation tool provides details regarding online access to web content. This review suggests there are elements that are compliant, as well as elements that need to be brought into compliance. The County should evaluate the entire website for ADA compliance. See below website link for more information regarding an explanation of WAVE and how you can make your page more accessible.
(<http://wave.webaim.org/report#/https://knoxcounty.org>)
- A complete summary of possible solutions is provided in **Appendix C**.

3.2.4 Non-Discrimination Language for Contracts, Agreements, and Waivers

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity. In doing so, public entities should provide a statement in all agreements and contracts with the County to ensure non-discrimination for both parties and to clarify accessibility obligations.

A complete list of documents reviewed is provided in **Appendix C**.

Non-Discrimination Language for Contracts, Agreements, and Waivers: Self-Evaluation Findings

All contracts, agreements, and waivers reviewed did not contain ADA language that would clarify ADA responsibilities and obligations.

Non-Discrimination Language for Contracts, Agreements, and Waivers: Possible Solutions

The County should develop guidelines to assist the appropriate staff in writing non-discrimination language to be included in all County contracts and agreements. This non-discrimination language would need to be assessed by legal counsel on a case-by-case basis. These guidelines shall include language that clarifies responsibilities regarding ADA maintenance, alterations, and construction.

3.2.5 Design Standard Review

The County has adopted the 2012 International Building Code and Tennessee Department of Transportation (TDOT) construction standards and specifications. The County does not have any unique design standards or specifications specific to the County and none were reviewed as part of this process.



3.2.6 Effective Communication Efforts and Policy

The ADA requires that all Title II entities communicate effectively with people who have communication disabilities by providing auxiliary aids and services. The goal is to ensure that communication with persons with disabilities is equally effective as communication with people without disabilities.

Auxiliary aids and services are ways to communicate with persons with disabilities. The type of auxiliary aids and services are assessed on a case-by-case basis. Auxiliary aids and services must be provided free of charge and provided in accessible formats, in a timely manner, and must be provided in a way that ensures individual privacy and independence. Examples of common auxiliary aids and services include, but are not limited to:

- Sign Language Interpreters
- Written materials
- Closed Captioning
- Real-time captioning
- Audio recordings
- Materials and displays in braille
- Large print materials
- Accessible electronic and information technology
- Assistive listening devices and systems

Effective Communication Efforts and Policy: Self-Evaluation Findings

The County does not have County-wide specific guidelines or policies and procedures regarding effective communication.

Effective Communication Efforts and Policy: Possible Solutions

The County should develop guidelines regarding effective communication efforts. These efforts should be effective by providing auxiliary aids and services to individuals who have communication disabilities. These guidelines should be consistent with the U.S. Department of Justice's guidance for "Effective Communication." This guidance can be found here: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>

[The remainder of this page intentionally left blank.]



3.3 Facilities Review

3.3.1 Buildings

135 buildings within Knox County were evaluated. A breakdown of buildings by type included in the evaluation are listed in **Table 1**. A complete list of all buildings evaluated are provided in **Appendix D, Tables A1 – A9**.

Table 1. Summary of Buildings Reviewed

Buildings	
Type	Quantity
Library Facilities	18
Senior Centers	6
PBA Managed / Other Facilities	20
Waste Centers	7
Schools	89
Other Programs / Department Facilities	2

Buildings: Self-Evaluation Findings

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of issues is provided in the building facility reports (see **Appendix F**). Common issues identified for each building type are as follows:

Library Facilities

- Non-compliant accessible parking
- Non-compliant transaction counters
- Non-compliant room signs
- Non-compliant restrooms
- Non-compliant drinking fountains

Senior Centers

- Non-compliant accessible parking
- Non-compliant room signs
- Non-compliant restrooms
- Non-compliant drinking fountains

PBA Managed / Other Facilities

- Non-compliant accessible parking
- Non-compliant entrances
- Non-compliant transaction counters
- Non-compliant room signs
- Non-compliant restrooms



Buildings: Self-Evaluation Findings (cont.)

Waste Centers

- Non-compliant accessible parking

Schools

- Non-compliant accessible parking
- Non-compliant entrances
- Non-compliant classroom amenities
- Non-compliant restrooms

Other Programs / Department Facilities

- Non-compliant accessible parking
- Non-compliant transaction counters
- Non-compliant restrooms

Buildings: Possible Solutions

A complete list of possible solutions is provided in the building facility reports (see **Appendix F**).

