

City of Angola

Americans with Disabilities Act **Self-Evaluation and Transition Plan: Facilities, Programs and Policies**



March 2020 – FINAL

Prepared by:



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TABLE OF CONTENTS

List of Abbreviations/Acronyms	iv
Executive Summary	v
1.0 Introduction and Overview	1
1.1 Introduction	1
1.2 Purpose.....	1
1.3 Transition Plan Overview.....	2
1.4 Legislative Background & Framework	3
1.5 Facility Access versus Program Access.....	4
1.6 Undue Burden	6
1.7 ADA Self-Evaluation and Transition Plan Requirements.....	6
1.8 Facility Audit.....	7
1.9 City Administration and Departments	8
1.10 Department Self-Evaluation.....	11
1.11 Public Outreach.....	11
2.0 Self-Evaluation of City Policies, Services, Activities, and Programs - Findings & Recommendations.....	13
2.1 Program Evaluation Interdepartmental Memo.....	13
2.2 Overall Findings – General Policies and Practices	13
2.3 Public Information	14
2.4 Designation of ADA Coordinator	15
2.5 Grievance/Uniform Complaint Procedures	15
2.6 Public Meetings	16
2.7 Accommodations to Access Programs, Services, and Activities	18
2.8 Special Events and Private Events on City Property.....	18
2.9 Contracted Services and Contractors	20
2.10 Customer Service, Satisfaction, and Input.....	20
2.11 Equally Effective Communication	21
2.12 Alternate Communication Formats.....	24
2.13 Fees and Surcharges	25
2.14 Information and Signage	26
2.15 Staff Training	26
2.16 Emergency Evacuation Procedures.....	28
2.17 Employment	32
2.18 Department Self-Evaluation Findings and Recommendations	35
2.19 Ordinances, Design Standards, and Other Documents	37
2.20 Facility Self-Evaluation Findings and Recommendations.....	40
3.0 Transition Plan	41
3.1 Public Outreach.....	41
3.2 Phasing of Corrections	41
3.3 Priorities for Barrier Removal.....	42
3.4 Right-Of-Way Facilities.....	45

3.5	Transition Plan Phasing	49
3.6	Plan Updates and Enforcement.....	50
4.0	ADA Tool Kit.....	51
4.1	Introduction	51
4.2	Federal Accessibility Standards and Regulations.....	51
4.3	Resources for Providing Accessible Programs & Facilities	55
4.4	Technical Resources	56
5.0	Definitions	62

FIGURES

Figure 1.....	City of Angola Location Map
Figure 2.....	City of Angola Incorporated Limits
Figure 3.....	City of Angola Facilities Location Map

APPENDICES

Appendix A.....	City Questionnaires
Appendix B	Public Outreach
Appendix C	Forms and Notices

List of Abbreviations/Acronyms

AA – Affirmative Action
AASHTO – American Association of State Highway and Transportation Officials
ABA – Architectural Barriers Act of 1968
ADA – Americans with Disabilities Act of 1990
ADASAD – Americans with Disabilities Act Standards for Accessible Design
CDBG – Community Development Block Grant
CEMP – Comprehensive Emergency Management Plan
CFR – Code of Federal Regulations
D.A.R.E. – Drug Abuse Resistance Education
DDRS – Indiana Division of Disability & Rehabilitative Services
DHHS – Deaf & Hard of Hearing Services, Indiana Division of Disability & Rehabilitative Services
DOJ – U.S. Department of Justice
DOT – U.S. Department of Transportation
EEOC – Equal Employment Opportunity Commission
EMS – Emergency Medical Services
FHWA – U.S. DOT Federal Highway Administration
FTA – U.S. DOT Federal Transit Administration
G.E.D. – General Educational Development
GIS – Geographic Information System
HR – Human Resources Department
HTML - Hyper Text Markup Language
INDOT – Indiana Department of Transportation
ISA – International Symbol of Accessibility
IT – Information Technology Department
NCA – National Center on Accessibility
OTRB – Over-the-Road Buses
PDF – Portable Document Format
PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way
RA – Rehabilitation Act of 1973
ROW – Right-of-Way
RTF – Rich Text Format
SETP – Self-Evaluation and Transition Plan
TDD – Telecommunications Devices for Deaf Persons
TTY – Teletypewriter
UFAS – Uniform Federal Accessibility Standards

Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure.

The City of Angola (City) completed self-evaluations of all City facilities in 2018-2019. A transition plan for the public right-of-way (ROW) dated August 30, 2018 included designation of an ADA Coordinator, development of the City’s Grievance Procedure, self-evaluation of the pedestrian ROW facilities, and a plan for implementation of corrective actions. The City contracted with DLZ to complete an accessibility review of their building and park facilities, resulting in the April 2019 City of Angola Facilities Assessment: ADA Accessibility Review Report (Facility Assessment). With these documents in place, the City pursued completion of a review of programs and procedures, and development of a Transition Plan to supplement the current ROW Transition plan, and incorporating the Facilities Assessment by reference, to be fully compliant with the requirements of Title II of the ADA. The City will strive to ensure that all residents and visitors are able to access all services, programs and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the City will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be provided, alternate means to provide the same opportunities to persons with disabilities will be provided.

The self-evaluation component of this Transition Plan reviewed existing City policies and procedures within each department. The focus of this review began with distribution of a questionnaire to each department, followed by interviews or other data gathering if needed to better understand the responses or the operation of each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department.

It is the goal of the City to make facilities for all services, programs and activities fully accessible within 20 years, though this will be largely dependent on a number of economic factors and future changes to the ADA Standards for Accessible Design (ADASAD) or other unforeseen requirements that would necessitate additional improvements to City facilities. The City has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the City is fully compliant with ADASAD standards.

The results of the Facilities Assessment identified a number of architectural barriers at City facilities. The estimated cost to correct these deficiencies is over **\$602,976 and their prioritization is addressed in the Facilities Assessment**. The improvements will be categorized into a 30-year phasing program to spread out the cost for implementation and address the most serious deficiencies at the most used City facilities. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be

impacted by complaints, new regulations and requirements, and availability of funding. Note that these costs are to resolve accessibility issues by making architectural improvements and in many instances, there are procedural or other modifications that can be made to provide equal access to City programs and some modifications are not required until renovations are completed. These modifications are noted within this report.

The statements and findings contained in this Transition Plan and supporting information are the opinion of DLZ based on our knowledge and interpretation of ADA requirements. Nothing in this document should be considered as legal advice. Clients are urged to seek appropriate legal assistance as needed on ADA issues.

1.0 Introduction and Overview

1.1 Introduction

The [Americans with Disabilities Act of 1990](#) (ADA), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by [Section 504 of the Rehabilitation Act of 1973](#). The ADA was signed into law by President George Bush on July 26, 1990, extending civil rights protections to individuals with physical or mental disabilities in the following areas:

1. **Title I** – Employment (all Title II employers and employers with 15 or more employees)
2. **Title II** – Public Services (state and local government including public school districts and public transportation)
3. **Title III** – Public Accommodations and Services operated by Private Entities
4. **Title IV** – Telecommunications
5. **Title V** – Miscellaneous

The City of Angola is located in northeast Indiana (Figures 1 and 2) with a population of 8,612 at the 2010 Census. Angola is home to Trine University and is the county seat for Steuben County. It is classified as a “public entity” pursuant to Title II of the ADA. The City is also required to comply with Title I, which requires state and local government entities to practice nondiscrimination in all parts of the employment process.

1.2 Purpose

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the



Figure 1 – City of Angola Location Map

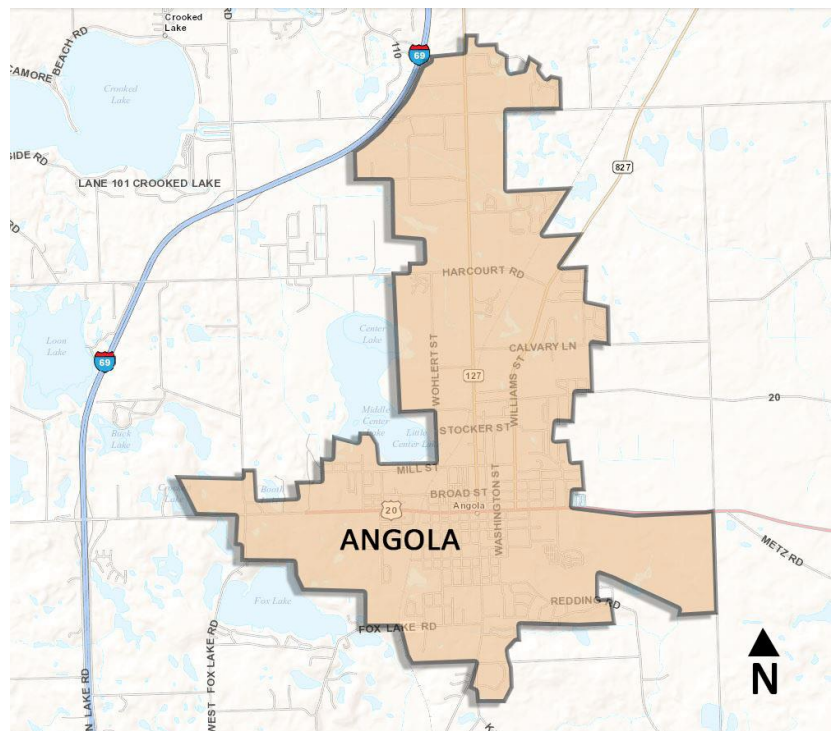


Figure 2 – City of Angola Incorporated Limits

Federal government. It is divided into 50 titles that represent broad areas subject to Federal regulation. Each volume of the CFR is updated once each calendar year and is issued on a quarterly basis.

Relative to the ADA on July 26, 1990, the DOJ issued rules implementing Title II, which is codified at [28 CFR Part 35](#), which applies to the City of Angola. Title II requires state and local governments to make their programs and services accessible to persons with disabilities. This requirement extends not only to physical access at government facilities, programs, and events, but also to policy changes that state and local governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of state and local governments.

The ADA regulations [ref. *U.S. DOJ, 28 CFR Part 35, Subpart A, 35.105 and 35.150(a) and (d)*] require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the self-evaluation is to identify potential problems before they occur, so that discrimination complaints won't be necessary. By identifying the policies, programs, services, and activities that do not comply, the City can take action to remove those barriers to ensure that the City is not discriminating against individuals with disabilities.

The City is committed to complying with the tenets of Title II of the ADA of 1990, and other Federal and state statutes and regulations intended to make City-owned and operated facilities, programs, services, and activities accessible to persons with disabilities. This ADA Self-Evaluation and Transition Plan (SETP) establishes a new benchmark for compliance with ADA and identifies a plan to remove barriers.

1.3 Transition Plan Overview

The City of Angola completed self-evaluations of all City facilities in 2018-2019.

A transition plan for the public right-of-way (ROW) was completed prior to this effort, dated August 30, 2018. It included designation of an ADA Coordinator, development of the City's Grievance Procedure, self-evaluation of the pedestrian ROW facilities, a plan for implementation of corrective actions, issuance of a public notice of compliance with the ADA, and adoption of the 2011 Proposed

TITLE II ADMINISTRATIVE RESPONSIBILITIES

Title II of the ADA stipulates that the Title II entities are required to perform six administrative responsibilities as part of the transition plan process:

- Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance [28 CFR 35.107 (a)]
- Administer and write a self-evaluation of the programmatic barriers in services offered by the local government and provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments on the transition plan [28 CFR 35.105]
- Publicize and inform applicants, participants, and beneficiaries of the policy of non-discrimination on the basis of disability related to City services, programs, and activities [28 CFR 35.106]
- Establish a complaint/grievance procedure to respond to complaints of non-compliance from the public [28 CFR 35.107 (b)]
- Develop a transition plan if structural changes are necessary for achieving program accessibility [28 CFR 35.150 (a) and (d)]
- Retain the self-evaluation and provide it for public inspection for three years [28 CFR 35.105 (c)]

Accessibility Guidelines for Pedestrian Facilities in the Public Right-Of-Way (PROWAG) and the 2010 ADA Standards for Accessible Design. These items are available on the City [website](#).

The City contracted with DLZ to complete an accessibility review of their building and park facilities, resulting in the April 2019 City of Angola Facilities Assessment: ADA Accessibility Review Report (Facility Assessment).

With these documents in place, the City pursued completion of a review of programs and procedures, and development of a Transition Plan to supplement the current ROW Transition Plan and incorporate the Facilities Assessment by reference, to be fully compliant with the requirements of Title II of the ADA. The current work plan to assess City programs, policies, services, and activities to complete the remaining administrative responsibilities includes:

- Self-evaluation of City programs, services and activities
- Outreach to advocacy groups and the general public
- Develop written transition plan (ROW SETP and Facility Assessment included by reference)
- Adoption of the transition plan

A public involvement process was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for structural or programmatic solutions to facilitate the opportunity of access to all individuals are subject to review, revision, and approval of the Board of Public Works and/or City Council and appropriation of funding to implement the improvements.

This transition plan is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes or when existing accessibility guidelines change or new guidelines are established. In its efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the transition plan:

- Designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA.
- Implementation activities will be part of the City's annual Capital Improvement Plan.
- Implementation will be spearheaded by the ADA Coordinator and ADA committee and will include an annual report on efforts undertaken, accommodations made, and any comments or complaints received during each year.

1.4 Legislative Background & Framework

For more than 40 years, the City has been subject to many of the non-discrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the [Architectural Barriers Act of 1968](#) (ABA) and [Section 504 of the Rehabilitation Act of 1973](#) (RA).

Congress' first significant effort to address discrimination on the basis of disability was its enactment of the ABA, which provided that all buildings constructed, altered, leased, or financed by the U.S. Government shall be accessible to, and usable by, individuals with physical disabilities.

Section 504 of the Rehabilitation Act states: *"No otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under*

any program or activity conducted by any Executive Agency". It also requires Federal agencies to provide accessible programs and facilities.

The ADA was modeled on Section 504. The ADA applies to state and local government entities, public accommodations, public transportation, and commercial establishments. The key points of understanding for ADA are:

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by the public.
- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- Outdoor recreation standards as they relate to ADA for a variety of facilities were included in the 2010 ADA Standards for Accessible Design (ADASAD). Standards for amusement rides, boating and fishing facilities, exercise machines and equipment, golf and miniature golf facilities, play areas, and swimming/wading pools and spas went into effect on March 15, 2012 for all new or altered facilities.

Title II of the ADA was effective on January 26, 1992.

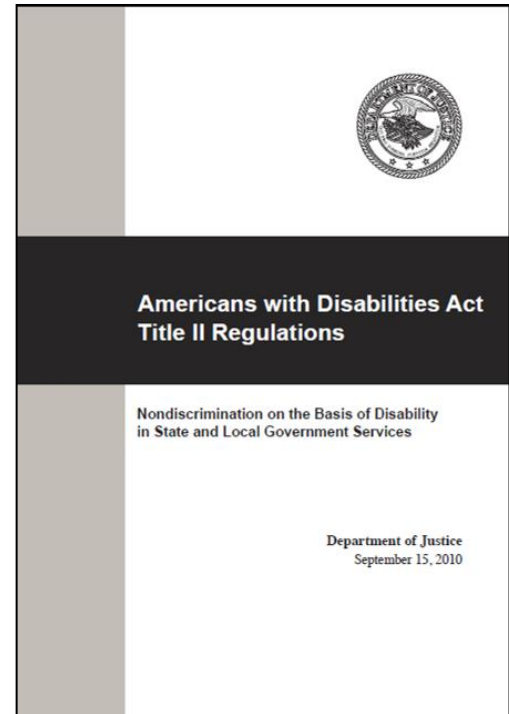
Governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic functions. Public entities are not required to take actions that would result in undue financial and administrative burdens. However, they are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

1.5 Facility Access versus Program Access

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be physically accessible. Individuals with disabilities cannot be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant.



Disability:

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

PROGRAM ACCESSIBILITY

In accordance with Title II program accessibility requirements, Angola is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community. [28 CFR 35.130(a)-(b)(1) (vii)]
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity. [28 CFR 35.130(b)(2); (d)]
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters. [28 CFR 35.130(f)]
- Allow a person with a disability to participate in a program, service, or activity regardless of disability. [28 CFR 35.130(g)]
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity. [28 CFR 35.130(b)(8)]
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities [28 CFR 35.130(b)(7)]
- Furnish auxiliary aids and services when necessary to ensure effective communication. [28 CFR 35.160(b)(1)-(2)]
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities. [28 CFR 35.163]
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location. [28 CFR 35.150(b)(1)]
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities. [28 CFR 35.151]

The ADA requires all City programs, but not all City buildings, to be accessible. The regulation implementing Title II, 28 CFR Part 35 (as amended September 15, 2010) contain two “safe harbor” provisions. Under the first “safe harbor” provision, elements of existing facilities that already comply with either the 1991 ADA Standards or Uniform Federal Accessibility Standards (UFAS) are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012. Under the second “safe harbor” provision elements comprising a path of travel to an altered primary function area are not required to comply with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access. The City is required to provide program access, which means that programs, services, and activities when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

When choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.

1.6 Undue Burden

The City does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. For example, a City sponsors college-level classes that may be used toward a college degree. To be eligible to enroll, an individual must have either a high school diploma or a General Educational Development certificate ("G.E.D"). If someone lacks a diploma or G.E.D. because of a cognitive disability, it is unlikely that the City would have to alter the requirement to provide equal access. Modifying the rule would change the class from college level to something less than college level and would fundamentally alter the original nature of the class.

Accessible:

Refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

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

1.7 ADA Self-Evaluation and Transition Plan Requirements

The purpose of this ADA SETP is to document the City's review of access to programs, services, and activities by individuals with disabilities in order to determine if there are any discriminatory or potentially discriminatory practices, policies, or procedures.

In accordance with the Title II requirements for self-evaluation, the City:

- 1) Identified all of the public entity's programs, activities, and services. [\[28 CFR 35.105\(a\)\]](#)
- 2) Reviewed all the policies and practices that govern the administration of the City's programs, activities, and services. [\[28 CFR 35.105\(a\)\]](#)

If structural changes are identified to provide program accessibility as part of the self-evaluation, the ADA identifies specific elements to be included in the transition plan. Items 1 and 2 are identified in the Facility Assessment incorporated here by reference. At a minimum, the elements of the transition plan are:

- 1) A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities. [\[28 CFR 35.150 \(d\)\(3\)\(i\)\]](#)
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible. [\[28 CFR 35.150 \(d\)\(3\)\(ii\)\]](#)
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period. [\[28 CFR 35.150 \(d\)\(3\)\(iii\)\]](#)
- 4) The name of the official responsible for the plan's implementation. [\[28 CFR 35.150 \(d\)\(3\)\(iv\)\]](#)

1.8 Facility Audit

In 2018-2019, audits of building interiors and exterior site features were performed. The locations of City facilities and parks (by number) are shown in Figure 3 overlaid on maps provided via IndianaMAP.

These audits included only in those areas of each facility that are open to the public and employee common use areas. The Facility Assessment identified physical and architectural barriers and provided recommendations to comply with Federal accessibility standards. They were reviewed for compliance with the 2010 ADA Standards for Accessible Design (ADASAD). All new construction and alterations undertaken after March 15, 2012, are subject to ADASAD. Some facilities, or portions of the facilities, included in this evaluation may not be required to meet ADASAD standards until an alteration is undertaken and instead may currently be required to meet the 1991 ADA Accessibility Guidelines (ADAAG).

Areas that are not accessible to the public must be accessible for employees as a requirement of Title I. Accessibility in employee work areas should be assessed on a case-by-case basis based on the needs of the individual and nature of their disability and reasonable accommodations that may be needed to perform essential job functions.

City Facilities

1. City Hall
2. Public Safety
3. Monument Plaza
4. 306 W. Mill Training Center
5. Wastewater Treatment Plant
6. Water Treatment Plant
7. Street Department
8. Commons Hall
9. Parks Department
10. Commons Park
11. Firemen's Park
12. Nature Park

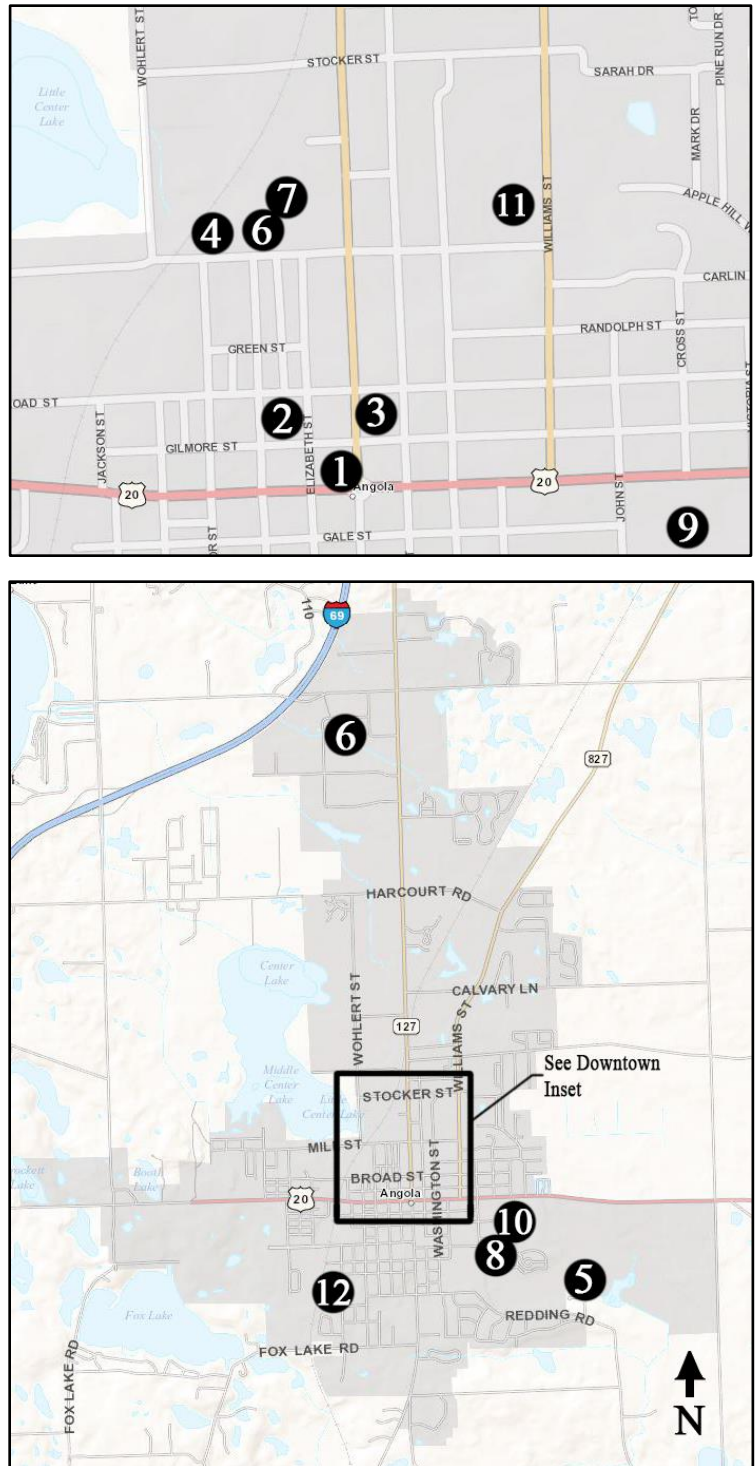


Figure 3. Location Map of City facilities

1.9 City Administration and Departments

There are several distinct departments that provide City services, programs, and activities that are accessible to the public. The level of interaction of each Department is classified as extensive (high numbers daily), regular (variable but generally low numbers daily to weekly), limited (generally weekly or less), or none. These Departments and descriptions of their functions and types and regularity of interaction with the public are:

- **Board of Public Works (210 N. Public Sq.)** The Board of Public Works and Safety has broad statutory grants of power to enable to carry out their functions. The public safety function includes law enforcement and fire protection. The public works function includes control over streets, sanitation, transportation, sewers, and water utilities. Interaction with the public is limited.
- **Building Safety Department (210 N. Public Sq.)** The Angola Building Safety Department helps make the buildings where the community lives, works and plays safe. The City of Angola Site Improvement Permitting and Inspection Process complements the system of checks and balances resulting in a safe, completed and compliant Class 1 or Class 2 construction project. The construction permit process allows the City of Angola International Code Council Certified Officials to reduce potential hazards of unsafe construction and provide for the public health, welfare and safety. By following Indiana statewide code of fire safety laws and building laws, completed Class 1 and Class 2 construction projects will meet minimum safety standards. Interaction with the public is limited.
- **Clerk-Treasurer (210 N. Public Sq.)** The Clerk-Treasurer is elected every four years by city residents at the same time as the Mayor and Common Council. This person is responsible for the overall collection and disbursement of funds, the administration of the accounting system, the signing of checks, the city seal, and serves as the investment coordinator for the municipal treasury. The Clerk-Treasurer oversees payroll, accounts payable, taxes and grants for the City of Angola. The Clerk-Treasurer also serves as clerk of the Common Council and Board of Public Works and Safety by attending meetings, preparing agendas, and recording proceedings. Interaction with the public is extensive.
- **Common Council (210 N. Public Sq.)** The Common Council (often referred to as the City Council) is both the legislative body and fiscal body. As the City's legislative body, the Council exercises many of the powers given cities through the passage of ordinances and appropriation of monies. The Council fixes the annual salaries of all elected officials. Council has the authority to reduce, but not to increase, any other items in the City budget as submitted by the Mayor for its approval. Interaction with the public is limited.
- **Downtown Services (210 N. Public Sq.)** Downtown Services continues the ongoing work of downtown revitalization through marketing and community development. It serves as a liaison between downtown businesses and the City of Angola, is a point of contact for registration of downtown public events, works as staff for the Historic Preservation Commission, and has partnered with the Downtown Angola Coalition, Angola's Main Street Organization. Downtown Services is also an integral part of growing a sustainable arts and culture foundation in Angola and works with the Mayor's Arts Council. Interaction with the public is extensive.
- **Economic Development and Planning (210 N. Public Sq.)** The Department of Planning and Economic Development promotes economic development to include industry, business, and residential. The Department prepares and presents verbal and written technical assistance reports gathered from on-site inspection and research on a case-by-case basis for the Mayor, Common Council, Plan

Commission and the Board of Zoning Appeals. The Department also serves as the staff person to the City's Economic Development Commission, Redevelopment Commission, and Historic Preservation Commission. The Department also assists, advises and explains to petitioners, the public and developers, the process and procedures for zone changes, variances, special exceptions, and subdivision and zoning ordinance requirements. The Department is also responsible for issuing City sign permits and maintain the Unified Development Ordinance (effective June 11, 2008). Other projects underway are the Downtown 20/20 Plan and an owner-occupied rehabilitation housing program that may lead to grant opportunities for local homeowners. They also offer free workshops that range from business plan development for budding entrepreneurs to restoration workshops for historic building owners. Interaction with the public is regular.

- **Engineering (210 N. Public Sq.)** The Engineering Department has experience and knowledge in surveying, engineering, and construction related industries. Department functions and services include providing data collection, field surveying, drafting, mapping, engineering, design, and other miscellaneous services to all City Departments, coordination of design review and routing of all commercial projects and all subdivisions and planned unit developments, and review of new projects for compliance with the Stormwater Control Ordinance and the Erosion Control Ordinance. They also administer storm sewer connection permits, sanitary sewer connection permits, water system connection permits, water tap permits, and excavation permits within the City rights-of-way, and site improvement permits. Interaction with the public is regular.
- **Fire Department/EMS (202 W Gilmore St)** The Angola Fire Department provides fire and rescue services covering more than 100 square miles in Steuben County, protecting areas made up of residential, commercial, heavy industrial, light industrial, and agricultural areas. The department operates out of one central fire station, which is staffed by one Fire Chief, twelve career firefighters and twenty-nine paid on call firefighters, who perform tasks such as fire suppression and various other emergencies, including but not limited to, medic assist calls, vehicle extrications, water rescues, gas and electrical emergencies, carbon monoxide monitoring, natural disasters, and mutual aid responses for surrounding departments. Other duties performed include fire prevention and inspections, fire investigations, fire and medical training, apparatus and building maintenance, public safety, and smoke detector programs. Angola Firefighters are offered training weekly on Monday evening to keep up on their in-service hours for firefighting and medical certifications. Currently, the City Fire Department provides fire protection within the city of Angola, Pleasant Township, a portion of Jamestown and Jackson Townships, Scott Township, and York Township. The Angola Fire Department responds to approximately 1,500 incidents annually and strives to make the community as safe as possible. Interaction with the public is regular.
- **Human Resources (210 N. Public Sq.)** The City of Angola, Indiana Human Resources Office promotes the recruitment, development and retention of highly motivated, well qualified individuals to provide efficient, effective and courteous service to citizens and visitors. The City of Angola strives to create mutually rewarding career opportunities that are available to all applicants without regard to race, sex, age, color, religion, national origin, disability, citizenship status, military status, or any other category protected under federal, state, or local law. Interaction with the public is limited.
- **Information Technology (210 N. Public Sq.)** The Information Technology (IT) Department for the City was created to perform a variety of administrative and technical tasks concerning short and long range planning programs and standards for the on-going design and integration of City information systems, geographic information systems (GIS), and network environment. IT is responsible for all

network and telecommunication hardware, software, and applications developed in house or by contract used or stored on City equipment. Interaction with the public is limited.

