City of Jacksonville



# The Americans with Disabilities Act

TRANSITION PLAN

Disabled Services 8/16/2018

#### **TABLE OF CONTENTS**

THE AMERICANS WITH DISABILITIES ACT	2
SELF-EVALUATION	3
NOTIFICATION	4
NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT	5
EFFECTIVE COMMUNICATION	6
LAW ENFORCEMENT AND EFFECTIVE COMMUNICATION	8
TRAINING	9
EMPLOYMENT	10
POLLING PLACES	11
EMERGENCY MANAGEMENT PROCEDURES	12
SIDEWALKS & CHANGES TO FACILITIES	13
WEB BASED PROGRAMS AND SERVICES	15
ACCESSIBLE PEDESTRIAN SIGNALS	17
REFERENCES	18

#### THE AMERICANS WITH DISABILITIES ACT

The Americans with Disabilities Act (ADA) became law in 1990. The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else. The ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. The ADA is divided into five titles (or sections) that relate to different areas of public life<sup>1</sup>.

#### Title I – Employment<sup>2</sup>

- Ensures persons with disabilities have access to the same employment opportunities and benefits available to people without disabilities.
- Applies to employers with 15 or more employees.
- Requires employers to provide reasonable accommodations to qualified applicants or employees. A "reasonable accommodation" is a change that accommodates employees with disabilities so they can do the job without causing the employer "undue hardship" (too much difficulty or expense).
- Defines disability, establishes guidelines for the reasonable accommodation process, and addresses medical examinations and inquiries.
- Regulated and enforced by the U.S. Equal Employment Opportunity Commission.

#### Title II - Public Services: State and Local Government<sup>3</sup>

- Prohibits discrimination on the basis of disability by "public entities" such as state and local government agencies. .
- Requires public entities to make their programs, services and activities accessible to individuals with disabilities.
- Outlines requirements for self-evaluation and planning; making reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination; identifying architectural barriers; and communicating effectively with people with hearing, vision and speech disabilities.
- Regulated and enforced by the U.S. Department of Justice.

#### Title III – Public Accommodations and Services Operated by Private Entities<sup>4</sup>

 Prohibits discrimination on the basis of disability in the activities of places of public accommodations

<sup>&</sup>lt;sup>1</sup> (Network, 2018)

<sup>&</sup>lt;sup>2</sup> (Network, 2018)

<sup>&</sup>lt;sup>3</sup> (Network, 2018)

<sup>4 (</sup>Gov, 2018)

 Requires newly constructed or altered places of public accommodation-as well as commercial facilities to comply with ADA Standards

#### Title IV - Telecommunications<sup>5</sup>

- Requires the establishment of telephone relay services for individuals who use telecommunications display or similar devices
- The Federal Communications Commission (FCC) enforces these regulations and offers technical assistance to the public
- The FCC enforces provisions of the Telecommunications Act which address the accessibility of telecommunications equipment and services, as well as television programming

#### Title V - Miscellaneous Provisions<sup>6</sup>

- Contains a variety of provisions relating to the ADA as a whole, including its relationship to other laws, state immunity, its impact on insurance providers and benefits, prohibition against retaliation and coercion, illegal use of drugs, and attorney's fees.
- Provides a list of certain conditions that are not considered disabilities.

#### **SELF-EVALUATION**

#### **SELF-EVALUATION AND TRANSITION PLANS**

All city governments were required to complete a self-evaluation of their facilities, programs, policies, and practices by January 26, 1993. The self-evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Self-evaluations should consider all of a city's programs, activities, and services, as well as the policies and practices that a city has put in place to implement its various programs and services. Remedial measures necessary to bring the programs, policies, and services into compliance with Title II should be specified -- including, but not limited to: (1) relocation of programs to accessible facilities; (2) offering programs in an alternative accessible manner; (3) structural changes to provide program access; (4) policy modifications to ensure nondiscrimination; and (5) auxiliary aids needed to provide effective communication.

If a city that employs 50 or more persons decides to make structural changes to achieve program access, it must develop a transition plan that identifies those changes and sets a schedule for implementing them. Both the self-evaluation and transition plans must be available to the public.

