

The Essentials of ADA Self Evaluations and Transition Plans

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Adapted from a

Corada Webinar Series including content from programs presented by Irene Bowen – ADA One, Robin Jones – Great Lakes ADA Center, and Michael Edwards & Eric Stockton – Great Plains ADA Center



Program Description

Self Evaluations and Transition Plans were first mandated by the Rehabilitation Act 48 years ago covering all programs, activities, services, and benefits receiving federal funds. They were expanded 32 years ago under the ADA to cover all programs offered and supported by public entities (state and local governments). This program covers the basic obligations of those mandates, options for approaching the effort, the information types to include, and the methods of organizing and evaluating the resulting data so that public entities can efficiently and effectively meet their obligations to provide equal access for people with disabilities to all of their programs.

Learning Objectives

1. Participants will understand the objectives and minimum requirements for Self Evaluations by public entities.
2. Participants will know how to use the results of their Self Evaluations to manage their ADA compliance efforts.
3. Participants will understand the objectives and minimum requirements for Transition Plans by public entities.
4. Participants will understand the different approaches public entities can use when developing their Transition Plans, which details they may want to collect, and how to organize, prioritize, and use the results of their plans.

ADA Title II Basics

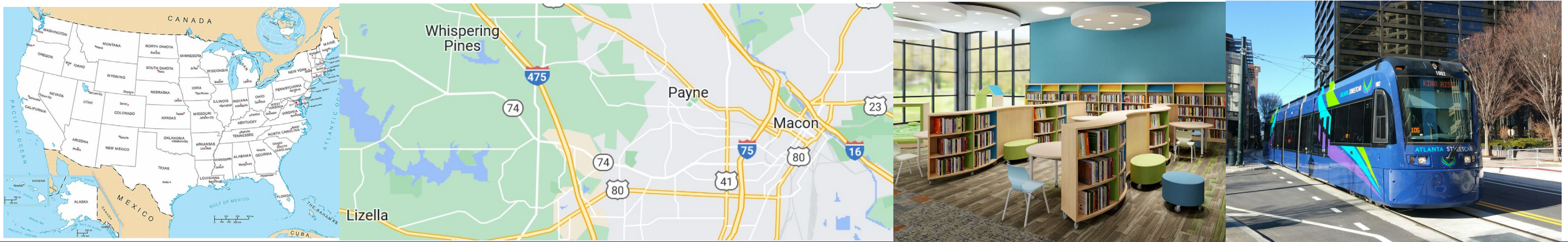
Audience Poll

1. If you work for a public entity and somebody calls your office with a disability-related problem with one of your programs and a question, can you look up the relevant details in your Self Evaluation or Transition Plan to answer their question within five minutes?
 - ☐ Yes
 - ☐ No
2. If not, do you know who to call to get the answer quickly?
 - ☐ Yes
 - ☐ No

Who is subject to Title II?

A public entity covered by Title II is defined as:

1. Any state or local government, regardless of size
2. Any department, agency, special purpose district, or other instrumentality of a state or local government
3. Certain commuter authorities and AMTRAK



How is Title II enforced?

ADA provides 3 methods of enforcement:

1. File a complaint under the public entity's grievance procedure
2. File a complaint with a designated federal enforcement agency
3. File a lawsuit

5 Administrative Requirements of Title II

1. Designate a responsible employee

Someone with sufficient authority to make decisions and take action – Usually called the “ADA Coordinator”

2. Grievance Procedure

Establish and publicize a procedure for addressing complaints regarding ADA Compliance

3. Notice to the Public

Public statement of ADA Compliance to be made available across multiple platforms (print, auditory, website, etc.)

5 Administrative Requirements of Title II

4. Conduct a Self-Evaluation

(An assessment of all programs and services to identify any barriers to participation by people with disabilities)

- Required by all entities, regardless of size
- Must be kept on file for 3 years for entities with 50 or more employees

(To be completed by July 26, 1993)

5 Administrative Requirements of Title II

5. Develop a Transition Plan

(A plan that identifies the architectural barriers that limit access to programs and activities offered by a public entity)

- Only required for entities with 50 or more employees (but smaller ones still have all of the other compliance obligations including full program access)

(To be completed by July 26, 1992

All identified barriers were to be removed by July 26, 1995)

Self Evaluations

Audience Poll

Why should I help complete a Self Evaluation?

