

# Metro Parks Tacoma - American's With Disabilities Act Agency Compliance Manual

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## 1.0 INTRODUCTION

1.1 PURPOSE: This manual is designed to guide Metro Parks Tacoma in its voluntary compliance with the requirements of Title II of the American's With Disabilities Act (ADA) of 1990 which applies to State and Local Governments. This guidance is based on materials issued by the Department of Justice. It is written documentation of the agency's responsiveness to its self-evaluation.

Title II of the ADA applies to the programs, activities and services of public entities -- defined as any state or local government, any department, agency, special purpose district, or other instrumentality of a State or local government. The goal of this legislation is to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination on the basis of disability established by section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance.

Metro Parks Tacoma confirms that we are a public entity that intends to abide by the ADA requirements in its operations. (Please see the agency's Inclusion & Accessibility Policy, Appendix I).

Additionally, Metro Parks Tacoma may have a close relationship to private entities that are covered by title III, and the result is that both entities may be at least indirectly affected by both Title II and Title III. Where public and private entities act jointly, the public entity must ensure that the relevant requirements of Title II are met; and the private entity must ensure compliance with Title III. Metro Parks Tacoma, therefore, employs business practices to require private entities we contract with to provide public services in such a way that we are able to meet our Title II obligations. Examples include private concessionaires on park property, Park District operations and offices housed in non-Park District facilities, service contractors, as well as public-private partnerships.

1.2 HISTORY OF METRO PARKS TACOMA COMPLIANCE EFFORTS: Per the ADA, "public entities must achieve program accessibility by January 26, 1992. If structural changes are needed to achieve program accessibility, they must be made as expeditiously as possible, but in no event later than January 26, 1995. This three-year time period is not a grace period; all changes must be accomplished as expeditiously as possible. A public entity that employs 50 or more persons must develop a transition plan by July 26, 1992, setting forth the steps necessary to complete such changes. "

Based on this legislation, Metro Parks Tacoma initiated the self-evaluation process and developed a draft ADA Transition Plan on March 22, 1994.

Facilities under Park District ownership were evaluated. Several properties, not owned by Metro Parks Tacoma, but by other public entities were not evaluated at that time.

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The resulting audits were filed and maintained for the mandatory 3-year period. After this time frame, the documents were archived.

With the passage of the 2005 Park Bond and development of the Strategic Parks & Program Services Plan in 2006, Metro Parks Tacoma felt it was important to perform a new self-evaluation in order to update facility compliance information and use this new information to guide capital projects and work plans that would implement the agency's strategic actions.

An agency task force began this work in 2007 and moved forward with the adoption of a Diversity, Inclusion & Accessibility Policy, as well as the formation of an ADA Self Evaluation Transition Team to perform this necessary work in 2009. This manual is the result of these efforts to revitalize and enhance the agency's commitment to inclusion & accessibility.

1.3 DEFINITIONS & REQUIREMENTS: Title II of the ADA prohibits discrimination against any "qualified individual with a disability." Whether a particular individual is protected by Title II requires a careful analysis first, of whether an individual is an "individual with a disability," and then whether that individual is "qualified." Metro Parks Tacoma yields to sections 2.1000-2.7000 of the Department of Justice's Manual when determining the definition of an applicable disability under the ADA.

Title II protects three categories of individuals with disabilities based on the ADA's legal definition:

- 1) Individuals who have a physical or mental impairment that substantially limits one or more major life activities;
- 2) Individuals who have a record of a physical or mental impairment that substantially limited one or more of the individual's major life activities; and
- 3) Individuals who are regarded as having such an impairment, whether they have the impairment or not.

"Physical impairments" include -- 1) Physiological disorders or conditions; 2) Cosmetic disfigurement; or 3) Anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs (which would include speech organs that are not respiratory such as vocal cords, soft palate, tongue, etc.); respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine.

"Mental impairments" include -- mental or psychological disorders, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Simple physical characteristics such as the color of one's eyes, hair, or skin; baldness; left-handedness; or age do not constitute physical impairments. Similarly, disadvantages attributable to environmental, cultural, or economic factors are not the type of impairments covered by Title II. Moreover, the definition does not include common personality traits such as poor judgment or a quick temper, where these are not symptoms of a mental or psychological disorder.

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Drug addiction is an impairment under the ADA. A public entity, however, may base a decision to withhold services or benefits in most cases on the fact that an addict is engaged in the current and illegal use of drugs. Title II prohibits discrimination against drug addicts based solely on the fact that they previously illegally used controlled substances.

To constitute a "disability," a condition must substantially limit a major life activity. Major life activities include such activities as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. There is no absolute standard for determining when an impairment is a substantial limitation. Some impairments obviously or by their nature substantially limit the ability of an individual to engage in a major life activity.

An impairment substantially interferes with the accomplishment of a major life activity when the individual's important life activities are restricted as to the conditions, manner, or duration under which they can be performed in comparison to most people. The issue of whether a temporary impairment is significant enough to be a disability must be resolved on a case-by-case basis, taking into consideration both the duration (or expected duration) of the impairment and the extent to which it actually limits a major life activity of the affected individual.

Whether a person has a disability is assessed without regard to the availability of mitigating measures, such as reasonable modifications, auxiliary aids and services, services and devices of a personal nature, or medication. Likewise, persons with impairments, such as epilepsy or diabetes, that, if untreated, would substantially limit a major life activity, are still individuals with disabilities under the ADA, even if the debilitating consequences of the impairment are controlled by medication.

The ADA protects not only those individuals with disabilities who actually have a physical or mental impairment that substantially limits a major life activity, but also those with a record of such an impairment or who have recovered from the ailment (such as cancer, drug addiction, or mental illness).