#### **PUBLIC INPUT**

The City of Jacksonville is dedicated to program accessibility and continually seeks input from interested persons with disabilities who wish to participate in the development of new programs and activities and policies and procedures. The City solicits input from interested persons with disabilities through the Mayor's Disability Council<sup>7</sup> and a number of other committees and commissions established to remove barriers for citizens with disabilities, including the Special Needs Steering Committee, Accessible Housing Task Force, City Council, and the Election Advisory Panel.

<sup>&</sup>lt;sup>5</sup> (Center, Title IV Telecommunications, 2018)

<sup>&</sup>lt;sup>6</sup> (Network, 2018)

<sup>&</sup>lt;sup>7</sup> (Council/McDaniel, 2018)

#### **MAYOR'S DISABILITY COUNCIL**

The Mayors Disability Council is a diverse group of people; approximately 80 percent represent the disability population. The 13 member board was created in 1989. These council members volunteer their time and expertise to improve the lives of persons with disabilities.

The purpose of the Mayor's Disability Council is to provide a public forum for persons, groups and businesses to present their disability problems, concerns and successes, and to acknowledge work done well. The MDC shall be responsible for timely reports of the same to the Jacksonville mayor.

The council works hand in hand with the Disabled Services Division.

#### **DISABLED SERVICES DIVISION**

The overall goal of the Disabled Services Division is to improve the quality of life for people with disabilities by addressing, researching and attempting to resolve the many barriers they encounter. These barriers include transportation, housing, accessibility, discrimination and employment.

At least annually, the City's transition plan will be reviewed by the ADA Coordinator and made available to the public, as well as the Mayor's Disability Council so that they may participate in the continued development process and submit comments. The ADA Coordinator and Disabled Services Division shall be responsible for implementation of the plan.

The Disabled Services Division houses programs and services geared towards serving citizens with disabilities, such as the Adaptive Recreation Program, Disabled Parking Enforcement Program, Title III Support Program, Wheelchair Ramp Program, and Emergency Assistance.

The Division hosts educational symposiums with specific tracks dedicated to the American's with Disabilities Act, which provide continuing education credits for architects, contractors, and human resource professionals.

Additionally, the Disabled Services Division provides technical support to City departments and other non-constitutional agencies such as JEA and JTA, and has a technical role in Emergency Operations, building and design, and information and technology as it pertains to ADA requirements.

The Division works closely with the Mayor's Disability Council to implement new initiatives that improve access to persons with disabilities.

#### **NOTIFICATION**

At least annually, the City of Jacksonville will post the notice document titled "NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT" (attachment A) and its ADA Grievance Procedure, on its Internet Home Page and in conspicious locations in its public buildings, and distribute to all agency heads. It will refresh the posted copies, and update the contact information contained on the Notice as needed. The Notice shall contain the City's policy in regards to the Americans with Disabilities Act, the process for requesting an accommodation, and contact information for the ADA Coordinator. The Notice and ADA Grievance Procedure can be found at <a href="https://www.jaxada.com">www.jaxada.com</a>.



## NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

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

*Employment:* City of Jacksonville 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 Americans with Disabilities Act (ADA).

*Effective Communication:* City of Jacksonville will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City 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:* City of Jacksonville will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcomed in City 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 City program, service, or activity, should contact the office of Disabled Services, **Kevin McDaniel**, **ADA Coordinator**, **P:904-630-4940 TTY:904-630-4933** as soon as possible but no later than 48 hours before the scheduled event.

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

Complaints that a City program, service, or activity is not accessible to persons with disabilities should be directed to **Kevin McDaniel**, **ADA Coordinator**, **P:** 904-630-4940 **TTY:** 

#### 904-630-4933.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Attachment A to Settlement Agreement between the United States of America and the City of Jacksonville, Florida in DJ# 204-17M -398

#### **EFFECTIVE COMMUNICATION**

The ADA requires that title II entities (State and local governments) and title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. Effective communication is essential to providing accessible services in that whatever is written or spoken must be as clear and understandable to people with disabilities as it is for people who do not have disabilities.