3.3.2 Parks

47 parks within Knox County were evaluated. All parks included in the evaluation are listed in **Appendix D, Table A10** and shown on the map in **Appendix E**.

Parks: Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. A complete list of issues is provided in the park facility reports (see **Appendix F**). Common issues identified included:

- Non-compliant accessible parking
- Non-compliant paths and access to amenities
- Non-compliant spectator seating
- Non-compliant playgrounds
- Non-compliant restrooms

Parks: Possible Solutions

Each park that includes picnic units with outdoor constructed features (picnic tables, fire rings, grills, etc.) must have 20 percent, but not less than two (2), of the picnic units with fully accessible features. At least one of each type of outdoor constructed feature must be accessible. Where more than one of the same type of outdoor constructed feature is provided at an accessible picnic unit, at least two of the same type of feature must be accessible (i.e. if a picnic unit is served by two or more grills, then two of the grills must be accessible). A complete list of possible solutions is provided in the park facility reports (see **Appendix F**).

3.3.3 Greenways

Seven (7) greenways within Knox County were evaluated. All greenways included in the evaluation are listed in **Appendix D, Table A11** and shown on the map in **Appendix E**.



Greenways: Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the greenway amenities, access into facilities, signage, drinking fountains and restrooms. A complete list of issues is provided in the greenway facility reports (see **Appendix F**). Common issues identified included non-compliant benches.

Greenways: Possible Solutions

A complete list of possible solutions is provided in the greenway facility reports (see **Appendix F**).

3.3.4 Signalized Intersections

82 signalized intersections within Knox County were evaluated. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

All signalized intersections included in the evaluation are listed in **Appendix D, Table A12** and shown on a map in **Appendix E**.

Signalized Intersections: Self-Evaluation Findings

Common curb ramp issues included excessive flare cross slopes, missing flush transitions from the curb ramp to the roadway, excessive landing cross slopes, excessive curb ramp counter slopes, and excessive curb ramp cross and running slopes. **Table 2** provides a summary of the curb ramp issues at signalized intersections.

About eighteen (18) percent of pedestrian crossings at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. Pedestrian push buttons and signal heads were recommended to be installed at all signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included non-existent or inaccessible push button clear spaces, excessive push button clear space cross slopes, push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance, and push button diameters not 2". **Table 3** provides a summary of the push button issues.

Signalized Intersections: Possible Solutions

A complete list of possible solutions can be found in the signalized intersection reports provided in **Appendix F**.

[The remainder of this page intentionally left blank.]



Table 2. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curbed sides at 90°	71	70	98.6%
Curb ramp lands in crosswalk	183	179	97.8%
Curb ramp does not have traversable sides	71	68	95.8%
Curb ramp width ≥ 48"	183	167	91.3%
Curb ramp present where curb ramp is needed	355	318	89.6%
48" crosswalk extension exists	158	138	87.3%
No ponding in curb ramp, curb ramp turning space, or flares	183	136	74.3%
Detectable warning surface color contrasts with adjacent curb ramp surface	183	131	71.6%
Presence of detectable warning surface	183	127	69.4%
No obstruction in curb ramp, curb ramp turning space, or flares	183	123	67.2%
Curb ramp turning space running slope ≤ 2%	113	75	66.4%
Curb ramp turning space exists	183	119	65.0%
Curb ramp counter slope ≤ 5%	183	99	54.1%
Curb ramp cross slope ≤ 2%	183	98	53.6%
Curb ramp running slope ≤ 8.3%	183	97	53.0%
Curb ramp turning space cross slope ≤ 2%	113	59	52.2%
Flush transition to roadway exists	183	95	51.9%
Flare cross slope ≤ 10%	112	46	41.1%



Table 3. Summary of Push Button Issues

Push Button Element	Number Evaluated	Number Compliant	Percent Compliant
Push button height \leq 48"	191	184	96.3%
Pedestrian head exists where pedestrian head is needed	675	552	81.8%
Push button exists where push button is needed	675	546	80.9%
Push button offset from crosswalk \leq 5'	191	153	80.1%
Push button orientation is parallel to crossing direction	191	149	78.0%
Push button diameter is 2"	191	149	78.0%
Push button offset from curb \leq 10'	191	147	77.0%
Clear space cross slope \leq 2%	90	42	46.7%
Clear space exists and can be accessed	191	81	42.4%

3.3.5 Sidewalk Corridors

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel, which includes the sidewalk, railroad crossings, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. Approximately 140 miles of sidewalk were evaluated. The included sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. A map of the evaluated sidewalk corridors is provided in **Appendix E**.