(Check all that apply to you)

1. What's a "Self Evaluation"?
2. I don't know, my boss said I had to do one for our department
3. To "check the box" that it's done
4. To comply with the ADA
5. To help our entity effectively serve people with disabilities

What are the minimum obligations?

Evaluate services, policies, and practices, and the effects of them, that do not or may not meet Title II requirements

- Describe areas examined, problems identified, modifications made
- Provide opportunity for interested persons to participate (at least to submit comments)
- If entity larger than 50 employees, keep record of self-evaluation on file and available for public inspection for at least three years
- Make any necessary modifications [action plan]

What's the point of a Self Evaluation?

Remember that the purpose of the Self Evaluation is to help the public entity achieve compliance with the ADA and the Rehab Act. Simply completing the Self Evaluation and storing it on the shelf or in a computer for at least three years does not help you reach that goal or reduce your liability from injuries, complaints, lawsuits, or investigations.

You really want a live effort to identify your problems, plan for eliminating them, track your progress, and document your successes.

(That is a big part of how San Francisco prevailed in the Kirola Case.)

What are the components of a Self Evaluation?

- Examine the entities programs, services, activities and information technology
- Evaluate how people with disabilities receive benefits and services and participate in programs and activities
- Develop a set of priority-driven recommendations to make these programs, services, and activities accessible to people with disabilities



Why is it important?

- It's the law
- To meet the needs of a growing and aging population
- To achieve the entity's goal to make their programs and services accessible to its citizens and visitors
- To provide equal access to people with disabilities seeking to use the entity's facilities and services
- To educate and empower government personnel about the importance of providing access



What are “Programs, Services, and Activities”?



Broadly defined:

For purposes of the self-evaluation and transition plan, a “program” is a service or activity with a single purpose. It is an activity undertaken by a department that affords benefits, information, opportunities or activities to one or more members of the public.

How big is a program, and how many do you have?
It depends on how you count...



Boulders

Ex: Parks & Rec.



Rocks

Ex: Swimming

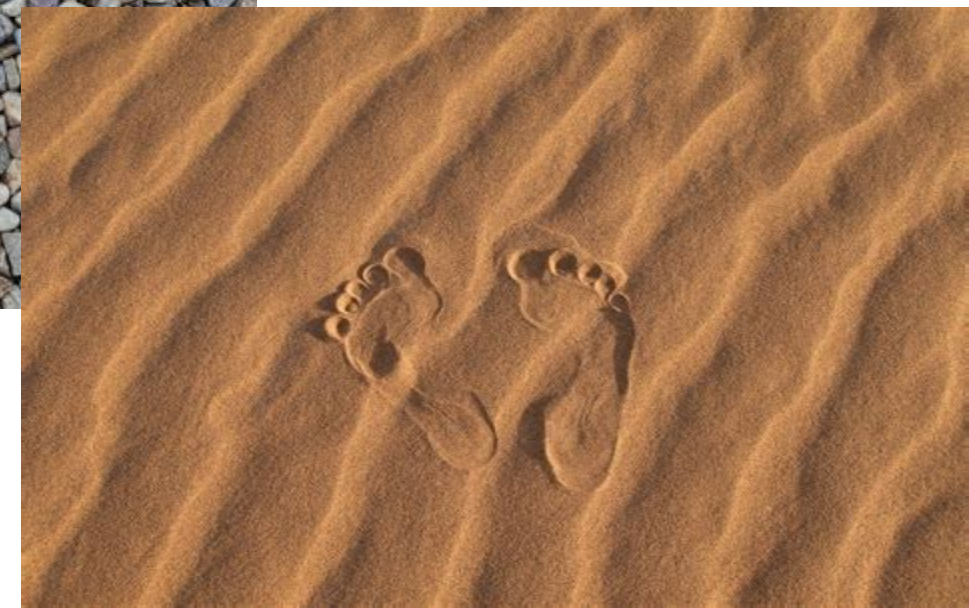
Gravel

Ex: Swim Lessons



Sand

Ex: Infant Swim



What are some examples of Programs?