#### **METHODS OF COMMUNICATION**

The City of Jacksonville is committed to providing effective communication to all citizens and continues to identify new resources and technologies to improve access. The City continues to identify sources of qualified sign language and oral interpreters, real-time transcription services, and vendors that can put documents in Braille. In order to ensure that all forms of communication are accessible, the City is taking specific actions to improve communications, including the following:

- 1. **ADA Grievance Policy and Procedures** The City has developed a formal Grievance Policy and Procedure for ADA Compliance. This document will be distributed to all City departments and made available at public buildings. It will also be posted on the website.
- 2. **Website Communication** The City posts agendas on the City's web site, which, when used with the free Adobe Acrobat Reader function, allows for enlargement so the contents of agendas may be viewed from one's personal computer. Web content authors are required to attend mandatory ADA compliance training to ensure documents and online communication are accessible to citizens who use assistive technology.
- 3. Accommodations for participation in Public Meetings The City continuously looks to identify new assistive technology and equipment which will improve accessibility in public meetings. The City currently holds contracts with ASL and Oral Interpreters, Reader Services, owns Braille printing equipment and can provide upon request, and has developed policies and procedures that incorporate multiple methods of communication, including large print, Braille, and text-only versions of released documents.
- 4. Accessibility of Phone Communication The City offers multiple methods of accessible phone communication, including TTY, TRS, VRS, VRI, and Real-time captioning. The City also contracts with local agencies to provide Florida Relay training to all appropriate employees to make and receive calls.
  - A teletypewriter (TTY) is a device on which you can type and receive text messages. For a TTY to be used, both parties to the conversation must have a TTY or a computer with TTY capability<sup>8</sup>.
  - Telecommunications relay service (**TRS**), reached by calling 7-1-1, uses communications assistants (also called CAs or relay operators) who serve as intermediaries between people who have hearing and speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones<sup>9</sup>.
  - Video Relay Service (VRS) is a free, subscriber-based service for people who use sign language and have videophones, smart phones, or computers with video communication capabilities<sup>10</sup>.
  - Video Remote Interpreting (VRI) is a fee-based service that uses video conferencing technology to access on off-site interpreter to provide real-time sign language or oral

<sup>&</sup>lt;sup>8</sup> (ADA.GOV, 2018)

<sup>&</sup>lt;sup>9</sup> (ADA.gov, www.ada.gov, 2008)

<sup>10 (</sup>ADA.gov, www.ada.gov, 2008)

- interpreting services for conversations between hearing people and people who are deaf or have hearing loss<sup>11</sup>.
- **Real-time Captioning** (also known as computer-assisted real-time transcription, or CART) is a service similar to court reporting in which a transcriber types what is being said at a meeting or event into a computer that projects words onto a screen<sup>12</sup>.
- 5. **UBI DUO Hardware** The UbiDuo is a communication device that enables deaf/hard-of-hearing individuals and hearing individuals to communication with each other face-to-face without an interpreter<sup>13</sup>. UbiDuo machines are used throughout the City in the Disabled Services Division, at each JSO sub-station location, Pre-trail facility, and are available upon request.
- 6. **630-CITY** 630-CITY is Jacksonville's trusted resource; connecting customers to City services, while creating the ultimate service experience. 630-CITY expands customers' knowledge, enrich perceptions of City government, and empower them to utilize the full range of resources.

The Customer Service Center strives to:

- Focus on customer service and build solution-based relationships by listening, acting with integrity, and creating positive results
- Educate and empower citizens to access City services and information
- Help City agencies improve service delivery by allowing them to focus on their core mission and efficiently manage their processes

The Customer Service Center works closely with the Disabled Services Division to ensure effective communication is provided and offers multiple methods of communication in which customers may report issues, complaints, compliments, and requests, including; voice, email, online access via <a href="http://630city.coj.net/">http://630city.coj.net/</a>, mobile application, walk-in, and US mail. Requests are processed efficiently and expeditiously.

During emergency events such as Hurricane Matthew and Irma, 630-CITY is activated and utilized as the Citizen Information Center and works with the Emergency Operations Center to ensure effective communication is provided and citizen safety concerns are identified.

630-CITY is an award winning center. In 2018 the center received the Innovators Award from QScend Technologies, Inc. The center has also earned the Citizen Engaged Community designation from 2014-2016 and 2016-2018 from the Public Technology Institute.