Sidewalk Corridors: Self-Evaluation Findings

Common issues along the sidewalk corridors were excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, Knox County may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at unsignalized intersections along the sidewalk corridors include excessive flare cross slope, excessive curb ramp cross slopes, and no presence of texture contrast or color contrast. A summary of the unsignalized intersection curb ramp issues is provided in **Table 4**. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized interactions were recommended to be removed and replaced.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, "curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb." For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New Construction and Alterations, which states,



Sidewalk Corridors: Self-Evaluation Findings (cont.)

“newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways.”

Sidewalk Corridors: Possible Solutions

To meet the federal requirements for curb ramp installations, the following recommendations were made:

- Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, two (2) directional curb ramps were recommended to be installed where geometry permitted. The Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) requires two (2) directional curb ramps be installed during modifications unless there are existing physical constraints.
- Where sidewalk parallel to the project corridor leads up to the curb at a driveway, directional curbs ramps were recommended to be installed to serve the driveway crossing.
- Where diagonal curb ramps were installed with the intent to serve a side-street crossing only, receiving curb ramps are still required to be installed on the opposite side of the major street. However, an engineering study should be performed prior to the installation of the receiving curb ramps to determine if the major street crossing is safe to accommodate. If the engineering study determines the major street crossing is unsafe to accommodate, the existing diagonal curb ramps should be removed and replaced with directional curb ramps in addition to the other requirements noted in **Section 3.5 FHWA Guidance on Closing Pedestrian Crossings** being implemented.

A complete list of possible solutions can be found in the sidewalk, unsignalized intersection, and railroad crossing facility reports provided in **Appendix F**.

[The remainder of this page intentionally left blank.]



Table 4. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curb ramp lands in crosswalk	2,421	2,385	98.5%
Curb ramp does not have traversable sides	1,579	1,518	96.1%
Curbed sides are 90°	1,579	1,513	95.8%
48" crosswalk extension exists	2,373	2,222	93.6%
Curb ramp width ≥ 48"	2,421	2,176	89.9%
Curb ramp present where curb ramp is needed	4,544	3,796	83.5%
No ponding in curb ramp, landing, or flares	2,421	1,995	82.4%
Landing area exists	2,421	1,965	81.2%
Curb ramp counter slope ≤ 5%	2,421	1,947	80.4%
No obstruction in curb ramp, landing, or flares	2,421	1,844	76.2%
Flush transition to roadway exists	2,421	1,597	70.0%
Curb ramp running slope ≤ 8.3%	2,421	1,136	46.9%
Landing running slope ≤ 2%	2,421	1070	44.2%
Landing cross slope ≤ 2%	2,421	977	40.4%
Detectable warning surface color contrasts with adjacent curb ramp surface	2,421	936	38.7%
Curb ramp cross slope ≤ 2%	2,421	893	37.0%
Presence of detectable warning surface with correct placement	2,421	854	35.3%
Flare cross slope ≤ 10%	842	216	25.7%



3.4 Maintenance Versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification with regard to when curb ramp installation is required as part of a project be distributed to the appropriate Knox County staff.