“Programs, services, activities, aids, and benefits” provided by or on behalf of a public entity.

For example, in parks and recreation:

- ▶ Senior center exercise classes
- ▶ Dances for seniors
- ▶ Swimming lessons
- ▶ Swim team
- ▶ Swimming competitions
- ▶ Free swim opportunities
- ▶ Day care
- ▶ Concession stands and their offerings
- ▶ Summer camp
- ▶ Fishing
- ▶ Hiking
- ▶ Little league teams
- ▶ Etc...

Title II Basics – Non-discrimination Provisions

Equal opportunity to participate in and benefit from programs, services, and activities

- No exclusion from programs
- No denial of benefits or services
- No provision of different aids, benefits, services
- No provision of unequal aids, benefits, services

Title II Basics – Non-discrimination Provisions

- Integration
- Reasonable modifications to policies, practices, and procedures
- Effective communication
 - Auxiliary Aids and Services
- No eligibility criteria that exclude or screen out individuals with disabilities.

Title II Basics – Non-discrimination Provisions

- Equal access to licensing and exams
 - Accessible location
 - Alternate formats
 - Auxiliary Aids
- No surcharges
 - Service animals
 - Alternate format documents
- Non-discrimination in employment

Core topics and obligations



- Participation requirements (initial and continuing)
- Tests
- Policies, practices, and procedures that may discriminate
- Separate programs/services
- Effective Communication
- Infrastructure (Transportation, etc.)
- Emergency preparedness and building evacuation planning
- Outside entities (vendors, contractors, grantees)
- Furniture, equipment, purchasing
- Program and employment applications

What are the basic exceptions and defenses?

- Fundamental alteration in the nature of a service, program, or activity
- Undue financial and administrative burdens, but:
 - Decision must be made by head of the public entity after considering all resources available and must be in writing
 - And public entity must take other actions that will not result in fundamental alteration or undue burdens, but still provide access
- Historic properties where the sole program they offer is the preservation of history, 28 CFR 35.150(a)(2), 35.150(b)(3)
- Safe harbor

Suggested actions before you begin your Self Evaluation

1. Secure support from the top
2. Appoint an ADA Coordinator
3. Build your Internal team – who “owns” it?
4. Finalize the breadth and depth of analysis
5. Establish the method of information gathering, analysis
6. Establish the method/level of how you will report findings
7. Determine how you will get public input – when and how?

Suggested actions before you begin your Self Evaluation

8. When do you want to start and how will you implement changes (immediately when barriers are identified? After you finish the process?)
9. Finalize what the internal resources are in terms of time, money, expertise (will people be “assigned” or will you seek “volunteers”?)

Suggested actions before you begin your Self Evaluation

10. Determine if you will use outside consultants and, if so, how they will be used: Entity-driven or Consultant-driven?
11. How will your process encourage ongoing improvement?
12. How will your process and documentation system(s) facilitate efficient and effective process management, internal communications, and on-going compliance into the future?

Under every approach,
plan for training!!!



- Disability awareness
- Process of assessment
- Difficult areas
- Different strokes for different folks
- Periodic/refreshers
- It must be Required
- In person or by webinar
- Track who's been trained and who needs it

For further information

This PowerPoint was taken from a free, more detailed live and **on-demand webinar series on Self Evaluations** being developed by Corada. For information about that program, go to www.ADASelfEvaluations.com.

Self Evaluation software available from various companies:
Corada Pro – Self-Evaluation and Compliance Management
BlueDAG - ADA Grievance Tracking, Notices, & SE Logs

Audience Poll

Self Evaluations do not include detailed information about physical barriers that limit access to programs provided by the public entity.

☐ True

☐ False

What should I read?