7

<sup>&</sup>lt;sup>11</sup> (ADA.gov, www.ada.gov, 2008)

<sup>&</sup>lt;sup>12</sup> (ADA.gov, www.ada.gov, 2008)

<sup>&</sup>lt;sup>13</sup> (AbleData, 2018)

#### LAW ENFORCEMENT AND EFFECTIVE COMMUNICATION

The Jacksonville Sheriff's Office has adopted the Policy Statement on Effective Communication and distributed to all law enforcement officers (attachment D). Effective Communication policies and procedures have been incorporated into JSO Order 513.

The Jacksonville Sheriff's Office contracts with local qualified oral/sign language interpreter agencies to ensure that interpreting services are available on a priority basis, twenty-four hours per day, seven days a week. The Office of the Sheriff also utilizes Video Remote Interpreter Services via VRI Purple and Video Relay Services via Purple for the Correction facilities.

The City of Jacksonville will continue to ensure that each Sheriff's Office station or substation and each jail and detention facility is equipped with a working VRS to enable persons who are deaf, hard or hearing, or who have speech disabilities to make outgoing telephone calls. Where inmate telephone calls are time-limited, the City of Jacksonville has adopted policies permitting inmates to use VRS Purple, which provides a longer period of time to make video calls, due to the slower nature of VRS communications compared with voice communications.

The Office of the Sheriff also utilizes Video Remote Interpreter Services via Video Relay Services Purple for Corrections facilities.

#### 911/TTY

The City of Jacksonville will ensure that each 9-1-1 call station is equipped with a TTY or computer equivalent. Texts to 9-1-1 capabilities were installed and available to the public in 2017. Public outreach and education programs are conducted with members of the Deaf and Hard of Hearing community and deaf advocacy program, as well as the general public.

The City has developed procedures for answering 9-1-1 calls that include training all call takers to use a TTY and take 9-1-1 calls, to recognize a "silent" open line as a potential TTY call and respond by TTY, to ensure that TTY calls are answered as quickly as other calls received. Disciplinary procedures for call takers who fail to perform TTY call-taking consistent with training and procedures will be incorporated into policy. Communications Unit procedures are in section 431, Progressive Discipline is in section 501, and procedures relating to providing services to persons with disabilities are in section 513. Yearly testing of TTY machines is conducted by the Disabled Services Division by contract with community partners who serve the Deaf and Hard of Hearing community.

#### **TRAINING**

The City of Jacksonville recognizes that staff training is a critical component in ensuring accessibility to all citizens. To ensure equal access to all programs and services the City has to offer, disability training has been incorporated into training processes and policies and procedures.

#### **Disability Sensitivity Training**

Disability Sensitivity Training, mandated for every new employee, is provided by the Disabled Services Division each month and includes the following;

- Disability Facts and Statistics
- Do's and Don'ts
- Disability types
- People first language
- Best practices
- The 5 titles of the ADA
- The City's ADA Grievance Procedure
- Public Input the Mayor's Disability Council
- Technical support for employees and management

#### ADA, ITD, and Employment Symposiums

The Disabled Services Division provides annual trainings for City employees, which are also open to the public and intended to provide updated and refreshed guidance for human resource personnel, information and technology professionals, and facility access staff, including the annual ADA Symposium, Information and Technology Symposium for Accessibility, and Hiring Abilities Symposium and Job Fair.

#### Florida Relay and Accessible Phone Communications

The Disabled Services Division partners with local agencies to provide Florida Relay training to appropriate employees, and is a technical resource for the City's VRI and VRS customers. The Division also partners to provide annual TTY testing and purchases assistive technology and procures new training as needed.

The City's comprehensive Florida Relay training includes;

- 7-1-1 Assistance instruction
- Benefits of Using TRS
- Accessing TRS Services
- Making and receiving a relay call
- Types of devices that are compatible with relay
- How citizens interact with relay and best practices

The City continues to look to identify new trainings, such as training for Supervisors and ADA Accommodations based on public feedback and necessity that will improve access for citizens with disabilities and remove barriers for all citizens.