The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

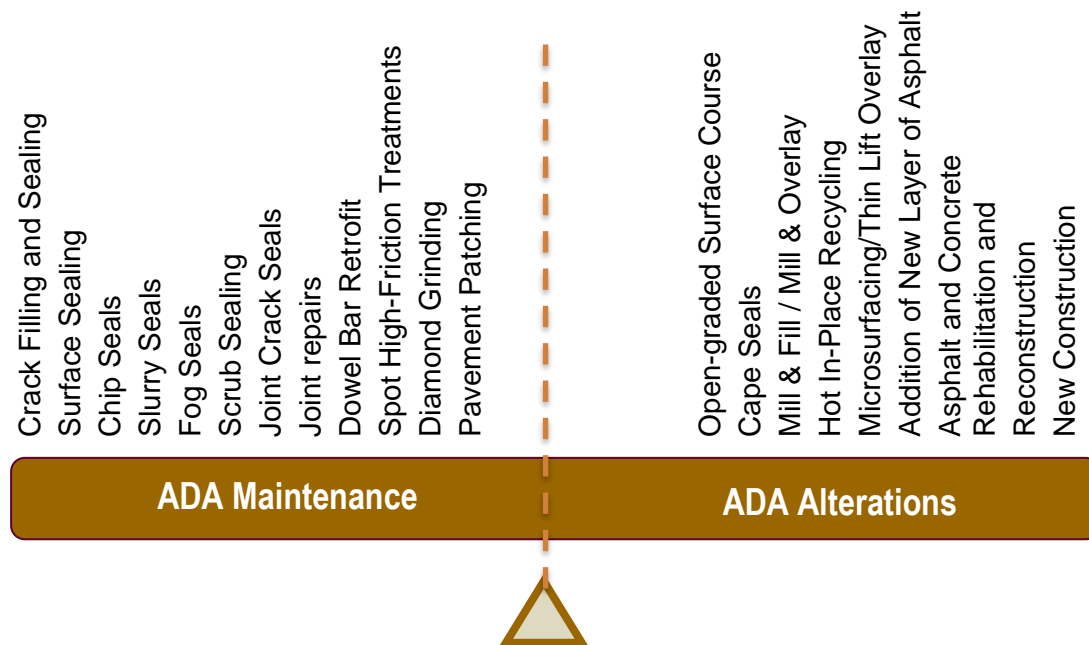
FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.



Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

3.5 FHWA Guidance on Closing Pedestrian Crossings

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed if an engineering study (performed by the County and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb is acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The agency wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. Knox County should also develop and implement a policy on how to close those crossings that are accommodated based on the existing conditions at the crossing location (e.g., existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk serving the crossing), but should not be due to safety concerns.



3.6 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, signalized intersections, sidewalks, and unsignalized intersections. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.6.1 Prioritization Factors for Facilities

Buildings, parks, and greenways were prioritized on a 12-point scale, which is defined in **Table 5**. This prioritization methodology was developed by the Consultant Team to aid the County in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA. The priorities are based on the priorities set forth by the Department of Justice and are as follows:

1. Accessible Parking/Approach/Entrance
2. Access to Goods and Services
3. Usability of Restrooms
4. Additional Access (drinking fountains, public telephones, etc.)

The prioritization schedule includes “severe”, “moderate”, and “minimal” descriptors to determine the priority level. “Severe” refers to instances where major reconstruction is required to achieve compliance; “moderate” includes instances where minor reconstruction may be needed, or fixtures/elements relocated a small amount; and “minimal” refers to instances where compliance can be achieved easily with little to no effort.

Signalized intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in **Table 6**. This prioritization methodology was developed by the Consultant Team to aid the County in determining which signalized intersections should be prioritized for improvements over other signalized intersections based on the severity of non-compliance with ADA.

Building, park, greenway, and public rights-of-way sidewalk were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, “Low” based on the severity of non-compliance, which is defined in **Table 7**. Compliant segments of the sidewalk corridor were given a priority label of “Compliant”.

[The remainder of this page intentionally left blank.]



Table 5. Prioritization Factors for Buildings/Parks/Greenways

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	<ul style="list-style-type: none"> • Element is more than twice the allowable requirement. No known complaint. • AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.
3 (high)	<ul style="list-style-type: none"> • Element is more than twice the allowable requirement. No known complaint. • AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.
4 (high)	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
5 (medium)	Issues with access to goods and services (DOJ level 2) – severely out of compliance
6 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – moderately out of compliance; • Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR • Restrooms (DOJ level 3) – severely out of compliance
7 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – minimally out of compliance; • Restrooms (DOJ level 3) – moderately out of compliance; OR • Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance
8 (medium)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
9 (low)	Issues with restrooms (DOJ level 3) – minimally out of compliance
10 (low)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
11 (low)	<ul style="list-style-type: none"> • Client is a Title II agency; AND • Elements out of compliance, but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability
12 (low)	Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered



Table 6. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps, but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the curb ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	Existing diagonal curb ramp (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner.
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48-inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above



Table 7. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	



Table 8, Tables 9A – 9D, and Tables 10A – 10D provide summaries of the prioritization classifications for signalized intersections, sidewalks, and unsignalized intersections, respectively.