- Mayor's Office (210 N. Public Sq.)** The Mayor is the city executive and the head of the executive branch. The specific duties and responsibilities are defined by state statutes (Indiana Code 36-4-5) such as enforcement of City ordinances, provide information and recommendations to the City Council, ensure efficient government of the city, approve or veto ordinances, orders, and resolutions of the City Council, and filling vacancies in city offices when required. Within this department operates the Services Finance and Budget Committee, the Angola Investment fund Account Board, Downtown Services (see above), Mayor's Youth Council and the Mayor's Arts Council. The Mayor's Arts Council was created to help build and support a more robust arts and culture foundation for the city of Angola and its surrounding area. Interaction with the public is regular.
- MS4/Stormwater (210 N. Public Sq.)** The EPA has established a Municipal Separate Storm Sewer System (MS4) stormwater management program that is intended to improve the Nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems. The MS4 department is involved in a variety of activities including stormwater permitting & plan review, construction inspection, floodplain administration and compliance with the Stormwater Quality Management Plan (SWQMP). Interaction with the public is limited.
- Parks and Recreation (299 S. John St.)** The Angola Parks & Recreation is made up of four full time staff members, four seasonal maintenance positions and three Summer Recreation Program staff members. The staff manages over 120 acres of parkland and 4.2 miles of trail within the City of Angola. They have three developed parks which are Commons Park with over 100 acres of recreational space, Firemen's Park located on Williams St. and Nature Park located on the corner of Ettinger St. and Butler St. Some of the amenities included in these parks are four baseball/softball diamonds, a soccer field, three playgrounds, volleyball courts and five picnic shelters available for rent and an indoor rental facility. Angola Parks & Recreation are responsible for a variety of programs and events each year. The programs consist of the Summer Recreation Program and the Tree Memorial Program. They host a variety of events throughout the year, such as the City Wide Tree Give Away, Easter Egg Hunt, Independence Day Celebration, Civil War Days, Halloween Fun and two concerts each year and offer free yoga classes and pickleball classes. Interaction with the public is extensive.
- Police Department (202 W. Gilmore St.)** The mission of the Angola City Police Department is to enhance the quality of life in the City of Angola by educating and working cooperatively with the public within the framework of the United States Constitution, to preserve peace, reduce fear, and provide a safe environment for the citizens of Angola. The Angola City Police Department currently fields seventeen (17) full time sworn police officers, six (6) Reserve Officers, and five (5) Special (Part Time) Officers. Additional, there are four (4) full time and five (5) part time dispatchers. Four (4) school crossing guards support school patrol operations. They also provide child safety seat information, domestic violence hotline, handle sex and violet offender registry, applications for handgun permits, and host the Angola City Police Citizen's Academy. Interaction with the public is extensive.
- Street Department (210 W. Mill St.)** The Street Department provides maintenance of city streets, alleys, parking lots, sidewalks, curbs, and ramps. The department handles brush pick-up, yard waste pick-up, leaf pick-up, as well as snow and ice removal. They also handle city street sign maintenance,

street sweeping, replace and repair of old catch basins as needed. Interaction with the public is limited.

- **Utilities (210 N. Public Sq.)** The City of Angola provides utilities to citizens. Utility payments are handled through the Clerk-Treasurer's office. The website offers information on payments, rates and charges, and starting/stopping service. Interaction with the public is regular.
- **Wastewater (1055 Redding Rd.)** The Angola Wastewater Treatment Plant (WWTP) is a Class III facility designed for an average daily flow of 1.7 MGD. With a conventional activated sludge process, the plant consistently removes more than 95% of the biochemical oxygen demand, total suspended solids, and ammonia. This process includes both physical and biological treatment including such equipment as screening, grit removal, primary clarification, secondary aeration, and UV disinfection before discharging effluent to the H. D. Wood Ditch. This ditch eventually flows into the Pigeon Creek which in turn flows into Long Lake and eventually into the St. Joseph River. Since the St. Joseph River flows into Lake Michigan, the City of Angola is under the jurisdiction of the Great Lakes Initiative and must therefore maintain effluent limits of Total Phosphorus below 1.0 mg/L. Interaction with the public is limited.
- **Water (300 W. Mill St.)** The Angola Water Treatment Plant, acquired by the City in 1921, was originally a privately-owned steam plant that started in 1885 at the 210 W. Mill St. site. Plant improvements and several expansion projects have brought about the present facilities which includes aeration, filtration, ion exchange softening, chlorination and fluoridation. In 1989 a second treatment plant was completed and put in service at the 550 Pokagon Trail site. Water Works is responsible for providing safe reliable and sustainable drinking water and managing drinking water production, storage and distribution facilities for its present and future customers. Water department staff continuously monitor the treated water supply at water taps throughout the distribution system. All monitoring is done in compliance with the Indiana Department Of Environmental Management and the U.S. Environmental Protection Agency in accordance with the Safe Drinking Water Act. The entire water supply system is monitored with SCADA (Supervisory Control and Data Acquisition) distribution control system software, allowing operators to control operations at both treatment plants and throughout the distribution system. The management of the municipal Water Works is under the direction of a five-member Common Council and a three-member Board of Public Works. Day-to-day operations of the Water Works are the responsibility of the superintendent. Interaction with the public is limited.

1.10 Department Self-Evaluation

As part of this self-evaluation, DLZ provided a questionnaire to the ADA Coordinator in order to better understand the operation and services offered by various City departments regarding ADA compliance. The sample questionnaire is located in Appendix C and answers were used to compile the information in this SETP. Policies, programs, activities, and services were evaluated and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Section 2.18 Department Self-Evaluation - Findings & Recommendations.

1.11 Public Outreach

Public outreach began by publishing a notice in the local newspaper (The Herald Republican) to solicit input from the public about barriers or perceived barriers that might exist to access or use of City facilities. Notices were also sent by U.S. mail to several local and regional disability advocacy groups (see *Appendix B*). The

public comment period was open from November 19 through December 13, 2019. No public comments were received.

Following completion of the draft SETP, copies of the draft Self-Evaluation and Transition Plan were available for public review on the City website (<https://www.angolain.org>) or at the following locations during normal business hours between February 24 and March 9, 2020.

- City Hall (Main Service Window) - 210 N. Public Square, Angola
- Carnegie Public Library of Steuben County (Circulation Desk) – 322 S Wayne St, Angola

A meeting to receive public comments on the draft ADA SETP was held during the regularly scheduled council meeting at 7pm on March 2, 2020 in the City Council Chambers at City Hall. Comments were accepted until 4pm on March 9, 2020. Meeting information presented and comments/responses can be found in *Appendix B*.

2.0 Self-Evaluation of City Policies, Services, Activities, and Programs - Findings & Recommendations

This section of the self-evaluation summarizes the review of current City-wide policies, services, activities, and programs based on meetings with City staff and responses to the program accessibility questionnaire received from City departments and divisions. The findings and recommendations contained in this section will provide the basis for the implementation of specific improvements for providing access to City programs.

2.1 Program Evaluation Interdepartmental Memo

The self-evaluation of the City's services, programs, and activities required and involved the participation of every City department. City of Angola evaluated its policies, procedures, and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. DLZ distributed questionnaires to the City ADA Coordinator as one measure to determine the level of ADA compliance (see *Appendix A*).

The primary purpose of this questionnaire was to allow DLZ staff to better understand how each department operates and the programs provided by each so that an accurate assessment can be made of architectural and procedural barriers and how each can be corrected to provide access. The level of investigation into the operations of the various departments was generally consistent with the amount of interaction with the public and the extent of the public programs offered by each.

2.2 Overall Findings – General Policies and Practices

The self-evaluation of the Departments identified common accessibility issues between all City Departments. The findings from the City Departments can be organized into the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on City Property
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Employment

The findings and recommendations in the following subsections apply to all departments.

2.3 Public Information

The City is required to notify the public of their rights and protections under the ADA ([28 CFR 35.106](#)), which states: “A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part.” In addition, notices regarding ADA should be included in a number of other situations to inform the public of their rights and opportunities to ensure accessibility, including signage directing the public to accessible routes and entrances.

Self-Evaluation General Findings:

- Posters entitled “Equal Opportunity is the Law”, defining the requirements of Title VII, are posted by the City. They are located at the following places: City Hall, Police Department Building, Fire Department Building, Park Department Building, Street Department Building, Water Department Building, and Wastewater Department Building. There is also an electronic copy on the City server that can be accessed by all City employees.
- The adopted Grievance procedure is available on the City website, as adopted in Resolution 2012-612, and revised in Resolution No. 2020-771 on February 17, 2020.
- The Notice Under the Americans with Disabilities Act was adopted by the Common Council via Resolution 2012-612 on October 15, 2012.
- Non-discrimination notice/request for accommodations is not included on most printed public meeting notices.
- Signage, including the International Symbol of Accessibility (ISA), is not present for directing visitors to the accessible entrances at all facilities where multiple entrances are present and not all are accessible. The ISA is not provided in clear view at all accessible entrances.

Recommended Action:

- Standard language for a Notice of Nondiscrimination needs to be used by all departments for all City publications and printed materials. This statement should include, at a minimum, the following language: *“The City of Angola acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Angola, should contact the ADA Coordinator at (260) 665-6683 or buildingdept@angolain.org as soon as possible but no later than three business days before the scheduled event.”*
- As standard practice, the City public notices and agendas need to include a statement regarding requests for accommodations for compliance with ADA as noted above. The statement should list a TDD/TTY (TeleTYpewriter) number. Public notification should always identify a contact person for individuals with disabilities who may request program modifications, or information on how a hearing or speech impaired person could communicate by telephone.
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other City activities. The City should endeavor to inform the public of the possible modifications required to make its services, programs, and activities accessible.
- Include the following notice on all materials printed by the City that are made available to the public: *This publication can be made available in alternative formats, such as Braille, large print, audiotape, or .pdf. Requests can be made by calling (260) 665-6683. Please allow three business days for your request to be processed.*

- List City departments, and specialized services that offer TDD/TTY in printed City directories. (See also section 2.11 and 2.12).
- Signage directing visitors to public entrances at City buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.

2.4 Designation of ADA Coordinator

The ADA regulations require any public entity with fifty or more employees to designate at least one employee to coordinate ADA compliance ([28 CFR 35.107 \(a\)](#)). Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. The ADA Coordinator's role is to plan, coordinate, organize, facilitate, and promote compliance efforts. The Coordinator responds to requests for accommodations or barrier removal. The Coordinator also receives and investigates complaints and grievances.

Self-Evaluation Findings:

- The Common Council appointed the City of Angola Building Commissioner as ADA Coordinator via Resolution 2012-612 on October 15, 2012.

Mr. Scott Lehman, ADA Coordinator

Phone: (260) 665-6683 Email: buildingdept@angolain.org

Recommendations:

- Contact information should be consistent for all inquiries directed to the ADA Coordinator. City plans to update all references to the position of Building Commissioner, rather than a specific person. Contact information will be updated in all locations accordingly.
- Activities related to ADA compliance should be directed to the Coordinator, and each City department should designate a liaison for ADA issues and publicize the identity of this person.
- Information regarding the identity of the City's ADA Coordinator should continue to be provided to staff, posted at all City facility locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the City website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the City.
- It is strongly suggested that each department have one individual with knowledge of ADA that can respond to issues that arise within their department and assist the ADA Coordinator.

2.5 Grievance/Uniform Complaint Procedures

A public entity that employs 50 or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA ([28 CFR 35.107 \(b\)](#)).

Self-Evaluation Findings:

- The City of Angola indicated it had a grievance procedure that provided for resolution of complaints as established by the Common Council via Resolution 2012-612 on October 15, 2012. After further review, it was determined to add a detailed grievance procedure via revision to this resolution on February 17, 2020 to improve the clarity of the process (Resolution No. 2020-771). The procedure indicates grievance must be submitted within one hundred eighty (180) days of the date of the alleged discrimination and should be directed to the ADA Coordinator. A timeline for investigation, communication of findings, and appeals process is outlined. See Appendix C for full procedure.

Recommendations:

- Centralized record keeping of complaints and tracking of complaint resolution will help the City to regularly update its compliance efforts, and plan for additional compliance implementation. The ADA Coordinator should ensure that records are kept of all ADA-related complaints, including informal items brought to their attention.
- Information regarding complaint procedures should be available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.
- The City should review its current administrative policy and be able to provide the ADA Complaint Form in an alternate accessible format, i.e. Braille, audio-tape, e-text, large print, etc.
- Administrative policies and procedures should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.

2.6 Public Meetings

Public meetings are routinely held by various City departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.150 \(a\)\(1\); \(b\)\(1\)](#)).

Self-Evaluation Findings:

- The following boards/commissions meet at various times on City business and would be considered open meetings that can be attended by members of the general public. These meetings are typically held at City Hall in the Council Chambers unless otherwise noted below. Other groups may meet, but do not have regular published schedules.
 - Common Council – First and third Monday of each month at 7:00 p.m.
 - Board of Public Works & Safety (BPWS) – First Monday of each month at 6:30 p.m.
 - Services and Budget Committee – Third Monday of each month at 6:00 p.m. at City Hall, Conference Room 206.
 - Police Pension Board – Once annually at the Public Safety Building, 202 West Gilmore Street.
 - Fire Pension Board – Once annually at City Hall, Conference Room 206.
 - Plan Commission – Second Monday of each month at 5:00 p.m.
 - Board of Zoning Appeals – Fourth Monday of each month at 5:00 p.m.
 - Economic Development Commission - Does not meet regularly. The annual organizational meeting is held in February. Meetings are held at City Hall, Council Chambers. Publicized on news media, WLKI and Herald. Their agendas include an ADA statement as follows: *'If special assistance is needed to attend this meeting, please call in advance to the City of Angola Department of Economic Development and Planning office at 260.665.7465 during business hours between 9:00 a.m. and 4:00 p.m. Monday through Friday.'*
 - Redevelopment Commission - Does not meet regularly.
 - Historic Preservation Commission - The first Tuesday of each month at 5:30 p.m.
 - Parks & Recreation Board – First Wednesday of each month at 10:00 a.m. at the Parks and Recreation Department, 299 South John Street. Publicized with local media (radio and newspaper). Agendas are posted one week in advance.
 - Tree Board - Does not meet regularly. Meetings are held at the Parks and Recreation Department, 299 South John Street.
 - MS4 Stormwater Advisory Group - Does not meet regularly.

- Investment Fund Account Board – Public meetings followed by executive sessions begin at 5:00 p.m. the last Monday of January, February, April, May, July, August, October, and November. Meetings are held at City Hall, Conference Room 206.
- Other departments, such as the Wastewater and Water, typically conduct any public business as part of a larger publicized meeting, such as a City Council or BPWS meeting.
- Per the Clerk-Treasurer, meetings for the year for all City departments are posted on the City’s website and at City Hall in the vestibule entryway. Agendas, if made available, are posted on both at least 48 hours before the meeting day/time. No statement is on the notice or agenda for most departments (except where noted above).
- The Council Chambers has an audio system, but there is no assistive listening system (ALS) to amplify sounds. Economic Development and Planning noted that an assistive listening device (ALD) has been requested.
- City Hall Conference Room 206 does not have an audio system.
- Several meetings are recorded for audio only. The meetings that are recorded are Common Council, Board of Works, Board of Zoning Appeal, and Plan Commission. Meetings held in Council Chambers are recorded and used by staff in the creation of minutes. Per the Clerk-Treasurer, those recordings are purged after the minutes are approved by appropriate boards.
- There is the capability to show a video stream of the meeting in the room adjacent to the Council Chambers however, closed captioning is not available. Further coordination/set-up would need to occur to allow for video streaming of the meetings.
- Most City departments have not been requested to provide accommodation at meetings in the past.

Recommendations:

- The City should continue to schedule and hold public meetings in the most accessible locations whenever possible. Meetings which the public regularly attends should be made the highest priority.
- Standard language on all City meeting agendas regarding availability of and request for accommodations should be provided to departments. This could include language similar to the following: *“Individuals with disabilities who require accommodations for participation in meetings must request accommodations at least 3 business days ahead of the scheduled meeting. Contact (NAME, ADDRESS, PHONE, EMAIL) as soon as possible but no later than 3 business days before the scheduled event.”*
- The City should develop procedures for obtaining and providing auxiliary aids such as sign language interpreters, readers, descriptive services, and other assistive technologies. It is typically recommended that Assistive Listening Systems and Devices be made available at public meeting rooms even if not required by the standards. (See also section 2.11.) Compliant signage that includes the International Symbol of Access for Hearing Loss should be installed where assistive listening devices are available.
- The City should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings. (See also section 2.11.)
- Consider purchase of a hearing-aid compatible assistive listening system. ALS is required in all rooms with amplification.
- Provide meeting agendas and minutes in alternative formats when requested.
- The City should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all City departments for their programs and events.



*International Symbol of Hearing Loss
on ALS Signage*

2.7 Accommodations to Access Programs, Services, and Activities

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. A public entity may not adopt policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral, but have discriminatory effect. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities ([28 CFR 35.130 \(b\)\(3\)](#); [35.150 \(a\)\(1\)](#); [\(b\)\(1\)](#)).

Self-Evaluation Findings:

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to City programs, services, or activities.
- Public meetings are generally held in locations that are thought to be accessible to persons with mobility impairments and staff had no recollection of any previous complaints of issues.
- Some City departments offer programs and services requiring registration.
 - Parks offers Summer Recreation Program. They utilize paper registration and registration forms are available online or at City Hall/Park Office, local schools and the library.
 - Police Dept holds a Citizens Academy program. They utilize Google Drive for application, and pamphlets, Facebook, and City newsletter for advertising.

Recommended Action:

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas.
- Front line staff such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities.
- The City should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services, and activities.
- The ADA Coordinator should continue to monitor programmatic access and make necessary changes to ensure access.

2.8 Special Events and Private Events on City Property

The City could provide opportunities for private organizations to utilize City facilities for special or private events. Contained within the ADA are two titles that pertain to public and private entities. Public entities are not subject to Title III of the ADA. Conversely, private entities are not subject to Title II. In many situations, however, public entities have close relationships with private entities that are covered by Title III (Public Accommodations), with the result that certain activities may be at least indirectly affected by both Titles. This is the case with certain special events or private organizations that may use City facilities.

Self-Evaluation Findings:

- The City accommodates requests to utilize City facilities such as the Public Square.
 - Entities using the downtown area (or partnering with the City) are required to complete an event form. This form does not address any accessibility requirements by the end user nor do they specify whether facilities available for use are accessible.
 - Annual events held and managed by the Downtown Angola Coalition take place on the parking quadrants of the Public Square and throughout the commercial historic downtown

district. They include the Angola Art Fest, Santa's Arrival, Holiday Wagon Rides, and a Halloween Costume Contest. The City assists by providing resources.

- Downtown Halloween Trick or Treat and city-wide Halloween is advertised by the City and the Downtown Angola Coalition but happens without management. Families walk the downtown district and businesses hand out candy.
- Steuben County Farmers' Market uses the south part of the Monument Plaza parking lot for Wednesday Farmers' Market from the end of July through the end of October or early November. The accessible parking is located on the north side of the Plaza and remains open.
- The Freedom Academy leases space (Building 1B) from the City's Training Center on an annual basis. The lease does not address accessibility of the existing facility or of the programs operated within. They utilize the building for adult education purposes.
- Most departments do not provide, or do not have, any facilities for use by private organizations. However, Angola Parks and Recreation allows many organizations to use rental facilities throughout the year. They have five outdoor pavilions and in October 2019 opened an indoor facility for use. These rentals, prices and more information can be found on the City website. No special provisions related to accessibility are indicated on the rental forms or included in Parks procedures and policies.
- City departments may sponsor or participate in special events open to the public as follows:
 - Engineering as part of the City of Angola-Trine University MS4 cosponsored at contractor lunch and learn workshop. RSVP was handled via email or phone by Steuben County SWCD.
 - Fire Department participates in 4th of July parade.
 - IT is in charge of the downtown sound system and facilities and its use for events throughout the year.
 - Police Department hosts Citizens Academy, a 10 week/3 hour per week program at the PSB, Cops for Kids, and staff Christmas party. The police department occasionally utilizes its upstairs training rooms for training and classes that may include members of the public.
 - Parks and Recreation hosts the largest number of special events including the following:
 - Easter Egg Hunt is held in Commons Park
 - Tree Memorial Dedication Ceremony is held at the Selman Timber Frame Pavilion.
 - Tree Giveaway – Local residents can pre-order a tree from Angola Parks and Recreation. At the end of April, staff teams up with the students of Angola Middle School and they plant the trees around the community
 - Pig Out in the Park is an event held at the Selman Timber Frame Pavilion.
 - Spring Concert is a free concert for the community held annually during the month of June.
 - Music Americana is an event held by the Council on Aging, but the Angola Parks Department helps them advertise through social media and websites. This event is held at the T. Furth Center for Performing Arts.
 - July 4th Celebration is an all-day event in Commons Park.
 - Fall Concert is a free evening concert held towards the end of summer for the community.
 - Back to School Bash is an afternoon event held in Commons Park.
 - Dog Day in the Park is a morning event hosted at the Selman Timber Frame Pavilion.
 - Civil War Days is held annually the last weekend in Sept. at the Selman Timber Frame Pavilion.
 - Halloween Fun is an evening event at the Selman Timber Frame Pavilion.

Recommended Action:

- Guidelines or policies should be in place for ensuring that any City sponsored special events, such as the parades and carnivals, are accessible including items such as accessible parking, designated wheelchair seating, and accessible restroom facilities. Where City events are currently being hosted in facilities (or parts of facilities) with known barriers to access, such as the Police Department's upstairs training rooms which are only accessed via stairs, consider relocating the program as needed to a more accessible location.
- In situations where private organizations sponsor events in City facilities, the City should encourage private organizations to comply with applicable ADA requirements. The City may want to provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA, if applicable. This may be addressed by modifications to the current required planning forms in order to address items like location of accessible parking on logistics maps, provision for accessible portable restrooms if used, ensuring adequate clear widths for accessible routes around/between barricades and vendor setups, vendor utility cord management to avoid trip hazards and displacements within accessible routes, etc.
- The City should thoroughly review the current accessibility conditions of the facilities available for public use and indicate availability of accessible facilities on the rental request form and any other locations where the City may list these facilities as available for public use.
- The City should consult the City attorney for any appropriate language in rental agreements or event requests about accessibility needs.
- If any City employees participate in speaking engagements on the City's behalf, they should coordinate with the host group regarding presence of any assistive listening devices or other available accommodation.

2.9 Contracted Services and Contractors

Public entities cannot use contract procurement criteria that discriminates against persons with disabilities ([28 CFR 35.130 \(b\)\(5\)](#)). In addition, selected contractors should be held to the same nondiscrimination rules as the City.

Self-Evaluation Findings:

- No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.
- Engineering services and other consultants are contracted according to state codes, mainly via Requests for Qualifications.

Recommended Action:

- All City contracts should be reviewed to ensure that they include specific, detailed ADA language to ensure that contractors that provide City services to the public comply with the ADA.
- It is recommended that the City consider means to maintain compliance when contracting for services by including ADA compliance requirements in new requests for proposals and reviewing ADA requirements when contracts are negotiated, revised, or renewed.

2.10 Customer Service, Satisfaction, and Input

ADA requires a public entity to provide an opportunity to interested persons and organizations to participate in the self-evaluation process. For three years after completion of the self-evaluation, a public entity must maintain a record of any problems identified ([28 CFR 35.105](#)).

Self-Evaluation Findings:

- Public notices of this SETP process were advertised in the local newspaper (The Herald Republican) and invitations extended to local advocacy groups via US mail.
- No complaints or grievances were reported related to inability to accommodate customers with disabilities or inability of persons with disabilities to access City programs or facilities.

Recommended Action:

- Conduct periodic customer satisfaction surveys or gather input from recipients of City services using an alternate method, such as public hearings or focus groups. An additional emphasis should be made to survey individuals with disabilities and organizations representing individuals with disabilities.
- Partner with persons with disabilities, their caregivers, and advocates for the disabled to identify concerns and gather comments on capital improvement projects to improve accessibility to people with disabilities during design.

2.11 Equally Effective Communication

ADA calls for public entities to provide applicants, participants, members of the public, and companions with disabilities with communication access that is equally effective as that provided to persons without disabilities ([28 CFR 35.160\(a\)-\(d\)](#)). The regulations also require that the public entity provide the appropriate auxiliary aids and services where necessary to give people with disabilities an equal opportunity to participate in, and enjoy the benefits of a service, program, or activity of a public entity. The law stipulates that the individuals can request the auxiliary aids and services of their choice and that the City will honor the request unless a suitable substitute exists or the request is not required under the law. In addition, the City may provide qualified interpreters via video from a remote location as long as it can meet the performance requirements of [28 CFR 35.160\(d\)](#).

Auxiliary Aids and Services

Self-Evaluation Findings:

- ALS is not provided within the City facilities, including Council Chambers where the majority of public meetings are held.
- No departments have hired/utilized transcription services and readers.

Recommended Action:

- The City should provide staff training and information regarding auxiliary aids and effective communication. Encourage staff to offer alternate means to complete transactions and assistance to complete City forms if possible.
- An ALS with appropriate number and type of ALDs should be provided in the Council Chambers at City Hall to provide better access for persons with hearing impairment attending Council meetings and other public offerings.
- Compliant signage that includes the International Symbol of Access for Hearing Loss should be provided outside of all rooms that provide ALDs and staff should be trained on operation.



Sign Language Interpretation



Volume Control Telephone



Telephone Typewriter (TTY)



Assistive Listening Systems

- The City should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc. This list should be made available to the public to inform them of services available and how they can be accessed by persons needed accommodation.

Interpreter Services

Self-Evaluation Findings:

- No departments indicated use of or request for interpreters.

Recommended Action:

- The City should consider a City-wide contract for qualified sign interpreter services that departments could utilize as needed. At a minimum, a list of qualified individuals should be maintained for all potential services that might be required on short notice. The City could also explore the viability of providing qualified sign interpreters from a remote location and transmitting the disabled participant's response to the interpreter in accordance with [28 CFR 35.160\(d\)](#). Interpreters should be provided upon request for accommodations or in situations where an interpreter is known to be required.

Telecommunications Devices for the Deaf

Self-Evaluation Findings:

- The Contact page on the City's website does not identify numbers capable of use with TDD/TTY.
- The Contact page does not include a listing for the ADA Coordinator.
- The Steuben County Communications Center is the 9-1-1 Public Safety Answering Point (PSAP) for all of Steuben County's police, fire and EMS providers. The PSAP has TDD/TTY capability.
- No City departments/phone numbers have TDD/TTY capability.
- The Police department has communicated with speech and hearing impaired using written notes.

Recommended Action:

- Where 911 is publicized, it should identify the method of communicating with hearing impaired persons.
- Where the City uses an automated answering system for receiving and directing incoming telephone calls, the City should enable this system to provide real-time communication with individuals using auxiliary aids and services, including TTY and telecommunications relay systems ([28 CFR 35.161\(b\)](#)).
- The City should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.

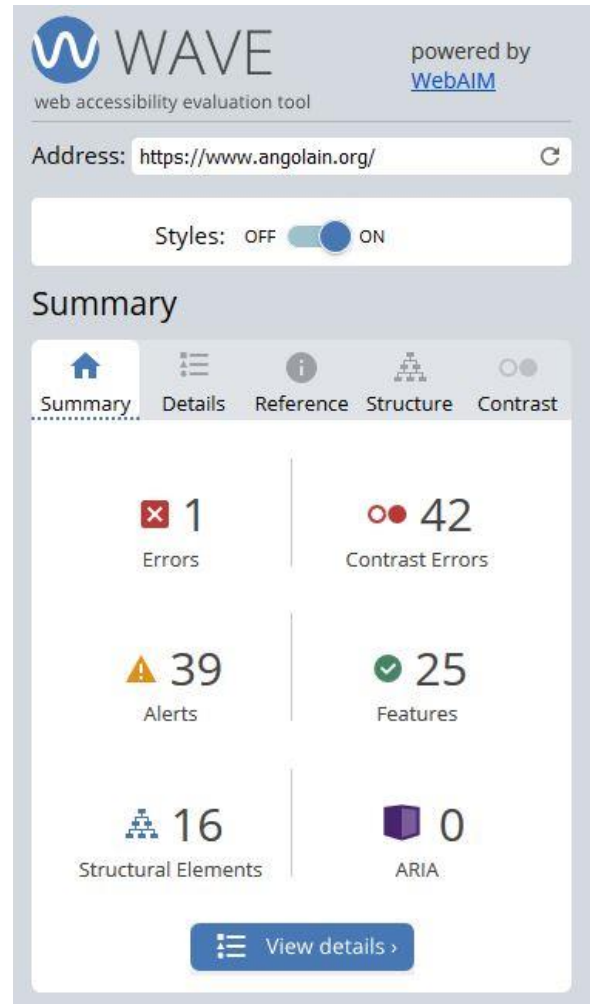
Website

Currently there are no adopted standards for websites that apply to Title II or Title III entities. However, numerous lawsuits have been filed recently, alleging discrimination due to websites not meeting the Web Content Accessibility Guidelines (WCAG), which apply to federal websites. Some decisions that make it to Federal Appeals Courts may be binding to all similar entities in that court jurisdiction. It is very likely that the WCAG will be the enforceable standard for all websites at some point in the future. It is highly recommended

that all Title II and Title III entities work towards modifications to websites to meet WCAG sooner rather than later.