#### **EMPLOYMENT**

The City of Jacksonville has amended its employment policies to comply with the regulations of the U.S. Equal Employment Opportunity Commission implementing Title I of the Americans with Disabilities Act of 1990, codified at 29 C.F.R. Part 1630. At minimum, those policies will provide that the City of Jacksonville:

- a) Will not discriminate on the basis of disability in its hiring or employment practices
- b) Will not ask a job applicant about the existence, nature, or severity of a disability. Applicants may be asked about their ability to perform specific job functions. Medical examinations or inquiries may be made, but only after a conditional offer of employment is made and only if required of all applicants for the position.
- c) Will make reasonable accommodations for the known physical or mental limitations of a qualified applicant or employee with a disability upon request unless the accommodation would cause an undue hardship on the operation of the City's business. If an applicant or an employee requests a reasonable accommodation and the individual's disability and need for the accommodation are not readily apparent or otherwise known, the City may ask the individual for information necessary to determine if the individual has a disability-related need for the accommodation.
- d) Will maintain any employee's medical records separate from personnel files and keep them confidential.
- e) Will make an individualized assessment of whether a qualified individual with a disability meets selection criteria for employment decisions. To the extent the City's selection criteria have the effect of disqualifying an individual because of disability; those criteria will be job-related and consistent with business necessity.

Directive 0604 ADA Reasonable Accommodation was updated in 2016 to ensure equal access. Requests for Reasonable Accommodation may be initiated by email at ADAAccommodationRequest@coj.net.

#### **POLLING PLACES**

Before designating any site as a new polling place, the Supervisor of Elections will survey the site using the survey instrument at Attachment F to determine whether the site contains barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, or voting area. The Supervisor of Elections will not designate any such site as a polling place until all such barriers have been removed.

The Supervisor of Elections will continue to survey polling places to identify barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, and voting area. For each such polling place, the Supervisor of Elections will then either (1) ensure that all barriers to access by people with disabilities have been removed or (2) identify an alternate polling place with no barriers to access by people with disabilities. That identification of accessible polling places will utilize the survey instrument that appears at Attachment F to this transition plan. The Supervisor of Elections will then take immediate steps to change each inaccessible polling place to a new accessible location.

The Supervisor of Elections will continue to provide opportunities for same-day balloting for voters with disabilities whose assigned polling place does not have accessible parking, exterior route to entrance, entrance, interior route to the voting area, and voting area. The method for providing these opportunities may include allowing individuals with disabilities to vote by an absentee ballot that is accepted if postmarked on the day of the election (or picked up by election officials at the home of the voter on the same day as the election), or any other method that ensures that voters with disabilities have the same degree of information available to them when casting their ballots as others.

The Supervisor of Elections will continue survey its voter registration locations for accessibility to persons with disabilities by using the form provided at Attachment G. If barriers to access are identified, the Supervisor of Elections will modify its plan to provide program access, which may include allowing persons to register to vote through alternative means or at alternative locations.

To ensure effective communication and program access, the Supervisor of Elections will make all voter registration materials available in alternate formats, including Braille, large print, accessible audio format, and accessible electronic format.

At least annually, the Supervisor of Elections will train poll workers on the rights of people with disabilities and the practical aspects of assuring those rights. The training will cover, at minimum, the need to maintain the physical accessibility of polling locations; how to assist people with disabilities, as necessary; and how to operate any non-standard voting equipment or accessible features of standard equipment (particularly new, accessible equipment).

The Supervisor of Elections works closely with the Election Advisory Panel, which includes members of the Mayor's Disability Council, to ensure that all polling places are accessible on Election Day.

#### **EMERGENCY MANAGEMENT PROCEDURES**

The City of Jacksonville will ensure that the City of Jacksonville's Comprehensive Emergency Management Plan (CEMP) will be in compliance with ADA requirements. The touchstone for compliance with ADA requirements relating to emergency management is Chapter 7 of the Department's ADA Best Practices Tool Kit for State and Local Government (ADA Tool Kit), which addresses in detail key ADA obligations that apply to all aspects of emergency management, including planning, preparedness, evacuation, shelters, medical and social services, lodging and housing programs, recovery, and rebuilding.