The ADA also protects certain persons who are regarded by a public entity as having a physical or mental impairment that substantially limits a major life activity, whether or not that person actually has an impairment such as an illness that may be triggered, disturbing physical disfigurement, or reputation of disease.

Metro Parks Tacoma will not discriminate against individuals or entities because of their known relationship or association with persons who have disabilities. This prohibition applies to cases where the public entity has knowledge of both the individual's disability and his or her relationship to another individual or entity. In addition to familial relationships, the prohibition covers any type of association between the individual or entity that is discriminated against and the individual or individuals with disabilities, if the discrimination is based on the disability.

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## 2.0 AGENCY SELF EVALUATION & BASIC COMPLIANCE PROTOCOL

The ADA, like other civil rights statutes, prohibits the denial of services or benefits on specified discriminatory grounds; participation cannot be refused solely because an individual has a disability.

The foundation of many of the specific requirements in the Department of Justice's regulations is the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services. As long as persons with disabilities are afforded an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services, the ADA's guarantee of equal opportunity is not violated. There is no guarantee of equity of results.

Title II requires that public entities take several steps designed to achieve compliance. Metro Parks Tacoma has taken these steps by:

- 1) Performing a self evaluation and identifying compliance and improvements in this document (see Appendix II);
- 2) Developing a grievance procedure (see section 2.3 in this manual);
- 3) Designating and publicizing an individual to oversee Title II compliance ( see section 2.2 in this manual);
- 4) Developing an audit tool and transition plan for structural changes necessary for achieving program accessibility (see Appendix III and section 5.0 of this manual); and
- 5) Defining a way to maintain records of our self-evaluation and responding improvements beyond the required three year timeframe. (see section 4.0 of this manual). Metro Parks Tacoma will keep these new documents as evidence of our good faith efforts to comply with Title II's requirements.

Further, the Department of Justice expects that many public entities will re- examine all their policies and practices periodically. Actions recommended may not have been implemented fully or may no longer be effective. Therefore, Metro Parks Tacoma will review facility audits as opportunities for improvements exist, but in any course, no less than every 6 years.

In this manual/self evaluation document, Metro Parks Tacoma verifies that we have made an assessment of current policies and practices. As part of the self-evaluation, Metro Parks Tacoma has analyzed whether our policies and practices adversely affect the full participation of individuals with disabilities in our programs, activities, and services. The checklist used to assess our compliance is Appendix II. We have met the following requirements:

- 1) We **examined each program** to determine whether any **physical barriers** to access exist. We have audits on file for parks and buildings that include current condition, recommended changes and improvements made. Structure changes are listed in the audit and utilized for decision-making as noted in our facility section of this manual. (see section 5.0 of this manual).

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- 2) We reviewed policies and practices to determine whether any **exclude or limit the participation of individuals with disabilities in its programs, activities, or services**. Where needed, we modified such policies or established protocols to enact policy. Key practices of inclusion are listed in this manual.
- 3) We reviewed policies to **ensure we communicate with applicants, participants, and members of the public with disabilities in a manner that is as effective as its communications with others**. (See manual section 2.6)
- 4) We reviewed policies to ensure that we include provisions for readers for individuals with visual impairments; interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments; and amanuenses for individuals with manual impairments. Methods for securing these services have been developed, including guidance on when and where these services will be provided. Where communication equipment is used as part of our program, activity, or service, an assessment is made to ensure that the equipment is usable by individuals with disabilities, particularly individuals with hearing, visual, and manual impairments. In addition, this manual incorporates review expectations to ensure that its equipment is maintained in operable working order. (See 3.0)
- 5) We reviewed **procedures to evacuate individuals with disabilities during an emergency**. Each facility's emergency plan includes information on the visual and audible warning signals and special procedures for assisting individuals with disabilities from a facility during an emergency. (See 5.1)
- 6) We reviewed our written and audio-visual **marketing materials** to ensure that individuals with disabilities are not portrayed in an offensive or demeaning manner.
- 7) We created a methodology to assess **historic preservation programs** in order to ensure that we give priority to methods that provide physical access to individuals with disabilities. (see 4.3)
- 8) We reviewed policies to ensure that decisions concerning a **fundamental alteration in the nature of a program, activity, or service, or a decision that an undue financial and administrative burden imposed by Title II, are made properly and expeditiously**. (see 3.2)
- 9) We reviewed policies and procedures to ensure that individuals with mobility impairments are provided **access to public meetings**. (see 2.6)
- 10) We reviewed **employment practices** to ensure that we comply with other applicable nondiscrimination requirements, including section 504 of the Rehabilitation Act and the ADA regulation issued by the Equal Employment Opportunity Commission. (see 2.4)
- 11) We reviewed building and construction policies to ensure that the **construction of each new facility** or part of a facility, or the alteration of existing facilities after January 26, 1992, conforms to the standards designated under the Title II regulation. (see 4.0)
- 12) We have devised a training program to ensure that **employees of Metro Parks Tacoma are familiar with the policies and practices** for the full participation of individuals with disabilities. (See Appendix I: Policy and 3.0)

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13) We have ensured that policies do not discriminate against **former drug users**, as opposed to individuals who are currently engaged in illegal use of drugs.

Appendix II shows the results of Metro Parks Tacoma's 2009 self-evaluation and the immediate action taken to improve or enhance our compliance efforts in compliance with 35.105.

2.1 PUBLIC COMMENT: In order to provide all interested persons the opportunity to comment on our self-evaluation and transition strategies, Metro Parks Tacoma has:

1. Posted this self-evaluation report and manual on the Metro Parks Tacoma website as of September 15, 2009.
2. Hosted a public review with special invitation made to persons with disabilities and advocates.
3. Provided the report to local educational institute experts for review.
4. Asked for a peer review by area ADA Compliance Officers and the City of Tacoma Commission on Disabilities.
5. Posted the availability to review the Self-Evaluation Plan and facility audit/transition plan at major community facilities.