Table 8. Prioritization Summary Signalized Intersections

Priority	Number of Intersections
0 (compliant)	30
1 (high)	0
2 (high)	23
3 (high)	0
4 (high)	2
5 (medium)	25
6 (medium)	0
7 (medium)	1
8 (medium)	0
9 (low)	1
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	0
Total	82

Table 9A. Prioritization Summary for Building Sidewalk

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalks	10.76	9.08	0.77	23.08	43.69
Driveways	0.27	0.36	0.15	0.29	1.07
Cross Streets	0.02	0.01	0.02	0.03	0.07
Total	11.06	9.44	0.94	23.39	44.83



Table 9B. Prioritization Summary for Park Sidewalk

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalks	3.77	3.23	1.43	7.59	16.02
Driveways	0.02	0.00	0.03	0.00	0.05
Cross Streets	0.02	0.00	0.02	0.00	0.04
Total	3.81	3.23	1.48	7.59	16.11

Table 9C. Prioritization Summary for Greenway Sidewalk

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalks	1.79	1.55	0.34	5.07	8.75
Driveways	0.07	0.05	0.02	0.01	0.15
Cross Streets	0.01	0.01	0.06	0.04	0.13
Total	1.87	1.62	0.42	5.12	9.03

Table 9D. Prioritization Summary for Public Rights-of-Way Sidewalk Corridors

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalks	33.02	35.08	0.87	46.86	115.82
Driveways	9.52	3.23	2.35	2.52	17.62
Cross Streets	0.84	1.19	1.90	2.67	6.60
Total	43.37	39.50	5.12	52.05	140.04



Table 10A. Prioritization Summary for Building Unsignalized Intersections

Priority	Number of Intersections
0 (compliant)	4
1 (high)	0
2 (high)	293
3 (high)	30
4 (high)	0
5 (medium)	1
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	9
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	103
Total	440

Table 10B. Prioritization Summary for Park Unsignalized Intersections

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	17
3 (high)	3
4 (high)	0
5 (medium)	1
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	1
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	34
Total	56



Table 10C. Prioritization Summary for Greenway Unsignalized Intersections

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	5
3 (high)	1
4 (high)	0
5 (medium)	5
6 (medium)	0
7 (medium)	0
8 (medium)	0
9 (low)	0
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	19
Total	29

Table 10D. Prioritization Summary for Public Rights-of-Way Unsignalized Intersections

Priority	Number of Intersections
0 (compliant)	45
1 (high)	0
2 (high)	230
3 (high)	13
4 (high)	1
5 (medium)	753
6 (medium)	67
7 (medium)	2
8 (medium)	5
9 (low)	19
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	144
Total	1,279



3.7 Conclusion

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for Knox County. In developing the Transition Plan, programs, services, and activities were reviewed for compliance with ADA guidelines and a Self-Evaluation was conducted on the following facilities:

- 142 buildings and 44.8 miles of associated sidewalk, unsignalized intersections, and driveways;
- 47 parks and 15.1 miles of associated sidewalk, unsignalized intersections, and driveways;
- 7 greenways and 9.1 miles of associated sidewalk, unsignalized intersections, and driveways;
- 82 signalized intersections; and
- 140.1 miles of public rights-of-way sidewalk and all unsignalized intersections and driveways along the sidewalk corridors.

The recommended improvements were prioritized, and an implementation plan was developed to provide guidance for the County's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

The County is taking the actions referenced below and will continue to look for and remedy, barriers to access to ensure that Knox County citizens who are disabled are given access to the County's programs, services, and activities.

To confirm follow-up on corrective actions required under the Transition Plan, the County will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the Governing Body of the County, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. See example of ADA Action Log provided in **Appendix G**.

[The remainder of this page intentionally left blank.]



[Page intentionally left blank]



4.0 Facility Costs

4.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from the Tennessee Department of Transportation (TDOT) construction projects, along with Consultant Team experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an engineering design percentage (15%). All costs are in 2018 dollars. **Table 11** provides a summary of the estimated costs to bring each facility type into compliance.