Title II Regulations and commentary

Title II Technical Assistance Manual

2010 Standards for Accessible Design

Title II Action Guide

ADA Best Practices Toolkit

Title II Statute

State and Local Accessibility Laws

These may be found at your regional ADA Center, on www.ADA.gov,
www.ADAta.org, or on www.Corada.com

Additional resources

City of Tacoma, Washington -- Self evaluation developed by staff

<http://cms.cityoftacoma.org/hrhs/ada/FinalADAPlanJune08.pdf>

San Francisco -- Contractor-developed

<http://www.sfgov2.org/index.aspx?page=546>

Sacramento approach (standard activities vs. unique services)

<http://www.cityofsacramento.org/adaweb/summary.html#sapproach>

For further information

Fulton County, GA – county-wide report (contractor – ADA One)

http://fultoncountyga.gov/images/stories/OEE0/FC_I_ADA_SEval.pdf

Somerville, MA – self-evaluation as basis for transition plan
(contractor) (mostly facilities)

<http://www.somervillema.gov/sites/default/files/Somerville2013-Self-Evaluation.pdf>

Transition Plans – Part One

Why do a Transition Plan now?

Since 1990, most of you have seen thousands of barriers to people with disabilities removed, policies changed, and opportunities expand for people with disabilities. But much, much more remains to be done. How can you move to the next level of ADA compliance providing integrated, safe access for people with disabilities? A functional Transition Plan is one of your best tools.

Information Covered in Part 1

- ▶ When is a Transition Plan required?
- ▶ Where do the obligations apply?
- ▶ What is program access?
- ▶ What is a program & what makes a program accessible?
- ▶ Top 14 TP considerations
- ▶ Most common facility types
- ▶ Most common physical barriers

Information Covered in Part 2

- ▶ When to use physical access v. alternative methods
- ▶ Four requirements of a Transition Plan
- ▶ How to select standards that identify barriers to program access
- ▶ Two approaches for finding program access barriers

Information Covered in Part 3

- ▶ How to prevent and monitor barriers
- ▶ Things to know about leased facilities
- ▶ Practicalities of transition planning
- ▶ How to fund accessibility work

Title II ADA Regulation at 28 CFR 35.150(d)

Transition Plan:

“If structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop ...

a transition plan setting forth the steps necessary to complete such changes.”

- Opportunity for interested parties to participate
- Copy available for public inspection (no time given)
- Make changes by January 26, 1995 (as expeditiously as possible)

When is a transition plan required?

30 years later, what is required now?

Your programs must be accessible.

A transition plan helps keep track of everything you still need to fix.

Instead of a dead-end report, it needs to be a live database, or a spreadsheet as a minimum.

With it, you can manage all of your accessible facilities, new facilities, new programs, program relocations, requests from participants, capital planning, progress tracking, etc.

When do program access requirements apply?

- ▶ Program access requirements related to facility access apply in addition to the requirements for new construction and alterations, and in addition to self evaluation requirements related to communications, policies, practices, and procedures.
- ▶ When no new construction or alterations are taking place, there is still an obligation to remove barriers that limit program access.

What is “Program Access?”

- ❖ A broad term used by access specialists to describe access to facilities where programs are offered
- ❖ Program access means that there are no physical barriers that limit access for people with disabilities to programs that your public entity offers.

Title II: Typical Questions

Title II: programs in existing facilities must be accessible when viewed in their entirety (cannot deny benefits, services, etc. due to inaccessible facilities).

- ▶ What is a program? (covered earlier)
- ▶ What are the characteristics of an accessible program?
- ▶ What is an “existing” facility?
- ▶ When is a feature or an element accessible?
- ▶ Are the ADA Standards the limit?

Some characteristics of program access

- ▶ Provide equal opportunity
- ▶ Range of choices similar to others'
- ▶ Integration
- ▶ Privacy / confidentiality
- ▶ Dignity

Existing Facility

DOJ definition in 2010 Reg's. - An “existing facility” is one that exists...

- ▶ -- that is, on a given date
- ▶ One facility can be both new and existing.
- ▶ Significance for program access: ALL buildings & facilities are evaluated

When is a feature or
element “accessible?”...
when it meets the relevant
standards

Reference point since
March 15, 2012 –

▶ 2010 ADA Standards
(Even for alterations
in older facilities)

▶ Major new obligations
for elements newly-
covered in the 2010
Std:

▶ Pools

▶ Exercise machines
and equipment

▶ Residential
facilities dwelling
units

▶ Play areas

▶ Team or player
seating

Since the Standards changed in 2010...