Self-Evaluation Findings:

- The main City website is <https://www.angolain.org>
- Online bill pay is available via the bsaonline.com website linked from the main home page.
- The Document Center offers various City documents in pdf format, including meeting minutes and agendas. Many of these appear to be scanned copies and are not compatible with screen reader programs. Other forms, such as the Cruise to the Monument Sponsorship Form, Creative Entrepreneur and Driven by Data applications, July 4th Registration, Reserve Patrol Officer Program and Parks and Recreation 2019 Guide appear to be generated directly from electronic document formats such as Word.
- The Notice Under the Americans with Disabilities Act, Grievance Form, ROW Transition Plan, ADA resolutions, and various Title VI documents are available on the Document Center and via an ADA link.
- An interactive calendar is provided but does not appear to include many City meetings.
- Videos featured on the website are via YouTube which offers Closed Captioning.
- The City, and some departments such as Parks and Recreation, also have social media pages.
- Each board and commission has a separate page indicating purpose and meeting schedules, and providing various applications, forms and documents.
- The Community tab provides links to other community organizations and services, such as the Chamber of Commerce, local schools, and the Downtown Angola Coalition.
- The Contact page provides telephone and email contact information for all departments but does not provide specific listing for the ADA Coordinator or any numbers capable of use with TDD/TTY.
- A link to sign up for the City's REACH Alert system is included on the website. This system is a text alert system managed by 4 network administrators (Downtown Services Coordinator, Public Information Officer at Fire Department, Police Chief, and Clerk-Treasurer).
- Each department monitors and updates their portion of the website as needed by assigned department personnel. Downtown Services and the City's IT department are listed as administrators for the website. The website's Site Design and Content Management is provided by <https://www.egovstrategies.com>
- Running an accessibility check with the Web Accessibility Evaluation Tool (WAVE - <http://wave.webaim.org/>) generated the following information on the main page as an example. The City website included accessible features such as alternative text (content or function of an image to screen reader users or in other situations where images cannot be seen), form labels, and headings (which help organize information and provide additional information and navigation for screen reader users). Errors included linked image missing alternative text, low contrast, redundant, along with alerts including redundant or long alternative text, small text, and redundant title text and links.

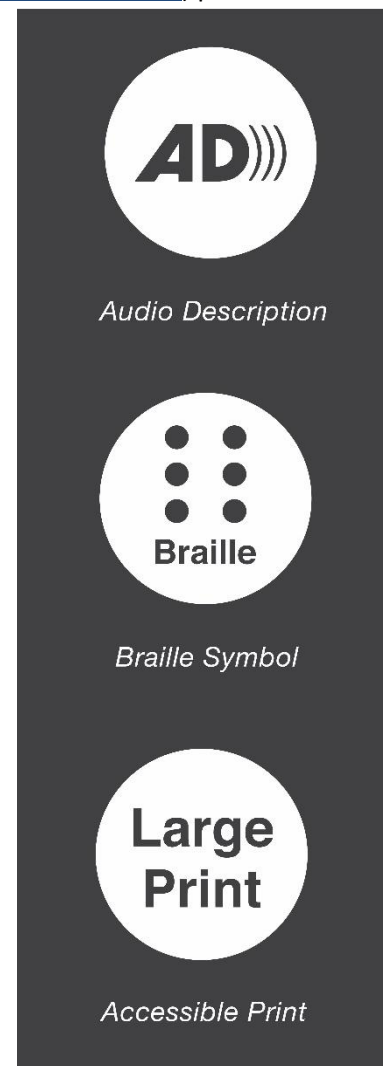


Recommended Action:

- Provide PDF documents that are directly converted to PDF and not a scan of the original document. Scans are not compatible with reader programs. If that is not possible, documents could be posted in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF.
- Consider adding a general disclaimer on City website “The City of Angola cannot confirm the accessibility of third party websites” to address linked websites.
- Consider adding a dedicated page for ADA and Title VI information that appears on the main page of the City website. ADA-related website content should include publicity of the statement of ADA compliance, contact information for the City ADA Coordinator, grievance and complaint procedures and form, publication of the self-evaluation and transition plan when completed, an annual list of ADA projects, and a list of the departments that offer TDD/TTY and the phone numbers. As noted above, some of this information is available, but is not easily accessed.
- The City’s website should be periodically reviewed by the developer to maintain, update, and monitor website accessibility. The following may provide useful information:
 - Utilize an accessibility checklist similar to that published by the Access Board.
 - The University of Wisconsin Trace Center (<http://trace.wisc.edu/world/web/>) provides resources and on-line information that might assist the City in development and implementation of an accessible website.
 - The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible (www.w3.org/WAI/).
 - The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility (www.icdri.org/section508/index.htm).
 - The DOJ provides a number of resources on their website as well (www.ada.gov).

2.12 Alternate Communication Formats

A public entity has a responsibility to provide information in alternative formats to comply with [28 CFR 35.160](#). This section of the ADA requires state and local government entities to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Communication access involves providing content in methods that are understandable and usable by people with reduced or no ability to: speak, see, hear and limitations in learning and understanding. Some alternative formats can be produced in-house at minimal costs, i.e. large print, disks, and e-mail attachments. Other formats, such as Braille and audio-formats, may need to be produced by a vendor. Alternate communication formats that are likely to be requested include, but are not limited to: audio-formats, Braille, large print, captioned films and video, electronic text/disk/CD-ROM, or sign interpreted films and video.



Self-Evaluation Findings:

- The ADA Coordinator will be the main point of contact for requesting and providing information in alternate formats on a request for accommodation basis and will communicate with other departments as needed.
- Most City departments and offices produce printed information that is distributed and available to the public as follows:
 - Building Safety provides applications for different types of building permits, fuel gas pressure test reports, and an unsafe building complaint form. All can be accessed in person or on website.
 - Clerk-Treasurer utilizes receipts, auto debit forms, billing email form, request for public records form, utility brochure, and trash schedule. Some of these documents and forms are available on the City website.
 - Engineering handles permit applications and permits used by the public during project approvals. These are provided in person or by email. Brochures and other educational material is created and distributed by the MS4 Coordinator. These are usually made available at events or included in the utility billing.
 - Fire Department facilitates burn permits which can be accessed on City website.
 - Parks has a Park Guide and Calendar of events available at City Hall and in the Park Office during hours of operation.
 - Economic Development and Planning issues improvement location permits and planning and zoning permits. These may be accessed in person at City Hall or via email.
 - Police Department provides brochures and booklets/pamphlets that are available in person at the Public Safety Building
 - Shut-off notices for non-payment, service, or maintenance appointment notice are issued via door hang tags by the Water Department. Boil water advisories are issued via mailing.
 - Limited brochures and other documents from the WWTP are available for public distribution at City Hall.
- The City has not been asked to provide written materials and publications in Braille or large print text.
- The majority of the departments do not have a standard procedure to communicate and produce accessible alternate formats for people with disabilities.
- Police have communicated with speech and hearing impaired using written notes.

Recommended Action:

- The City should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats. This should also include information on the duties of the ADA coordinator and role in coordinating requests for accommodations.
- Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner.
- The City should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings.

2.13 Fees and Surcharges

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services, or activities accessible to persons with disabilities ([28 CFR 35.130\(f\)](#)).

Self-Evaluation Findings:

- There was no evidence of fees charged to individuals *with* disabilities that were not charged to individuals *without* disabilities to access programs, services, and activities.

Recommended Action:

- The City should continue to monitor and review policies and practices to ensure that fees and surcharges are not charged to individuals *with* disabilities that were not charged to individuals *without* disabilities.

2.14 Information and Signage

A public entity is required to ensure that individuals with disabilities are directed to an accessible entrance to a building and to the location and existence of accessible services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility ([28 CFR 35.163](#)). Paragraph (b) requires the public entity to provide signage at all inaccessible entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.

Self-Evaluation Findings:

- Inaccessible public entrance at City Hall provides signage directing users to the south accessible entrance as shown to the right. Most other City facilities do not have more than one public entrance. The police station public entrance is not accessible and does not provide signage indicating the location of the secure accessible entrance at the west side that does have the ISA.
- Signage within City buildings varies. Some rooms at newer facilities such as the WTP, City Hall, and Monument Plaza provided signage; however, other facilities frequently provided visual text only. Some do not provide signage at all, are lacking raised text and braille or are mounted in the wrong location. Permanent rooms should provide signs that comply with ADASAD 703, including the requirement of having both visual and tactile characters and Braille.

Recommended Action:

- An accessible signing strategy for City facilities should be developed for interior and exterior directional, informational, and permanent room signs based on the findings of the Facility Assessment.
- Design standards for accessible signs or use of a qualified design professional should be created to guide the production and installation of the accessible signs.
- Signage replacement projects should include replacement or installation of accessible signs as required.

2.15 Staff Training

On-going compliance with the ADA can only be achieved if City staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although training is not required by the ADA, training regarding the requirements of the ADA is recommended.



Signage directs visitors to the accessible entrance at City Hall



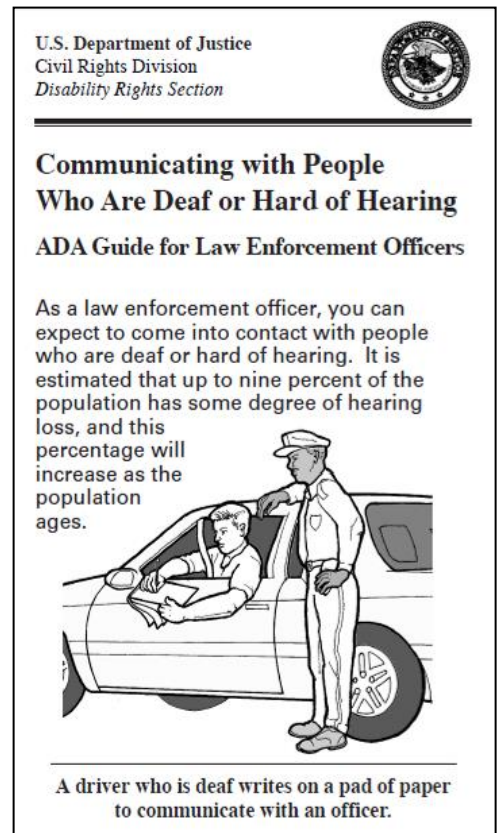
The ISA is posted at the accessible entrance at the Police Department

Self-Evaluation Findings:

- The ADA Coordinator has attended ADA webinars sponsored by the Association of Indiana Municipalities (AIM).
- Parks staff has attended classes provided at the Great Lakes Park Training Institute regarding topics dealing with ADA but no specific formal training.
- Police Department officers are trained yearly on how to interact with people with mental illnesses, addictive disorders, mental retardation, autism and developmental disabilities. Training was last completed in February 2019.
- Downtown Services staff attended 2019 Indiana Arts Homecoming which offered classes such as Diversity in Indiana and Making Art Accessible for Everyone.
- See also staff suggested training in Section 2.18 Department Self-Evaluation Findings.

Recommended Action:

- The City should provide training regarding ADA and related civil rights legislation. Suggested training topics include, but are not limited to:
 - Requirements of the ADA for the City
 - Consequences of Non-Compliance
 - Disability Etiquette – a good resource is http://transition.fcc.gov/cgb/dro/504/disability_primer_4.html
 - Acceptable Terminology and Phrases
 - Grievance/Complaint Procedures
 - Reasonable Accommodations
 - Awareness and Sensitivity
 - Accessible Locations for Meetings
 - Consequences of Non-Compliance
 - Barriers to Access – Programmatic and Physical
 - Auxiliary Aids and Services
 - TDD/TTY
 - Building Evacuation Procedures to Assist Persons with Disabilities, especially in multi-story buildings with public access to upper floors
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should coordinate additional ADA training to all Department managers and staff who have regular contact with the public.
- It is recommended that the Police Department continue to receive training on ADA accessibility issues related to their activities. In particular, training on communicating with people who are deaf or hard of hearing (reference www.ada.gov/lawenfcomm.pdf) and developing a policy on the topic as well (refer to www.ada.gov/lawenfmodpolicy.pdf). Review of other guidance should be done as well, including the publication “Commonly Asked Questions About the Americans with Disabilities Act and Law Enforcement” (www.ada.gov/q%26a_law.pdf).
- Additional training materials may be made available to officers on “Disabilities and Law Enforcement”, which is available on the U.S. Department of Justice web site (www.ada.gov/policeinfo.htm).



- Staff responsible for enforcement and inspection of local building facilities and inspection/plan review for ROW facilities should receive relevant training on both the State adopted Indiana Accessibility Code and the more stringent ADA. For right-of-way improvements, this would help ensure new City facilities are being designed and constructed per current best practices.

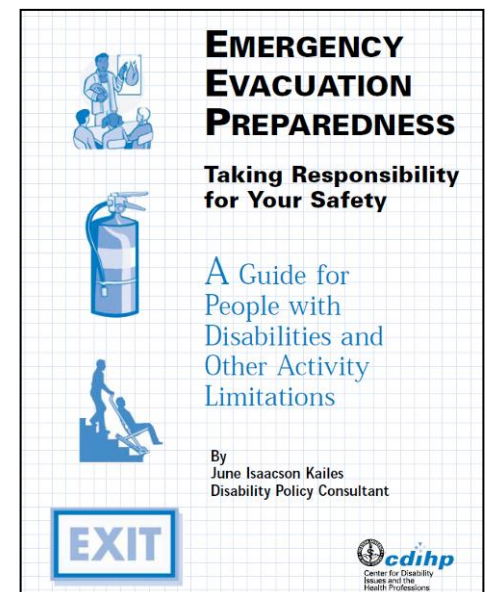
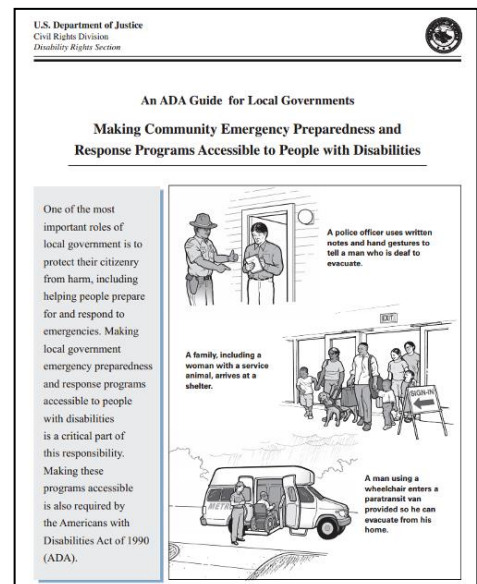
2.16 Emergency Evacuation Procedures

The City is required to establish emergency evacuation procedures to safely evacuate persons with disabilities who may need special assistance in an emergency. These plans and procedures should include identification of assembly locations for persons with disabilities in each facility, staff assigned to ensure that assembly areas are checked prior to leaving buildings during an emergency, identification of assembly locations for pickup and transport of persons with disabilities, and location of accessible shelters to be used for various types of emergencies. Depending on the nature of the emergency, some shelters may not be appropriate.

Self-Evaluation Findings:

- Angola is located within Steuben County and as such is within the jurisdiction of the Steuben County Emergency Management Agency (SC EMA).
- The SC EMA works in conjunction with the Indiana Department of Homeland Security (IDHS), United States Department of Homeland Security, and the Office for Domestic Preparedness, and many other State and Federal agencies. They also work with town, city and county response agencies of all types, ensuring preparedness and response capabilities for any manmade or natural disaster that may occur anywhere within Steuben County. The EMA is responsible for writing, updating, and disseminating the Steuben County Comprehensive Emergency Management Plan (CEMP), Strategic Preparedness Plan, Standard Operating Procedures, Memoranda of Understanding (MOU), and Mutual Aid Agreements. They receive new and updated requirements from IDHS and relay them to County agencies. Steuben County is part of IDHS District 3.
- EMA coordinates public and private services in order to assist with public needs during a disaster. Following an event their role is to conduct a county-wide damage assessment in order to qualify for Federal or state disaster recovery funds that may become available.
- The CEMP was last updated in January 2012. The City of Angola is identified as part of the County's plan to prepare for, respond to, and recover from disasters/emergencies in this CEMP.
- The CEMP includes a letter of agreement between SCEMA, Health, Highway, Sheriff, and **the City of Angola (including the police, fire department and public works)**, County and City School corporations, and the American Red Cross.
- The CEMP include a listing of emergency support functions and the agencies providing those services. These are formalized through written agreements with voluntary organizations and mutual aid agreements between responding organizations and other local, state, federal, and private organizations.
 - In ESF #1 Transportation, it indicates an existing agreement with county and city school corporations to utilize school bus transportation and bus drivers for use in evacuation from affected areas and/or transportation to clinic sites or shelters. The bus fleet does include some vehicles with accessible features, but this is not identified as such in the CEMP. Local street departments are also identified as a support agency.
 - ESF #2 Communication identifies the Angola Police and Fire Departments as support agencies for assistance in coordination and communication. They are also listed in ESF #4 Firefighting and Emergency Medical Services, ESF #6 Mass Care, Housing and Human Services, ESF #9 Search and Rescue, ESF #10 Hazardous Materials, and ESF #13 Public Safety.

- ESF #3 Public Works and Engineering indicates that the Angola City Engineer is a primary agency, with support from street, water, and sewer departments.
- ESF #7 Resource Support includes support functions from Police, Fire, and the City Clerk-Treasurer.
- ESF #14 identifies the Mayor as support for Long-Term Recovery functions and ESF #15 External Affairs (regarding public information and planning)
- Steuben County has established some emergency agreements with local private sector companies and businesses for heavy equipment, generators, food, bottled water, and other key commodities and resources.
- During disaster operations, numerous private sector and private non-profit organizations provide resources. Included among these are the American Red Cross, Salvation Army, various church-related groups, United Way, Radio Amateur Personnel, and local hospitals such as Cameron Memorial, etc.
- EMA works with the American Red Cross, who maintains a list of shelters to be used in the event of an evacuation or emergency and assists in coordinating transportation for the public to these locations depending on the nature of the emergency.
There is no reference to the availability of shelters which may be 'accessible' to persons with disabilities or to those who require the use of service animals.
- The plan does not identify the need to provide additional support for persons with disabilities or other special needs groups or outline the necessary tasks and resources to manage and provide appropriate care to those persons with special needs sheltered within the County.
- CEMP addresses care of animals via support agencies/partners such as the Steuben County Animal Shelter, Humane Society, and local veterinarians under ESF #11 of the main document but does not indicate any provisions specific to service animals except as noted below in one Hazard-Specific Planning Annex.
- In the Hazard-Specific Planning Annexes, Winter Weather Response Plan Planning Considerations:
 - (Page 282) it states that *'Steuben County has, like most Indiana counties, special needs populations, which will require special attention and alternate consideration in such key actions as transportation, evacuation, sheltering and medical care.'*
 - Page 283 indicates that the County utilizes 'County Warning Point' for alert, warning and notification.
 - ESF #6 on page 309 *'Coordinate with the Health and Medical ESF for the provision of first aid services at the shelters and other fixed sites and address, where applicable, issues with the special needs population.'*
 - ESF #8 on page 315 addresses tasks regarding the status of emergency health



care and hospital facilities, which is relevant to care of many special needs groups particularly those already in hospital care, as well as noting a need to address issues with those on home health care and special needs populations.

- Response Tasks under ESF #11 states *'coordinate the provision of companion/service animal sheltering with the County Shelter and Mass Care ESF.'*
- In Planning Support Annexes – Special Needs Population, The Support Annex Summary defines this per the National Response Framework (NRF) as *'Populations whose members may have additional needs before, during and after an incident in functional areas, including but not limited to maintaining independence, communication, transportation, supervision and medical care. Individuals in need of additional response assistance may include those who have disabilities; who live in institutionalized settings; who are elderly; who are children; who are from diverse cultures; who have limited English proficiency; or who are non-English speaking; or who are transportation disadvantaged. These populations may also include young children not able to identify themselves, older adults with dementia, Alzheimer's or other psychiatric conditions, deaf, blind, homeless, and minority populations.'*
- The Support Annex also indicates that *'the Special Needs Steering Committee comprised of public health and safety agencies and organizations, local first responders, and the Steuben County Emergency Management Agency have collaborated to provide guidance for the sheltering and care of special needs populations during a disaster or emergency event. The Special Needs Population Annex provides checklists on the necessary tasks and resources to manage and provide appropriate care to those persons with special needs sheltered within Steuben County. The Annex also considers the challenge of evacuating and transporting special needs populations to suitable shelters or to potential locations outside of the county, should the need arise.'*
- Neither the City nor County currently maintains a list of homebound clients and group homes. No process for citizens to register themselves as disabled or homebound individuals is mentioned in the County CEMP. The Mayor's office had previously advertised for any residents that were oxygen machine dependent or homebound to call the City to be put on a list for emergency purposes; however, this list has not been maintained/updated and is likely no longer valid.
- The Steuben County Communications Center is the 9-1-1 Public Safety Answering Point (PSAP) for all of Steuben County's police, fire and EMS providers. The PSAP has TDD/TTY capability.
- The City utilizes a REACH Alert system to send text alerts. A link to register is included on the City's website. The system is managed by 4 network administrators (Downtown Services Coordinator, Public Information Officer at Fire Department, Police Chief, and Clerk-Treasurer).
- Based on responses from the department questionnaires, enactment of emergency plans and staff understanding of plans seems to vary indicating a need to clarify and clearly post emergency procedures. Responses were summarized as follows:
 - City Hall has emergency plans in place for fire and severe storm/tornado emergencies.
 - Emergency procedures are in place for the Clerk-Treasurer Department but not identified in the building.
 - Maps of evacuation and shelter in place locations are on display in the City Engineer's office.
 - (At City Hall) the basement serves as indoor assembly place in case of emergency. Outside, they are to meet in the parking lot directly across from the Public Safety Building in front of the PD.
 - Parks has identified and posted the locations for both shelter and emergency assembly. Interior restrooms are sheltering locations and assembly location is the flagpole to the south of the office. The basement of the Commons Hall is also utilized as a shelter if needed.
 - Economic Development and Planning stated the only emergency procedure is the map provided to the department and have never practiced evacuation with the plan commission, board of zoning

appeals, redevelopment commission, economic development commission, historic preservation commission. The map shows emergency assembly identified for all floors.

- Police department indicated there are exit signs.
- Street Department indicated a plan is in place, but no detail given.
- Water Department has a plan, but emergency shelter is not marked. Staff has been trained to go to certain areas of building.
- WWTP employees are trained to meet in the parking lot in front of the WWTP in the event of a fire and are to use the basement of the Harriet Building in the event of a weather emergency.
- Fire Department indicated they do not have emergency plans.
- The Employee Handbook indicates that each facility has specific procedures about emergencies, that training will be provided, and a Safety Manual is located in each department.

Recommended Action:

- The CEMP should review and address the specific needs for evacuation of persons with disabilities or other special needs. The County should review and update, if necessary, response procedures to include evacuation procedures to evacuate people with disabilities from all buildings, as well as from the community, to suitable shelters depending on the nature of the emergency. Excellent resources can be found at:
 - [FEMA](#)
 - www.ada.gov/emergencyprepguide.htm
 - www.cdihp.org/evacuation/emergency_evacuation.pdf
 - onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_150.pdf
 - www.nod.org/assets/downloads/Guide-Emergency-Planners.html
 - www.ada.gov/pccatoolkit/chap7emergencygmtadd1.htm
- The EMA should clearly identify and publicize in their CEMP evacuation routes and shelters to be used for various types of emergencies and ensure that vehicles used to evacuate residents are accessible, as are all of the emergency shelters. This would facilitate persons in the community knowing the closest emergency shelter prior to an emergency and allow them to get there sooner, without having to contact the County or other agency to find out where they should go. This is especially important for caregivers of persons with disabilities and group homes that are able to transport their clients.
- Ensure that accommodation can be made for service animals at shelters and that persons with allergies can be provided shelter and accommodation away from them.
- The County should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities, to all employees and volunteers charged with assisting in evacuations.
- The EMA should identify potential sources of equipment that can be made available for persons with disabilities in the event of an emergency. This equipment could include wheelchairs, walkers, etc. that might be left behind at homes or damaged during an evacuation.
- Stress the importance of ensuring that non-profit agencies that coordinate and maintain the list of shelters identify and communicate which are accessible for various disabilities. Work closely with advocacy groups to update lists of homebound individuals and others needing assistance in the event of evacuation.
- Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in the community who may require special assistance in the event of an emergency or natural disaster and encourage residents with special needs to register with the County and/or City to ensure that proper assistance can be provided if needed.
- All City staff should be made aware of the location of the posted evacuation routes within their facilities. These routes should be conspicuously posted for the public within each facility.

- Include within evacuation plans for each building guidelines for the evacuation of persons with disabilities for various emergency situations. Each Department should use these guidelines to create their own emergency evacuation plans, which should:
 - Address what to do when an alarm is triggered;
 - Establish meeting places for assistance and evacuation at staircases;
 - Establish floor captains who will ensure that each floor is vacated prior to leaving themselves and ensuring that persons that need assistance are removed to safety.

2.17 Employment

Title I of the ADA requires public entities not to discriminate against persons with disabilities in all parts of the recruitment and employment process ([28 CFR 35.140](#) and [29 CFR 1630.4](#)).

Self-Evaluation Findings:

- The majority of applicant, employee, and retiree services are handled by Human Resources. The Clerk-Treasurer's Office handles payroll services.
- The City of Angola Employee Handbook (Adopted October 17, 2011 and updated 2019) includes the following references potentially related to persons with disabilities:
 - **Page 5-6: Americans with Disabilities Act Amendments Act**
 - *The City supports the intent and purpose of the Americans with Disabilities Act Amendments Act (ADAAA) and will not discriminate against qualified individuals with disabilities because of the disability of such individual regarding job application procedures, hiring, advancement, discharge, compensation, job training and other terms, conditions and privileges of employment.*
 - *Title I obligations that regulate employment will be the responsibility of the Office of the Mayor – Human Resources.*
 - *If an employee is disabled and believes that they are a qualified individual with a disability as defined in the ADA and require an accommodation to perform the essential functions of their job, the employee may request the City to provide a reasonable accommodation.*
 - *A disabled employee whom the City cannot or is not required to accommodate and who has exhausted all applicable paid leave may request an unpaid leave of absence as provided in this handbook, provided the employee is able to provide and substantiate the employee's ability to return to work. All inquiries concerning disabilities must be directed to Human Resources.*
 - *Disability separation is when an employee has exhausted all applicable paid leave and/or family medical leave and the employee is unable or unwilling to admit to their personal incapacity. The employee will be required to submit to an examination by a licensed physician chosen by the City to determine if the employee is capable of performing the essential functions of the employee's job. The cost of the exam will be paid by the City. Should the employee be declared physically incapable of performing the essential functions of the job by the licensed physician and the employee is unable to perform the essential functions of any vacant position with the City, either with or without a reasonable accommodation the employee will be separated from employment with the City.*
 - *Title II obligations that regulate public entities will be the responsibility of the City's Department of Building Safety. The Building Commissioner is the Employer's ADAAA Compliance Coordinator and is responsible for: Maintaining a self-evaluation program, maintaining a transition plan, coordinate, investigate and respond to complaints under the*

Conflict Resolution process for complaints involving non-accessibility of services, programs or facilities and alleged discrimination against disabled individuals.

- *The City maintains in operable working order, all features of facilities and equipment which are for the use, benefit, aid or service of the public, in a manner which is readily accessible to and usable by persons with disabilities. Each service program and activity is operated in a manner that, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.*
- *The City ensures that communications with applicants, participants and members of the public with disabilities are as effective as communications with others. In addition, the City ensures that all interested persons (including those with impaired vision or hearing) can obtain information on the existence and location of accessible services, activities and facilities. Notwithstanding the above commitments to accessibility, taking action to achieve accessibility is not required when it would result in a fundamental alteration in the nature of a service, program or activity, or cause an undue financial burden and administrative hardship.*
- **Page 6: Anti-Discrimination/Equal Employment Opportunity**
 - *The City of Angola is an Equal Opportunity Employer. All employees will be recruited, evaluated, hired, promoted, transferred, demoted, laid-off, suspended or terminated without unlawful discrimination. No personnel decisions concerning any term or condition of employment will be based upon race, color, religion, sex, national origin, age, genetic information, disability, veteran status or any other legally protected status, except where such criteria constitute a bona fide occupational requirement.*
 - *The Human Resources Administrator is the City's EEO Coordinator and is responsible for providing information regarding anti-discrimination employment laws to employees and others and for reviewing and resolving complaints involving alleged discrimination. Any person who is aware of or encounter behavior perceived as discriminatory must report such concerns to their supervisor, Human Resources, Mayor or any department head. An Anti-Discrimination/Equal Employment Opportunity Report form 11-030, should be filed as soon as possible. The City will thoroughly investigate and resolve all complaints in compliance with applicable laws. Any employee found to be in violation of this policy or retaliating in any form against an employee filing a complaint or a witness to a discriminatory act under this policy will be subject to disciplinary action, up to and including discharge.*
 - *All information disclosed in alleging discrimination will be held in strictest confidence to the extent allowed by law and otherwise will only be revealed on a need-to-know basis in order to investigate and resolve the matter. Employees have the right to circumvent the normal chain of command in selecting which person to whom to file a complaint of discrimination.*
Additional information is available at: www.eeoc.gov
- Page 6 also includes the City's general Anti-Harassment policy.
- Page 9 outlines the City's Conflict Resolution policy, which is assumed to also include any issue arising under the above-mentioned policies.
- Page 26 Social Media lists 'content that promotes, fosters or perpetuates discrimination based on race, color, age, religion, gender, national origin, genetic information, physical or mental disability or any other legally protected status' as prohibited.
- Pages 38-42 address Family Medical Leave Act (FMLA).
- All job applications are handled through the Office of the Mayor by the HR Administrator. All departments utilize the City's standard Employment Application. This form (Form 11-001 Rev. 4/17) was reviewed with the following findings:
 - The application says 'Equal Opportunity Employer' on top left hand corner of the first page.