Metro Parks Tacoma maintains a record of persons consulted, comments received, any further audit or assessment performed based on the comments received and modifications made. These records are maintained by the agency compliance officer.

2.2 COMPLIANCE OFFICER: (Regulatory Reference 35.107)

Metro Parks Tacoma has designated an employee who is responsible to coordinate its efforts to comply with and fulfill its responsibilities under Title II. The Executive Director shall name the ADA Coordinator and approve any changes to the assignment.

Metro Parks Tacoma lists the name, office address, and telephone number of the ADA Coordinator on the website, agency phone listings, as part of the grievance procedures, and on print materials meant to explain the agency's mission and operations.

2.3 GRIEVANCE PROCEDURE (Regulatory reference: 28 CFR 35.170-35.190). Metro Parks Tacoma has adopted and published grievance procedures in order to provide prompt and equitable resolution of participant and patron complaints alleging any actions believed to be prohibited by Title II. Grievance procedures for applicants or employees of Metro Parks Tacoma are included in the Human Resources policy of Reasonable Accommodation for Disabilities (referenced in Section 2.4).

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The agency grievance procedures are as follows:

Individuals wishing to file a complaint with Metro Parks Tacoma, should contact the ADA Coordinator. Staff members receiving a complaint should forward it to the ADA Compliance Officer in an email, noting any actions taken or denied. The ADA Coordinator will respond within 48 hours of receiving a phone, email or written message. The ADA Coordinator will record and investigate the concern; looking at whether the complaint falls under the ADA, and whether accommodations were offered or adequate. A response relating immediate or long-term actions shall be relayed to the individual in no less than 7 business days.

Actions may include:

- Review or reverse a determination made that a fundamental alteration or undue burden exists.
- Recommend a program modification
- Update a facility audit or prioritize capital or maintenance repairs identified in an audit
- No change from a decision or action

If the individual is not satisfied with the ADA Coordinator response, a follow up meeting can be requested with a member of the Executive Cabinet.

If the individual is still not satisfied with the agency response, they may choose to make a Title II Complaint. Individuals wishing to file Title II complaints may either file --

- 1) An administrative complaint with an appropriate Federal agency; or
- 2) A lawsuit in Federal district court.

If an individual files an administrative complaint, the appropriate Federal agency will investigate the allegations of discrimination. Should the agency conclude that the public entity violated Title II, it will attempt to negotiate a settlement with the public entity to remedy the violations. If settlement efforts fail, the matter will be referred to the Department of Justice for a decision whether to institute litigation. A complaint must be filed within 180 days of the date of the alleged act(s) of discrimination, unless the time for filing is extended by the Federal agency for good cause. As long as the complaint is filed with any Federal agency, the 180-day requirement will be considered satisfied.

The Federal agency processing the complaint will resolve the complaint through informal means or issue a detailed letter containing findings of fact and conclusions of law and, where appropriate, a description of the actions necessary to remedy each violation. Where voluntary compliance cannot be achieved, the complaint may be referred to the Department of Justice for enforcement. In cases where there is Federal funding, fund termination is also an enforcement option.

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Exhaustion of a public entity's grievance procedure is not a prerequisite to filing a complaint with either a Federal agency or a court. Also, the ADA does not require complainants to exhaust administrative remedies prior to instituting litigation.

Individuals who exercise their rights under the ADA, or assist others in exercising their rights, are protected from retaliation. The prohibition against retaliation or coercion applies broadly to any individual or entity that seeks to prevent an individual from exercising his or her rights or to retaliate against him or her for having exercised those rights. Any form of retaliation or coercion, including threats, intimidation, or interference in participating in future programs and services, is prohibited if it interferes with the exercise of rights under the Act.

2.4 EMPLOYMENT: (Regulatory reference Sect 102) Beginning January 26, 1992, Title II has prohibited all public entities, regardless of size of workforce, from discriminating in their employment practices against qualified individuals with disabilities. All public entities must ensure that their employment practices and policies do not discriminate on the basis of disability against qualified individuals with disabilities in every aspect of employment, including recruitment, hiring, promotion, demotion, layoff and return from layoff, compensation, job assignments, job classifications, paid or unpaid leave, fringe benefits, training, and employer- sponsored activities, including recreational or social programs. Employment tests measure job skills or aptitude related to the position. Metro Parks Tacoma will make "reasonable accommodation" to the known physical or mental limitations of otherwise qualified applicants or employees with disabilities, unless we can show that the accommodation would impose an "undue hardship" on the operation of our agency.

Metro Parks Tacoma policies that reflect this commitment are in Appendix IV include:

1. equal employment opportunity policy
2. recruitment policy;
3. reasonable accommodation for disability policy

2.5 FAIRNESS IN BUSINESS PRACTICES: MPT will not discriminate on the basis of disability in contracting for the purchase of goods and services. Contractors must have the appropriate licenses to do the work. A person is a "qualified individual with a disability" with respect to licensing or certification, if he or she can meet the essential eligibility requirements for receiving the license or certification.

Metro Parks Tacoma posts its need for licensed contractors. We do not require any disclosure of disability when competing for work. Metro Parks Tacoma follows fair and legal standards for open competition and bidding.

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## 2.6 COMMUNICATIONS: (Regulatory references: 28 CFR 35.160-35.164)

Metro Parks Tacoma strives to ensure that its communications with individuals with disabilities are as effective as communications with others without taking on any actions which would result in a fundamental alteration in the nature of its services, programs, or activities, or in undue financial and administrative burdens.

