



**City of Centerville**  
**Americans with Disabilities Act**  
**Self-Evaluation and Transition Plan**

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## **City of Centerville Americans with Disabilities Act Self-Evaluation and Transition Plan**

### **1.0 Background**

This Americans with Disability Act (ADA) Self-Evaluation and Transition Plan (herein referred to as the Plan) is intended to guide the City of Centerville's efforts to provide accessible programs, services, and facilities. The purpose of the Plan is to identify deficiencies in the City of Centerville's policies, procedures, practices, and physical assets. The Plan also provides guidance for the removal of accessibility barriers. The Plan outlines progress to date and identifies steps necessary to bring the City of Centerville's programs into compliance with current ADA regulations. The Plan is intended to be a living document that will be updated regularly to track ongoing achievements toward compliance.

#### **1.1 Section 504 of the Rehabilitation Act of 1973**

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of programs and activities operated by a department, agency, or other instrumentality of state or local government. Section 504 applies to the City of Centerville, as well as all sub-recipients of federal funds.

#### **1.2 Americans with Disabilities Act (ADA) of 1990**

The American with Disabilities Act (ADA) of 1990 expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of disability by public entities regardless of whether they receive federal financial assistance. The Act is divided into five titles describing requirements relating to (I) employment, (II) state and local government services, (III) public accommodations for Private Entities, (IV) telecommunications, and (V) miscellaneous provisions. Title I is overseen by the City of Centerville Human Resources Department. Title II applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. The Code of Federal Regulations (CFR) outlines regulations implementing ADA, which apply to the City of Centerville.

### **2.0 Foundation**

As a key component of ADA compliance, the Self Evaluation, Transition Plan and its required and related elements – including its context within the transportation planning process and relevant projects covered by Title II/ Section 504, plan stakeholders, the review process, and future updates are discussed in this section.

## 2.1 Outreach

Public input is an essential element in the self-evaluation process and transition plan development. ADA implementation requires public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)). Annually, the City of Centerville will request public input in identifying deficiencies and/or problem areas within the City controlled properties and ROWs.

## 2.2 Plan Elements/Requirements

Per 28 CFR §35.150(d)(3)(9-12-06), Title II requires the Plan to accomplish the following tasks, at a minimum:

- Identify physical obstacles in a public agency's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to upgrade pedestrian access to meet ADA and Section 504 requirements in each year following the Plan;
- Include a schedule for providing curb ramps or other sloped areas where pedestrians walk across curb, giving priority to walkways serving entities covered by Title II, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas;
- Indicate the official responsible for the implementation of the plan; and
- Provide opportunities to interested persons and groups to participate in the Self-Evaluation and development of the Transition Plan.

## 2.3 Projects Covered by ADA and Section 504

Any project for construction or alteration of a facility that provides access to pedestrians must be made accessible to persons with disabilities. Projects that alter the use of the public right of way by making any changes that affect or could affect access, circulation, or use by affecting the structure, grade, or use of the roadway – must incorporate pedestrian access improvements within the scope of the project to meet the requirements of the ADA and Section 504.

Alterations include reconstruction, major rehabilitation, widening, resurfacing, signal installation and upgrades, and projects of similar scale and effect. Regular maintenance activities are not considered to be alterations, per the Department of Justice (DOJ). The FHWA considers the following to be maintenance activities: actions intended to preserve the system, forestall future deterioration, and

maintain the functional condition of the roadway without increasing the structural capacity such as nonstructural thin surface treatments, joint repair, pavement patching, shoulder repair, signing, striping, minor signal upgrades, and repairs to drainage systems.

## 2.4 Review Process

The Plan should be periodically reviewed by City staff through a Self-Evaluation process, which should take place both prior to and following completion of the Transition Plan. These Self-Evaluation activities are intended to gauge the level of existing compliance and determine the potential need for additional areas of inclusion for accessibility improvements. Identified deficiencies should be catalogued and included in future Transition Plan updates.

## 2.5 Future Plan Updates

While there is no required timeline for making future updates to a Transition Plan, the City should engage in Self-Evaluation activities as necessary to ensure that the Plan document is current and meets the needs of disabled persons. Since each plan is required to have an annual schedule that is ideally aligned with annual funding allocations through transportation planning and programming mechanisms, annual milestones should be adjusted regularly to reflect any changes in real world conditions.

## 2.6 References

- Rehabilitation Act of 1973 (Section 504) Americans with Disabilities Act of 1990 (ADA)
- Code of Federal Regulations (CFR) (2019)
- Department of Justice (DOJ)
  - 2010 ADA Standards for Accessible Design Americans with Disabilities Act Accessibility Guidelines (ADAAG)
  - Proposed - Public Right of Way Accessibility Guidelines (PROWAG) (2019) Federal Highway Administration (FHWA).