- ▶ Existence of a barrier is (at least initially) measured by looking to the 2010 ADA Standards
- ▶ Remedy to a barrier is measured the same way
- ▶ SO what happened when the “measure” changed between the time the facility was built and now?

Safe harbor for program accessibility

Existing elements that complied with pre-2010 requirements (either UFAS or 1991 ADA Standards on a building-by-building basis) are “safe” from further changes for the sake of program accessibility and path of travel requirements until they are altered. Newly-covered elements are not safe harbored.

2010 ADA regulations at section 35.150(b)(2)(i)

2010 ADA regulations at section 35.151(b)(4)(ii)(C)

Are the Standards the Limit?

The program access obligation is more flexible than the Standards, but the equal opportunity requirements may require you to go “beyond” the standards...

- ▶ Automatic doors
- ▶ More accessible parking
- ▶ Bariatric fixtures/equipment
- ▶ Etc.

Other Limits Program access does not require:

- ▶ Fundamental alteration in the nature of a service, program, or activity
- ▶ Undue financial and administrative burdens

BUT:

- ▶ Any undue burden decision must be made by the head of the public entity after considering all resources available and it must be in writing
- ▶ And, the public entity must still take other actions that will not result in fundamental alteration or undue burdens, but still provide program access
- ▶ See also historic exceptions, 28 CFR 35.150(a)(2), 35.150(b)(3) – This exception applies **ONLY** when the facility's **sole** purpose is to preserve history.

Transition Planning Considerations

1. Overview of the requirements of the law for physical & program access
2. Breadth and scope of facility types covered
3. Types of physical barriers
4. Alternative methods
5. What must be included in the plan
6. Which Standards?
7. Logical approaches to providing physical access

Transition Planning Considerations

- 8. Facility selection for program access
- 9. Surveying facilities for program access
- 10. Information needed
- 11. Barrier prevention and monitoring
- 12. Leased facilities
- 13. TP practicalities
- 14. Funding the work

I. Physical access is like a seven-layer cake

Program access (It's the icing that covers everything)

1. Operations (including communications about accommodations)
2. Maintenance
3. Facilities offering programs under contract with your entity
4. Leased facilities (Site selection)
5. Path of travel to altered areas and additions
6. Alterations
7. New construction and additions

II.a. Typical breadth of facility types covered

1. City and town halls and administrative centers
2. Courthouses
3. Jails, Prisons, and detention centers
4. Police stations
5. Fire stations
6. Sheriffs' departments

II.b. Typical breadth of facility types covered

7. Animal shelters

8. Libraries

9. Museums

10. Fairgrounds

11. Convention centers

12. Auditoriums and theaters

13. Baseball and football
stadiums

14. Visitors centers

15. Parks, also including

- a. Public Gardens
- b. Recreation centers
- c. Golf courses
- d. Ice skating rinks
- e. Public swimming and wading pools
- f. Playgrounds
- g. Ball fields

15. Parks, also including

h. Bleachers

i. Tennis centers

j. Band shells

k. Gazebos

l. Marinas and fishing facilities

m. Nature trails

n. Shared use paths

II.e. Typical breadth of facility types covered

- 16. Airports, public transportation stops, and transit stations
- 17. Public rights of way elements
- 18. Waste disposal/landfill facilities open to public use
- 19. Schools
- 20. All other public entity owned and/or controlled public facilities and areas where programs are offered

III.b. Types of physical obstacles listed most frequently in DOJ Agreements

1. Parking
2. Curb ramps
3. Routes from public transportation, accessible parking, streets and/or sidewalks to accessible entrances
4. Routes through the facilities connecting accessible spaces and elements
5. Doors and door hardware
6. Ramps and handrails
7. Stairs and handrails

III.b. Types of physical obstacles listed most frequently in DOJ Agreements

- 8. Elevator cabs and lobbies
- 9. Platform lifts
- 10. Rest rooms, accessible plumbing fixtures, and accessories
- 11. Showers and bathing facilities
- 12. Dressing and lockers
- 13. Alarms
- 14. Signage

III.c. Types of physical obstacles listed most frequently in DOJ Agreements

15. Drinking fountains

16. Telephones

17. Service and ticket sales counters

18. Concession stands and gift shops

19. Wheelchair seating in assembly areas

20. Access to stages and performing areas

21. Assistive listening systems

22. Libraries

Audience Poll

Which of the following are characteristics of program access?