Therefore, Metro Parks Tacoma makes available appropriate auxiliary aids and services where necessary to ensure effective communication. The aids and services available are listed here as well as maintained in the Comprehensive Communications & Marketing Plan. Auxiliary aids and services are available to program participants, applicants, and members of the general public who are seeking to learn about Metro Parks Tacoma services.

Metro Parks Tacoma will work with media outlets to foster multi-faceted formats of communication. Information on District services shall be available in multiple audio (phone call, radio, television, and live person contact), and visual (brochures, printed reports, web-based) formats. Metro Parks Tacoma reviews its marketing materials, publications and visual imagery to ensure a positive portrayal of our diverse community.

### COMMUNICATION ACCOMMODATIONS:

The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved.

When an auxiliary aid or service is required, Metro Parks Tacoma will provide an opportunity for individuals with disabilities to request the auxiliary aids and services of their choice and will give primary consideration to the choice expressed by the individual. "Primary consideration" means that we honor the choice, unless we can demonstrate that another equally effective means of communication is available, or that use of the means chosen would result in a fundamental alteration in the service, program, or activity or in undue financial and administrative burdens. We consult with the individual because the individual with a disability is most familiar with his or her disability and is in the best position to determine what type of aid or service will be effective.

*List of available aids and services:*

#### **Disability: Deaf/Hard of Hearing**

#### **Resource: Audio Limitations Aids**

Options: 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 (TDD's), videotext displays, and exchange of written notes.

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Metro Parks Tacoma Implementation Strategies:

1. Assistive Listening System in Board Room
2. TTY line to main reception; symbol on agency materials and at main office reception counter
3. Arrangements for interpreters for programs through accommodation requests
4. Written program materials and instructions
5. Staff trained in offering the exchange of written notes
6. Closed captioning added to portions of television and videotape programming produced as educational or marketing tools

**Disability: Vision Impairment**

**Resource: Visual Limitation Aids**

Options: Qualified readers, taped texts, audio recordings, Braille & tactile signage, large print materials, and assistance in locating items.

Metro Parks Tacoma Implementation Strategies:

1. Telephone information lines.
2. Braille/Raised signage for entrance, public meeting rooms, restrooms, elevators/stairs and other primary public service locations.
3. Large print materials or audio recordings upon request.
4. Web-site text enhancement program
5. Service staff trained to provide assistance to customers while in the lobby.

**Disability: Speech Impairment**

**Resource: Oral Speech Limitation Aids**

Options: TDD's, computer terminals, speech synthesizers, and communication boards. A TDD is a telephone relay device. Relay services involve a relay operator who uses both a standard telephone and a TDD to type the voice messages to the TDD user and read the TDD messages to the standard telephone user. Only relay devices can speak effectively to our TDD line. Staff at the main office is instructed to accept and handle relayed calls in the normal course of business.

Metro Parks Tacoma Implementation:

1. TTY main information line
2. Ability to email, text, or write questions
3. Ability to point to visual indicators to represent need or sentiment.

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Metro Parks Tacoma has one public board meeting room which has been established for members of the public to attend and participate in the governance issues of Metro Parks Tacoma. All notices of public meetings held by Metro Parks Tacoma include notification that accommodations are available upon request. The Board Room is equipped with an assistive listening system. Public meetings and hearings may be held in other conference rooms, however, such meetings will be moved to the Board Room upon receipt of an accommodation request.

Metro Parks Tacoma's inventory of auxiliary aids and services shall be posted on the website as both an audio file and a document. Metro Parks Tacoma shall work with partners in the community to regularly assess the functionality of these methods.

### COMMUNICATION SYSTEM MAINTENANCE STANDARDS:

In order to maintain on-going integrity of our communications system, the following activities have been integrated into the regular operations of Metro Parks Tacoma:

Review of information/assistance signage: monthly by customer service staff.

Review of website, print material and communications systems for functionality, and positive presentation: no less than every 6 months by Advisory Network & MarCom staff.

Review of interior room signs: Renewed facility audit every 6 years, or when improvements are scheduled.

Universal symbol of accessibility on all required locations including restrooms, public meeting rooms, entrances and parking signs.

Symbol of TTY on literature listing number and at facilities where the TTY rings in.

Symbol of Assistive Listening system at Board Room entrance.

Written materials that do not include a TTY number or information on the right to an alternative format will carry the website and/or main agency number which includes a full list of alternative formats and opportunities.

Customer service refresher training on auxiliary aids and services shall occur no less than annually.

**2.7 INTERPRETATION:** When an interpreter is required, Metro Parks Tacoma shall provide a qualified interpreter, that is, an interpreter who is able to sign to the individual who is deaf what is being said by the hearing person and who can voice to the hearing person what is being signed by the individual who is deaf. This communication must be conveyed effectively, accurately, and impartially, through the use of any necessary specialized vocabulary. Signing and interpreting are not the same thing. Being able to sign does not mean that a person can process spoken communication into the proper signs, nor does it mean that he or she possesses the proper skills to observe someone signing and change their signed or finger spelled communication into spoken words. The interpreter must be able to interpret both receptively and expressively.

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Metro Parks Tacoma:

1. May allow, but not require, an individual to provide friend or family as his or her own interpreter. The obligation to provide "impartial" interpreting services requires that, upon request, the public entity provide an interpreter who does not have a personal relationship to the individual with a disability. When, through an accommodation request review, it is deemed best for a person familiar to the participant to act as the interpreter and accompany the participant, they shall be provided access to the program or service free of charge.
2. Certification is not required in order for an interpreter to be considered to have the skills necessary to facilitate communication. Regardless of the professionalism or skills that a certified interpreter may possess, they must have the necessary vocabulary/expertise for the role.
3. Metro Parks Tacoma does not provide interpretation services for passive activities, however if a tour or program experience includes narration, verbal instruction, or an interpretive experience offered to others, interpretation shall be provided upon request.