## 3.0 Administration

### 3.1 Requirements of ADA

Section 504 of the Rehabilitation Act of 1973 (49 CFR §27.13) and Title II of the Americans with Disabilities Act of 1990 (28 CFR §35.107) specify that any public entity with fifty (50) or more employees must designate at least one employee to coordinate compliance with the respective regulations. The City of Centerville has met this basic program requirement, which also serves as a key required element of the Transition Plan, by designating a formal ADA

Coordinator. The City of Centerville has also developed several notices related to ADA - including a grievance procedure, among others - and is planning wider dissemination of these documents internally and to the public.

### 3.1.1 Designation of ADA Coordinator

The City of Centerville has designated an ADA Coordinator and has made available to all interested individuals the name, office address, and contact information, which is found in Appendix B.

The ADA/504 Coordinator is charged with the responsibility for implementing, monitoring and ensuring the agency's compliance with Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990. The ADA Coordinator may delegate responsibilities to designees in their particular field of expertise and work area. Under the direction of the City Manager and in conjunction with the ADA Advisory Committee, the functions performed by the ADA Coordinator are outlined below:

- Monitoring the City's current policies and practices for implementing ADA/504.
- Identifying shortcomings in compliance and developing remedies.
- Evaluating remedial steps taken to eliminate the effects of discrimination.
- Monitoring complaint procedures that incorporate appropriate due process standards and providing for prompt and equitable resolutions of complaints filed under ADA/504.
- Ensuring City compliance with ADA/504.
- Collaborating and coordinating with the Department Directors to enable ADA/504 compliance efforts.
- Establishing and maintaining collaborative relationships with critical external stakeholders, such as disability advocacy groups and organizations.
- Monitoring the City's ADA/504 Transition Plan to ensure that all Department facilities remain in compliance with applicable accessibility standards.
- Monitoring established procedures to ensure that requested auxiliary aids are provided for persons with disabilities.
- Conducting annual reviews of ADA/504 program areas.
- Conducting ADA/504 training programs for department directors and employees.
- Monitoring the preparation of ADA/504 information for dissemination to the general public, including the "Notice to the Public" offer to provide reasonable accommodation

upon request.

- Identifying, investigating, and eliminating ADA/504 discrimination when it is found to exist.

### 3.1.2 Notice of ADA Requirements

Under Title II, the City of Centerville must make information about ADA requirements pertaining to its services, programs, and activities available to the public.

The City of Centerville has adopted an ADA Notice of Non-Discrimination statement (Appendix C) that is provided on all public notices and documents. City of Centerville's website includes a description of the ADA program, ADA Coordinator contact information, the complaint procedure and form, and links to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and Public Right of Way Accessibility Guidelines (PROWAG) documents. The City's website provides information about City of Centerville's ADA program and opportunity for public feedback.

### 3.1.3 Establishment of Grievance Procedures

Public entities employing at least 50 people are required to adopt and publish grievance procedures providing prompt and equitable resolution of complaints. The City of Centerville has developed a grievance procedure and form. The current Grievance form is included in Appendix D, posted online, and available at the Centerville Municipal Building.

An Annual Log of ADA Complaints (Appendix E), documenting all ADA complaints, will be kept by the ADA Coordinator for each calendar year. This log will be reviewed by the ADA Advisory Committee.

### 3.1.4 Assurances

In order to receive federal funding, the City of Centerville must guarantee non-discrimination and ensure new projects will be ADA compliant. Presently, the City of Centerville includes a non-discrimination statement on all contracts receiving federal funds. The document requires the City of Centerville to comply with federal statutes, policies, and procedures. The document states no person on the grounds of race, color, national origin, sex, age, and handicap/disability may be excluded from federally funded programs. ADA compliance must also be met on all federally funded projects conducted by sub-recipients.



### 3.1.5 Personnel Training

The City of Centerville plans to provide access to ADA training for employees. Advanced training will be focused for employees whose job responsibilities require day-to-day decisions, notably those in the following departments: Human Resources, Engineering, and Public Service.

## 3.2 Interdepartmental Coordination

The City of Centerville's efforts to address and resolve ADA compliance issues recognize the importance of interdepartmental coordination. Recent efforts aimed at greater collaboration include the institution of an ADA Advisory Committee, provision of basic training and awareness within the departments, and identification of data and expertise-sharing opportunities across the City.