(Select all that apply.)

- ☐ Provide equal opportunity
- ☐ Equal benefit
- ☐ Range of choices similar to others'
- ☐ Integration
- ☐ Privacy / confidentiality
- ☐ Dignity

Part Two

IV.a. Physical access v. alternative methods

- A. Flexibility allowed in achieving program accessibility: almost any method that results in making services, programs or activities accessible
- B. BUT Public entity must give priority to those methods that provide for integration of persons with disabilities
- C. Physical access is not required to every facility where alternative methods are as effective in providing program access, but, where structural changes are required, a Transition Plan is required

IV.b. Physical access v. alt. methods

- ▶ Alternative methods for compliance in existing facilities may include:
 - ▶ Redesigning equipment
 - ▶ Reassigning services to accessible buildings
 - ▶ Assigning aides to beneficiaries or home visits
 - ▶ Delivery of services at alternate sites
 - ▶ Alteration of existing facilities
 - ▶ Construction of new, accessible facilities
 - ▶ Use of accessible rolling stock or other conveyances
 - ▶ Other methods to achieve “readily accessible to and usable by”

V. Four requirements of a Transition Plan

- ▶ Identify all physical obstacles (**barriers**) in the facilities that limit program access
- ▶ Detail the **methods** that will be used to make the (programs and/or) facilities accessible
- ▶ **Schedule** the steps to be taken each year to achieve compliance
- ▶ **Name of official responsible** for implementation

[If authority over streets, roads, walkways, include schedule for curb ramps or other sloped areas where pedestrian walks cross curbs. 28 CFR 35.150(d)(2)&(3)]

VI. Determine which Standards will be used to identify barriers

- ▶ 2010 ADA Standards
- ▶ 1991 ADA Stds. or UFAS (for Safe Harbor)
- ▶ State and/or Local Standards (Safe Harbors?)
- ▶ Rehab. Act - Section 504 program access standard
- ▶ Public right of way (PROW Guidelines?)
- ▶ Shared use paths (PROW SNPRM?)
- ▶ Outdoor developed areas (ABA?)
- ▶ Other(s)?

VIII.c. Multi-site programs

Entities have discretion in determining how many spaces in a building and how many facilities serving a multi-site program must be made accessible to achieve overall program accessibility.

Examples: City parks, libraries, parking facilities, & county courthouses (But be very careful with courts. Judges are usually very resistant to moving cases around the building, even when that is needed for access by people with disabilities.)

VIII.d. Multi-site programs

DOJ 2010 regulation preamble describes factors for evaluation of a multi-site program for “accessibility in its entirety”

- ▶ Size of entity
- ▶ Program features at each site
- ▶ Distance between sites
- ▶ Travel times
- ▶ Number of sites
- ▶ Public transportation
- ▶ Integrated setting

DOJ did not adopt the concept of a “reasonable number”