## **3.0 PROGRAM INVENTORY**

**3.1 PROGRAM QUALIFICATION:** Metro Parks Tacoma promotes the benefits of inclusion of persons with disabilities into its full program offering. An individual with a disability may elect to participate in Metro Parks Tacoma's non-specialized or specialized or adaptive programs if they meet the minimum qualifications of the program.

In order to be an individual protected by Title II, the individual with the disability must be "qualified" for the program. To be qualified, the individual with a disability must meet the essential eligibility requirements for participation in programs, activities, or services with or without --

- 1) Reasonable modifications to rules, policies, or practices;
- 2) Removal of architectural, communication, or transportation barriers; or
- 3) Provision of auxiliary aids and services.

The "essential eligibility requirements" for participation in many activities may be minimal or stringent. Metro Parks Tacoma will list the basic requirements, such as age, prerequisite skill, minimum behavior expectations and financial commitment for any participant when it advertises programs, activities, and services.

Metro Parks Tacoma will follow legal guidelines when imposing eligibility limits, such as:

1. Legitimate safety requirements necessary for safe operation of services, programs, or activities exist. These safety requirements will be based on real risks, not on speculation, stereotypes, or generalizations about individuals with disabilities.
2. Inquiring only as necessary into the existence of a disability. Each piece of information requested must be needed to ensure safe participation in activities. Information gathered cannot be used to screen out persons with disabilities from admittance.

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3. Not placing any surcharge only on particular individuals with disabilities or groups of individuals with disabilities to cover expenses of participation. Metro Parks Tacoma may adjust its tuition or fees for all participants in a program to aid with the expenses of modifications for the whole program or agency.

Title II protects any qualified individual with a disability involved in any capacity of Metro Parks Tacoma's programs, activities, or services this includes spectators, participants, and consumers. Determinations about whether someone is qualified for participation with or without modification or a direct threat shall be made by Metro Parks Tacoma's Certified Therapeutic Recreation Specialist upon referral by program staff or a consumer who is requesting a modification to allow program participation.

If denial to participate, or removal from a program occurs, it must be because the person presents a direct threat. An individual who poses a direct threat to the health or safety of others will not be "qualified." A "direct threat" is a significant risk to the health or safety of others that cannot be eliminated or reduced to an acceptable level by the public entity's modification of its policies, practices, or procedures, or by the provision of auxiliary aids or services. Metro Parks Tacoma's determination that a person poses a direct threat to the health or safety of others may not be based on generalizations or stereotypes about the effects of a particular disability; it must be based on an individualized assessment that relies on current medical evidence, or on the best available objective evidence, to assess --

- 1) The nature, duration, and severity of the risk;
- 2) The probability that the potential injury will actually occur; and,
- 3) Whether reasonable modifications of policies, practices, or procedures will mitigate or eliminate the risk.

Making this assessment will not usually require the services of a physician. Medical guidance may be obtained from public health authorities, such as the U.S. Public Health Service, the Centers for Disease Control, and the National Institutes of Health, including the National Institute of Mental Health. Current drug use and behavior, and not prior drug usage, must be used as a determining factor.

Metro Parks Tacoma shall not impose eligibility criteria for participation in its programs, services, or activities that either screen out or tend to screen out persons with disabilities, unless we can show that such requirements are necessary for the provision of the service, program, or activity.

**3.2 PROGRAM MODIFICATIONS & ACCESSIBILITY:** Metro Parks Tacoma will reasonably modify its policies, practices, or procedures to avoid discrimination. (3.6000) Metro Parks Tacoma will make modifications unless we can demonstrate that the modifications that allow participation that do not fundamentally alter the nature of its service, program, or activity.

When Metro Parks Tacoma chooses to partner or contract with another public, non-profit or for-profit agency to deliver programs ADA facility/program access, modification, and accommodation must be part of the discussion, decision and agreement. Contractors agree to follow all applicable laws when

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doing service for, or on behalf of, Metro Parks Tacoma. All contracted instructors must be made aware of their responsibility to comply with ADA requirements in delivery of public programs, activities, and services through an addendum to their contract.

Metro Parks Tacoma shall not provide individuals with disabilities with personal or individually prescribed devices, such as wheelchairs, prescription eyeglasses, or hearing aids, or to provide services of a personal nature, such as assistance in eating, toileting, or dressing. However, if personal services or devices are customarily provided to individuals served by Metro Parks Tacoma, then these personal services should also be provided to individuals with disabilities.

When choosing a method of providing program access, Metro Parks Tacoma must give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. Some of the methods of providing program access that are not related to facility improvements include:

1. Introduction of specialized equipment.
2. Changes of venue to an accessible location.
3. Carrying (note that although carrying may serve as a temporary expedient until construction is completed, it is not ideal. Carrying is permitted in manifestly exceptional cases if (a) carriers are formally instructed on the safest and least humiliating means of carrying and (b) the service is provided in a reliable manner. Carrying is contrary to the goal of providing accessible programs, which is to foster independence. )
4. Alternate entrances.
5. Communication system modifications.
6. Program modifications.
7. Staffing modifications.

Unlike private entities under Title III, public entities are not required to remove barriers from each facility, even if removal is readily achievable. A public entity must make its programs accessible. Physical changes to a building are required only when there is no other feasible way to make the program accessible. If structural changes are needed to achieve program accessibility, they must be made as expeditiously as possible.