- No additional statements of non-discrimination are included.
- It requires applicant to initial agreement with the following statement: *'I understand and accept that, depending on the position for which I am applying; employment may be contingent on successful completion of a medical, psychological, drug, substance abuse and/or alcohol testing to determine abilities to perform essential functions of the position.'* Information is not provided on what is considered an 'essential function.' The Employee Handbook indicates that *'a description of essential job duties and responsibilities, minimum qualifications, licensing and certification requirements, work hours required, along with other important job-related information are maintained in the Job Description program. Human Resources is responsible for the administration of the Job Description program.'*

Recommended Action:

- The City should continue to practice the City policies of non-discrimination as required by ADA and other applicable laws.
- Review the Employee Handbook-referenced 'Job Description program documents.' Carefully consider physical requirements in relation to actual job duties and potential reasonable accommodation when developing job descriptions. Consider adding language in appropriate locations to clarify that reasonable accommodation may include: making facilities readily accessible to individuals with a disability, restructuring jobs, modifying work schedules, modifying equipment, or other similar accommodations.
- An excellent resource to review when considering updates or modifications to various documents, including job descriptions, is the Job Assistance Network at <https://askjan.org/topics/jobdesc.cfm> and the U.S Department of Labor, Office of Disability Employment Policy at <https://www.dol.gov/odep/#>.
- Consider "ADA Compliant Language" in regard to work duties. Examples include modifying statements such as 'stand or sit' to 'stationary position', 'talk/hear' to 'communicate, convey, express oneself, exchange information', 'use hands/fingers to handle or feel' to 'operate, activate, use, prepare, inspect, detect, position', 'see' to detect, perceive, identify, recognize, observe, inspect, assess', 'carry or lift' to 'transport, move, position, put, install'.
- The City should consider updates to the Employee Handbook to reflect recent changes to ADA, employment law, and case law. Potential updates could include:
 - Develop more comprehensive language regarding prohibition against disability discrimination. An example offered by the EEOC is *"Angola prohibits any and all types of discrimination against a qualified applicant or employee on the basis of (1) a current disability, (2) record of a prior disability, (3) being perceived or regarded as disabled, or (4) a relationship or association with someone with a disability. A qualified applicant or employee is an individual who can perform the essential functions of the job in questions, either with or, without a reasonable accommodation"*.
 - Add comprehensive language regarding disability accommodation. An example offered by the EEOC is *"Requests for accommodations can be either oral or in writing, and individuals are not required to use any particular words in making a requests. The ADA coordinator is responsible for determining if an individual is considered 'qualified' and if a 'reasonable*



Reasonable accommodation tailoring workspace for wheelchair user

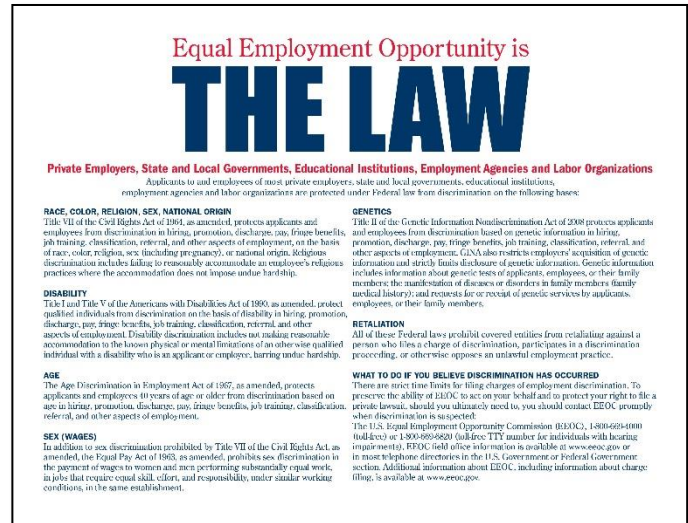
accommodation' exists. As such, an applicant or employee in need of an accommodation, or a manager aware of an applicant's or employee's need for an accommodation, should contact the ADA Coordinator who will promptly engage in the interactive process with the applicant or employee regarding the requested accommodation".

2.18 Department Self-Evaluation Findings and Recommendations

DLZ distributed a questionnaire to the ADA Coordinator that included a request for information about various departments, policies, and procedures of the City. This information included specific items that the departments were requested to provide information to help DLZ better understand the policies and procedures of each related to ADA understanding, training, and accommodation (see *Appendix A*). DLZ reviewed responses and coordinated clarifications and questions with the ADA Coordinator. A secondary benefit of the questionnaire is allowing DLZ to gain an understanding of how well the person completing the questionnaire understands the obligation to ensure their programs are accessible and their general understanding of how to provide accommodations. Additional inquiries were also made during the facility evaluations. A general summary follows.

Self-Evaluation Findings:

- The City has departments with daily public interaction that is both in person and over the telephone.
- No departments responded that the programs offered for persons with disabilities were different in any way.
- Some City staff have interacted with persons with disabilities and altered their normal procedures to accommodate them in some way as follows:
 - Building Safety met with customer in wheelchair in 2nd floor lobby instead of office.
 - IT has made employee accommodations related to hearing aids and computer functionality as well as providing special monitor to help with eye pain.
 - Parks staff has assisted people with mobility issues in order to seat them for concerts.
 - Police have communicated with speech and hearing impaired using written notes.
- Many departments have publications, documents, and forms that are available to the public. No requests have been received to provide special accommodation for these documents.
- Department liaisons to the ADA Coordinator have not yet been identified.
- Some departments provided suggestions and comments regarding procedures, programs and potential training as follows:
 - Building Safety indicated any training would be helpful. While the City has ADA programs in place, they may be made more readily available to people with disabilities.
 - Clerk-Treasurer would like to see training on the basics like understanding the law and what accommodations must be offered.
 - Engineering suggested basic training on types of disabilities that city employees could encounter and how to appropriately satisfy the needs of the disabled customer.
 - IT suggested they could do more in regard to public meetings such as video or transcription.



- Parks is aware and working toward making facilities and events more accessible to those with disabilities. Training on being more accessible to disabilities, not associated with mobility, would be helpful. Many park programs are geared toward children. Training on instructing children with disabilities could be beneficial for staff.
- Economic Development and Planning felt it would be helpful to go over emergency maps with all the boards and commissions and how to address potential need to use the stairs to the basement. Would like to know if the City has any equipment for hearing impaired and if so, where and how to use it. Suggestions for locations for wheelchair users to sit within the council room would also be helpful.
- Updates to the Clerk-Treasurer's office window due to the window height, push button for the double doors to allow the public to gain entry to the second floor of City Hall, and improvements to access for both the Fire and Police Department were specifically suggested in relation to facility access.
- Further education on the ADA, the broad definition of disability, and diversity training including situational, locational, and event awareness, interaction with people with disabilities, and how to work with other organizations to encourage ADA compliance was also requested.

Recommended Action:

- Public interactions with persons needing special accommodation due to a disability is likely to occur for all departments at some point. Training should be provided to all departments to review how to accommodate various disabilities and provide the same level of service. See suggestions above and in Section 2.15.
- Examples of interactions and accommodation for persons with disabilities demonstrated flexibility and desire to provide access to all programs offered.
- All departments should have a liaison identified that will interact with the ADA Coordinator and be responsible for ADA compliance in their department. This should be coordinated between the ADA committee and the department heads. This will help to better communicate the role of the ADA coordinator, the appropriate process for accommodations and centralize recordkeeping related to ADA. Also, members of the ADA committee specialize in various areas and can provide supplemental assistance as needed, such as the City engineer providing guidance related to ROW issues, or Downtown Services in regard to event protocols.
- Continue to ensure that all programs offered do not segregate customers with disabilities or not provide the same type and level of service.
- Ensure that all publications, documents, and forms that are provided to the public can be made available in alternate formats easily. This would include large print versions and electronic versions in multiple file formats. All departments should have an accessible work space or clipboard that can be provided to someone that cannot reach counters that are above required height.
- All departments evaluated have some manner of barrier present, nearly all of which can be addressed by architectural modifications, various methods of equal accommodation, or changes in procedures. Target high priority improvements as noted in the Facility Assessment along with areas specifically identified by complaints and staff suggestions.
- Funding will be a key component in some instances but many improvements in service to persons with disabilities can be done inexpensively and within a short timeframe.
- The report includes a number of ways that departments can accommodate persons various disabilities, but circumstances and barriers vary between departments. Training of staff is a key component to knowing how to accommodate and provide equal service to persons with disabilities of all kinds.

2.19 Ordinances, Design Standards, and Other Documents

Title II entities typically have a number of documents that specify requirements, design standards, and other requirements for construction of various facilities. Often, these documents reference pertinent guidance, such as state DOT, International/State Building Codes, etc. A review of documents that contain, or should contain, provisions related to accessibility was done by searching key words where possible.

Self-Evaluation Findings:

- Citizens can view the City of Angola's Municipal Code Online and link is provided from the home page to an external website to view the code via the Code Publishing Company.
- Review of the Angola Municipal Code noted the following references related to persons with disabilities, or code sections potentially influencing accessibility:
 - The following sections contain references related to Taxicab driver licenses issued by the City.

5.20.130 Taxicab driver license application procedure.

(E) A list of the applicant's physical or mental disabilities or incapacities. With respect to each such disability or incapacity, applicant shall state whether the same would interfere with the proper management and control of a motor vehicle.

5.20.160 further includes grounds to deny or refuse to renew license if the 'disability...shall adversely affect the qualifications, functions or duties of the applicant' along with appeal process.

- The following sections contain references which help maintain a clear accessible route within the ROW.

12.05.040 Sidewalk cleaning – Owner responsibility.

The person owning or occupying any lot bordering on any street shall keep the sidewalks adjoining such lot free and clear from all obstructions, and from weeds, rubbish and accumulations of ice and snow. Snow shall be removed from the sidewalks within 12 hours after any snowfall. [Code 2000 § 96.04; Code 1981 § 9.50.040.]

18.160.290 Outdoor dining standards.

(C) (1) (a) All outdoor dining areas shall maintain a minimum four-foot-wide pedestrian circulation area along a public sidewalk. The pedestrian circulation area shall be free of all obstacles including but not limited to tree wells, fire hydrants, street light poles, and newspaper boxes. This pedestrian circulation area shall be maintained at all times.

18.160.300 Outdoor storage standards – General.

(B) Vehicles. Vehicles shall not encroach into a right-of-way or block or impede an access easement, sidewalk, or driving aisle.

18.160.340 Permanent outdoor display standards.

(C) (1) Accessibility. A permanent outdoor display shall not block any sidewalk, accessibility ramp, or driveway.

18.172.010 General landscaping standards.

(2) (c) Landscape materials shall not project into sidewalks, pedestrian paths, and the like below a height of seven feet.

- The following sections contain references which dictate construction of sidewalks, physical requirements, and plan review.

12.05.080 Sidewalk construction – Repair and maintenance.

(A) Sidewalks are required within the city limits and shall be constructed or rebuilt in accordance with AMC [18.160.350](#).

(B) Standards and grades approved by the Common Council shall be on file with the Clerk-Treasurer of the city.

(C) When a new building or structure is erected or built within the corporate limits, sidewalks shall also be constructed. If sidewalks exist on adjoining property, the new sidewalks shall form a continuous surface and will abut, touch or be otherwise contiguous. If sidewalks do not exist on adjoining property, the new sidewalk shall extend from property line to property line. This applies equally to lots. If inclement weather prohibits timely installation, the owner or developer shall complete the sidewalk as soon as weather allows.

(D) All property abutting public ways of the city shall keep their respective sidewalks in good repair and safe condition. [Ord. 1208-2005; Ord. 1058-2001; Ord. 546, 1979. Code 2000 § 96.08; Code 1981 §§ 12.04.010 and 12.04.030.]

18.160.350 Public improvement standards.

(B) (2) Public Sidewalks. Public sidewalks shall be required along the edge of the right-of-way, except when the Zoning Administrator determines the development is agricultural in nature or it is unlikely the public sidewalk will provide connectivity to future trails or sidewalks. New public sidewalks shall closely align with existing sidewalks, be installed approximately one foot inside the right-of-way, and meet or exceed the city of Angola's construction standards.

18.156.170 Pedestrian network standards.

(A) Applicability. Developments shall integrate an interior and exterior pedestrian network comprised of concrete sidewalks and/or asphalt sidepaths for pedestrian transportation and recreation. This network shall consist of sidewalks along street frontages and sidepaths between developments and public destinations (e.g., schools, parks, hospitals), nearby trails, other developments, and undeveloped properties.

(2) Width. The minimum sidewalk or sidepath width shall be as indicated in the chapter for each subdivision type in Division IV of this title, Subdivisions, or as indicated in Chapter [18.124](#) AMC, Planned Development (PD) District, for planned developments. If not indicated, the Zoning Administrator shall determine the appropriate sidewalk or sidepath width.

Note: Only subdivision sections include minimum sidewalk requirements: Conservation Subdivision (4' min. on internal local, collector, and arterial streets; 6' along perimeter streets) and Zero Lot Line Subdivision (5' both sides internal collector and local streets, 6' internal arterial streets and perimeter streets.)

12.10.140 Construction of sidewalks and driveways.

(A) Construction of sidewalks shall conform to the specifications of the city on file in the office of the City Engineer.

(B) Construction of driveways shall conform to the specifications of the city on file in the office of the City Engineer. [Ord. 806, 1991. Code 2000 § 150.53; Code 1981 §§ 12.10.040 and 12.10.050.]

18.192.050 Improvement location permit.

(A) Applicability. An improvement location permit shall be required prior to permanent construction, installation, addition, alteration, or relocation of a structure; prior to permanent alteration to the land; and prior to establishment of a new land or change to an existing land use. The following are examples of projects necessitating an improvement location permit process:...Constructing a public sidewalk.

- The following section contains reference to provisions for accessibility needs on trails.

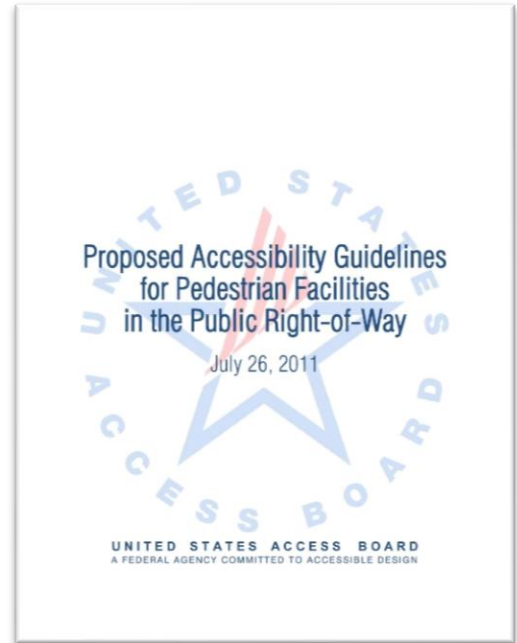
12.25.150 Use of Angola trail.

(A) Motorized Vehicles Prohibited. No person shall operate or use a motorized vehicle on the trail including, but not limited to, motorized bicycles, motorcycles, scooters, all-terrain vehicles, and mowers. This section shall not prohibit the use of motorized wheelchairs or other medically necessary devices.

- Ordinances do not include incorporation by reference to any utilize known standards (such as IBC, Indiana Handicapped Accessibility Code, ADASAD or PROWAG). However, the City indicated that INDOT and PROWAG requirements are followed for ROW improvements and the Building Inspector utilizes Indiana codes.

Recommended Action:

- It is recommended that known standards (such as IBC, Indiana Handicapped Accessibility Code, ADASAD and PROWAG) be adopted as the basis for compliance and included in the ordinances as incorporated by reference. Staff should continue to utilize these known standards for consistency.
- Several locations reference '*specifications of the city on file in the office of the City Engineer*', but it was determined the City does not have their own specifications, but utilize the standards noted above. Consider updating the language to avoid confusion.
- Verify language utilized in Municipal Code sections regarding disabilities and taxicab licensure with City attorney to assure in compliance with ADA.
- If any other City facilities, other than Angola trail mentioned above, prohibit motorized vehicles, ensure that City policies that apply are consistent with the ADA requirements of Other Power-Driven Mobility



Devices (OPDMD). OPDMD is defined in the new rules as “any mobility device powered by batteries, fuel, or other engines . . . that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices... such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair”. See guidance on OPDMDs at the USDOJ website at www.ada.gov/opdmd.pdf.

- Provide training for plan reviewers and field inspectors on the requirements of ADA facilities and ensure that design plans meet the standards and construction meets the design plans.
- Provide references to the various ADA standards and guidelines in all documents that reference design and construction.
- Consider an educational campaign regarding the barriers presented, and the prohibition by ordinance, to persons with mobility impairments of blocking sidewalks with parked vehicles (even when those vehicles are within driveways), sidewalk signs, bistro tables, etc.

2.20 Facility Self-Evaluation Findings and Recommendations

A comprehensive review of accessibility at all public areas and employee common use areas of City facilities identified in Section 1.8 was performed consistent with ADASAD. The findings and recommendations can be found in the City of Angola Facilities Assessment: ADA Accessibility Review Report dated April 2019 and includes the following information:

- **1.0 Introduction and Overview**
- **2.0 ADA Compliance Evaluation** Comprised of facility-by-facility summarization of both exterior and interior physical barriers, description of scope of evaluation and limitations of review along with select photographs of existing conditions, facility ranking and probable cost of corrective action. Items that were deemed to not meet the 2010 ADASAD are fully noted in the Facility Assessment Appendix A with a short description of the variance, planning level opinion of probable cost to correct, and priority for corrective action.
- **3.0 Discussions and Recommendations** Contains an overall summary with descriptions and photographs or figures from the ADASAD of some of the common issues encountered throughout the City facilities, along with options and recommendations for corrective action. Prioritization is discussed in terms of physical impedance factors (the actual physical characteristics of the specific feature and the severity of the barrier to use).
- **4.0 Conclusions**
- **5.0 Definitions**

While the Facility Assessment includes an estimated cost for corrective action to improve accessibility, there are a number of items that cannot have an estimated cost provided due to the need for additional investigation to make the item compliant. Examples include major renovations, investigating if walls are load bearing where restrooms need to be enlarged and available space is inadequate or where door maneuvering spaces are limited due to an adjacent wall, or where extensive plumbing work is needed to reconfigure fixtures for various reasons. The calculated cost estimate that could be determined to meet 2010 ADASAD requirements for all items in the facilities is approximately \$602,976 as shown in Section 3.3 on Table 4-1 from the Facility Assessment Report.

3.0 Transition Plan

The Transition Plan describes how City of Angola will be transitioning to full compliance with the ADA and applicable standards. Public entities, like the City, are required to provide access to City programs, services, and activities for all of the recipients. Thus, the City must provide access for individuals with disabilities and document areas of non-compliance. Additional documentation is provided as barriers are removed.

If structural changes are identified to provide program accessibility as part of the self-evaluation, ADA identifies specific elements to be included in the transition plan. At a minimum, the elements of the Transition Plan are:

- 1) A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [[28 CFR 35.150 \(d\)\(3\)\(i\)](#)]
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [[28 CFR 35.150 \(d\)\(3\)\(ii\)](#)]
- 3) The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [[28 CFR 35.150 \(d\)\(3\)\(iii\)](#)]
- 4) The name of the official responsible for the plan's implementation. [[28 CFR 35.150 \(d\)\(3\)\(iv\)](#)]

The transition plan is a reaction to the findings of the facility audits, assessments of City policies, services, programs, and activities, and input from advocacy groups and the public. Recommended actions for City policies and programs can be found in Section 2.0.

The specific architectural and site improvement modifications required to make programs accessible are listed in the Facility Assessment and include buildings and their related grounds, owned, operated, or leased by City of Angola. The Facility Assessment contains a list of items that do not meet current ADASAD or PROWAG standards and barrier removal actions. Not all of these barriers must be removed by making renovations to the facilities in order to provide program compliance with the ADA. Removing barriers limiting access to programs or those which present a safety hazard should be the City's first priority.

3.1 Public Outreach

Public participation on the final contents of the Transition Plan, including setting of priorities and the phasing of improvements, is critical to the success of the endeavor and is required by law. A draft Transition Plan was made available for public review in hard copy at City Hall and the Carnegie Public Library of Steuben County, and on the City website (<https://www.angolain.org>) from February 24 through March 9, 2020. Comments could be provided via e-mail or in writing as advertised and posted. A summary of the meeting, the presentation and any comments received during the comment period are included in Appendix B. The final Transition Plan was then submitted to the City Council for adoption. See also *Section 1.12 – Public Outreach*.

3.2 Phasing of Corrections

A phased implementation of the required corrections to remove physical barriers at City-owned facilities is required and recommended. The City has limited funds and cannot immediately make all facilities fully compliant with ADA standards. The timing of the improvements by site will be determined by the City based on their funding availability, other project needs, and prioritization. Following evaluation of all facilities and programs, a prioritization was developed to identify a ranking system to utilize when determining which capital improvements need to be considered first and those that could be implemented in subsequent years.

The City should identify the most urgent access needs based on their experience, other capital projects, and the results of the Facility Assessment. At the time of the development of this report, few public complaints had been received about City-owned facilities. Complaints were not used as criteria to determine the phasing of improvements for any particular site, though future complaints could be the basis for funding improvements.

3.3 Priorities for Barrier Removal

In creating priorities, it is the City's intent to evaluate all areas of potential deficiency and to make structural changes where necessary and where equal accommodation cannot be made in another manner. The assignment of priorities is intended to facilitate public review and to address specific concerns of the local community. It must be emphasized that it is the City's intention that all individuals with all types of disabilities be reasonably accommodated to provide access to all programs offered at all facilities.

A review of facility utilization and programs provided at each location is critical to assisting in prioritizing which facilities should be given priority for improvements and order in which improvements should be completed. However, the facility prioritization should not be looked at in a vacuum, as improvements at lower use facilities may still warrant consideration for improvements in the near future if a barrier exists to program access. Site priorities considered each site's level of use, social need, civic function, and the general uniqueness of the site. Each of these criteria is assumed to have equal weight and no priority over another:

- **Level of Use:** Is the facility utilized quite frequently and by a large cross-section of the public?
- **Social Need:** Does the facility provide a social service or program for less fortunate or transient citizens?
- **Civic Function:** Does the facility provide access to civic programs and services that implement the civil and political rights provided by the government?
- **General Uniqueness of the Site:** Does the building, facility, or site provide a distinct program or service that cannot occur at a different location or facility?

For reference, the following facility tier listing for prioritization was provided in the Facility Assessment and relates to the level and type of services provided to the public at each of the facilities evaluated. Note that some areas of facilities may fall within a lower or higher tier. Tier 1 facilities have the highest use and should be the first priority, with Tier 2 facilities to follow. Tier 3 facilities are relatively low use for the public or have only employee common-use areas that require corrective actions.

Excerpt from Facility Assessment:

Table 3-1. Facility tier listing for prioritization.

Tier 1	Tier 2	Tier 3
City Hall	Police Department	Street Department
Police/Fire*	Fire Department	Wastewater Treatment Plant
Monument Plaza	Training Center	Water Treatment Plant
Parks Department	Nature Park	
Commons Park	Commons Hall	
Firemen's Park		

*Areas necessary for public access in case of emergency (i.e. front door, call buttons)

Within the Facility Assessment, the non-compliances were prioritized generally based on the level of physical impedance. All barriers are not equal in the impact they have on persons with disabilities to have equal

access to City facilities or programs. **Physical Impedance factors** include the actual physical characteristics of the specific feature and the severity of the barrier to use.

- **High priority** – High priority areas typically prohibit access for disabled persons, make access extremely troublesome, or present safety hazards to all users. Likely there are no acceptable alternative routes or treatments to overcome the barrier. Typically, these barriers are significant obstacles located at entry walks and doors, interior corridors, curb ramps, restrooms, and service counters. Examples include lack of accessible parking, lack of elevator in a multi-level building, stairs where ramps or level surface are needed, no exterior accessible route, narrow doors, lack of wheelchair accessible restroom stalls (or extreme deviations from stall size), lack of grab bars, extreme slopes or displacements, missing handrails, missing curb ramps, extreme slopes, particularly cross slopes impacting lateral balance, changes in level over 1" (trip hazards), signage related to life safety, and fixed obstructions limiting vertical and horizontal clearance.
- **Medium priority** – Medium priority areas include areas with conditions that make travel moderately difficult, but passable and affect the quality of usage for persons with disabilities to a greater extent than that afforded the non-disabled. Typically, these barriers are obstacles to amenities such as secondary entry points, vending machines, and drinking fountains, non-compliant dimensional issues (vestibules, corridors, etc.), stairwell/stair issues, particularly where an elevator is not available, or include moderate deviations to dimensional requirements of primary use areas. Exterior examples include moderate deviations in running and cross slopes, changes in level ½" to 1", obstructions that allow tight passage, along with landing and PAR width deviations.
- **Low priority** – Low priority areas include areas with conditions that deviate from codes and standards, but alternative means of use may be available to provide equal access or opportunities. In low priority areas, conditions may be an inconvenience, but neither travel nor safety is greatly impacted. These areas allow significant usability and independent travel is possible in most cases. These included, but are not limited to signage issues, electrical, exterior furnishings, and minor dimensional non-compliances.

The costs to remove barriers by priority are detailed for each facility in the Facility Assessment as shown in the referenced Table 4-1 on the following page. In addition, a time frame had to be identified to determine an average annual budget to consider. For the purposes of this report, a 30-year time frame was utilized. Using this, it is conceivable that at the end of 30 years, all non-compliant ADA issues would be addressed throughout all current City-owned facilities. This assumes that standards and guidelines are not modified. This further assumes that funding is available each budget cycle to make the necessary improvements. It is highly unlikely given the economy that this is realistic, particularly when considering that there are also likely to be a large number of other improvements needed by the City as part of regular maintenance, upkeep, and repairs.

In some instances, it may be advantageous to construct all improvements at a site at once rather than correct the high priority barriers first and come back at a later date to correct the medium or low priority barriers. For some sites, the total cost of construction for the corrections requires that they be spread out over two or more phases. The City has the right to modify the priorities based on funding levels and changes in City programs, activities, and services to have flexibility in accommodating community requests and complaints. Interim resolutions, such as assigning aids, temporary signing for alternate routes or sites, and modifications of programs, activities, and services may be implemented at the City's discretion to handle existing insufficiencies or access complaints received.

Based on the costs developed to address the architectural and engineering improvements required to fully comply with ADASAD standards, more than **\$602,976** (2019 costs) in improvements would be required to achieve ADA compliance at all of the City facilities. It is important to note at this point that many of the noted deficiencies are not significant barriers to access and some improvements are not required until such time as a major building renovation is completed. This does not avoid the need for the City to ensure all programs are accessible by some means. It must also be mentioned that the cost to correct significant non-compliant items cannot be determined based on the scope of the ADA self-evaluation. Additional investigation is needed to evaluate the various options and likely will include a review of other codes (plumbing, electrical, etc.) and possibly also review of the feasibility of removing walls (i.e., structural engineering review). Examples of these types of items would include:

- Conversion of multi-user restrooms to single user due to non-compliant space (may require analysis of plumbing code requirements for the number of fixtures required)
- Moving of walls in multi-user restrooms to enlarge an existing non-compliant stall to meet requirements (may require structural engineering review)
- Investigation required to determine how to best provide a level space at an entry door

Costs provided are estimated based on information available from the self-evaluation and may not account for hidden items not readily visible which may impact costs (e.g., lack of backer boards where toilet grab bars need to be relocated, would require drywall removal and replacement that is not included in noted costs). In some cases, the cost identified is for a specific solution and there are often multiple options with costs that can be quite variable. If the City were to set a goal for implementing all of the recommended improvements within a 30-year time frame, it would require an annual budget of approximately \$20,100 (in 2019 dollars) to bring all of the facilities evaluated in the Facility Assessment up to current ADA standards (no inflation included). These cost opinions are subject to change based on market conditions, economic conditions, inflation, material selection, etc. Multiple phases of projects, multiple bidding packages, design parameters, etc. all have an impact on project costs that cannot be finitely identified in a study with this level of detail and uncertainty related to funding. These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, etc.

The City of Angola should form a committee to identify the most urgent access needs based on their experiences. There may be grants available to make some of these improvements and this should be investigated further.

Excerpt from Facility Assessment:
Table 4-1. Facility Assessment Summary

CITY OF ANGOLA - ADA FACILITY ASSESSMENT SUMMARY				
Name & Location	Low Priority	Medium Priority	High Priority	Total Facility Cost
City Hall 210 N. Public Square	\$29,220	\$12,890	\$18,450	\$60,560
Public Safety - Police Department 202 W. Gilmore Street	\$28,620	\$5,402	\$2,220	\$36,242
Public Safety - Fire Department 202 W. Gilmore Street	\$10,040	\$7,910	\$1,600	\$19,550
Monument Plaza East Gilmore Street	\$6,730	\$2,700	\$0	\$9,430
Training Center 306 W. Mill Street	\$3,800	\$0	\$14,300	\$18,100
Wastewater Treatment Plant 1095 Redding Road	\$33,090	\$5,000	\$1,300	\$39,390
Water Treatment Plant 300 W. Mill Street, 550 Pokagon Trail	\$23,370	\$0	\$200	\$23,570
Street Department 210 W. Mill Street	\$13,180	\$3,450	\$100	\$16,730
Commons Hall 501 S. John Street	\$17,130	\$13,520	\$11,415	\$42,065
Parks Department 229 S. John Street	\$9,170	\$2,815	\$1,200	\$13,185
Commons Park John Street/Don Sell Lane/Circle Hill Cemetery Road	\$55,519	\$74,095	\$124,000	\$253,614
Firemen's Park Mill Street and Williams Street	\$23,740	\$16,490	\$26,820	\$67,050
Nature Park Ettinger Street	\$350	\$3,140	\$0	\$3,490
TOTALS	Low Priority \$253,959	Medium Priority \$147,412	High Priority \$201,605	Total Cost \$602,976

All cost estimates for City facilities are based on a single unified bid with 2019 estimated costs. Bidding in a different manner or different time period will require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical or structural concerns.