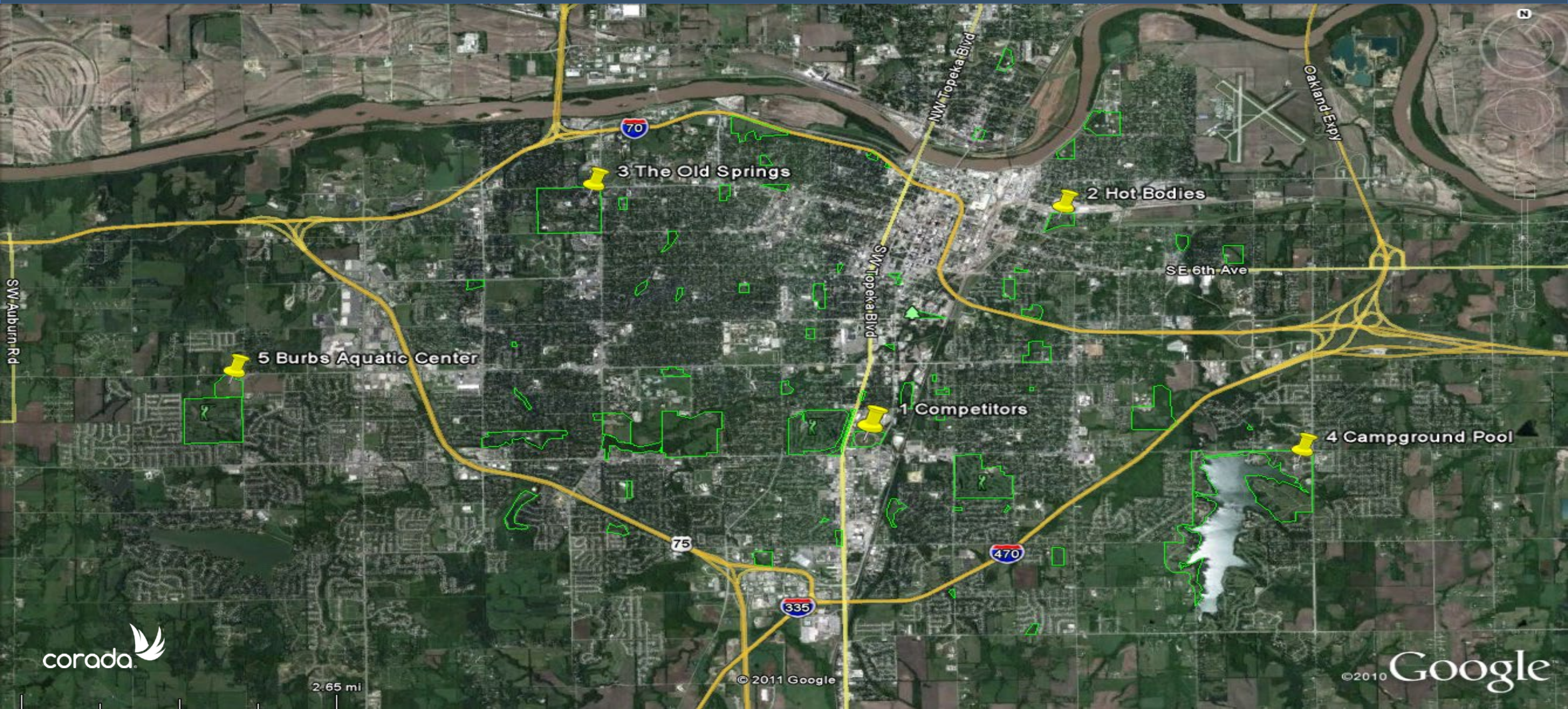
VIII.e Setting facility priorities

Which facilities and elements are the most important to review and fix first?

- ▶ Highest use
- ▶ Most critical for people with disabilities and seniors
- ▶ Those where corrective work has been requested by users
- ▶ Facilities with frequent use without advanced notice
- ▶ Facilities offering unique programs and services
- ▶ Distributed locations
- ▶ Access to public transportation

Some factors to consider when setting facility priorities:

- Programs offered
- Geographic distribution
- Communities served
- Public transportation



VIII.g. Setting curb ramp priorities

Which curb ramps tend to have the highest priorities?

- ▶ Those where work has been requested by users
- ▶ Curb ramps serving facilities for seniors and people with disabilities
- ▶ Highest use
- ▶ Closest to critical program facilities (like emergency shelters and healthcare)
- ▶ Areas where no curb ramps currently exist

VIII.h. Public input options (Interested parties)

When

- ▶ At beginning
- ▶ After tentative findings
- ▶ Before final recommendations

How

- ▶ Public hearings
- ▶ Meetings with constituencies
- ▶ Online surveys/comments

Who

- ▶ Advisory committee(s)
- ▶ Advocacy organizations
- ▶ Individuals

X. Additional information needed about each facility, each barrier, and each solution

Practically speaking, some additional information may be needed about each facility, each barrier, and each solution to actually execute the work. Care must be taken to organize that information to communicate the barriers information effectively, to make decisions consistently and appropriately, and to efficiently coordinate and implement the plan.