Table 11. Summary of Facility Costs

Facility Type	Priority			Total
	High	Medium	Low	
Buildings	\$1,606,227	\$18,534,757	\$516,198	\$20,657,183
Building Sidewalk	\$4,371,442	\$2,928,866	\$305,392	\$7,605,700
Building Unsignalized Intersections	\$1,900,300	\$3,000	\$146,100	\$2,049,400
Parks	\$986,109	\$470,019	\$8,836	\$1,464,964
Park Sidewalk	\$1,390,307	\$1,192,642	\$337,352	\$2,920,301
Park Unsignalized Intersections	\$161,300	\$9,900	\$36,800	\$208,000
Greenway Amenities	\$17,888	\$16,186	\$0	\$34,074
Greenway Sidewalk	\$787,232	\$640,355	\$138,613	\$1,566,200
Greenway Unsignalized Intersections	\$33,700	\$39,900	\$61,100	\$134,700
Signalized Intersections	\$1,357,600	\$1,605,200	\$25,500	\$2,988,300
Public Rights-of-Way Sidewalk	\$13,292,423	\$9,795,390	\$1,331,287	\$24,419,100
Public Rights-of-Way Unsignalized Intersections	\$3,416,500	\$11,647,100	\$552,500	\$15,616,100
County Totals	\$29,325,028	\$46,883,315	\$3,459,678	\$79,664,022



4.2 Implementation Schedule

Table 12 details the barrier removal costs and proposed implementation schedule by facility type for all County-owned facilities evaluated. This 40-year plan will serve as the implementation schedule for the Transition Plan. Knox County reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in County programs.

It is the intent of the County to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the Capital Improvement Program to be addressed on a fiscal year basis.

Table 12. Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget
Buildings	\$20,657,183	40	\$516,430
Building Sidewalk	\$7,605,700	40	\$190,143
Building Unsignalized Intersections	\$2,049,400	40	\$51,235
Parks	\$1,464,964	40	\$36,624
Park Sidewalk	\$2,920,301	40	\$73,008
Park Unsignalized Intersections	\$208,000	40	\$5,200
Greenway Amenities	\$34,074	40	\$852
Greenway Sidewalk	\$1,566,200	40	\$39,155
Greenway Unsignalized Intersections	\$134,700	40	\$3,368
Signalized Intersections	\$2,988,300	40	\$74,708
Public Rights-of-Way Sidewalk	\$24,419,100	40	\$610,478
Public Rights-of-Way Unsignalized Intersections	\$15,616,100	40	\$390,403
County Total	\$79,664,022		
Total Annual Budget			\$1,991,604

4.3 Funding Opportunities

Several alternative funding sources are available to the County to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

4.3.1 Federal and State Funding

Table 13 depicts the various types of federal and state funding available for the County to apply for funding for various improvements. The following agencies and funding options are represented in the chart.

- BUILD – Better Utilizing Investments to Leverage Development Transportation Discretionary Grants
- INFRA – Infrastructure for Rebuilding America Discretionary Grant Program
- TIFIA – Transportation Infrastructure Finance and Innovation Act (loans)



- FTA – Federal Transit Administration Capital Funds
- ATI – Associated Transit Improvement (1% set-aside of FTA)
- CMAQ – Congestion Mitigation and Air Quality Improvement Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- TA – Transportation Alternatives Set-Aside (formerly Transportation Alternatives Program)
- RTP – Recreational Trails Program
- SRTS – Safe Routes to School Program / Activities
- PLAN – Statewide Planning and Research (SPR) or Metropolitan Planning funds
- NHTSA 405 – National Priority Safety Programs (Nonmotorized safety)
- FLTTP – Federal Lands and Tribal Transportation Programs (Federal Lands Access Program, Federal Lands Transportation Program, Tribal Transportation Program, Nationally Significant Federal Lands and Tribal Projects)

Most of these programs are competitive type grants; therefore, Knox County is not guaranteed to receive these funds. It will be important for the County to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

[remainder of page intentionally left blank]