Metro Parks Tacoma strives to keep the public informed of its efforts to create accessible and inviting programs. Metro Parks Tacoma includes accessibility information on the website page for each of its attractions. In addition to providing information on how to get the most of the experience at any one location, MPT posts its policies/procedures related to service animals, motorized personal devices, special events, and rental/picnic permits on the main website in an easily identifiable location. These policies/guidelines are located in Appendix 8.

Accommodation requests are sent directly to the Certified Therapeutic Recreation Specialist to process. All other complaints or concerns are routed to the ADA Compliance Officer to assess.

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There are many ways to make programs, activities and events more accessible and inclusive for people with differing abilities. Special consideration must be taken during the planning process to create inclusive program offerings. Program Coordinators will consider the following:

- The physical environment is accessible (the facility, room set-up, access to restrooms)
- The activities can be adaptable to varying skill or mobility.
- The instructor/leader is knowledgeable, sensitive, able to make adjustments, create synergy
- Accurate description of the activity exists, clearly identifying prerequisites, and eligibility requirements that would not unduly screen out a person with a disability.
- How success is defined for program participants

Modifications that can be made as part of the accommodation request process are individual by nature and may include:

- Developing a behavior support plan
- Providing natural supports
- Modifying the rules, simplifying instructions, adapting the activity
- Providing sign language interpreters
- Providing written materials in alternative formats
- Altering the regulations for admittance or participation
- Providing adaptive equipment if necessary

Persons with disabilities may request accommodation prior to participation. The process for making an accommodation request includes a special form (Appendix V) and is as follows:

1. A statement offering accommodations is listed on the website, in the Program Guide, and on site where recreation and educational programs are offered.
2. Customer service staff receives the accommodation request and look at class capacity, fees, and other minimum eligibility requirements.
3. The request is forwarded to the Certified Therapeutic Recreation Specialist who has up to 10 business days prior to the start of the course to define an accommodation.
4. The Certified Therapeutic Recreation Specialist works with the participant and program staff to implement the accommodation for a successful experience.
5. If the CTRS believes that a proposed accommodation would fundamentally alter the service, program, or activity or would result in undue financial and administrative burden; they have the burden of proving that the compliance action would result in such alteration or burdens. The CTRS would provide the ADA Compliance Officer with this proof. A written statement of the reasons for reaching such conclusion must accompany the determination. The written statement and determination must be provided within 10 working days of the rejection and include grievance

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process instructions. If an action would result in such an alteration or such burdens, Metro Parks Tacoma must take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or service provided.

3.3 SPECIALIZED PROGRAMS: The ADA does not require Metro Parks Tacoma to provide additional services for individuals with disabilities that are not provided for individuals without disabilities. In fact, a primary goal of the ADA is the equal participation of individuals with disabilities in the "mainstream" of American society. The major principles of mainstreaming are --

- 1) Individuals with disabilities must be integrated to the maximum extent appropriate.
- 2) Separate programs are permitted where necessary to ensure equal opportunity. A recommendation for a separate program must be appropriate to the particular individual.
- 3) Individuals with disabilities cannot be excluded from the regular program, or be required to accept special services or benefits.

Metro Parks Tacoma offers separate or specialized programs as a means to provide individuals with disabilities an equal opportunity to benefit from recreational and educational programs. These programs are specifically designed to meet the needs of the individuals with disabilities for whom they are provided, yet, the provision of such services does not replace the individual with a disability's right to participate in Metro Park Tacoma's regular programs. The requirement that the individual be "qualified" for the program, still applies. Qualified individuals with disabilities are entitled to participate in regular programs, even if Metro Parks Tacoma may reasonably believe that they cannot benefit from the regular program. Individuals with disabilities may not be required to accept special "benefits" if they choose not to do so.

Provision of services to individuals with disabilities in a different location is one method of achieving program accessibility. Public entities should make every effort to ensure that alternative methods of providing program access do not result in unnecessary segregation.

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## **4.0 FACILITY INVENTORY** (Regulatory references: 28 CFR 35.150)

### 4.1 MAINTENANCE OF ACCESSIBLE FEATURES & FACILITIES

Metro Parks Tacoma will maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited, but will be managed in a way to minimize disruption to program.

Metro Parks Tacoma will maintain facility audits on record for each park and building maintained by Metro Parks Tacoma. This includes facilities that may be owned by other jurisdictions, but managed by Metro Parks. Facility audits are stored on the Public Drive.

Facilities will be re-audited no less than every 6 years. When improvements are made that address audit findings, these improvements will be recorded on the facility audit. An active audit shall remain on file to be consulted for on-going maintenance scheduling and capital improvements. A new audit may be issued based on revised standards, changing conditions or the substantial completion of improvements to address old audit findings. Old audits shall be archived only when replaced with a new audit and in accordance with the agency's archiving protocols.

As part of the auditing process, Metro Parks Tacoma creates program modifications to allow public access to facilities that are not in compliance with facility standards. Metro Parks Tacoma does not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. This standard, known as "program accessibility," applies to all existing facilities that are not fully accessible by design. These program modifications are listed on the audit, which are available through the ADA Compliance Office.

1. The public is informed that they have the right to view the audit for the facility and the program modifications.
2. Metro Parks Tacoma is not necessarily required to make each of our existing facilities accessible if we can provide the program equitably at a more accessible location.
3. As part of program accessibility "floor plans" for building spaces will be generated for any space which has movable furnishings to ensure that the accessible routes in the public space are not blocked by obstacles such as furniture, filing cabinets, or potted plants.
4. Staff will be trained to review lobbies and public spaces and promptly remove any object temporarily placed in such a way as to block access.