### 3.2.1 Establishment of ADA Advisory Committee

The City of Centerville has established an ADA Advisory Committee to engage an internal body of stakeholders on ADA-related issues. Collectively, members of this group span several functions within the agency based on their varied expertise. The individual representatives were selected by the City Manager. When necessary, the committee may involve other City officials and/or Subject Matter Experts as determined by the City Manager, ADA Coordinator, or their respective designees. The intent of this committee is to leverage the skills, experience, and expertise of the constituent members for matters and issues involving ADA compliance and accessibility. Current members of the ADA Advisory Committee are shown in Appendix F.

### 3.2.2 Training, Awareness, and Information Dissemination

The City of Centerville's ADA Advisory Committee is developing an ADA Education and Training Program designed to review ADA regulations, demonstrate ADA's application in daily work activities, show how ADA has been integrated within the City's actions and protocols, and instruct personnel on the policies and procedures for appropriately managing ADA requests and inquiries. The ADA Advisory Committee serves as a key platform for dissemination of information and Departmental coordination with respect to changing regulations and policy updates.

## 3.3 Plan Availability

The City of Centerville Self-Evaluation and Transition Plan is available at the

Centerville Municipal Building and Centerville Public Works Center. Alternate accessible formats of the document will be made available upon request or large font versions.

The Plan will be distributed to all City Departments.

### 3.4 Monitoring and Evaluation

#### 3.4.1 Annual Update Report

The annual update report is a worksheet summarizing tasks completed pertaining to the Plan. The City of Centerville ADA Coordinator will prepare an Annual Update Report at the end of each fiscal year. The report will facilitate progress tracking and aid in Plan management.

#### 3.4.2 Transition Plan Management and Updates

The ADA Coordinator is the lead point of contact for the City of Centerville Self-Evaluation and Transition Plan. The Plan will be re-evaluated and updated on a yearly basis for the first four years. Starting in 2022, the Plan will be re-evaluated and updated on periodic bases. The management and updates will be reviewed by the Advisory Committee. Modifications will be disseminated to departments for action.

### 4.0 Communications

Government agencies must communicate and interact effectively with the public. The City of Centerville utilizes various communication methods to aid the disabled community including auxiliary aids, services, information, and signage.

#### 4.1 Auxiliary Aids and Services

The City of Centerville attempts to eliminate communication barriers by offering a variety of auxiliary aids and services to the disabled community upon request.

The City of Centerville strives to provide accessible information to the public and attempts to accommodate each request.

#### 4.2 Information and Signage

Title II requires public entities to ensure disabled persons can obtain information about the existence and location of accessible services, activities, and facilities. City of Centerville's website is a key platform for providing information to the public. To ensure accessibility, information provided on the website must be compatible with appropriate software to accommodate specific disabilities.

Signage is another major aid in providing public information and direction. The City of Centerville follows ADAAG guidelines to ensure signs are readable and accommodating to the disabled community.

#### 4.3 City Web Accessibility

The City of Centerville is developing a comprehensive Web Accessibility policy statement. The objective of this policy is to improve the ease with which all citizens, including those with disabilities, can access and benefit from web-based government services and information.

### 5.0 Employment

The City of Centerville 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 Opportunity Commission under Title I of the ADA.

#### 5.1 Responsibility for Non-Discrimination

The Human Resource Director has primary responsibility for ensuring equal opportunity and non-discrimination in the recruitment and application process, the hiring, advancement of discharge of employees.

#### 5.2 Reporting and Requests for Accommodation

Pursuant to City Administrative Policy No. 610, all allegations of discrimination and/or requests from applicants and/or employees with disabilities regarding reasonable accommodation in the workplace shall promptly be reported to the Human Resource Director and/or the Human Resource Managers.

### 6.0 Public Right of Way

Under Title II of the ADA, the City of Centerville must assure all of its physical assets are ADA compliant, including existing and newly constructed features. Right of way (ROW) features include elements such as curb ramps, sidewalks, shared use paths, crosswalks, driveway crossings, transit stops, and traffic signals.

ADA compliant ROW is designed and constructed in a manner readily accessible and usable by individuals with disabilities. Examples of non-compliant accessibility barriers include steep curb ramp slopes that might hinder a person in a wheelchair, lack of handrails along a ramp, or sidewalk discontinuities that may cause trip hazards. The following sections note applicable City of Centerville policies and guidelines, previous and ongoing inventory data collection, data tracking, and barrier elimination efforts.