X.e. Organizing and communicating the information

- ▶ Difficulties with hard copy data, plans, & spreadsheets
- ▶ Database with standard analysis options and tailored reports
- ▶ Database live on a secure internet server with layered access for specific user types

X. f. Organizing and communicating the graphic information

- ▶ Photos (before and after)
- ▶ Site and floor plans of facilities, parks, etc.
- ▶ Geographic information systems to manage PROW and site data and to document process (GIS)
- ▶ Map(s) showing all facilities with the accessible ones and their accessible entrances designated
- ▶ Map(s) showing most accessible routes (keep updated)

Part Three

XI.a. Barrier prevention and monitoring

- ▶ Conduct plan reviews of new projects during design
- ▶ Verify construction in the field
- ▶ Check alterations projects
- ▶ Watch and train maintenance staff
- ▶ Train and oversee custodial / housekeeping staff

XI.b. Barrier prevention and monitoring

- ▶ Coordinate with operations personnel
- ▶ Work with public service representatives
- ▶ Coordinate with Purchasing – Verify accessibility of products specified
- ▶ Follow up with vendors and suppliers
- ▶ Verify access to new and changing programs

XII.a. Leased facilities

- ▶ Under title II, a state or local government should attempt to lease accessible facilities. If they are not available, then the program access requirements will apply to any inaccessible leased facilities.
- ▶ Necessary changes must be negotiated with the landlord.
- ▶ Refusal on the part of the landlord does not make the changes technically infeasible.

Coordinate your physical facility access solutions with the operations, maintenance, procurement, and various program providers to assure consistent “program access” in practice

Don't assume that fixing physical barriers will fix all of the problems, that part of your work only provides opportunities for your staff and to provide program access

XIV Funding the Work - Avoid New Barriers

Trying to improve access is like getting yourself out of a hole. Your first task should be to stop digging the hole any deeper.

Your first “funding source” to improve access should be to avoid the costs of fixing new barriers that should have never been built.

XIV.a. Funding the work

Stop the processes that are creating new barriers

- ▶ Train ALL design and construction team members
- ▶ ADA plan reviews of new construction and alterations
- ▶ Reviews and approvals of standard accessible products
- ▶ Training and support for maintenance and operations teams
- ▶ Train front-line “public-contact” & “customer service” staff

XIV.b. Funding the work

Look for opportunities and methods to piggyback ADA work onto other projects

- ▶ New construction
- ▶ Additions
- ▶ Alterations projects

XIV.c. Funding the work

Look for opportunities and methods to piggyback ADA work onto other projects

- ▶ Ongoing maintenance work
 - ▶ Never allow a new, non-compliant element to replace an old one
 - ▶ List barriers as their responsibility in your DB
 - ▶ Integrate repairs with their normal work
 - ▶ Require regular reports on progress

XIV.d. Funding the work

Seek new funding sources

- ▶ Donations and partnership projects
- ▶ State funding sources
- ▶ Federal funding sources (CDBG, FEMA, DOT, Direct, etc.)
- ▶ Accessible parking ticket revenue
- ▶ Crowd Source funding...

XIV.e. Funding the work

Look to your landlords and tenants

- ▶ Write your leases to require compliance
- ▶ Give them detailed lists of what is wrong with their facilities
(It will make it more difficult for them to declare ignorance later if they or you are sued)
- ▶ Remind them that THEY may be eligible for tax credits and deductions

XIV.f. Funding the work

Look to your landlords and tenants

- ▶ Verify compliance before entering into ANY new leases
- ▶ Verify their compliance before renewing every lease
- ▶ Give your vendors your Title II compliance responsibilities when they provide services for you or in your facilities

XIV.g. Funding the work

Trade – Find Win-Win opportunities!

- ▶ Offer great deals to non-profits, like low rent, in exchange for services:
 - ▶ Braille printing
 - ▶ Transcription services
 - ▶ Captioning
 - ▶ ASL interpreters
 - ▶ Ask them what else they might be able to provide inexpensively

Questions & Answers

For further information

This PowerPoint was taken from a free, more detailed on-demand **webinar series on Transition Plans** available on Corada. For information about that program, go to www.ADATransitionPlans.com.

ADA Facility Surveying and Transition Planning software available from various companies:

BlueDAG Facility Surveying and Transition Plan Builder

Deepwalk – Sidewalks and Curb Ramps

Survey Solutions - Endelman & Associates

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