The City and agencies in which it partners or contracts with to provide emergency services will comply with the following:

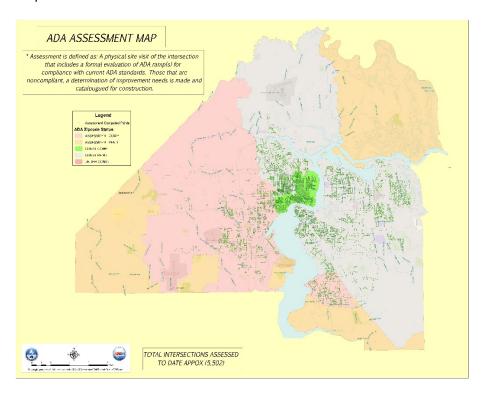
- Regularly solicit and incorporate input from persons with disabilities and those agencies that serve them regarding all phases of its emergency management program (preparedness, notification, response, mitigation, and recovery).
- Ensure that its community evacuation plans ensures that individuals who have mobility
  disabilities, are blind or have low vision, are deaf or hard of hearing, have cognitive disabilities,
  mental illness, or other disabilities to safely self-evacuate or be evacuated by others. The City of
  Jacksonville's Special Needs Registry, identifies individuals who require evacuation
  transportation assistance.
- Ensure that if its emergency warning systems use sirens or other audible alerts, it will also provide ways to inform persons who are deaf or hard of hearing of an impending disaster. The use of autodialed TTY messages to pre-registered individuals who are deaf or hard of hearing, text messaging, e-mails, open-captioning on local TV stations and other innovative uses of technology may be incorporated into such procedures, as well as lower-tech options such as dispatching qualified sign language interpreters to assist with emergency TV broadcasts.
- Ensure that, if utilized, emergency shelters have a back-up generator as a way to keep
  medications refrigerated (such as a refrigerator or a cooler with ice). Access to back-up power
  and refrigeration at such shelters will be made available to persons whose disabilities require
  access to electricity and refrigeration, for example, for using life-sustaining medical devices,
  providing power to motorized wheelchairs, and preserving certain medications, such as insulin,
  that require refrigeration. The written procedures will include a plan for notifying persons of the
  location of such shelters.
- Provide equivalent opportunities for accessible post-emergency temporary housing to persons with disabilities.
- Ensure that information it makes available regarding temporary housing includes information on accessible housing (such as accessible hotel rooms within the community or in nearby communities) that could be used if people with disabilities cannot immediately return home after a disaster if, for instance, necessary accessible features such as ramps or electrical systems have been compromised.

Policies and procedures that incorporate the provisions above, such as the City's CEMP, Sheltering Plan, Special Needs ICP, and Temporary Housing ICP will be reviewed as needed to ensure continued accessibility.

#### **SIDEWALKS & CHANGES TO FACILITIES**

The City of Jacksonville has a total area of 841 square miles and has over 3,600 linear miles in roads, streets and highways. It also owns and operates the largest Parks system in the United States, with over 400 parks, community centers, and other parks facilities.

Since 2013, the City has identified 29,259 ramps that have required assessments prior to construction to adhere to the agreement with the Department of Justice. By July 1, 2018 the City estimates that 100% of all ramps will have been assessed with approximately 5,520 completed as of April 2018. Ramp construction is expected to conclude in 2023.



The City of Jacksonville has identified 401 **Public Building** facilities that were not surveyed by the Department of Justice that require remediation to adhere to the standards prescribed by the Americans with Disabilities Act. As part of its assessment, the City has developed a transition plan, which includes a facilities schedule, to address identified barriers to accessibility.

#### - Public Buildings identified by COJ

2016	8 Facilities	Complete
2017	8 Facilities	Complete
2018	31 Facilities	Complete or In Progress
2019	33 Facilities	Projected
2020	20 Facilities	Projected
2021	39 Facilities	Projected
2022	26 Facilities	Projected
2023	35 Facilities	Projected
2024	39 Facilities	Projected

The City has also made great strides in its remediation efforts regarding Department of Justice surveyed Public Building facilities. Of the 66 Public Building facilities identified by the Department of Justice, the following remain or are in progress:

#### - Public Buildings identified by the Department of Justice

Property	Status	Deficient Items
Pre-Trial Detention Facility	In Progress	1
IM Sulzbacher Shelter	In Progress	1
Office of the Sheriff	In Progress	0
Wallace Smalls Senior Center	In Progress	0
Jacksonville Zoo	In Progress	0

The City of Jacksonville has the largest Parks system in the United States with over 400 parks throughout Duval County. Efforts to remedy accessibility issues within Parks are divided into three categories: **Park Buildings**, **Regional Parks**, and **Other Park** facilities.