Table 13. Funding Opportunities

ACTIVITY	BUILD	INFRA	TIFIA	FTA	ATI	CMAQ	HSIP	NHPP	STBG	TA	RTP	SRTS	PLAN	NHTS	FLTP
Access enhancements to public transportation	X	X	X	X	X	X		X	X	X					X
ADA/504 Self-Evaluation / Transition Plan									X	X	X		X		X
Bus shelters and benches	X	X	X	X	X	X		X	X	X					X
Coordinator positions (state or local)						X			X	X		X			
Crosswalks (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Curb cut and ramps	X	X	X	X	X	X	X	X	X	X	X	X			X
Paved shoulders for pedestrian use	X	X	X			X	X	X	X	X		X			X
Pedestrian plans				X					X	X		X	X		X
Recreational trails	X	X	X						X	X	X				X
Shared use paths / transportation trails	X	X	X	X	X	X	X	X	X	X	X	X			X
Sidewalk (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Signs / signals / signal improvements	X	X	X	X	X	X	X	X	X	X		X			X
Signed pedestrian routes	X	X	X	X	X	X		X	X	X		X			X
Spot improvement programs	X	X	X	X			X	X	X	X	X	X			X
Stormwater impacts related to pedestrian projects	X	X	X	X	X		X	X	X	X	X	X			X
Trail bridges	X	X	X			X	X	X	X	X	X	X			X
Trail / highway intersections	X	X	X			X	X	X	X	X	X	X			X
Trailside and trailhead facilities	X	X	X						X	X	X				X
Training						X	X		X	X	X	X	X	X	
Tunnels / undercrossings for pedestrians	X	X	X	X	X	X	X	X	X	X	X	X			X

*Adapted from FHWA Pedestrian and Bicycle Funding Opportunities, Revised August 9, 2018:
https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm*



4.3.2 Local Funding

There are several local funding options for the County to consider, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) is to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Transportation Reinvestment Zone
- Transportation User Fee / Street Maintenance Fee

4.3.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the County to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

4.4 Next Steps

The County will begin internal coordination to address the programmatic barriers identified in the Transition Plan.

The County will develop a budget to include the next 40 fiscal years. Projects identified in the ADA Transition Plan will be programmed within the 40-year budget based prioritization provided (see **Section 3.6 Prioritization**) and other factors determined by the County, such as how barrier removal can be incorporated into existing County projects identified for capital improvements.

The County also intends to adopt the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) to enable County enforcement of these guidelines throughout the design and construction process of pedestrian facilities in the public rights-of-way.



[Page intentionally left blank]



Appendix

Appendix A: Departmental Survey and Interview Finding Summaries

Appendix B: Grievance Procedure

Title I Grievance Procedure

Title I Grievance Form

Title II Grievance Procedure

Title II Grievance Form

Appendix C: Programs, Services, and Activities Review

Public Notice

Roles and Responsibilities of the ADA/504 Coordinator

Job Description Review

Equivalent Language Guidance

Documents, Forms, and Videos Review

Cursory Website Review

Alternate Format Policy, Procedure, and Request Form

Sample Accessibility Checklist for Tours and Events

Appendix D: Facility Lists

Libraries

Senior Centers

PBA Managed / Other Facilities

Solid Waste Centers

Elementary Schools

Middle Schools

High Schools



Non-Traditional Schools

Other Programs / Department Facilities

Parks

Greenways

Signalized Intersections

Appendix E: Facility Maps

Libraries

Senior Centers

PBA Managed and Other Facilities

Solid Waste Centers

Schools

Other Programs and Department Facilities

Parks

Greenways

Signalized Intersections

Sidewalk Corridors



Appendix F: Facility Reports

Libraries

Library Buildings

Library Sidewalks

Library Unsignalized Intersections

Senior Centers

Senior Center Buildings

Senior Center Sidewalks

Senior Centers Unsignalized Intersections

PBA Managed / Other Facilities

PBA Managed / Other Facilities

PBA Managed / Other Facility Sidewalks

PBA Managed / Other Facility Unsignalized Intersections

Solid Waste Centers

Solid Waste Center Buildings

Solid Waste Center Sidewalks

Solid Waste Center Unsignalized Intersections

Schools

School Buildings

School Sidewalks

School Unsignalized Intersections

Other Programs / Department Facilities

Other Programs / Department Facilities

Other Programs / Department Facility Sidewalks

Other Programs / Department Facility Unsignalized Intersections



Parks

Park Amenities

Park Sidewalks

Park Unsignalized Intersections

Greenways

Greenway Amenities

Greenway Sidewalks

Greenway Unsignalized Intersections

Public Rights-of-Way

Signalized Intersections

Public Rights-of-Way Sidewalk

Public Rights-of-Way Unsignalized Intersections

Appendix G: ADA Action Log