3.4 Right-of-Way Facilities

Existing Transition Plan for the Public Rights-of-Way & Updates

The City's curb ramps and sidewalks were inventoried as part of the Transition Plan for Public Rights-of-Way last revised in 2018. These were inventoried in accordance with INDOT standards at the time of the evaluation. The summary of the inventory and recommendations for curb ramps and sidewalks is included in Appendix C of that document. These recommended improvements were divided into yearly allotments from 2013 – 2024. The City committed \$50,000 annually for rehabilitation of these facilities.

Of the previous areas identified, approximately 16 blocks of sidewalk and 59 curb ramps remain to be replaced. The City engineer is in the process of completing a new sidewalk assessment database and creating a budget and prioritization for the remaining improvements.

Curb Ramp and Sidewalk Maintenance Considerations

A key component to ensuring ROW facilities remain usable, whether they are fully compliant with PROWAG or not, is to perform required maintenance activities in a manner that does not reduce accessibility. This maintenance can be performed by adjacent property owners, contractors, or City staff and should be ongoing. Examples of maintenance activities that may be required within the public ROW include:

- **Vegetation** – proper maintenance of grass, landscaping, shrubs, and trees adjacent to the PAR is vital to ensuring compliance with the standards. Over time, sod can grow over the sidewalk and not only reduce the width of the PAR to less than 48”, but also prevent proper drainage. Taller vegetation can grow into the PAR, creating an obstruction and/or protrusion.
- **Snow and Ice Removal** – snow and ice accumulation along sidewalks, curb ramps, and on-street parking presents a barrier to many persons with disabilities and a potential safety hazard to all users. The prompt removal of snow for the full width of the sidewalk following a storm is vital to ensuring that pedestrians can use the sidewalk and not have to use the streets. Delays in removing the snow or not removing the full width of the sidewalk can significantly impact the ability of all users to utilize sidewalks. Not clearing accessible parking spaces and access aisles makes it extremely difficult for persons with disabilities to get from their vehicles to the PAR.

Another snow and ice removal concern is snow placement and plowing of streets. Particularly during large snow accumulations, multiple passes along the streets are required by snow plows to keep the streets clear for vehicles, with snow typically plowed to the curb. These accumulations of snow often block sidewalks and curb ramps to the point that they are unusable by persons with disabilities.



Winter sidewalk maintenance

- **Obstructions and Protrusions** – when utility poles, signs, and other objects are replaced, it is important to make sure that they are moved out of the PAR to the greatest extent possible and obstructions and protrusions are eventually eliminated. Items such as utility poles, hydrants, street signs, mailboxes, etc. can all be relocated as part of regular maintenance activities.
- **Level Changes** – displacement of surfaces from an adjacent surface creates trips hazards to all users. The causes of these level changes vary and short term fixes can be considered until such time as a sidewalk project is completed. Minor level variances can either be beveled or grinded level. More severe elevation changes may require something more extreme, such as temporary patching material being placed to remove a vertical level change.



Overhanging trees in the ROW

- **Temporary Signage** – consideration could be given to putting temporary signage at PARs that could present significant barriers to persons with disabilities. These signs should be located as close to an intersection as possible and identify an alternate route that does not have the same significant issues.

Additional ROW elements

Other elements such as site furnishings, marked on-street parking, roundabouts, accessible pedestrian signals, and transit stops also have requirements for accessibility and should be reviewed thoroughly during design if they are provided in the future.

- **Site furnishings** should be located on an accessible route, provide clear level ground space for approaches and wheelchair parking adjacent to benches, and meet reach range requirements for any operable parts, such as trash receptacle flaps.
- **On-Street Parking** should follow the requirements of the PROWAG as follows:
 - Per R214, *'where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces shall be provided. Accessible parking spaces should be located where the street has the least crown and grade and close to key destinations (R309.1).*
 - *Where width of sidewalk or available ROW exceeds 14', an access aisle shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. Access aisle shall comply with R302.7 and shall not encroach on vehicular travel lane. An access aisle is not required where width of adjacent ROW is less than or equal to 14'. Where an access aisle is not provided, the parking spaces shall be located at the end of the block face (R309.2). Where perpendicular or angled parking is provided, an access aisle 8' wide minimum shall be provided at street level the full length of the parking space and shall connect to a PAR. (309.3)'. Where accessible parking is provided at angled parking, it is also recommended that the access aisle be located on the passenger side to facilitate deployment of a lift from the vehicle.*
 - Parking space identification signage is required per the PROWAG. Signs shall include the International Symbol of Accessibility. Signs should be located 60" minimum to bottom of sign if not located on



Clear space for wheelchair parking



Accessible parking signage



Accessible pedestrian signal

pedestrian circulation route, with 80" minimum from finish grade provided if along pedestrian circulation route to avoid protruding objects. For parallel parking, they should be located at the head or foot of the parking space per R211.4.

- Per R209, *'where pedestrian signals are provided at pedestrian street crossings, they shall include **accessible pedestrian signals (APS)** and pedestrian push buttons complying with sections 4E.08 through 4E.13 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD)*'. According to the Public Rights-Of-Way Accessibility Guidelines, *'An accessible pedestrian signal and pedestrian push button is an integrated device that communicates information about the WALK and DON'T WALK intervals at signalized intersections in non-visual formats (i.e., audible tones and vibro-tactile surfaces) to pedestrians who are blind and have low vision.'* At such time as the City plans infrastructure improvement projects where new signal construction is included, accessible pedestrian signals should be considered for inclusion.
- **Roundabouts** should follow all guidelines for curb ramps, sidewalks and pedestrian refuge islands (R305.2.4) along with the additional roundabout specific requirements located in R306.3-4 of the PROWAG. These include requirements for separation and edge treatments and select use of pedestrian activated signals based on roundabout configuration.

Future Improvements

While the Americans with Disabilities Act does not require pedestrian facilities in the absence of a pedestrian route, it does require that pedestrian facilities, when newly constructed or altered, be accessible. Pedestrian facilities would include, but not be limited to, sidewalks, curb ramps, pedestrian signals, and street furnishings. The previous sections of this SETP addressed those facilities already existing. The focus of this section is on future construction and connection of existing corridors.

While many City construction projects do include pedestrian facilities, not all project areas are suitable for pedestrian use. As such, the following publications could be used as a guide to determine the appropriateness of pedestrian facilities in any given corridor. Any future requests for pedestrian facilities necessitate an assessment of current conditions and needs in order to be considered for implementation.

Per the policy statement in FHWA's **Accommodating Bicycle and Pedestrian Travel: A Recommended Approach**, *"bicycle and pedestrian ways shall be established in new construction and reconstruction projects in all urbanized areas unless one or more of three conditions are met:*

- *Bicyclists and pedestrians are prohibited by law from using the roadway. In this instance, a greater effort may be necessary to accommodate bicyclists and pedestrians elsewhere within the right of way or within the same transportation corridor.*
- *The cost of establishing bikeways or walkways would be excessively disproportionate to the need or probable use. Excessively disproportionate is defined as exceeding twenty percent of the cost of the larger transportation project.*
- *Where sparsity of population or other factors indicate an absence of need."*

From the FHWA's publication, **'Bicycle and Pedestrian Transportation Planning Guidance'**, an assessment might include the following:

'The challenge for transportation planners, highway engineers and bicycle and pedestrian user groups, therefore, is to balance their competing interest in a limited amount of right-of-way, and to develop a transportation infrastructure that provides access for all, a real choice of modes, and safety in equal measure for each mode of travel.'

(Excerpt from FHWA's *Accommodating Bicycle and Pedestrian Travel: A Recommended Approach*)

- Determination of current levels of use for bicycling and walking transportation trips, and current numbers of injuries and fatalities involving bicyclists and pedestrians.
- Evaluation of the existing transportation infrastructure (including on- and off-road facilities) to determine current conditions and capacities and to identify gaps or deficiencies in terms of accommodating potential and existing bicycle and pedestrian travel.
- Identification of desired travel corridors for bicycle and pedestrian trips.
- Examination of existing land use and zoning, and the patterns of land use in the community.
- Basis of the need for modifications to the transportation system through surveys, origin destination studies, public input, or other data collection techniques.

A complete listing of recommended considerations can be found at

www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/inter.cfm

Other Construction

When planning for maintenance of existing roadways and pedestrian facilities, it is important to understand what roadway work triggers curb ramp work. Projects that include alteration to a street or roadway require installation or upgrade of non-compliant curb ramps at the time of improvements if PAR is present.

Maintenance applications do not require curb ramps at time of improvement. Joint technical assistance is available from DOJ, DOT and FHWA and may be helpful in understanding ADA requirements where roads are resurfaced and what work is considered alteration vs. maintenance. This can be found at the following web addresses:

https://www.fhwa.dot.gov/civilrights/programs/doj_fhwa_ta.cfm

https://www.fhwa.dot.gov/civilrights/programs/ada_resurfacing_webinar.pdf

3.5 Transition Plan Phasing

The ADA Coordinator should work closely with the City Council to make funding available where possible to make the most urgent improvements to ensure all programs are accessible. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc. The City is committed to becoming ADA compliant within the confines of preserving existing programs and services to all and budgetary limitations. Many of the items that are not compliant with current standards may be compliant with previous standards and are not required to be modified until a building renovation is completed.

Any changes to the ADA policy after the sites were surveyed are not reflected in these basic cost estimates. Additionally, it is the City's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed improvements and facilities that are brought up to current ADA standards. Finally, the site surveys performed for this report are not to design level detail and are intended to be used to give a framework to the Transition Plan. When the Transition Plan is approved and the planning stages are begun for implementation of the first improvements, a more detailed survey of each site should be performed and improvements should be designed by licensed professionals that are knowledgeable with ADA as well as all other applicable codes, including building and fire codes. At this time, costs are estimated but precise costs cannot be determined until final design and the Transition Plan should be adjusted to reflect this knowledge.

Complaints received may also help determine the priorities of the improvements. If the City receives complaints about access at a particular site that is not slated for upgrades for several years, they should

adjust the Transition Plan to accommodate the implementation of improvements to be sooner or as necessary.

3.6 Plan Updates and Enforcement

Changes to the City of Angola's policies and programs should be drafted, implemented, and documented by the ADA Coordinator. Examples of some of these changes were provided in the Self-Evaluation. These changes should have little cost of implementation, mainly consisting of the time to develop the language of the policy and program changes, time to train City staff, and administrative costs. Some of the suggested language for City ADA documentation has been suggested in this report, but these suggestions are not exhaustive.

4.0 ADA Tool Kit

4.1 Introduction

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

If you need any additional assistance, please contact:

Mr. Scott Lehman, ADA Coordinator

Phone: (260) 665-6683 Email: buildingdept@angolain.org

4.2 Federal Accessibility Standards and Regulations

U.S. Department of Justice

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

Unless noted, the ADA publications have not been updated to reflect the recent revisions to the ADA regulations that took effect on March 15, 2012.

- *ADA Regulation for Title II.* This publication describes Title II of the ADA (http://www.ada.gov/regs2010/ADAREgs2010.htm#titleII_final_2010), Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under Section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth Standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.
- *Title II Technical Assistance Manual (1993) and Supplements.* This 56-page manual (www.ada.gov/taman2.html) explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance.
- *Accessibility of State and Local Government Websites to People with Disabilities.* This is a 5-page publication providing guidance (www.ada.gov/websites2.htm) on making state and local government websites accessible.

U.S. Access Board

The full texts of Federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded from the Access Board's website (www.access-board.gov/the-board/laws). In addition to regular print, publications are available in large print, disk, audiocassette, and Braille. Multiple copies of publications can be ordered by sending a request to pubs@access-board.gov. In addition to the guidelines, guidance material is also available to assist staff in understanding and implementing Federal accessibility guidelines.

The following publications are currently available from the U.S. Access Board.

Guidelines and Standards for Facilities

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The City should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

- *ADA Standards for Accessible Design (ADASAD)*. This document (www.ada.gov/2010ADASTandards_index.htm) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA, including special provisions where applicable for elements designed specifically for children ages 12 and under. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the DOT, under the ADA.
- *Accessibility Guidelines for Play Areas*. The Access Board has developed accessibility guidelines for newly constructed and altered play areas. This bulletin is designed to assist in using the play area accessibility guidelines and provides information regarding where the play area guidelines apply, what a play component is considered to be, how many play components must be an accessible route, and the requirements for accessible routes within play areas. (www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas)
- *Accessibility Guidelines for Recreation Facilities*. The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADAAG. They cover the following facilities and elements: amusement rides, boating facilities, fishing piers and platforms, miniature golf courses, golf courses, exercise equipment, bowling lanes, shooting facilities, swimming pools, wading pools, and spas. These summaries were updated following issuance of ADASAD (www.access-board.gov/guidelines-and-standards/recreation-facilities/guides)
- *Accessibility Guidelines for Outdoor Developed Areas*. The Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas was established in June 1997. The accessibility guidelines proposed by the Committee include consideration of the latest information, design, and construction practices in existence. Proposed Section 16 of ADAAG requires all areas of newly designed or newly constructed and altered portions of existing trails connecting to designated trailheads or accessible trails to comply with this section. This proposed section also provides design guidelines for all newly constructed and altered camping facilities, picnic areas, and beach access routes. It is recognized that compliance with this section will not always result in facilities that will be accessible to all persons with disabilities. These guidelines recognize that often the natural environment will prevent full

compliance with certain technical provisions, which are outlined in this publication (www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/draft-final-guidelines/text-of-the-guidelines).

Guidance Material and Advisory Reports for Facilities

The following publications provide additional information on specific aspects of the above guidelines and standards for facilities. Employees are encouraged to refer to these publications to obtain more detailed and up-to-date information when evaluating and implementing accessibility improvements to facilities. Note that several websites have been reconfigured and some outdated information removed. Some web addresses or hyperlinks may not be functional and not all information contained in the documents references current standards.

- *Using ADAAG Technical Bulletin*. This bulletin was developed to serve the specific needs of architects and other design professionals who must apply the ADAAG to new construction and alterations projects covered by Titles II and III of the ADA. It is also intended to clarify accessibility regulations generally, including those that apply to existing facilities covered by the ADA.
- *Detectable Warnings Update (March 2008)*. Currently, the Access Board is in the process of developing guidelines on public rights-of-ways that, once finalized, will supplement the new ADAAG. This update is expected in 2013. While ADAAG covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public rights-of-way. Constraints posed by space limitations at sidewalks, roadway design practices, slope, and terrain raise valid questions on how and to what extent access can be achieved. Guidance on providing access for blind pedestrians at street crossings is also considered essential. This bulletin outlines the requirements of detectable warnings, a distinctive surface pattern of domes detectable by cane or underfoot, which are used to alert people with vision impairments of their approach to streets and hazardous drop-offs. The ADAAG require these warnings on the surface of curb ramps, which remove a tactile cue otherwise provided by curb faces, and at other areas where pedestrian ways blend with vehicular ways. They are also required along the edges of boarding platforms in transit facilities and the perimeter of reflecting pools. (www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update)
- *Assistive Listening Systems Technical Bulletins*. Assistive listening systems are devices designed to help people with hearing loss improve their auditory access in difficult and large-area listening situations. Typically, these devices are used in such venues as movie houses, theaters, auditoriums, convention centers, and stadiums, where they are piggybacked on a public address system. They may also be used in smaller listening locations like courtrooms, museums, classrooms, and community centers. This web site provides information about the types of systems that are currently available and tips on choosing the appropriate systems for different types of applications.
(www.michdhh.org/assistive_devices/hearing_assistive_tech.html).

Guidelines for Transportation

- *ADAAG for Transportation Vehicles*. This publication provides minimum guidelines and requirements for accessibility standards for transportation vehicles required to be accessible by the ADA, including over-the-road bus and tram systems. (www.access-board.gov/guidelines-and-standards/transportation/vehicles/adaag-for-transportation-vehicles).
- *ADAAG for Transportation Vehicles; Over-the-Road Buses*. This publication outlines the amendments to the accessibility guidelines for over-the-road buses (OTRB) made by the Architectural and Transportation Barriers Compliance Board and the DOT to include scoping and technical provisions for lifts, ramps, wheelchair securing devices, and moveable aisle armrests. Revisions to the specifications for doors and lighting are also adopted. The specifications describe the design features that an OTRB must have to be readily accessible to and usable by persons who use wheelchairs or other mobility aids. (www.access-board.gov/guidelines-and-standards/transportation/vehicles/technical-assistance-manuals-on-adaag-for-transportation-vehicles/subpart-g-over-the-road-buses-and-systems)
- *American Association of State Highway and Transportation Officials (AASHTO)*. AASHTO is the organization that maintains the “Green Book” for design of roads and highways and has begun to address accessibility of pedestrian networks. Several AASHTO publications, which can be ordered from the AASHTO website (<http://transportation.org/>), address accessible circulation systems, including: *AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities* (1st edition) and *Guide for the Development of Bicycle Facilities* (3rd edition).
- *Federal Transit Administration (FTA)*. FTA regulates and enforces requirements of the ADA covering transportation facilities and systems. FTA maintains a technical assistance line on ADA questions (888-446-4511) and on their website (www.fta.dot.gov).
- *Securement of Wheelchairs and Other Mobility Aids*. As a public or private transit authority, the responsibility of safe, efficient service from public agencies who offer transportation services has been enlarged to affording ridership to people using a wide variety of mobility aids. In considering not only the many types of mobility aid devices, but also the variety and sizes of lifts, and the numerous makes of buses and vans, it can be easily seen that there is no single, definitive solution to accessibility on mass transit vehicles. Various publications can be found that report on the experience of transit agencies that have taken the initiative to involve the ridership in needs assessment and have established policies, educated operators, and informed the public to achieve greater accessibility in their bus transit systems.

Guidance Material for Communication

- *Standards for Electronic and Information Technology*. The Access Board is issuing final accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 requires the Access Board to publish standards setting forth a definition of electronic and information technology and the technical and functional performance criteria necessary for such technology to comply with section 508. (www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/section-508-standards)
- Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency. (www.section508.gov/)

- *Bulletin on the Telecommunications Act Accessibility Guidelines.* As technology continues to improve our means of telecommunication, it can pose challenges to accessibility on one hand, while on the other hold the key to innovative access solutions. Section 255 of the Telecommunications Act requires telecommunications products and services to be accessible to people with disabilities. This is required to the extent access is "readily achievable," meaning easily accomplishable, without much difficulty or expense. Telecommunications products covered include: wired and wireless telecommunication devices, such as telephones (including pay phones and cellular phones), pagers, and fax machines; other products that have a telecommunication service capability, such as computers with modems, and equipment that carriers use to provide services, such as a phone company's switching equipment. (www.access-board.gov/the-board/laws/telecommunications-act)

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The City should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

4.3 Resources for Providing Accessible Programs & Facilities

- *ADA Document Portal:* This website (www.adaportal.org) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- *DisabilityInfo.Gov:* A one-stop interagency portal for information on Federal programs, services, and resources for people with disabilities, their families, employers, service providers, and other community members.
- *National Center on Accessibility (NCA):* The Center (<http://ncaonline.org>) is a cooperative effort between the National Park Service (NPS) and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. Initiated in 2005, this longitudinal study is primarily the result of questions that the National Center on Accessibility has, for many years and continues to receive from organizations, agencies and individuals who desire to make their trails accessible; are interested in an unobtrusive surface that blends and is friendly to the environment; and provides a quality trail experience for people with and without disabilities.
- *National Center on Health, Physical Activity, and Disability:* The Center (www.ncpad.org) provides information and resources on physical activity to help people with disabilities find ways to become more active and healthy. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps, and health and leisure services.
- *National Park Service:* NPS has many programs that address the issue of providing accessible recreation services to people with disabilities. These include Wilderness Accessibility for People with Disabilities (www.ncd.gov/publications/1992/December1992#8-1a) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program (www.nps.gov/accessibility.htm), lists applicable laws, standards, and authorities, implementation strategies, roles, and responsibilities. It also addresses NPS policies and provides links to additional information sources.

4.4 Technical Resources

The City should utilize the many disability-related resources available through the internet. Begin at AbleData (www.abledata.com), maintained by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education. The site provides up-to-date links to assistive technologies and disability-related resources. AbleData's mission is to provide objective information on such assistive products as:

- *Architectural elements*: Products that make the built environment more accessible, including indoor and outdoor architectural elements, vertical lifts, lighting, and signs.
- *Blind and low vision*: Products for people with visual disabilities, including computers, educational aids, information storage, kitchen aids, labeling, magnification, office equipment, orientation and mobility, reading, recreation, sensors, telephones, tools, travel, typing, and writing (Braille).
- *Communication*: Products to help people with disabilities related to speech, writing and other methods of communication, including alternative and augmentative communication, signal systems, telephones, typing, and writing.
- *Computers*: Products to allow people with disabilities to use desktop and laptop computers and other kinds of information technology including software, hardware, and computer accessories.
- *Controls*: Products that provide people with disabilities with the ability to start, stop, or adjust electric or electronic devices including environmental controls and control switches.
- *Deaf and hard of hearing*: Products for people with hearing disabilities, including amplification, recreational electronics, signal switches, and telephones.
- *Deaf and blind*: Products for people who are both deaf and blind.
- *Education*: Products to provide people with disabilities with access to educational materials and instruction in school and in other learning environments including classroom and instructional materials.
- *Recreation*: Products to assist people with disabilities with their leisure and athletic activities including crafts, electronics, gardening, music, photography, and sports.
- *Seating*: Products that assist people to sit comfortably and safely including seating systems and therapeutic seats.
- *Transportation*: Products to enable people with disabilities to drive or ride in cars, vans, trucks and buses including mass transit vehicles and facilities and vehicle accessories.
- *Wheeled mobility*: Products and accessories that enable people with mobility disabilities to move freely indoors and outdoors including wheelchairs (manual, sport, and powered), wheelchair alternatives (scooters), wheelchair accessories, and carts.
- *Workplace*: Products to aid people with disabilities at work including agricultural equipment, office equipment, tools, and work stations.

Assistive Technology Vendors and Service Providers

- **International Commission on Technology and Accessibility**
Initiates, facilitates, and provides information regarding technology and accessibility through the internet. This information is available to people with disability, advocates, and professionals in the field of disability, researchers, legislative bodies, and the general community. (www.ictaglobal.org)
- **National Center for Accessible Media**
A research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces, and communities. NCAM has developed an authoring tool to make web- and CD-ROM-based multimedia materials accessible to persons with

disabilities. Called Media Access Generator (MAGpie, versions 1.0 and 2.01) create captions and audio descriptions of rich media and can be downloaded on their website (ncam.wgbh.org).

- **American Sign Language Interpreters**

A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a 24-hour basis to handle emergency procedures. The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, unique circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. Resources and contacts for qualified sign language interpreters and information for the deaf and hard of hearing are at the following locations:

- Deaf & Hard of Hearing Services (DHHS), Division of Disability & Rehabilitative Services (DDRS)
402 W. Washington St., Rm. W453
P.O. Box 7083
Indianapolis, IN 46207-7082
1-800-545-7763
DHSHelp@fssa.IN.gov
www.in.gov/fssa/ddrs/2637.htm
- American Sign Language Interpreter Network - www.aslnetwork.com/
- Registry of Interpreters for the Deaf – www.rid.org/

- **Assistive Listening Systems and Devices**

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

- *Relay Indiana*: [Relay Indiana](http://RelayIndiana.com), a service of InTRAC, is a free service that provides full telecommunications accessibility to people who are deaf, hard of hearing, or speech impaired. This service allows users with special telecommunication devices to communicate with standard users through specially trained Relay Operators. InTRAC also provides free, loaned equipment to those who qualify.
- *Closed Caption Machine* - To the extent practical, City Divisions should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- *Enlarging Printed Materials* - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- *Optical Readers* - Equipment that can translate printed information into an audio format should be available to Departments.
- *TDD* - To the extent necessary, City Divisions should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.
- *TDI* – TDI's (formerly known as Telecommunications for the Deaf, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI's online resources (www.tdiforaccess.org/index.aspx) include information about telecommunications access such as a TTY, pagers, telephony, VoIP, and more.

Guide to Disabilities and Disability Etiquette

A summary guide to disabilities and disability etiquette has been included below. The guide will allow staff members to become familiar with a variety of types of disabilities, and help them to be more sensitive to the

abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

The National Organization on Disability reports that more than 59 million Americans have a disability. This section is for anyone — with or without a disability — who wants to interact more effectively with people who are disabled.

The ADA was conceived with the goal of integrating people with disabilities into all aspects of American life, particularly the workplace and the marketplace. Sensitivity toward people with disabilities is not only in the spirit of the ADA, it makes good business sense. It can help the City expand its services to citizens, better serve its customers and improve relationships with its employees.

When supervisors and co-workers use disability etiquette, employees with disabilities feel more comfortable and work more productively. Practicing disability etiquette is an easy way to make all people feel more comfortable and welcomed in their environment.

There is no reason to feel awkward when dealing with a person who has a disability. This section provides some basic tips for City staff to follow. If a City employee is ever unsure how to best serve a person with a disability, just ask them.

- **Ask Before You Help**

Just because someone has a disability, don't assume he/she needs your help. If the setting is accessible, people with disabilities can usually get around fine without assistance. Adults with disabilities want to be treated as independent people. Offer assistance only if the person appears to need it. If they do want help, ask what type of help they would like before you offer any assistance. What you think they may need may not be what they really need.

- **Do Not Touch!**

Some people with disabilities depend on their arms for balance. Grabbing them — even if you mean well — could knock them off balance and create an injury. This is especially true of a person using a cane, crutches, or walker.

When someone is in a wheelchair, never pat their head or touch their wheelchair (or scooter) without permission. This equipment is part of their personal space and touching it is considered rude.

- **Engage Your Mind Before Engaging Your Mouth**

Always speak directly to the person with the disability NOT to their companion, aide, or sign language interpreter. Making small talk with a person who has a disability is great; just talk to him/her like you would anyone else. Respect his/her privacy and don't ask questions about their disability unless they invite the discussion. If you are with a child who asks, don't make the situation awkward for everyone; let the person with the disability respond directly to the child. They are used to children's questions.

- **Make No Assumptions**

People with disabilities are the best judge of what they can or cannot do. Do not make any decisions for them about participating in any activity or what they may or may not be able to do. Simply respond to their questions and let them make their own decisions. Depending on the situation, it may be a violation of the ADA to exclude someone because of a wrong decision on what they're capable of doing.

- **Respond Graciously To Requests**

When people who have a disability ask for an accommodation at a City-owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again.

and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.

- **Terminology**

PUT THE PERSON FIRST! Always say “person with a disability” rather than “disabled person”. This recognizes that they are a person first, not a disability first. If someone has a specific disability, it would be a “person who is blind”, a “person who is deaf”, or a “person with dwarfism”. Each person may have their own preferred terminology, and if you’re not sure what to use, just ask them. Most, however, will recognize the effort when you just refer to them as “people”.

Avoid outdated, politically incorrect terms like “handicapped” or “crippled”. Be aware that many people with disabilities dislike jargon and euphemistic terms like “physically challenged” and “differently abled”. Say “wheelchair user” instead of “confined to a wheelchair” or “wheelchair bound”. The wheelchair is what enables the person to get around, but they are neither confined by it nor bound to it. The wheelchair is liberating, not confining.

With any disability, avoid negative, disempowering words like “victim” or “sufferer”. Say “person with AIDS” instead of “AIDS victim” or person who “suffers from AIDS”.

It’s okay to use idiomatic expressions when talking to people with disabilities. For example, saying “It was good to see you” and “See you later” to a person who is blind is completely acceptable. They will use the same terminology and it’s inappropriate to respond with questions like, “How are you going to see me later?”

People in wheelchairs will say things like, “Let’s go for a walk” and it’s okay for you to say it too. The situation will only become awkward if you make it so.

Many people who are Deaf communicate with sign language and consider themselves to be members of a cultural and linguistic minority group. They refer to themselves as Deaf (with a capital D) and may be offended by the term “hearing impaired.” Others may not object to the term, but in general it is safest to refer to people who have hearing loss but communicate through a spoken language as “people with hearing loss” and those who have a profound hearing loss as “people who are Deaf”.

Community Groups, Organizations, Associations and Commissions

There are a large number of groups nationally, regionally, and within each state that provide specialized services, information, and advocacy for persons with all disabilities. A sampling of available advocacy groups are listed below.

- *Ability Resources, Inc.:* Ability Resources Inc. (www.ability-resources.org/home.org) was founded in 1976. Their mission is to assist people with disabilities in attaining and maintaining their personal independence. One way this can be achieved is in the creation of an environment in which people with disabilities can exercise their rights to control and direct their own lives.
- *ADA National Network:* The ADA National Network (<http://adata.org/>) provides information, guidance and training on the Americans with Disabilities Act (ADA), tailored to meet the needs of business, government and individuals at local, regional and national levels. The ADA National Network consists of ten Regional ADA National Network Centers located throughout the United States that provide local assistance to ensure that the ADA is implemented wherever possible.
- *American Council of the Blind:* ACB (www.acb.org) is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800.424.8666) or by e-mail at info@acb.org.