#### Park Buildings identified by COJ

2018	27 Parks/Centers	Complete or In Progress
2019	33 Parks/Centers	Projected
2020	19 Parks/Centers	Projected
2021	20 Parks/Centers	Projected
2022	20 Parks/Centers	Projected
2023	24 Parks/Centers	Projected
2024	18 Parks/Centers	Projected

#### - Regional Parks

2018	Regional 1	Scheduled
2019	Regional 2	Projected
2020	Regional 3	Projected
2021	Regional 4	Projected
2022	Regional 5	Projected
2023	Regional 6	Projected
2024	Regional 7	Projected
2025	Regional 8	Projected

**Other Park** facilities, such as neighborhood, community, and pocket parks, represent 232 sites that require further assessment or have been identified as having barriers to accessibility. Approximately 10% of the remaining 232 sites are to be scheduled for remediation, with preference given to lower income areas first, beginning in 2026 to conclude by 2036.

To ensure new or altered facilities meet the requirements of the Americans with Disabilities Act, the City will continue to adhere to the 2010 Standards for Accessible Design or current Federal Accessibility Standards. In addition, the ADA Project Manager, staffed by the Disabled Services Division, continues to provide technical support and plan review to City partners and other departments during construction and prior to construction.

#### WEB BASED SERVICES AND PROGRAMS

The City is dedicated to online accessibility for all citizens and has adopted the technical assistance document "Accessibility of State and Local Government Websites to People with Disabilities" and recognized WCAG 2.0 as the standard in which accessibility may be accomplished in regards to web based services.

### The City has implemented various processes, policies and procedures in order to ensure ADA compliance for its websites which include:

- Created accessibility page on all external City websites that identify accessibility features and standards.
- Created implementation process for accessible websites
  - Development (Coding) Process
    - Developed ADA Compliance Specification standards document for developers.
    - Ensured all external websites are written to follow Web Content Accessibility
       Guidelines (WCAG) including:
      - Proper semantic HTML5 tags
      - ARIA roles and labels
      - Access Keys (navigation skip-to links)
      - Proper color contrast and font sizes
      - Alt tags for images
  - Quality Assurance (Testing) Process
    - Implemented a two-phased ADA compliance test process
    - Phase I
      - QA analyst or Developers test websites based upon compliance standards and ADA compliance testing checklist.
      - Utilize standard testing tools such as JAWS, NVDA, and other screen reader test tools for testing site.
    - Phase II
      - Disabled Services test sites in order to ensure appropriate level of testing; at times including testing with members of the disabled community.
  - Content Quality
    - Website content editors were trained on site ADA compliance standards for content including Do's and Don'ts
    - Meetings with content editors are held to update them on ensuring ADA compliance.

#### To ensure ongoing compliance, the City will continue to:

- Post online its policy that its web pages will be accessible and create a process for implementation (http://www.coj.net/all-of-coj/accessibility-statement.aspx)
- Ensure that all new and modified web pages and content are accessible
- Develop and implement a plan for making existing web content more accessible

- Provide a way for online visitors to request accessible information or services by posting a telephone number or e-mail address on its home page (<u>www.jaxada.com</u>)
- Periodically (at least annually) enlist people with disabilities to test its pages for ease of use

The Disabled Services Division has partnered with the Mayor's Disability Council to enlist volunteers with disabilities to test its web pages weekly. Issues identified by staff and/or volunteers are compiled into weekly reports and sent to the division's 508 Compliance staff member to review. Upon review, violations are shared with the Public Information Office to distribute among departments that have accessibility violations that require remediation.

The Disabled Services Division also hosts annual training created for information and technology professionals and content creators to ensure continued compliance.