Metro Parks Tacoma has a preventative maintenance program which includes assessments of all locations no less than annually. Metro Parks Tacoma fulfills its obligation to ensure that improper or inadequate maintenance does not cause repeated and persistent failures by reviewing work order requests and facility audits at the time that preventative maintenance is scheduled.

Although Metro Parks Tacoma reserves the right not to take any action that we can demonstrate would result in a fundamental alteration in the nature of its program or activity or in an undue financial and administrative burdens, we strive to make our facilities and programs as accessible as possible. Accessibility is part of maintenance and capital improvement decision making.

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Even though Metro Parks Tacoma is not required to make structural changes in existing facilities where other methods are effective in achieving compliance, Metro Parks Tacoma evaluates how well facilities meet the structural standards through facility audits. These audits are then used to inform the scope of work for capital projects in the Capital Improvement Program (CIP). The CIP is a 6-year work plan for building and structural improvements scheduled for completion.

Public entities may achieve program accessibility by a number of methods. In many situations, providing access to facilities through structural methods, such as alteration of existing facilities and acquisition or construction of additional facilities, may be the most efficient method of providing program accessibility. We may however, pursue alternatives to structural changes in order to achieve program accessibility. Nonstructural methods include acquisition or redesign of equipment, assignment of aides to beneficiaries, and provision of services at alternate accessible sites. When determining which capital improvements to make, consideration for structural improvements that will most likely increase program access are considered before structural improvements that will improve compliance with standards, but has not been identified as a barrier to program participation.

Facility audits are reviewed and prioritized for inclusion in the CIP which is updated annually. The CIP is the document that identifies sources of funding and timelines for implementation of improvements. It includes elements of the audits which have been prioritized for improvement based on regional impact/number of users and identified restrictions to program access. The ADA Compliance Officer reviews all audits no less than bi-annually to review status of improvements and make recommendations for inclusion in the CIP.

The CIP is reviewed by the Board's Capital Improvement Committee prior to going to the full Board of Parks Commissioners for approval as part of the budget process. Public hearing are a regular part of the budget process. Information on public hearings is publicized in accordance with the public participation policy.

If a structural change is not being made and the agency believes that they have a rationale for this decision, and the decision is challenged, Metro Parks Tacoma will issue a statement of the reasons for this conclusion. The determination must be made by the Chief Executive Officer in conjunction with the Chief Planner and ADA Compliance Officer. Possible determinations may be:

1. That no barrier to program exists even with structural barriers and that the agency has shown that there is no discrimination in program access or practice; or
2. That an undue burden exists to making the structural change or that any changes would fundamentally alter the program experience. This determination must be based on all resources available for use in the program. If an action would result in such an alteration or such burdens, the public entity must take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity.

The Chief Planner, Director of Parks & Building Services and ADA Compliance Officer are accountable to ensure that the facility audits are performed, integrated into the capital improvement program and facility preventative maintenance schedule, and updated in accordance with this manual.

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Appendix 6 includes the current Capital Improvement Program, and an overview of the workflow process managed by the Capital Projects Group to review accessibility during design, construction document development, construction, and closure of a project.

### 4. 2 CURBS, WALKWAYS & PARKING STRUCTURES

Even though Metro Parks Tacoma is not the primary jurisdiction with responsibility or authority over streets, roads, or walkways, we work collaboratively with the City of Tacoma to ensure curb cuts, parking, and walkways associated with park programs and facilities are on the City's schedule for improvements.

When designing parks, Metro Parks Tacoma will give priority to walkways that provide access to the active amenities of a park and facilities, followed by walkways serving other areas. The additional connection of these elements to accessible routes shall be show in park master planning documents and be listed as desired improvements in a facility transition plan (see 5.0).

Alternative routes to buildings that make use of existing curb cuts may be acceptable under the concept of program accessibility in the limited circumstances where individuals with disabilities need only travel a marginally longer route. In addition, the fundamental alteration and undue burdens limitations may limit the number of curb ramps required. To achieve or maintain program accessibility, Metro Parks Tacoma shall consider connectivity to a park or facility beyond the property lines of the park itself. When Metro Parks Tacoma installs a curb ramp on a pedestrian walkway that enters the park, they shall include a receiving ramp directly opposite.

The City of Tacoma maintains pedestrian infrastructure. If Metro Parks Tacoma receives a request for curb ramps for locations other than within park facilities or entry/receiving ramps, they shall direct these requests to the City. If a request is for a curb improvement within Metro Parks Tacoma's scope of responsibility, we shall ensure that ramp is listed on the facility audit and add priority to the audit resolution based on the compliant if program access is compromised.

Metro Parks Tacoma will follow the ADAAG guidelines for parking when parking amenities are provided as part of a park or facility. Neighborhood Parks, Open Space and other classifications of facilities that do not provide parking, may opt to include 1-2 parking spaces that are reserved for use by those members of the public for which pedestrian access is not feasible and whom have ADA Parking Permits. Pedestrian only access facilities shall have curb ramps at entry points, including the companion ramp directly across from the access point. The facility audit specifically addresses parking and pathways (See Appendix III)

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## 4.3 HISTORIC FACILITIES:

Special program accessibility requirements and limitations apply to historic preservation programs. Historic preservation programs have preservation of historic properties as a primary purpose. An historic property is a property that is listed or eligible for listing in the National Register of Historic Places or a property designated as historic under State or local law.

In achieving program accessibility in historic preservation programs, a public entity must give priority to methods that provide physical access to individuals with disabilities. Physical access is particularly important in an historic preservation program, because a primary benefit of the program is uniquely the experience of the historic property itself.

Metro Parks Tacoma is not required to take any action that would threaten or destroy the historic significance of an historic property. In cases where physical access cannot be provided because of this special limitation, or because an undue financial burden or fundamental alteration would result, alternative measures to achieve program accessibility must be undertaken.