- *American Association of People with Disabilities*: The American Association of People with Disabilities (www.aapd.com/) is the largest non-profit, non-partisan, cross-disability organization in the United States.
- *National Association of the Deaf*: NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website (www.nad.org).
- *National Federation of the Blind*: NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided online resources (www.nfb.org) for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed circuit TV (CCTVs).
- *National Organization on Disability*: The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources (www.nod.org).
- *Paralyzed Veterans of America*: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website (www.pva.org/sports/sportsindex.htm) provides information on useful sports publications and a list of contacts.
- *United Spinal Association*: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website (www.unitedspinal.org).
- *World Institute on Disability*: WID is an international public policy center dedicated to carrying out research on disability issues and overcoming obstacles to independent living. WID maintains an on-line information and resource directory on technology, research, universal design, and the ADA. (www.wid.org/resources).
- *State of Indiana Division of Disability & Rehabilitative Services (DDRS)*: www.in.gov/fssa/ddrs/2637.htm
- *State of Indiana Protection and Advocacy Services (IPAS)*: www.in.gov/ipas/
- *Disability Resources, Inc., Guide to Disability Resources on the Internet – IN*: Disability Resources, inc. is a nonprofit 501(c)(3) organization established to promote and improve awareness, availability and accessibility of information that can help people with disabilities live, learn, love, work and play independently. www.disabilityresources.org/INDIANA.html
- *Indiana Resource Center for Families with Special Needs (IN*SOURCE)*: The mission of IN*SOURCE is to provide parents, families, and service providers in Indiana the information and training necessary to assure effective educational programs and appropriate services for children and young adults with disabilities. IN*SOURCE employs nearly 13 staff at their central office in South Bend and 16 staff in other regional sites around the state. insource.org/index.htm
- *ADA-Indiana*: The mission of ADA-Indiana is to serve as a statewide resource for promoting the implementation of the Americans with Disabilities Act in Indiana. www.adaindiana.org/
- *Great Lakes ADA Center*: The Great Lakes ADA Center provides information, materials, technical assistance and training on the ADA. Topics addressed includes the non-discrimination requirements in employment, the obligations of state and local governments and business to ensure that programs, services and activities are readily accessible to and useable by people with disabilities. This includes

access to the information technology used by these entities including but not limited to websites, software, kiosks, etc.

The Great Lakes ADA Center's Accessible Technology Initiative encourages incorporation of accessible information technology in K-12 and post secondary school settings. Accessible Information Technology incorporates the principles of universal design so that people with a wide range of abilities and disabilities can access information disseminated electronically. www.adagreatlakes.org/

- *Indiana Council on Independent Living*: Their mission is to effectively lead a statewide Independent Living Movement that empowers people with disabilities. www.icoil.org/index.html
- *The Arc of Indiana*: The Arc of Indiana is committed to all people with developmental disabilities realizing their goals of learning, living, working and playing in the community. www.arcind.org/
- *Deaf Link*: Provides video remote interpreting (VRI) to provide the highest standard of inclusion for persons who are Deaf, Blind, Hard-of Hearing and Deaf-Blind. www.deaflink.com/index.aspx.

5.0 Definitions

The words, phrases and definitions summarized below are included in the ADA. Refer to the ADA 28 CFR 35.104 for full definitions. A list of common terms and definitions are included below.

2010 Standards: the 2010 Standards for Accessible Design (SAD), which consist of the 2004 ADAAG and requirements contained in 35.151.

Access Board: an independent Federal agency devoted to accessibility for people with disabilities. The [Access Board](#) developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines.

Accessible: refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

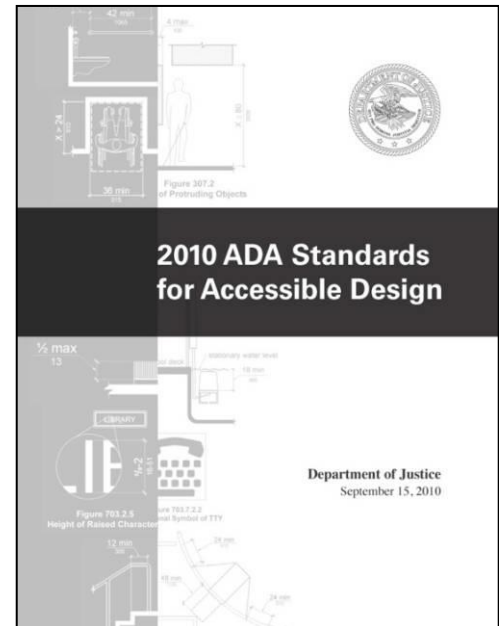
Affirmative Action (AA): a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds, including persons with disabilities. Affirmative action means inclusion, not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

Alteration: a change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

Americans with Disabilities Act (ADA): a comprehensive, Federal civil rights law that prohibits discrimination against people with disabilities in employment, state and local government programs and activities, public accommodations, transportation, and telecommunications.

ADA Standards for Accessible Design (ADASAD): consist of the 2004 ADAAG and requirements contained in 35.151 with scoping and technical requirements (dated September 15, 2010) to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the Department of Transportation (DOT).

Auxiliary Aids and Services: under Titles II and III of the ADA, includes a wide range of services and devices that promote effective communication or allows access to goods and services. Examples of auxiliary aids and services for individuals who are deaf or hard of hearing include qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, and exchange of written notes. Examples for individuals with vision impairments include qualified readers, taped texts, audio recordings, Braille materials, large print materials, and assistance in locating items. Examples for individuals with speech impairments include TDDs, computer terminals, speech synthesizers, and communication boards.



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

Discrimination on the basis of disability: means to:

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

Employer: a person engaged in an industry affecting commerce who has 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year, and any agent of such person, except that, for two years following the effective date of this subchapter, an employer means a person engaged in an industry affecting commerce who has 25 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding year, and any agent of such person. Exceptions: The term "employer" does not include the United States, a corporation wholly owned by the government of the United States, or an Indian tribe; or a bona fide private membership club (other than a labor organization) that is exempt from taxation under section 501(c) of Title 26 [the Internal Revenue Code of 1986].

Equal Employment Opportunity Commission (EEOC): the Federal agency charged with enforcing Title I of the ADA.

Essential Job Functions: the fundamental job duties of the employment position that the individual with a disability holds or desires. The term "essential functions" does not include marginal functions of the position.

Equal Employment Opportunity: an opportunity to attain the same level of performance or to enjoy equal benefits and privileges of employment as are available to an average similarly-situated employee without a disability.

Existing Facility: refers to buildings that were constructed before the ADA went into effect. A public building constructed before the effective date of Title II does not have to be fully accessible unless the removal of barriers, including structural ones, is readily achievable.

Facility: all or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

Grade Break: the line where two surface planes with different grades meet.

Historic Properties: those properties that are listed or eligible for listing in the National Register of Historic Places or properties designated as historic under State or local law.

Job Analysis: a formal process in which information about a specific job or occupation is collected and analyzed.

Job Description: a detailed summary, usually written, of the major components of a job. A typical job description consists of six major components: essential job functions, knowledge and critical skills, physical demands, environmental factors, the roles of the ADA and other Federal laws such as the Occupational Safety Health Act, and any explanatory information that may be necessary to clarify job duties or responsibilities.

Job Related and Consistent with Business Necessity: standard used to determine whether a qualification standard or employment policy concerns an essential aspect of the job and is required to meet the needs of the business.

Light Duty: generally, "light duty" refers to temporary or permanent work that is physically or mentally less demanding than normal job duties. Some employers use the term "light duty" to mean simply excusing an employee from performing those job functions that s/he is unable to perform because of an impairment. "Light duty" also may consist of particular positions with duties that are less physically or mentally demanding created specifically for the purpose of providing alternative work for employees who are unable to perform some or all of their normal duties. Further, an employer may refer to any position that is sedentary or is less physically or mentally demanding as "light duty". The term is often associated with workers compensation programs.

Major Life Activity: term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working. These are examples only. Other activities such as sitting, standing, lifting, or reading are also major life activities.

Marginal Job Functions: functions that are not considered essential to a job. Employers must consider removing marginal job functions as an accommodation under the ADA, but do not have to remove essential functions as an accommodation.

Medical Examination: a procedure or test that seeks information about an individual's physical or mental impairments or health. The following factors should be considered to determine whether a test (or procedure) is a medical examination: (1) whether the test is administered by a health care professional; (2) whether the test is interpreted by a health care professional; (3) whether the test is designed to reveal an impairment or physical or mental health; (4) whether the test is invasive; (5) whether the test measures an employee's performance of a task or measures his/her physiological responses to performing the task ; (6) whether the test normally is given in a medical setting; and, (7) whether medical equipment is used. In many cases, a combination of factors will be relevant in determining whether a test or procedure is a medical examination. In other cases, one factor may be enough to determine that a test or procedure is medical.

Mitigating Measures: medical treatment or devices that lessen the effects of an impairment, such as medication, a prosthesis, or a hearing aid. When determining whether a person has a disability under the ADA, the effect of mitigating measures is to be considered.

Pedestrian Access Route (PAR): a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

Pedestrian Circulation Path: a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

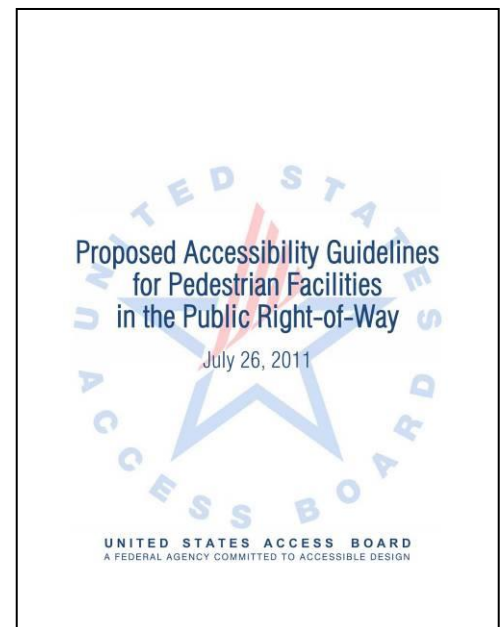
Physical or Mental Impairment: a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart 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: tranvestism, 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.

PROWAG: Proposed Accessibility Guidelines for Pedestrian Facilities within Public Right-of-Way. These proposed guidelines (dated July 26, 2011) provide design criteria for public streets and sidewalks, including pedestrian access routes, street crossings, curb ramps and blended transitions, on-street parking, street furniture, and other elements. The specifications comprehensively address access that accommodates all types of disabilities, including mobility and vision impairments, while taking into account conditions and constraints that may impact compliance, such as space limitations and terrain.

Public Accommodations: entities that must comply with Title III.

The term includes facilities whose operations affect commerce and fall within at least one of the following 12 categories: places of lodging (e.g., inns, hotels, motels) (except for owner-occupied establishments renting fewer than six rooms); establishments serving food or drink (e.g., restaurants and bars); places of exhibition or entertainment (e.g., motion picture houses, theaters, concert halls, stadiums); places of public gathering (e.g., auditoriums, convention centers, lecture halls); sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers); service establishments (e.g., laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals); public transportation terminals, depots, or stations (not including facilities relating to air transportation); places of public display or collection (e.g., museums, libraries, galleries); places of recreation (e.g., parks, zoos, amusement parks); places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools); social service center establishments (e.g., day care centers, senior citizen centers, homeless shelters, food banks,



adoption agencies); and places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

Public Entity: entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as Amtrak. It does not include the Federal government.

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

Readily Achievable: easily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include nature and cost of the action, overall financial resources and the effect on expenses and resources, legitimate safety requirements, impact on the operation of a site, and, if applicable, overall financial resources, size, and type of operation of any parent corporation or entity. Under Title III, public accommodations must remove barriers in existing facilities if it is readily achievable to do so.

Reasonable Accommodation: under Title I, a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. Reasonable accommodation is a key nondiscrimination requirement of the ADA.

Reasonable Program Modifications: if an individual's disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

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

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

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

Record of an Impairment: an individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity or has been diagnosed, correctly or incorrectly, as having such an impairment. An example: a man, who is in line for a promotion, has a history of cancer treatment, although he is now free of cancer. He is not given the promotion because his bosses are

worried that, if his cancer returns, he won't be able to do the job. He does not, at this point, meet the first part of the definition of disability because he does not have a physical or mental impairment that substantially limits one or more major life activities. However, based on his "record of" an impairment, he is being discriminated against.

Regarded as Having a Disability: an individual is disabled if he or she is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists. An example: a woman applies for a job as a customer service representative at a department store. Her face is badly scarred from an automobile accident. The interviewer doesn't want to give her the job, in spite of her skills and experience, because he thinks customers will be uncomfortable looking at her. She is not substantially limited in any major life activity, but the interviewer is "regarding her as" if she has a disability.

Running Slope: the grade that is parallel to the direction of pedestrian travel.

Safe Harbor: elements of existing facilities that already comply with either the 1991 ADA Standards or UFAS are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012 and elements comprising a path of travel to an altered primary function area are not required to comply with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

Service Animal: any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. See the 2010 revised requirements at http://www.ada.gov/service_animals_2010.htm.

Substantial Limitation on 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.

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.

Title V of the Rehabilitation Act of 1973: title of the law that prohibits discrimination on the basis of a disability by the Federal government, Federal contractors, by recipients of Federal financial assistance, and in Federally conducted programs and activities.

Transition Plan: refers to a requirement that state and local governments employing 50 or more people develop plans detailing structural changes necessary to achieve facility and program accessibility.

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

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

Undue Hardship: with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relationship to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

Uniform Federal Accessibility Standards (UFAS): one of two standards that state and local governments can use to comply with Title II's accessibility requirement for new construction and alterations that took place before March 15, 2012. The other standard is the ADA Accessibility Guidelines, which is the enforceable standard for new construction or alterations done after March 15, 2012.

U.S. Department of Justice: Federal agency that is responsible for enforcing Titles II and III of the ADA.

U.S. Department of Transportation: Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and paratransit, as well as privately operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

Appendix A

City Questionnaires

Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



Angola, Indiana

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

Name of Person(s) Completing This Form: _____ **Position:** _____

A. Provide a list of City Departments, responsibilities, and address of each. In addition, provide a short description of the primary duties of each department and copies of any payments, publications, applications, forms, etc. that are used for each (electronic preferred).

- Board of Public Works
- Building Safety Department
- Clerk-Treasurer
- Common Council
- Economic Development and Planning
- Engineering
- Fire Department/EMS
- Human Resources
- Information Technology
- Mayor's Office
- MS4/Stormwater
- Parks and Recreation
- Police Department
- Street Department
- Utilities
- Wastewater

- Water
- Others??

B. List all appointed boards and commissions and when and where they meet.

- Angola Investment Fund Account Board
- Board of Zoning Appeals
- Economic Development Commission
- Historic Preservation Commission
- Park Board
- Plan Commission
- Police Pension Board
- Redevelopment Commission
- Services, Finance and Budget Committee
- Training Board
- Tree Board
- Others??

C. Do all meeting rooms that hold public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type.

D. Are meetings televised or provided in audio format? If so, what accommodations have been made for hearing impaired?

E. Is there a poster for "Equal Opportunity is the Law" that describes the requirements of Title VII of the Civil Rights Act located somewhere in City buildings? If so, where (include all locations).

- F. How are public meetings (especially City Council) publicized? Are agendas posted in City Hall and on the web site? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda for all public meetings.
- G. Please provide DLZ with a copy (electronic preferred) of the City's Personnel Policy Manual and Application for Employment.
- H. Provide a copy of the resolutions or ordinances, or meeting minutes associated with establishment the ADA Coordinator, Non-Discrimination Notice, and Grievance Procedure.
- I. Are you aware of any instances where City staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.
- J. Do you allow any community groups, etc. to use City facilities for meetings, picnics, etc.? If so, provide a copy of any lease agreements. Please describe how these are advertised and how the public reserves these facilities.
- K. Please list any special events that the City sponsors or participates in some way (parades, carnivals, flea markets, etc.). Include location of events, duration, etc. and any documentation you can so we can understand what happens for each.
- L. Are emergency procedures in place at City facilities for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for each building? Please identify.
- M. Has the City ever been asked to provide special accommodation for printed materials? If so what was requested and provided?
- N. Do any City facilities have Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

- O. Websites: <https://www.angolain.org/>
- a. List any others utilized:
 - b. Who is the website developer for the City? How often is it updated? Who is the contact person to discuss the website with (name and phone number/e-mail)?
- P. Who at the City is the "Human Resources" person? Name and contact information is needed.
- Q. Does the City own all the buildings that provide services to the public? Does the City lease any buildings to someone else for their use? If yes for either, provide detail about the address, owner, and functions provided there.
- R. Provide a copy of the County's CEMP. Provide name and contact info for person at EMA that can answer questions if needed in relation to the City of Angola's participation and/or services received.
- S. Indiana Code 5-2-1-9(g) requires all police officers to undergo annual training how to interact with people with mental illness, addictive disorders, mental retardation (intellectual disability), autism, and developmental disabilities. Have all officers completed this training? If so, when was the last training sessions held. Has anyone at the police department had any other formal training on interacting with persons with disabilities?
- T. Are you aware of any formal training of non-police personnel related to ADA or working with persons with disabilities? If so, note who has taken training and the date, location, and provider of the training.
- U. Are there any specific suggestions or thoughts anyone at the City has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful for anyone at the City?

Americans with Disabilities Act Self-Evaluation Program, Services, and Activities Questionnaire



Angola, Indiana

The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.

Name of Department: _____ **Contact Person:** _____

A. Public Meetings:

- a. Do any meeting rooms where your department holds public meetings have an audio system (microphones and speakers)? Do they have any assistive listening devices for the hearing impaired? If so, how many and what type.
- b. Are meetings televised or provided in audio format? If so, what accommodations have been made for hearing impaired?
- c. How are your department's public meetings publicized? Where and when are agendas posted? Do the agendas have an ADA statement of accommodation on them? Provide a typical copy of a recent agenda.

B. Accommodations:

- a. Are you aware of any instances where your staff has interacted with persons with disabilities and altered their normal procedures to accommodate them in some way? Please describe and be specific.
- b. What types of documents and forms are provided for public use by your department? (i.e. permit applications, brochures, etc.) How are these accessed by the public?
- c. Has your department ever been asked to provide special accommodation for printed materials? If so, what was requested and provided?

- d. Do you use Telecommunication Devices for the Deaf (TDD) or access to a relay service to communicate to persons with hearing loss?

C. Special Events:

- a. Do you allow any community groups, etc. to use your department's facilities for meetings, picnics, etc.? Are any special provisions made related to accessibility?
 - b. Please list any special events that your department sponsors or participates in some way (parades, carnivals, flea markets, etc.). Include location of events, duration, etc. and any documentation you can so we can understand what happens for each.
 - c. Does your department offer any programs requiring registration? If so, describe methods utilized for advertising and registering for programs.
- D. Does your department utilize the City's standard job application? If not, please provide copy of application used.
- E. Does your department have a website or social media page separate from the City's official webpage? If so, please provide address.
- F. Are emergency procedures in place in your department for evacuation in the event of an emergency? Are emergency assembly or shelter areas identified for your building? Please identify.
- G. Are you aware of any formal training of staff in your department related to ADA or working with persons with disabilities? If so, note who has taken training and the date, location, and provider of the training.
- H. Are there any specific suggestions or thoughts anyone at the City has regarding how programs could be made more accessible to persons with disabilities? Training you think would be especially helpful?

Appendix B

Public Outreach

Public Notices
Advocacy Group Contacts
Proofs of Publication

Prescribed by State Board of Accounts

To: KPC Media Group Inc

P.O. Box 39, KENDALLVILLE, IN 46755

CITY OF ANGOLA (LEGAL) ACCOUNTS

To: HERALD REPUBLICAN

STEUBEN, Indiana

Order #: 2060905

PUBLISHER'S CLAIM

LINE COUNT

Display Master)must not exceed two actual lines, neither of which shall
total more than four solid lines of the type in which the body of the
advertisement is set) -- number of equivalent lines

Head -- number of lines	-----	1
Body -- number of lines	-----	49
Tail -- number of lines	-----	1
Total number of lines in notice	-----	51.0

COMPUTATION OF CHARGES

51.0 lines, null columns wide equals 51.0 equivalent lines at 0.4727 cents per line.	-----	\$24.11
Additional charges for notices containing rule or tabular work (50 per cent) of above amount	-----	\$
Charge for extra proofs of publication (\$1.00 for each proof in excess of 2)	-----	\$
TOTAL AMOUNT OF CLAIM	-----	\$24.11

DATA FOR COMPUTING COST:

Width of single column in picas - 9.9

Number of insertions: 1

Size of type - 7 point

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is
just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same
has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size,
which was duly published in said paper HERALD REPUBLICAN 1. The dates of publication being as follows:
11/19/2019

Additionally, the statement checked below is true and correct:

☐ Newspaper does not have a Web site.

☒ Newspaper has a Web site and this public notice was posted on the same day as it was published in
the newspaper

☐ Newspaper does a Web site, but due to technical problem or error, public notice as posted on _____

☐ Newspaper has a Web site, but refuses to post the public notice.

RECEIVED
NOV 22 2019

BY: _____

LANETTE MCGUIRE

Date: 11/19/2019

Title: Legal Clerk

Claim No. _____ Warrant No. _____

**IN FAVOR OF
KPC Media Group Inc.
PUBLISHERS OF**

The News Sun
Kendallville, Indiana

The Advance Leader
Ligonier, Indiana

The Star
Auburn, Indiana

The Garrett Clipper
Garrett, Indiana

The Herald Republican
Angola, Indiana

Albion New Era
Albion, Indiana

The Butler Bulletin
Butler, Indiana

Northwest News
Huntertown, Indiana

Churubusco News
Churubusco, Indiana

I have examined the within claim and hereby certify
as follows:

That it is in proper form.

That it is duly authenticated as required by law.

That it is based upon statutory authority.

That it is apparently ☐ correct ☐ incorrect

I certify that the within claim is true and correct; that
the services there in itemized and for which charge is
made were ordered by me and were necessary to the
public business.

_____, _____

\$ _____

ON ACCOUNT OF APPROPRIATION FOR

Appropriation No. _____

ALLOWED _____ , _____

IN THE SUM OF \$ _____

NOTICE OF PUBLIC
COMMENT PERIOD

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Public comments may be dropped off in writing or mailed to Scott Lehman, ADA Coordinator, 210 N. Public Square, Angola, IN 46703 during normal business hours or provided via email at slehman@angolain.org. Comments will be accepted until 3 p.m. Friday, December 13, 2019.

The City of Angola complies with the Americans with Disabilities Act. Upon request, the City will provide written materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Requests including your name, mailing address, phone number and brief description of the requested accommodation may be submitted at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (260) 665-6683.

HR,2060905,11/19,hspaxlp

RECEIVED
NOV 22 2019

BY: _____

Information contained in public notice was also sent via US Mail to the following local, county, and state advocacy groups:

ADA-Indiana, c/o Indiana Institute on Disability and Community
2853 E. 10th Street
Bloomington, IN 47409-2696

Indiana Governor's Council for People with Disabilities
Indiana Government Center South, Room E145
Indianapolis, Indiana 46204

Indiana Council on Independent Living
402 W. Washington St. Room W453
P.O. Box 7083
Indianapolis, Indiana 46207-7083

Easterseals ARC of Northeast Indiana
4919 Coldwater Road
Fort Wayne, IN 46825

Pathfinder Services
2824 Theater Avenue
P.O. Box 1001
Huntington, Indiana 46750

AWS Foundation
8515 Bluffton Road
Fort Wayne, IN 46809



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

ADA-Indiana, c/o Indiana Institute on Disability and Community
2853 E. 10th Street
Bloomington, IN 47409-2696

November 20, 2019

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Please share this information with any interested parties in your area in order to better help us reach out to individuals in your community.

DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Indiana Governor's Council for People with Disabilities
Suellen Jackson-Boner
Indiana Government Center South, Room E145
Indianapolis, Indiana 46204

November 20, 2019

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023))



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Indiana Council on Independent Living
Carol Baker
402 W. Washington St. Room W453, P.O. Box 7083
Indianapolis, Indiana 46207-7083

November 20, 2019

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

November 20, 2019

Easterseals ARC of Northeast Indiana
4919 Coldwater Road
Fort Wayne, IN 46825

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

AWS Foundation
Patti Hays
8515 Bluffton Road
Fort Wayne, IN 46809

November 20, 2019

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Pathfinder Services
2824 Theater Avenue
P.O. Box 1001
Huntington, Indiana 46750

November 20, 2019

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)

Prescribed by State Board of Accounts

To: KPC Media Group Inc

P.O. Box 39, KENDALLVILLE, IN 46755

CITY OF ANGOLA (LEGAL) ACCOUNTS

To: HERALD REPUBLICAN

STEUBEN, Indiana

Order #: 2062093

PUBLISHER'S CLAIM

LINE COUNT

Display Master) must not exceed two actual lines, neither of which shall
total more than four solid lines of the type in which the body of the
advertisement is set) -- number of equivalent lines

Head -- number of lines	-----	<u>1</u>
Body -- number of lines	-----	<u>66</u>
Tail -- number of lines	-----	<u>1</u>
Total number of lines in notice	-----	<u>68.0</u>

COMPUTATION OF CHARGES

68.0 lines, null columns wide equals 68.0 equivalent lines at 0.4727 cents per line.	-----	<u>\$32.14</u>
Additional charges for notices containing rule or tabular work (50 per cent) of above amount	-----	<u>\$</u>
Charge for extra proofs of publication (\$1.00 for each proof in excess of 2)	-----	<u>\$</u>
TOTAL AMOUNT OF CLAIM	-----	<u>\$32.14</u>

DATA FOR COMPUTING COST:

Width of single column in picas - 9.9

Number of insertions: 1

Size of type - 7 point

Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is
just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same
has been paid.

I also certify that the printed matter attached hereto is a true copy, of the same column width and type size,
which was duly published in said paper HERALD REPUBLICAN 1. The dates of publication being as follows:
02/21/2020

Additionally, the statement checked below is true and correct:

- ☐ Newspaper does not have a Web site.
- ☒ Newspaper has a Web site and this public notice was posted on the same day as it was published in
the newspaper
- ☐ Newspaper does a Web site, but due to technical problem or error, public notice as posted on _____
- ☐ Newspaper has a Web site, but refuses to post the public notice.

LANETTE MCGUIRE

Date: 02/21/2020

Title: Legal Clerk

NOTICE OF AVAILABILITY OF
ADA SELF-EVALUATION AND
TRANSITION PLAN

Notice is hereby given that the City of Angola is conducting a self-evaluation of all City-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the City's services, programs, and activities be readily accessible and usable by individuals with disabilities.

Copies of the draft Self-Evaluation and Transition Plan will be available for public review on the City website (<https://www.angolain.org>) or at the following locations during normal business hours between February 24 and March 9, 2020.

City Hall (Main Service Window) -
210 N. Public Square, Angola;

Carnegie Public Library of Steuben
County (Circulation Desk) - 322 S.
Wayne St., Angola

Public comments may be dropped off in writing or mailed to Scott Lehman, ADA Coordinator (210 N. Public Square, Angola, IN 46703) during normal business hours or provided via email to buildingdept@angolain.org. Comments will be accepted until 4 p.m. March 9, 2020.

In addition, the City has scheduled a meeting to solicit public input and comment on the Transition Plan. It will consist of a short presentation to provide information on the Transition Plan, followed by open discussion and interaction with attendees. This will be an opportunity for the community to ask questions as well as provide suggestions and comments on the draft Plan. All comments will be reviewed, considered and included in the appendix of the document. The meeting will be held during the regularly scheduled council meeting at 7 p.m. on March 2, 2020 in the City Council Chambers at City Hall.

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HR,2062093,2/21,hspaxlp

RECEIVED
FEB 24 2020

BY: _____

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INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

ADA-Indiana, c/o Indiana Institute on Disability and Community
2853 E. 10th Street
Bloomington, IN 47409-2696

February 18, 2020

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DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT

cc: Amanda Cope (City of Angola)
file (1966-4023)



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Indiana Governor's Council for People with Disabilities
Suellen Jackson-Boner
Indiana Government Center South, Room E145
Indianapolis, Indiana 46204

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Sara Hicks PLA, LEED AP, CPESC-IT
cc: Amanda Cope (City of Angola)
file (1966-4023))

2211 E. JEFFERSON BLVD., SOUTH BEND, INDIANA 46615 | OFFICE 574-236-4400 | ONLINE WWW.DLZ.COM

Akron Arlington Heights Burns Harbor Chicago Cleveland Columbus Detroit Fort Wayne Frankfort Hammond Indianapolis Joliet
Kalamazoo Lansing Louisville Melvindale South Bend Saint Joseph Toledo



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Indiana Council on Independent Living
Carol Baker
402 W. Washington St. Room W453, P.O. Box 7083
Indianapolis, Indiana 46207-7083

February 18, 2020

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- Carnegie Public Library of Steuben County (Circulation Desk) – 322 S Wayne St, Angola

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Please share this information with any interested parties in your area in order to better help us reach out to individuals in your community.