Monthly Website ADA Audit Disabled Services Division						
Date	General Description	Identifying Language	URL	Department/Agency	Violation (to be manually verific	ıd)
08/02/17	404-Server Error	404 - File or directory not found	http://www.coj.net/mayor/itinerary/all-ever	Mayor Itinerary Events - JHS	2.4.4 Link Pupose	-
08/02/17	Broken Link	Document not accessible to screen	"http://www.coj.net/departments/finance/d	Finance	2.4.9 Link Purpose	
08/02/17	Label	Page has multiple PDF files that	http://www.coj.net/departments/finance/	Finance	2.4.4 Link Pupose	-
08/03/17	Odd labeled and broken ligh	Fight Blight, Frontpage/image1 n	"http://www.coj.net/departments/finance@r	Information and Technology	2.4.4 Link Pupose	•
08/17/17	Broken Link	Link label 426	http://fl-duval-taxcollector.publicaccessner	Tax Collector	2.4.4 Link Pupose	Viol
08/31/17	Broken Link	Link below "Contact Us"	http://www2.duvalclerk.com/records/	Duval Clerk	2.4.4 Link Pupose	-
08/31/17	PDF not accessible	Youth Volunteer Application	http://www.jud4.org/Court-Programs/Tees	4th Judicial Circuit	2.4.4 Link Pupose	-
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#### **ACCESSIBLE PEDESTRIAN SIGNALS**

The City of Jacksonville Disabled Services Division and Division of Traffic Engineering has established criteria for the installation and operation of accessible pedestrian signal heads on City-owned roadways.

#### **Procedure**

- 1. Requests for accessible pedestrian signal may be made through the Traffic Engineering Division, the Disabled Services Division, or 630-CITY.
- 2. Any accessible pedestrian signal that is installed on City-owned roadways shall be reviewed and approved by the Chief of Traffic Engineering prior to installation.
- 3. Requests for audible signal installations received from the public and/or support groups for the visually impaired shall be reviewed by the Chief of Traffic Engineering with input, if necessary, from the Disabled Services Division, visually impaired agencies and/or support organizations that may conduct [physical assessment] studies to determine if the audible signal would be effective and/or safe for operation.
- 4. An engineering study may be conducted if the initial review supports the installation of the audible pedestrian signal.
- 5. The following criteria should be considered before approving an audible pedestrian signal:
  - a. Engineering study to assess the need
  - b. Right on red movements
  - c. Continuous right turn movements
  - d. Complexity of intersection geometry
  - e. Traffic volumes during times when pedestrians might be present (to determine the type of accessible pedestrian signal to be installed)
  - f. Audible tones or sounds that may cause confusion
  - g. Verbal messages instead of tones or sounds
  - h. Vibrotactile pedestrian devices
  - i. Pushbutton or passive pedestrian detectors
  - j. Sufficient audible above ambient noise, 89db (decibles) maximum
  - Installations at locations with more than four lanes and/or greater than 35 MPH posted speed limit shall be given additional considerations for geometrics, operations, and pedestrian safety
  - Consideration for audible signal installations other than at mid-block locations (i.e. transit corridors or hubs) shall be installed only after review and approval by the Chief of Traffic Operations
- 6. Upon approval by the Chief of Traffic Engineering, the type of accessible pedestrian signal shall be determined based on any studies conducted, physical assessments submitted by support organizations, and needs of the person for which the request was made.
- 7. For safety purposes, the Chief of Traffic Engineering may elect to erect yield to pedestrian crossings signage in locations in which new accessible pedestrian signals are installed.
- 8. If the proposed location is a wide crossing where pedestrian storage is required in the median area, or other location where geometry creates an unsafe condition, then an audible pedestrian signal installation may not be recommended.

#### **Approval/Denial Process**

- 1. The Chief of Traffic Engineering shall objectively review all requests for audible pedestrian signals received by the Division from an engineering study and/or local request before agreeing to approve the installation.
- 2. The initial review may require a brief site visit to view the field conditions.
- 3. If the initial review results in a decision not to consider the audible pedestrian signal head, the Chief of Traffic Engineering shall document the reasons and advise the requestor of the findings.

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