Alterations to historic properties must comply with the specific provisions governing historic properties in ADAAG or UFAS, to the maximum extent feasible. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative standards may be used. The decision to use alternative standards for that feature must be made in consultation with the appropriate historic advisory board designated in ADAAG or UFAS, and interested persons should be invited to participate in the decision-making process.

The following is Metro Parks Tacoma's historic preservation decision-making checklist:

### **ADA Historic Preservation Checklist**

1. Is this structure/facility listed in or eligible for listing in the National Register of Historic Places? (see below for definition of eligibility)
2. Is this structure/facility designated as historic under an appropriate State or local law?
3. Will ADA compliance (accessible routes –interior and exterior, ramps, entrances, or toilets) compromise the historic significance/character of the structure?
4. If items 1 and 2 are checked, has MPT Historic and Cultural Resource Manager reviewed proposed changes to historic structure/site?

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5. If items 1 and 2 are checked and state and/or federal dollars are being used to help fund the project, has the City of Tacoma Historic Preservation Officer or State Historic Preservation Officer reviewed proposed changes to historic structure/facility?
6. If the main entrance used by the public cannot comply with 4.4 without damaging the historic significance of the structure, is directional signage provided at the primary entrance to direct the public to an accessible entrance?
7. Does at least one accessible route comply with 4.3 from a site access point to an accessible entrance?
8. In cases where physical alteration to an historic property is not required because the action would threaten or destroy the historic significance or cause undue financial and administrative burdens, are alternative methods of achieving program accessibility utilized?
9. Are interpretive displays and written information located where they can be seen by a seated person?
10. Are exhibits and signage displayed horizontally placed no higher than 44 inches above the floor surface?

Eligibility for listing in the National Register of Historic Places is based on the following criteria:

- Significance in American history, architecture, archaeology, engineering and culture
- Sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and :
  - Are associated with events that have made a significant contribution to the broad patterns of our history
  - Are associated with the lives of persons significant in our past
  - That embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master
  - That have yielded or may be likely to yield information important in history
  - Are at least 50 years old

#### 4.4 NEW CONSTRUCTION AND ALTERATIONS (Regulatory references: 28 CFR 35.151)

All facilities designed, constructed, or altered by, on behalf of, or for the use of a public entity must be readily accessible and usable by individuals with disabilities, if the construction or alteration is begun after January 26, 1992. Each facility must be designed, constructed, or altered in strict compliance with a design standard. Metro Parks Tacoma chooses to use The ADA Accessibility Guidelines for Buildings and Facilities (ADAAG) as its standard to guide new construction and alterations. When developing or altering an outdoor facility, Metro Parks Tacoma will utilize the Outdoor Recreation Guidelines from the Access Board. Metro Parks Tacoma may use other accessibility standards when they provide more detail or applicability to a facility, location or amenity.

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## 4.5 LEASED BUILDINGS

Metro Parks Tacoma will make every attempt to only lease accessible space. Once Metro Parks Tacoma occupies a facility, we must provide access to all of the programs conducted in that space. Thus, the more accessible the space is to begin with, the easier and less costly it will be later on to make programs available to individuals with disabilities and to provide reasonable accommodations for employees who may need them. When working with other jurisdictions and partners, Metro Parks Tacoma will include contract and lease terms that support an expectation of program access.

## 5.0 TRANSITION PLAN

Where structural modifications are required to achieve program accessibility, a public entity with 50 or more employees must do a transition plan by July 26, 1992, that provides for the removal of barriers. Any structural modifications must be completed as expeditiously as possible, but, in any event, by January 26, 1995. Even though the agency has done facility transition plans in the past, on-going plans must cover those barriers to accessibility that were not addressed by the prior transition plans. Although not required, Metro Parks Tacoma has decided to maintain audits on all facilities and to update them regularly rather than identifying and excluding those barriers that were addressed in its previous plan.

A copy of the transition plan must be made available for public inspection. Metro Parks Tacoma maintains an electronic database of facility audits which meets all transition plan requirements. The combination of facility audits and the Capital Improvement Program (6-year plan) provides all of the information required:

- 1) A list of the physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- 2) A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
- 3) The schedule for taking the necessary steps to achieve compliance with Title II. 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; and,
- 4) The name of the official responsible for the plan's implementation.

Metro Parks Tacoma makes the current CIP, which is updated every two years, available to the public. All facility audits are available for public review upon request to the ADA Compliance Officer.

The Agency Compliance Manual (this full document) is available on line and for public review and comment after September 15, 2009. Additions are noted and dated as amended. This meets the requirement that allows the head of a public agency to make available compliance information in

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handbooks, manuals, and pamphlets that are distributed to the public to describe a public entity's programs and activities; the display of informative posters in service centers and other public places; or the broadcast of information by television or radio.

Metro Parks Tacoma shall provide any information related to this manual and compliance in alternate formats, as appropriate. Appendix 7 includes summaries of the outstanding ADA issues noted for MPT parks and facilities.

## 5.1 EMERGENCY AUDITS

No less than annually, the emergency systems of the facilities are assessed. This assessment includes the elevator system, emergency routes and signage, the fire pull stations, fire extinguishers, and the audible and visual alarm system. Any results requiring operational or maintenance repair are immediately implemented through the agency work order system.

Supporting Documents:

Appendix I: Agency Inclusion, Accessibility and Diversity Policy

Appendix II: Self Evaluation Checklist

Appendix III: Facility Audit Tools

Appendix IV: HR Policies (as referenced in section 2.4)

Appendix V: Accommodation Request form

Appendix VI: Capital Improvement Program and project development process

Appendix VII: Transition Plan Summaries

Appendix VIII: Program Guidelines