DLZ INDIANA, LLC

Sara Hicks PLA, LEED AP, CPESC-IT
cc: Amanda Cope (City of Angola)
file (1966-4023)

2211 E. JEFFERSON BLVD., SOUTH BEND, INDIANA 46615 | OFFICE 574-236-4400 | ONLINE WWW.DLZ.COM

Akron Arlington Heights Burns Harbor Chicago Cleveland Columbus Detroit Fort Wayne Frankfort Hammond Indianapolis Joliet
Kalamazoo Lansing Louisville Melvindale South Bend Saint Joseph Toledo



INNOVATIVE IDEAS
EXCEPTIONAL DESIGN
UNMATCHED CLIENT SERVICE

Easterseals ARC of Northeast Indiana
4919 Coldwater Road
Fort Wayne, IN 46825

February 18, 2020

Notice is hereby given that the City of Angola is conducting a self-evaluation of all City-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the City's services, programs, and activities be readily accessible and usable by individuals with disabilities.

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INNOVATIVE IDEAS
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AWS Foundation
Patti Hays
8515 Bluffton Road
Fort Wayne, IN 46809

February 18, 2020

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INNOVATIVE IDEAS
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Pathfinder Services
2824 Theater Avenue
P.O. Box 1001
Huntington, Indiana 46750

February 18, 2020

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PUBLIC MEETING MINUTES

MEETING DATE: March 2, 2020

WRITTEN BY: Sara Hicks

MEETING LOCATION: Council Chambers at City Hall

PURPOSE OF MEETING: Public Meeting for ADA Self Evaluation and Transition Plan Project (SETP)

ATTENDEES: See Attached Sign-In Sheet

1. As part of the regularly scheduled City Council meeting, a public meeting was held to provide an opportunity for the community to comment and ask questions regarding the draft Self-Evaluation and Transition Plan (SETP).
2. DLZ presented an abbreviated summary of the purpose of the SETP, process, and findings. See attached presentation slides. The PowerPoint presentation accompanying today's public meeting will be included in the final SETP document in the Public Outreach Appendices.
3. Floor was opened for questions and comments from those in attendance.
 - a. City Council members asked questions relating to potential standard changes and prioritization and implementation of the plan.
 - a.i. At this time, there is no indication that a standard change will occur in the near future. The current standard utilized has been in place since 2010.
 - a.ii. Prioritization within the plan is based on physical impedance (actual physical characteristics of the specific feature and the severity of the barrier to use), and the facilities are prioritized based on contextual factors (level of use, social need, civic function, etc.)
 - a.iii. The intention is for the ADA Committee and Coordinator to determine a plan of action on a yearly basis, taking into account other capital projects, Council priorities, any comments/complaints received, and budget available.
 - b. No public comments were received.



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4. Public comments may be dropped off in writing or mailed to Scott Lehman, ADA Coordinator (210 N. Public Square, Angola, IN 46703) during normal business hours or provided via email to buildingdept@angolain.org. Comments will be accepted until 4pm March 9, 2020.
-

DLZ INDIANA, LLC

Sara Hicks, PLA, LEED AP, CPESC-IT

Project Manager

Attachments: Sign-In Sheet, PowerPoint Presentation

**AGENDA OF THE COMMON COUNCIL
City of Angola, Indiana**

Monday, March 2, 2020 – 7:00 p.m.

CALL TO ORDER BY MAYOR HICKMAN

1. Council Member roll call by Clerk-Treasurer Twitchell.

Crum _____ Olson _____ Armstrong _____ Martin _____ McDermid _____

2. Remarks by Mayor Hickman.
3. Request approval of the February 17 minutes. (attachment)

UNFINISHED BUSINESS

1. Ordinance No. 1626-2020. AN ORDINANCE REESTABLISHING THE CUMULATIVE CAPITAL DEVELOPMENT FUND UNDER INDIANA CODE 36-9-15.5. (tax rate \$0.05) (second reading) (attachment)
2. Ordinance No. 1627-2020. AN ORDINANCE REESTABLISHING A PARK AND RECREATION CUMULATIVE BUILDING FUND UNDER INDIANA CODE 36-10-3-21. (tax rate \$0.0167) (second reading) (attachment)
3. Other unfinished business.

NEW BUSINESS

1. The ADA City of Angola Self-Evaluation and Transition Plan: Facilities, Programs, and Policies is presented by Sara Hicks, DLZ Indiana LLC. (separate attachment)
 - Public comment
2. Clerk-Treasurer Twitchell presents the Annual Report of the Redevelopment Commission on financial status for 2019. (attachment)
3. Reports:
 - Clerk-Treasurer
 - Department Heads
4. Request approval of the Allowance of Accounts Payable Vouchers 44906 through 45078 totaling \$531,377.58. (separate attachment)
5. Other new business.

Angola Common Council

Monday March 2, 2020

For the record, **please legibly**
PRINT your name. *Thank you!*

1. Sara Hicks
2. Colin Meadowcroft WLEI
3. FLYNN Cately
4. CRAIG WILLIAM
5. Ray Harvey
6. JASON CERRY
7. Eric Haggis
8. William HARTER
9. LEE GREENAMVER
10. Kevin R Mory
11. SUE ESSMAN
12. Jennifer Hagerty Laila Hagerty Hannah Hagerty
13. T.R. HAGERTY
14. Doug Anderson
15. Tom Selman
16. Martha Hagerty
17. Matt Hanna
18. Scott Lehman
19. Stacy Snyder
20. Pete Becker IV

21. JASON MEEK

22.

23. Amanda Cape

24. Stu Hamblen

25. Kim Ghoup

26. Ryan Herbert

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City of Angola

ADA Transition Plan Summary

March 2020



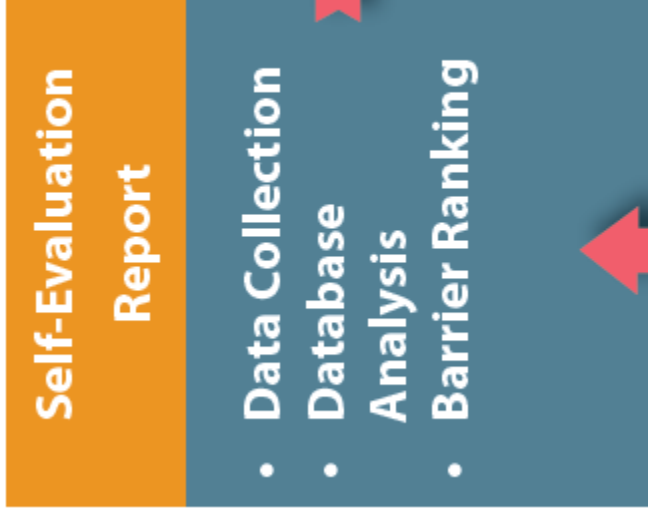
The Americans with Disabilities Act (ADA)

- ▶ Enacted in 1990
 - Companion to Civil Rights Act of 1964 (Title VII) regulations (can't discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), or genetic information).
 - Companion to Section 504 of Rehabilitation Act of 1973
 - Provides disabled employees with additional protections beyond Title VII.
- ▶ Mandates that disabled individuals shall not be excluded from participation in, denied the benefit of, or be subject to discrimination under any program or activity.
- ▶ The City of Angola is a Title II (Public Services) entity.

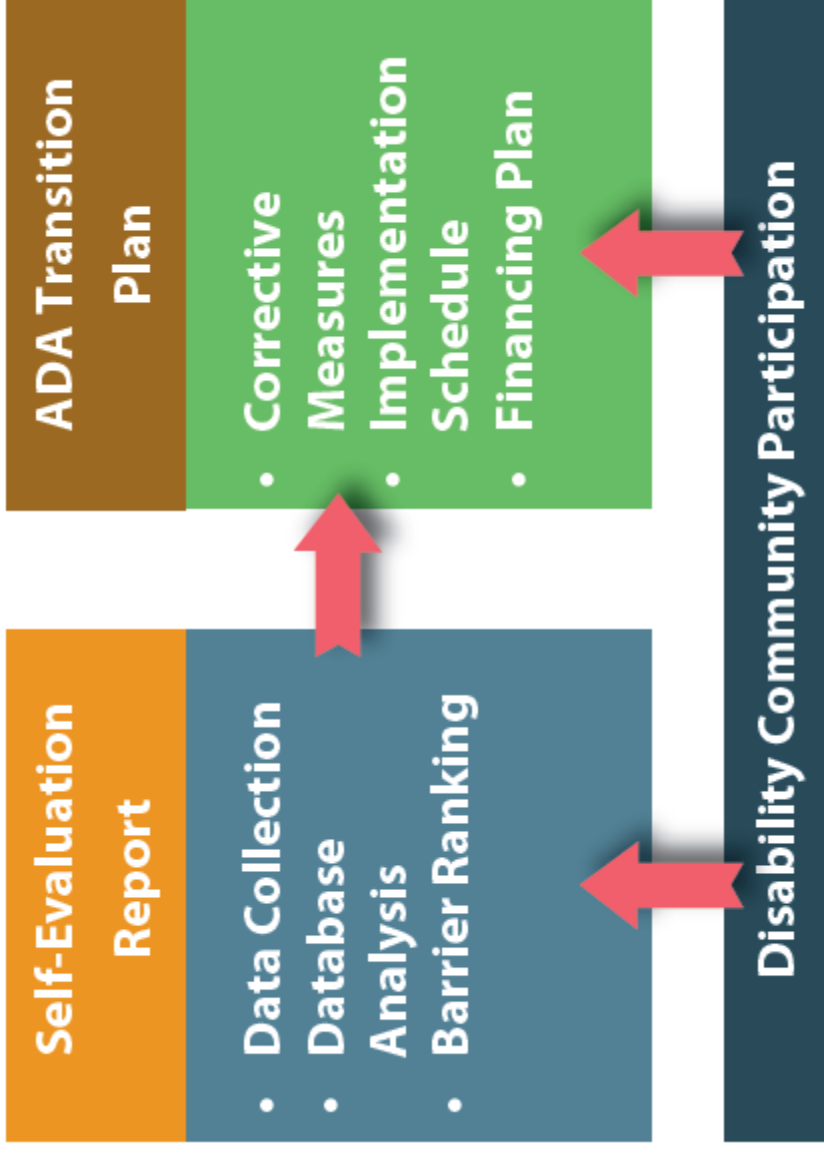


Self-Evaluation and Transition Plan: Title II State and Local Governments

28 CFR 35.105



28 CFR 35.150(d)(3)



City's Phased Approach

- A transition plan for the public right-of-way (ROW) was completed in 2012 and last updated in 2018.
 - Designation of an ADA Coordinator
 - Development of the City's Grievance Procedure
 - Self-evaluation of the pedestrian ROW facilities
 - Plan for implementation of corrective actions
 - Issuance of a public notice of compliance with the ADA
 - Adoption of PROWAG and ADA Standards for Accessible Design
- A Facilities Assessment Report was completed (dated April 2019).
 - Self-evaluation of all City facilities (areas open to the public and employee common use areas)
 - Summary of each variance
 - Planning level opinion of probable cost to correct
 - Prioritization of City facilities, and barriers within each facility, for corrective action.
- Programs and Policies Self-Evaluation and Transition Plan (THIS STUDY)
 - Self-Evaluation of Programs and Policies
 - Development of Transition Plan including other work by reference

City Facilities

In 2018-2019, the City conducted a facilities assessment for compliance with ADA as follows:

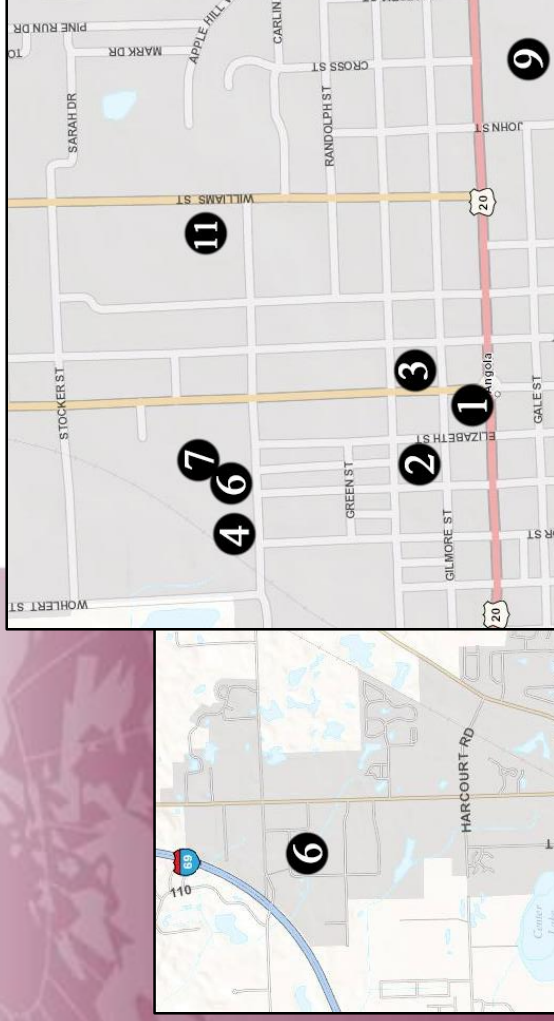
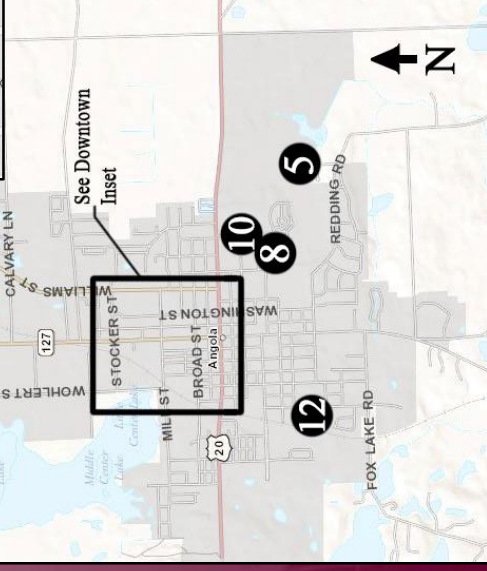


Figure 1. Location Map of City facilities

- City Facilities (Owned or Leased)**
1. City Hall
 2. Public Safety
 3. Monument Plaza
 4. 306 W. Mill Training Center
 5. Wastewater Treatment Plant
 6. Water Treatment Plants
 7. Street Department
 8. Commons Hall
 9. Parks Department
 10. Commons Park
 11. Firemen's Park
 12. Nature Park

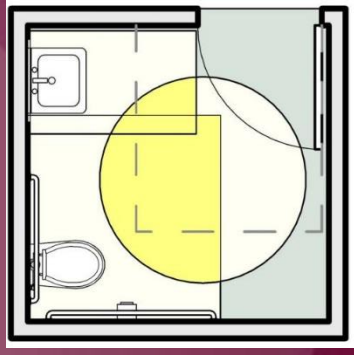
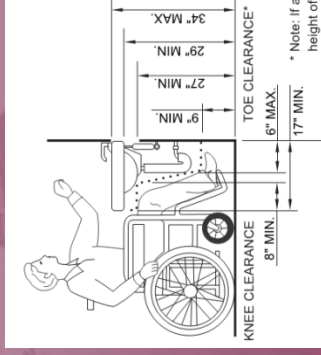
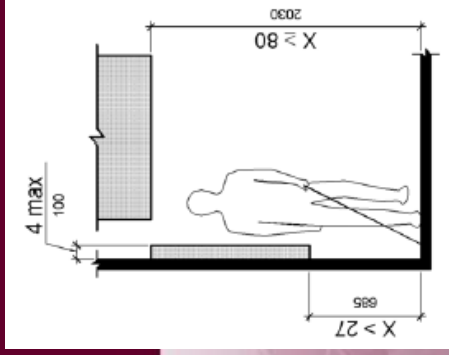


Self-Evaluation

- **Review of City Facilities**

- Parking
- Pedestrian Access Route (PAR) to building
- Architectural features including, but not limited to:

- Doors/Entries
- Elevators and Stairs
- Service counters & work surfaces
- Signage
- Fire Alarms
- Drinking Fountains
- Telephones
- Maneuvering space
- Protruding Objects
- Reach ranges for light switches, outlets, shelving, etc.
- Restroom stalls, sinks, showers, etc



Findings: City Facilities

- **Common Findings At City Facilities**

- Accessible parking exceeding slopes and lacking signage.
- Accessible routes over cross slopes, displacements
- Non-compliant curb ramps
- Door non-compliances such as excessive operating effort and closing speed, door hardware, glazing height and maneuvering spaces
- Inconsistent wall signage: not present or does not provide adequate raised text and Braille
- Non-compliant drinking fountains
- Protruding objects include fire extinguishers, drinking fountains and edges of counters.
- Operable parts on switches, outlets, dispensers, etc. over allowable heights.
- Lack of accessible service counters at City Hall and Police
- Restroom accessory issues such as mounting locations of dispensers, coat hooks, lack of stall door handles, lack of pipe insulation at sinks
- Restroom stall issues such as door width, stall width/depth, toilet position, incorrectly positioned grab bars, or lack of grab bars in entirety
- Lack of accessible facilities in employee breakrooms

(See Full Report for specific items by facility)

Findings: City Facilities



City Hall Examples

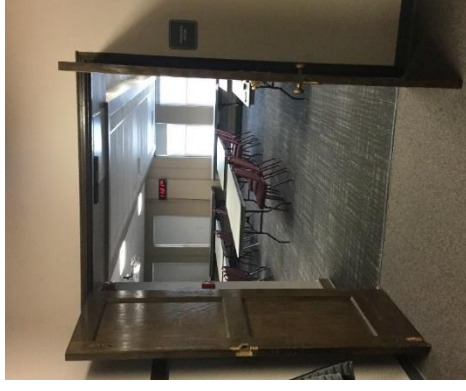
Findings: City Facilities



Police



Fire



Findings: City Facilities



Street
Department

Water Treatment Plant

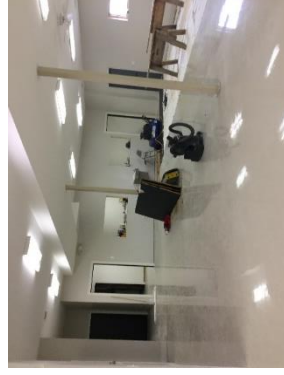
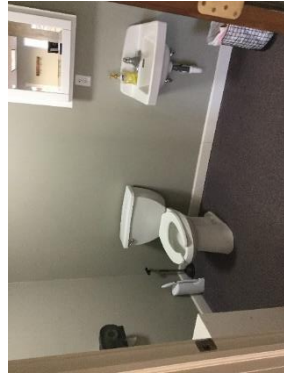


Wastewater Treatment Plant



Utility/Service Facility Examples

Findings: City Facilities



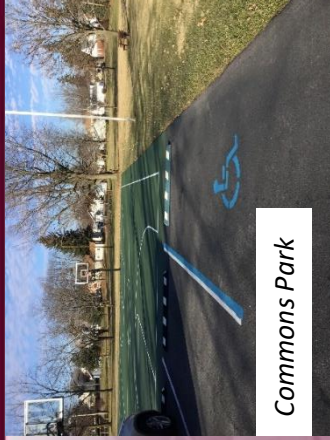
Parks Department

Commons Hall

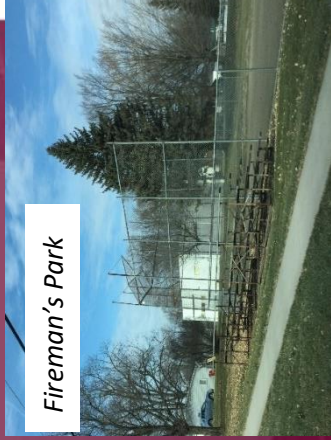


Training Center

Findings: City Facilities



Commons Park



Fireman's Park



Nature Park

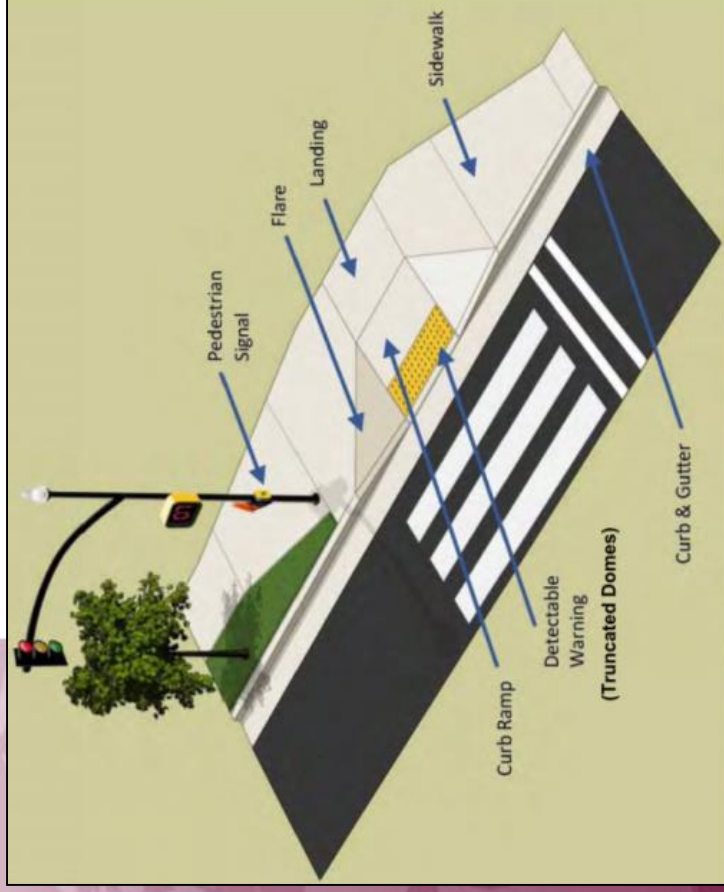


The Americans with Disabilities Act (ADA)

- Accessibility can be achieved several ways:
 - Relocate a program or activity to an accessible facility
 - Provide the activity, service, or benefit in another manner that meets ADA requirements
 - Make modifications to the building or facility to provide accessibility
- ADA does NOT require modifications to buildings or facilities if accessibility can be achieved in another manner.
- ADA standards do not apply if they would fundamentally alter the nature of a program, service or activity, or would impose an undue burden.

ROW Self-Evaluation

- Review of City ROW Facilities (does NOT include INDOT, County, or other incorporated ROW)
 - Curb Ramps and Blended Transitions
 - Sidewalks
- Update currently underway



Prioritization

Building Facilities

Level of Use

- Is the facility utilized quite frequently and by a large cross-section of the public?

Social Need

- Does the facility provide a social service or program for less fortunate or transient citizens?

Civic Function

- Does the facility provide access to civic programs and services that implement the civil and political rights provided by the government.

General Uniqueness

- Does the building, facility, or site provide a distinct program or service that cannot occur at a different location or facility?

Prioritization

Pedestrian Right-Of-Way

Areas of High Pedestrian Activity

- Adjacent to downtown, schools, community centers, churches, public transportation hubs, retail centers, and parks

Areas with a Higher Concentration of Persons with Disabilities

- Senior centers, assisted living communities, and areas adjacent to medical facilities, etc.

Areas of High Volume Streets

- Connectors between residential areas and destinations such as shopping, employment, and medical

Areas Accessing Place of Public Accommodation

- Serving government offices and facilities, public libraries, and community centers

Prioritization

High Priority

- **Prohibit** access for disabled persons, make access extremely troublesome, or present safety hazards to all users.
- Likely do not have acceptable alternative routes or treatments to overcome the barrier.
- Examples: Lack of accessible parking, stairs only, no exterior accessible route, narrow doors, extreme slopes or displacements, missing rails
- For ROW, missing curb ramps, extreme slopes, particularly cross slopes impacting lateral balance, changes in level over 1" (trip hazards), and fixed obstructions limiting vertical and horizontal clearance.

Medium Priority

- Partially prohibit access or make access quite difficult.
- Typically these barriers are obstacles to amenities such as secondary entry points, light switches, vending machines, and drinking fountains.
- For ROW, moderate deviations in running and cross slopes, changes in level ½" to 1", obstructions that allow tight passage, landing and PAR width deviations.

Prioritization

Low Priority

- Typically do not limit access to facilities or services for disabled persons.
- Typically, alternative routes or treatments are available or assistance can be provided to overcome the barrier.
- Examples: Signage issues, electrical, minor dimensional non-compliances
- For ROW, minor deviations in running and cross slopes, changes in level, landings and PAR width deviations, and presence of standard elements such as detectable warnings not in compliance with guidelines.
- Closely evaluate the cost implications vs. increase in accessibility in regards to corrections to these highly usable areas, specifically for sidewalks where otherwise in excellent condition.

CITY OF ANGOLA - ADA FACILITY ASSESSMENT SUMMARY

Name & Location	Low Priority	Medium Priority	High Priority	Total Facility Cost
City Hall 210 N. Public Square	\$29,220	\$12,890	\$18,450	\$60,560
Public Safety - Police Department 202 W. Gilmore Street	\$28,620	\$5,402	\$2,220	\$36,242
Public Safety - Fire Department 202 W. Gilmore Street	\$10,040	\$7,910	\$1,600	\$19,550
Monument Plaza East Gilmore Street	\$6,730	\$2,700	\$0	\$9,430
Training Center 306 W. Mill Street	\$3,800	\$0	\$14,300	\$18,100
Wastewater Treatment Plant 1095 Redding Road	\$33,090	\$5,000	\$1,300	\$39,390
Water Treatment Plant 300 W. Mill Street, 550 Pokagon Trail	\$23,370	\$0	\$200	\$23,570
Street Department 210 W. Mill Street	\$13,180	\$3,450	\$100	\$16,730
Commons Hall 501 S. John Street	\$17,130	\$13,520	\$11,415	\$42,065
Parks Department 229 S. John Street	\$9,170	\$2,815	\$1,200	\$13,185
Commons Park John Street/Don Sell Lane/Circle Hill Cemetery Road	\$55,519	\$74,095	\$124,000	\$253,614
Firemen's Park Mill Street and Williams Street	\$23,740	\$16,490	\$26,820	\$67,050
Nature Park Ettinger Street	\$350	\$3,140	\$0	\$3,490
TOTALS	Low Priority \$253,959	Medium Priority \$147,412	High Priority \$201,605	Total Cost \$602,976

All cost estimates for City facilities are based on a single unified bid with 2019 estimated costs. Bidding in a different manner or different time period will require adjustments to the probable project costs. All items indicated as 'TBD' require further evaluation for feasibility due to historical, topographical or structural concerns.

Excerpt from Facility Assessment:

Table 3-1. Facility tier listing for prioritization.

Tier 1	Tier 2	Tier 3
City Hall	Police Department	Street Department
Police/Fire*	Fire Department	Wastewater Treatment Plant
Monument Plaza	Training Center	Water Treatment Plant
Parks Department	Nature Park	
Commons Park	Commons Hall	
Firemen's Park		

*Areas necessary for public access in case of emergency (i.e. front door, call buttons)

City Programs/Policies

Self-Evaluation of City programs included the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Special Events and Private Events on City Property
- Contracted Services and Contractors
- Customer Service, Satisfaction, and Input
- Equally Effective Communication
- Alternate Communication Formats
- Fees and Surcharges
- Information and Signage
- Staff Training
- Emergency Evacuation Procedures
- Employment



Findings: Programs/Policies

The City meets many of the requirements for accessibility in their programs and services. However, room for improvement was seen in the following areas:

- Standard non-discrimination notice printed on publications/availability of other formats
- Standard language on all meeting agendas regarding availability of and request for accommodations
- Staff training (ADA requirements, interaction with people with disabilities, equal accommodation alternatives, etc.)
- Improve accessibility for hearing impaired persons – ALS for meeting rooms, phone system with TDD/TTY communication
- Develop guidance for conducting accessible meetings and events

Findings: Programs/Policies

The City meets many of the requirements for accessibility in their programs and services. However, room for improvement was seen in the following areas:

- For rental facilities, provide indication of accessible facilities
- Increase visibility of ADA related documents on City website
- Communicate protocol to staff for creating accessible document formats for use on website
- Partner with County EMA to ensure accessibility concerns are met for emergency situations
- Review City job descriptions for relevant language for job duties and accommodation
- Update ordinance language regarding design standards and guidelines and OPDMD.

Implementation

PROJECTED CITY COMMITMENTS

- Facility Improvements/Barrier Removal
 - Currently assumed 30 year timetable for Facilities
 - Approximately \$20,100 annually
 - Pedestrian ROW improvements will continue at a set minimum dollar value (new pedestrian facilities and/or replacement of existing) of \$50,000 annually
- Implementation
 - Barriers addressed generally in order of priority and as needed as part of capital improvement
 - Schedule for implementation on a yearly basis by ADA committee
 - Delay architectural changes as needed if equal accommodation can be provided.
 - Implement immediate low cost, programmatic changes where possible.
 - Provide relevant staff training related to ADA

Tasks Remaining

- **Provide Public Participation and Comment Period for Transition Plan**
(Ends March 9, 2020 at 4pm)
- Consider Public Comments for potential plan revisions.
- **Adoption of Transition Plan by City** (anticipated at next regular meeting)
- **Regular reviews and updates done as required**
 - Recommended to document corrective actions and removal of barriers in an annual summary
 - Document changes to ADA and other guidance that may require a review of facilities/programs
 - Maintain documentation of all activities, grievances, etc. as required by law

Discussion & Questions

- To provide additional comment, request reasonable accommodations, or to resolve future concerns, contact:

Mr. Scott Lehman, ADA Coordinator

Phone: (260) 665-6683

Email: buildingdept@angolain.org



Appendix C

Forms and Notices

Grievance Procedure
Notice Under the Americans with Disabilities Act

RESOLUTION NO. 2012-612

**A RESOLUTION OF THE COMMON COUNCIL OF THE CITY OF ANGOLA,
INDIANA, ADOPTING THE AMERICAN WITH DISABILITIES ACT (ADA)
ESTABLISHING THE ADA COORDINATOR AND GRIEVANCE PROCEDURE**

WHEREAS, the Federal Government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall name an ADA Coordinator; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall adopt a grievance procedure for resolving complaints alleging violation of Title II of the ADA; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall publish notice to the public regarding the ADA; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall post the ADA coordinator's name, office address, and telephone number along with the ADA Notice and ADA grievance procedure on its website, and

WHEREAS, the City of Angola remains committed to the ADA and the elimination of barriers to public facilities;

NOW, THEREFORE, BE IT RESOLVED by the Common Council of the City of Angola, Indiana:

The City of Angola Building Commissioner, 210 N Public Square, Angola, Indiana 46703, Telephone 260-665-6846, email buildingdept@angolain.org - is hereby designated as the ADA Coordinator for the City of Angola, Indiana.

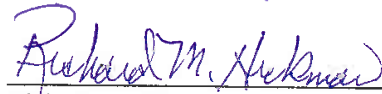
Also, an ADA Coordination Committee, comprised of three (3) City of Angola Department Heads or employees that are appointed by the Mayor, is hereby established, for the purpose of reviewing and responding, on behalf of the City of Angola, Indiana, to written ADA grievances filed against the City.

The ***NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT***, a copy of which is attached hereto and as revised from time to time, is adopted as the City of Angola, Indiana, Notice under the Americans with Disabilities Act.

The ***City of Angola, Indiana GRIEVANCE PROCEDURE UNDER THE AMERICANS WITH DISABILITIES ACT***, a copy of which is attached hereto and as revised from time to time, is adopted as the grievance procedure for addressing complaints alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Angola, Indiana.

In compliance with Federal and State laws as set forth above, the Common Council of the City of Angola resolves to post the required information regarding the ADA Coordinator, Notice under the Americans with Disabilities Act, and the ***City of Angola, Indiana, GRIEVANCE PROCEDURE UNDER THE AMERICANS WITH DISABILITIES ACT***, on its website and at such other locations as may be determined from time to time.

PASSED AND ADOPTED by the Common Council of the City of Angola, Steuben County, Indiana this 15th day of October 2012.



Richard M. Hickman
Mayor

Attest:



Debra A. Twitchell, IAMC/MMC/CPFA
Clerk-Treasurer

This resolution presented by me to the Mayor of the City of Angola, Indiana this 15th day of October 2012.



Debra A. Twitchell, IAMC/MMC/CPFA
Clerk-Treasurer

This resolution signed and approved by me, Mayor of the City of Angola this 15th day of October 2012.



Richard M. Hickman
Mayor

RESOLUTION NO. 2020-771

**A RESOLUTION OF THE COMMON COUNCIL OF THE CITY OF
ANGOLA, INDIANA, ADOPTING THE GRIEVANCE PROCEDURE UNDER
THE AMERICAN WITH DISABILITIES ACT**

WHEREAS, the Federal Government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall adopt a grievance procedure for resolving complaints alleging violation of Title II of the ADA (referenced in Resolution No. 2012-612); and

WHEREAS, the City of Angola remains committed to the ADA and the elimination of barriers to public facilities;

NOW, THEREFORE, BE IT RESOLVED by the Common Council of the City of Angola, Indiana:

Any person wishing to file a complaint regarding barriers, access, or discrimination or is believed to have been excluded from or denied participation in, been denied benefits of, or otherwise been subjected to discrimination in or under any program or activity may submit a grievance complaint. The City of Angola, Indiana assures every effort will be made to ensure nondiscrimination in all its programs and activities under Title II of the Americans with Disabilities Act (ADA).

Grievances forms may be found in the City of Angola, Indiana's website (<http://www.angolain.org>). Individuals are not required to use the grievance form and may submit a grievance in any format that includes the name, address and telephone number of the individual and brief description of the alleged discriminatory conduct or issue including the date of harm. An individual submitting a grievance alleging discrimination may include relevant evidence, including the names of witnesses and supporting documentation. A grievance must be signed by the complainant.

Grievance forms must be submitted within one hundred eighty (180) days of the date of the alleged discrimination. Grievance forms should be directed to:

Building Commissioner
City of Angola
Angola City Hall
210 N Public Square
Angola, IN 46703
260-665-6846
BuildingDept@angolain.org

Within sixty (60) days of the receipt of the complaint, the ADA Coordinator will conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant (or where appropriate in a format that is accessible to the complainant). The ADA Coordinator will try to obtain an informal voluntary resolution to all complaints at the lowest level possible.


Any person aggrieved by the findings of the ADA Coordinator may, within fifteen (15) days of the receipt of the response of the ADA Coordinator, file an appeal to the Office of the

RESOLUTION NO. 2020-771

Mayor, within 15 calendar days after receipt of the appeal of the ADA Coordinator's report, the Mayor of his/her designee will meet with the complainant to discuss the grievance and the possible resolutions. Within 15 calendar days of the meeting, the Office of the Mayor will respond in writing, or where appropriate in a format that is accessible to the complainant, will explain the position of the Mayor and offer a final resolution of the grievance. All written complaints received by the ADA Coordinator, appeals, and responses will be retained by the City of Angola for at least three (3) years.

These procedures do not deny the right of any individual to file a formal grievance with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination.

PASSED AND ADOPTED by the Common Council of the City of Angola, Steuben County, Indiana this 17th day of February 2020.


Richard M. Hickman, Mayor
Presiding Officer

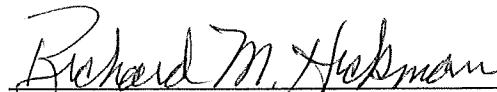
Attest:


Debra A. Twitchell, Clerk-Treasurer

This resolution presented by me, the Clerk-Treasurer of the City of Angola, Indiana to the Mayor at the hour of 7:32 a.m./p.m. this 17th day of February 2020.


Debra A. Twitchell, Clerk-Treasurer

This resolution signed and approved by me, Mayor of the City of Angola on this 17th day of February 2020.


Richard M. Hickman, Mayor

City of Angola
Complaint/Grievance Form

Grievant Information:

Grievant Name:			
Address:	City:	State:	Zip Code:
Phone: () -	E-Mail:		
Alternative Phone: () -			

Person Preparing Complaint Relationship to Grievant (if different from Grievant):

Name:			
Address:	City:	State:	Zip Code:
Phone: () -	E-Mail:		
Alternative Phone: () -			

Please specify any location(s) related to the complaint or grievance (if applicable):

Please provide a complete description of the specific complaint or grievance:

Please state what you think should be done to resolve the complaint or grievance:

Please attach additional pages as needed.

Signature: _____ Date: _____

Please return to: City of Angola
 Building Commissioner/ADA Coordinator
 210 N Public Square
 Angola, IN 46703

Upon request, reasonable accommodation will be provided in completing this Form or copies of the form will be provided in alternative formats. Contact the ADA Coordinator at the address listed above or via telephone (260) 665-6846.

**A RESOLUTION ADOPTING A TITLE VI OF THE CIVIL RIGHTS ACT
OF 1964 PLAN FOR THE CITY OF ANGOLA**

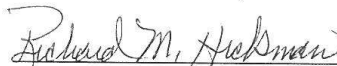
WHEREAS, the Federal Government enacted Title VI of the Civil Rights Act of 1964, as amended, to prevent discrimination on the grounds of race, color, sex, age, disability or national origin and to ensure that individuals are not excluded from participation in, denied benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, sex, age, disability or national origin;

WHEREAS, throughout the years, additional regulations, statutes, directives, cases and executive orders have been passed which expand the breadth of Title VI; and

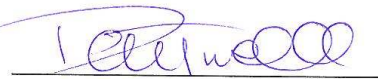
WHEREAS, it is a requirement of the Indiana Department of Transportation and the US Department of Transportation that communities receiving Federal financial assistance adopt a Title VI Plan;

NOW THEREFORE, BE IT RESOLVED by the Common Council for the City of Angola that it hereby adopts the *CITY OF ANGOLA, INDIANA TITLE VI IMPLEMENTATION PLAN* and orders that the plan be posted on the City of Angola website where it can be available for public review and comments.


PASSED AND ADOPTED by the Common Council of the City of Angola, Steuben County, Indiana this 18th day of April 2016


Richard M. Hickman, Mayor

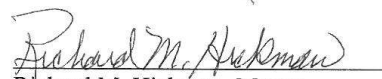
Attest:


Debra A. Twitchell, Clerk-Treasurer

This resolution presented by me, the Clerk-Treasurer of the City of Angola, Indiana to the Mayor at the hour of 7:55 a.m./p.m. this 18th day of April 2016.


Debra A. Twitchell, Clerk-Treasurer

This resolution signed and approved by me, the Mayor of the City of Angola, Indiana this 18th day of April 2016.


Richard M. Hickman, Mayor

**CITY OF ANGOLA, INDIANA
TITLE VI IMPLEMENTATION PLAN**

INTRODUCTION

This Title VI Implementation Plan is a part of the City of Angola's continual and ongoing effort to proactively meet and exceed the minimum compliance requirements established under Title VI of the Civil Rights Act of 1964 (Title VI), 49 CFR 26, and the related anti-discrimination statutes and regulations. With this Implementation Plan, the City of Angola seeks to provide continued transparency, clarity and technical guidance for internal and external constituents regarding its Title VI Program.

The City of Angola will implement compliance with Title VI 49 CFR 21, 23 CFR Part 200, and related statutes and regulations to ensure that no person is excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the Indiana Department of Transportation (INDOT) and/or the Federal Highway Administration (FHWA) on the grounds of race, color, national origin, sex, age, disability, low income status, sexual orientation or limited English proficiency.

PART A – POLICY STATEMENT

I. General Commitment to Non-Discrimination

The City of Angola, Indiana prohibits discrimination and/or the exclusion of individuals from its municipal facilities, programs, activities and services based on the individual person's race, color, national origin, sex, age, disability, low income status, sexual orientation or limited English proficiency. The City of Angola, Indiana affirms its commitment to providing meaningful opportunities and access to municipal facilities, programs, activities and services in an effort to comply with all laws including: Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; and the Americans with Disabilities Act of 1990, as amended.

The City of Angola, Indiana will post a Title VI Notice to the Public at each facility that receives and/or provides programs, goods, &/or services to the public.

II. Persons with Disabilities

The City of Angola, Indiana is committed to including qualified individuals with disabilities in municipal services, programs and activities. For further information, please see the City of Angola, Indiana's ADA Transition Plan on the City's website. (<http://www.angolain.org>)

III. Limited English Speaking (LEP) Persons

The City of Angola, Indiana is committed to providing persons with Limited English Proficiency (LEP) meaningful access and equal opportunity to participate in our services, activities and programs. The City of Angola, Indiana will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in City services, activities, programs and other benefits.

Which documents must be translated, when oral translation is necessary, and whether such services must be immediately available depend on many factors. As a result, the City of Angola, Indiana is committed to following the United States Department of Justice (USDOJ) guidance on making such determinations, which includes determining:

- 1) Number or Proportion of LEP Individuals
- 2) Frequency of Contact with the Program
- 3) Nature and Importance of the Program
- 4) Resources Available to the City of Angola, Indiana

This will be monitored and accomplished through the use of *Language Identification Flashcards* made available through the *United States Census 2010*, additionally LEP and other disadvantaged encounters will be tracked by city personnel through the use of *Encounter Forms* placed at the front desk of each department. Each department head will determine how this policy is incorporated in their

individual department and its needs.

IV. Contacting the City of Angola, Indiana

~~Individuals with requests for services, questions or complaints concerning the City of Angola, Indiana Non-Discrimination Policy on "Public Access to Facilities, Programs, Activities, & Services Policy"~~ should contact the City of Angola's Title VI Coordinator. The Title VI Coordinator for the City of Angola, Indiana is:

Human Resources Administrator
City of Angola
Angola City Hall
210 N. Public Square
Angola, IN 46703
260-624-2696
hr@angolain.org

PART B – NON DISCRIMINATION STANDARD OPERATING PROCEDURES

I. Elimination of Discrimination

The City of Angola, Indiana will continue to work to identify and eliminate discrimination on race, color race, color, national origin, sex, age, disability, low-income status, sexual orientation or limited English proficiency. If discrimination is found to exist, the City of Angola, Indiana will implement appropriate policies, procedures or programs to eliminate the discrimination. Programs and procedures, include, but are not limited to: Limited English Proficiency access plan; extend contracting and subcontracting activities to Disadvantaged Business Enterprises (DBE) and non-DBE minority and female owned business; and monitoring contractors and consultants for Title VI compliance.

II. Public Outreach

The City of Angola, Indiana is committed to providing the general public with information on the non-discrimination protections provided by Title VI, Section 504 and the ADA. The City of Angola, Indiana will pursue all available opportunities to educate the public on issues relating to discrimination under Title VI, Section 504 and the ADA. Public outreach may include, but is not limited to, posting the City of Angola, Indiana's non-discrimination policy in public locations, including the City of Angola, Indiana's non-discrimination policy in public notices as appropriate, and posting the City of Angola, Indiana's non-discrimination policy on the City of Angola, Indiana website. (<http://www.angolain.org>)

III. Limited English Proficiency

The City of Angola, Indiana will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits.

For any program or project receiving federal funds the City of Angola, Indiana will conduct a four part analysis to determine what, if any, limited English proficiency services will be required.

The four factors to be considered in determining the need and type of language assistance services are:

1. Number or Proportion of LEP Individuals
2. Frequency of Contact with the Program
3. Nature and Importance of the Program
4. Resources Available to the City of Angola, Indiana

If a review of the first two factors shows that less than five percent (5%) of the intended beneficiaries of the program or project are limited English proficient, no language assistance measures will be developed for that program or project. This will be determined through *United States Census Bureau* data as well as a review of *Encounter Forms* completed by city personnel.

However, in an effort to ensure that persons with Limited English Proficiency have meaningful access and equal opportunity, the

City of Angola, Indiana will accommodate any and all requests for oral or written translation services.

If more than five percent (5%) of the intended beneficiaries of the program or project are limited English proficient, the City of Angola, Indiana will review the nature and importance of the program or project to determine what language assistance measures should be developed for the program or project. The resources available to the City of Angola, Indiana should be considered in determining the appropriate language assistance measures. Language assistance measures may include, but are not limited to, oral translation services, including the use of a telephone interpreter line, and written translation services.

III. Monitoring Contractors and Consultants

The City of Angola, Indiana will ensure that all federally funded contracts contain required Title VI assurances prohibiting discrimination in violation of the City of Angola, Indiana's policy on non-discrimination. The City of Angola, Indiana will monitor consultants and contractors for compliance with the City of Angola, Indiana's non-discrimination policy. The City of Angola, Indiana will promptly investigate any alleged claim of discrimination and will work with the consultant or contractor to obtain voluntary compliance with the City of Angola, Indiana's non-discrimination policy.

PART C – COMPLAINT PROCEDURE

Any person who believes that he or she, on the basis of race, color, national origin, gender, age, disability, religion, low income status, or Limited English Proficiency, has been excluded from or denied participation in, been denied the benefits of, or otherwise been subjected to discrimination in or under any program or activity receiving federal funding assistance in violation of Title VI of the Civil Rights Act of 1964, as amended and its related statutes, regulations and directives, may submit a complaint. The City of Angola, Indiana assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Complaint forms may be found on the City of Angola, Indiana's website (<http://www.angolain.org>). Individuals are not required to use the complaint form and may submit a complaint in any format that includes the name, address and telephone number of the individual complaining and brief description of the alleged discriminatory conduct including the date of harm. An individual submitting a complaint alleging discrimination may include relevant evidence, including the names of witnesses and supporting documentation. A complaint must be signed by the complainant.

Complaint forms must be submitted within one hundred eighty (180) days of the date of the alleged discrimination. Complaint form should be directed to:

Human Resources Administrator
City of Angola
Angola City Hall
210 N. Public Square
Angola, IN 46703
260-624-2696
hr@angolain.org

Within sixty days of the receipt of the complaint, the Title VI Coordinator will conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant. The Title VI coordinator will try to obtain an informal voluntary resolution to all complaints at the lowest level possible.

Any person aggrieved by the findings of the Title VI Coordinator may, within fifteen (15) days of the receipt of the response of the Title VI Coordinator, file an appeal to the Office of the Mayor, within 15 calendar days after receipt of the appeal of the Title VI Coordinator's report, the Mayor or his/her designee will meet with the

complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Office of the Mayor will respond in writing, will explain the position of the Mayor and offer a final resolution of the complaint.

These procedures do not deny the right of any individual to file a formal complaint with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination. Complaints may also be filed with the following governmental agencies:

Indiana Department of Transportation

Economic Opportunity Division
100 North Senate Ave, Room N750
Indianapolis, IN 46204
Phone (317) 233-6511
Fax (317) 233-0891

Indianapolis District EEOC Office

101 West Ohio Street, Suite 1900
Indianapolis, IN 46204
Phone (800) 66-4000
Fax (317) 226-7953
TTY 1 (800) 669-6820

Indiana Civil Rights Commission

100 North Senate Ave, Room N103
Indianapolis, IN 46204
Phone (317) 232-2600
Fax (317) 232-6560
Hearing Impaired (800) 743-3336

Federal Highway Administration

Indiana Division Office
Civil Rights Program Manager
Federal Building, Room 254
575 North Pennsylvania Street
Indianapolis, IN 46204-1576
Phone (317) 226-7475
Fax (317) 226-7341

RESOLUTION NO. 2020-771

**A RESOLUTION OF THE COMMON COUNCIL OF THE CITY OF
ANGOLA, INDIANA, ADOPTING THE GRIEVANCE PROCEDURE UNDER
THE AMERICAN WITH DISABILITIES ACT**

WHEREAS, the Federal Government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities; and

WHEREAS, in compliance with Title II of the ADA, the City of Angola, Indiana, shall adopt a grievance procedure for resolving complaints alleging violation of Title II of the ADA (referenced in Resolution No. 2012-612); and

WHEREAS, the City of Angola remains committed to the ADA and the elimination of barriers to public facilities;

NOW, THEREFORE, BE IT RESOLVED by the Common Council of the City of Angola, Indiana:

Any person wishing to file a complaint regarding barriers, access, or discrimination or is believed to have been excluded from or denied participation in, been denied benefits of, or otherwise been subjected to discrimination in or under any program or activity may submit a grievance complaint. The City of Angola, Indiana assures every effort will be made to ensure nondiscrimination in all its programs and activities under Title II of the Americans with Disabilities Act (ADA).

Grievances forms may be found in the City of Angola, Indiana's website (<http://www.angolain.org>). Individuals are not required to use the grievance form and may submit a grievance in any format that includes the name, address and telephone number of the individual and brief description of the alleged discriminatory conduct or issue including the date of harm. An individual submitting a grievance alleging discrimination may include relevant evidence, including the names of witnesses and supporting documentation. A grievance must be signed by the complainant.

Grievance forms must be submitted within one hundred eighty (180) days of the date of the alleged discrimination. Grievance forms should be directed to:

Building Commissioner
City of Angola
Angola City Hall
210 N Public Square
Angola, IN 46703
260-665-6846
BuildingDept@angolain.org

Within sixty (60) days of the receipt of the complaint, the ADA Coordinator will conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant (or where appropriate in a format that is accessible to the complainant). The ADA Coordinator will try to obtain an informal voluntary resolution to all complaints at the lowest level possible.


Any person aggrieved by the findings of the ADA Coordinator may, within fifteen (15) days of the receipt of the response of the ADA Coordinator, file an appeal to the Office of the

RESOLUTION NO. 2020-771

Mayor, within 15 calendar days after receipt of the appeal of the ADA Coordinator's report, the Mayor of his/her designee will meet with the complainant to discuss the grievance and the possible resolutions. Within 15 calendar days of the meeting, the Office of the Mayor will respond in writing, or where appropriate in a format that is accessible to the complainant, will explain the position of the Mayor and offer a final resolution of the grievance. All written complaints received by the ADA Coordinator, appeals, and responses will be retained by the City of Angola for at least three (3) years.

These procedures do not deny the right of any individual to file a formal grievance with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination.

PASSED AND ADOPTED by the Common Council of the City of Angola, Steuben County, Indiana this 17th day of February 2020.


Richard M. Hickman, Mayor
Presiding Officer

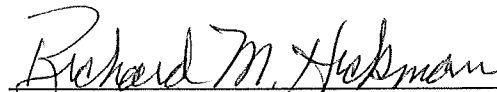
Attest:


Debra A. Twitchell, Clerk-Treasurer

This resolution presented by me, the Clerk-Treasurer of the City of Angola, Indiana to the Mayor at the hour of 7:32 ~~a.m.~~ p.m. this 17th day of February 2020.


Debra A. Twitchell, Clerk-Treasurer

This resolution signed and approved by me, Mayor of the City of Angola on this 17th day of February 2020.


Richard M. Hickman, Mayor



CITY OF ANGOLA

210 N. Public Sq.
Angola, IN 46703-1960

Phone: 260.665.2514
Fax: 260.665.9164

Date: Published December 28, 2011 in the HERALD REPUBLICAN

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the *Americans with Disabilities Act of 1990* ("ADA"), the City of Angola will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

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

Effective Communication: The City of Angola will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Angola's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Angola will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City of Angola's offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Angola, should contact the person or department who scheduled the event as soon as possible but no later than forty-eight (48) hours before the scheduled event. If you are not sure who you should contact, you may contact the ADA Coordinator identified in this notice.

The ADA does not require the City of Angola to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Angola is not accessible to persons with disabilities should be directed to the ADA Coordinator identified in this notice.

The City of Angola will not place a surcharge on a particular individual with a disability or group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable

modifications of policy, such as retrieving items or identifying locations that are open to the public but are not accessible to persons who use wheelchairs.

History of ADA compliance in Angola: The City of Angola has long supported the intent and purpose of the *Americans with Disabilities Act Amendments Act (ADAAA)* with respect to both Title I and Title II regulations. The City of Angola has been striving to make all facilities accessible to persons with disabilities aka handicap accessible since January 11, 1984 when a public notice was published in the Herald-Republican stating that the City of Angola “..does not discriminate on the basis of handicapped status in admission to, access to, or treatment or employment in, its programs and activities. Since the first accessibility plan was started in 1984, the City adopted construction standards for ADA sidewalk ramps and hundreds of ADA sidewalk ramps have been added throughout the City. Also, enforcement of building regulations has resulted in continued improvement in accessibility for persons with disabilities.

Items to be completed: The City of Angola will establish a grievance procedure for complaints regarding accessibility to City of Angola services, programs, or activities. The City continues to develop and require design standards, specifications, and details for public infrastructure improvements such as sidewalks and ADA ramps. The City of Angola will develop an inventory of all ADA accessible deficient buildings, sidewalks, ADA curb ramps, and any other items related to ADA accessibility. The City of Angola will develop a Transition Plan for eliminating the deficient items. The City of Angola will approve the Transition Plan which will identify the barriers and a timetable for removing the barriers based on realistic available budgeted funding. The City of Angola will continually monitor the Progress of the Transition Plan. When completed, the City of Angola’s Transition Plan will be published on the City of Angola’s website at <http://www.angolain.org>

ADA Questions and Complaints: The City of Angola has an ADA Coordinator and is developing official complaint and grievance procedures to insure that complaints are handled promptly. Until the formal complaint and grievance procedures are published, please contact the ADA Coordinator with any questions, special requests, or complaints about the City of Angola’s ADA compliance efforts. The City of Angola will maintain a log of all ADA complaints and will investigate all complaints and promptly take any remedial action deemed necessary to provide an equitable resolution to overcome the effects of a substantiated ADA violation or deficiency. When the official complaint and grievance procedures and forms are completed, the information will be published on the City of Angola’s website at <http://www.angolain.org> The ADA Coordinator’s contact info is listed below.

~~Dean Twitchell, Building Commissioner and ADA Coordinator~~
~~City of Angola, Indiana~~
~~210 N Public Square~~
~~Angola, IN. 46703~~
~~Telephone 260-665-6846~~
~~Fax-260-665-9164~~
~~email: deantwitchell@angolain.org~~

Updated 8/31/18
Building Commissioner and ADA Coordinator
City of Angola, Indiana
210 N Public Square
Angola, IN 46703
Telephone: 260-665-6846
Fax: 260-665-9164
Email: building@angolain.org

PUBLISHERS OF THE HERALD REPUBLICAN

PUBLISHER'S CLAIM

COMPUTATION OF CHARGES:

166 lines, 1 column(s) wide equals
166 equivalent lines at 0.380¢ cents per line, 63.15

Additional charges for notices containing rule or tabular work
(50% of above amount) AND/OR extra proofs of publication
(\$1.00 for each proof in excess of 2) equals 0.00 0.00

Data for computing cost:
Width of single column - 12 ems
Size of type - 7 points
Size of quad upon which type is cast - 8 pt.
Number of insertions - 1 63.15

LINE COUNT	1
HEAD (number of lines)	
BODY (number of lines)	164
TAIL (number of lines)	1
TOTAL	166

"Pursuant to the provisions and penalties of Chapter 155, Act 1953, (s)he further says that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid"

Date: 1/3/12

KELLY WALLEN
LEGAL CLERK

Ad #: 00285986
CITY OF ANGOLA (LEGAL)

**NOTICE UNDER THE AMERICANS
WITH DISABILITIES ACT**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Angola will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

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

Effective Communication: The City of Angola will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Angola's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Angola will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City of Angola's offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Angola, should contact the person or department who scheduled the event as soon as possible but no later than forty-eight (48) hours before the scheduled event. If you are not sure whom you should contact, you may contact the ADA Coordinator identified in this notice.

PUBLISHER'S AFFIDAVIT

Noble County) SS:
State of Indiana)

Personally appeared before me, a notary public in and for said county and state, the undersigned KELLY WALLEN who being duly sworn said that (s)he is of competent age and is LEGAL CLERK of KPC Media Group Inc, publisher of a daily newspaper in Kendallville, county of Noble, State of Indiana, a weekly newspaper in Ligonier, county of Noble, State of Indiana, a daily newspaper in Auburn, county of DeKalb, State of Indiana, a daily newspaper in Angola, county of Steuben, State of Indiana, a weekly newspaper in Garrett, county of DeKalb, State of Indiana, Butler a weekly newspaper in Butler, county of DeKalb, State of Indiana, and which during that time have been newspapers of general circulation, having bona fide paid circulations, printed in the English language and entered, authorized and accepted by the post office department of the United States of America as mailable matter of the second-class as defined by the Act of Congress of the United States on March 3, 1879, and that the printed matter attached is a true copy, which was duly published in said newspaper 1 times, the dates of publication being as follows : 12/28/2011

Affiant

Notary Public

Subscribed and sworn before me on this 3rd day of January, 2012

My commission expires May 21, 2018



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The ADA does not require the City of Angola to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Angola is not accessible to persons with disabilities should be directed to the ADA Coordinator identified in this notice.

The City of Angola will not place a surcharge on a particular individual with a disability to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as relieving him or her of the cost of a wheelchair, but will not place a surcharge on persons who use wheelchairs.

History of ADA compliance in Angola: The City of Angola has long supported the intent and purpose of the Americans with Disabilities Act Amendments Act (ADAAA) with respect to both Title I and Title II regulations. The City of Angola has been striving to make all facilities accessible to persons with disabilities since January 11, 1994 when a public notice was published in the Herald-Republican stating that the City of Angola "does not discriminate on the basis of handicapped status in admission to, access to, or treatment or employment in, its programs and activities. Since the first accessibility plan was started in 1984, the City adopted construction standards for ADA sidewalk ramps and hundreds of ADA sidewalk ramps have been added throughout the City. Also, enforcement of building regulations has resulted in continued improvement in accessibility for persons with disabilities.

Items to be completed: The City of Angola will establish a grievance procedure for complaints regarding accessibility to City of Angola services, programs, or activities. The City continues to develop and require design standards, specifications, and details for public infrastructure improvements such as sidewalks and ADA ramps. The City of Angola will develop an inventory of all ADA accessible deficient buildings, sidewalks, ADA curb ramps, and any other items related to ADA accessibility. The City of Angola will develop a Transition Plan for eliminating the deficient items. The City of Angola will approve the Transition Plan, which will identify the barriers, and a timetable for removing the barriers based on realistic available budgeted funding.

The City of Angola will continually monitor the progress of the Transition Plan. When completed, the City of Angola's Transition Plan will be published on the City of Angola's website at <http://www.angola.in.org>

ADA Questions and Complaints: The City of Angola has an ADA Coordinator and is developing official complaint and grievance procedures to insure that complaints are handled promptly. Until the formal complaint and grievance procedures are published, please contact the ADA Coordinator with any questions, special requests, or complaints about the City of Angola's ADA compliance efforts. The City of Angola will maintain a log of all ADA complaints and will investigate all complaints and promptly take any remedial action deemed necessary to provide an equitable resolution to overcome the effects of a substantiated ADA violation or deficiency. When the official complaint and grievance procedures and forms are completed, the information will be published on the City of Angola's website at <http://www.angola.in.org>. The ADA Coordinator's contact info is listed below.

Dean Twitchell, Building Commissioner and ADA Coordinator
City of Angola
210 N. Public Square
Angola, IN 45703
Telephone 260-965-6840
Fax 260-965-0184
Email dean@angola.in.org
HPL00285868.12/28

March 3, 1879, and that the printed matter attached is a true copy, which was duly published in said newspaper 1 times, the dates of publication being as follows : 12/28/2011

Affiant Debra Waller

Notary Public Mary Jo Monemiller

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