## 6.1 Design Standards and Construction Procedures

The City of Centerville follows established standards and policies that provide guidance for installation of accessible features on newly constructed or altered public ROW infrastructure. The primary standards and policies referenced by staff include:

- Public Right of Way Accessibility Guidelines (PROWAG):  
<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths/supplemental-notice>
- Americans with Disabilities Act Accessibility Guidelines (ADAAG):  
<https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/background/adaag>
- Ohio Department of Transportation Roadway Standard Construction Drawings  
<http://www.dot.state.oh.us/Divisions/Engineering/Roadway/DesignStandards/roadway/Pages/StandardConstructionDrawing.aspx>

The U.S. Access Board developed ADAAG in 1991 and continues to maintain these guidelines for the design of accessible buildings and facilities. ADAAG focuses mainly on buildings and site work and generally does not address conditions unique to the public ROW. Due to the need for accessibility guidelines specific to the public ROW, the Access Board has proposed the use of PROWAG, which was most recently updated in 2019. The 2019 version serves as the current set of best practices for the design of accessible features in the public ROW. These guidelines have been identified as a current best practice by the FHWA for elements not fully addressed by ADAAG.

## 6.2 Pedestrian Infrastructure

A Self-Evaluation of the transportation infrastructure is necessary to indicate where physical barriers limit accessibility within the City of Centerville ROW. The Self-Evaluation results in a list of barriers from which corrective action is based. This is the foundation from which the Transition Plan is developed. The Transition Plan will include a scope, schedule and budget to guide corrective action. The actions of the Transition Plan will be included in Capital Improvement projects and Operating efforts.

Due to environmental factors, accessibility may be negated over time. Such factors can include the heaving of sidewalk due to tree roots, deteriorating of the walking surface, damage due to vehicles, tree branches obstructing the pedestrian access route, etc. It will be necessary for Self-Evaluations to be performed on a re-occurring basis. In between citywide Self-Evaluation efforts, the notification of barriers will be feedback from the public and awareness of staff.

The Plan focuses on the following infrastructure components:

### 6.2.1 Curb Ramps

The City of Centerville shall map all street crossings within the City using GIS, and at these locations determine the compliance of existing curb ramps and use of detectable warnings. Reference Appendix I.

The City makes curb ramps compliant through several initiatives:

- Alterations to infrastructure listed by the Federal Highway Administration as of sufficient scope to require ADA compliance (resurfacing, replacement of traffic signals, etc). This work can occur prior to or as part of a project.
- Complaints received from citizens.
- Awareness of need from staff.

Priority is given to those locations serving public facilities (governmental, educational, etc), as well as those in which alternative options are less safe due to such factors as traffic volumes, traffic speeds, and sight distance. The progress of making curb ramps compliant citywide will be primarily coordinated with resurfacing projects. It is anticipated that substantial compliance will be achieved by 2040, at which time curb ramps would have been integrated in resurfacing projects that have covered the entire city street network.

### 6.2.2 Sidewalks

The City of Centerville has mapped all sidewalks within the City using GIS. The City shall inspect all sidewalks for ADA compliance. Reference Appendix I.

The City makes sidewalks compliant through several initiatives:

- Capital Improvement Projects in which the scope of work includes repair of sidewalk.
- Complaints received from citizens.
- Awareness of need from staff.

The cost to repair sidewalk is the responsibility of the City, with the exception of sidewalk within the limits of a private driveway. Property owners are informed of their responsibility to repair the sidewalk within their private driveway within a specified time frame. If corrective action is not taken by the property owner, the City will contract to make the necessary repairs and may assess the property owner.

The Street Maintenance Division of the Public Works Department may make temporary repairs to minimize the barrier until it is eliminated by means of a more permanent repair or replacement of the sidewalk.

### 6.2.3 Shared Use Paths

The City of Centerville has mapped all shared use paths within the City using GIS. The City shall inspect all paths for ADA compliance. Reference Appendix I. These can be located parallel to a roadway or on their own alignment.

The City makes shared use paths compliant through several initiatives:

- Capital Improvement Projects in which the scope of work includes repair of shared use path.
- Complaints received from citizens.
- Awareness of need from staff.

The Street Maintenance Division of the Public Works Department may make temporary repairs to minimize the barrier until it is eliminated by means of a more permanent repair of the path.

### 6.2.4 Crosswalks

Crosswalks exist on every leg of an intersection, unless signed otherwise. The City of Centerville makes crosswalks ADA compliant for new construction, and when possible during road reconstructions. The vertical alignment of an existing roadway may not allow compliance.

### 6.2.5 Driveway Crossings

The City of Centerville will conduct a self-evaluation of driveway crossings on non-local streets, and the information will be compiled using GIS. The existence and maintenance of driveways are the responsibility of the adjacent property owner. Therefore, the timing of alterations to these facilities will typically be at the discretion of the property owner. Grading outside of the ROW may not allow compliance. The use of concrete drive approaches is an effective means to ensure long-term compliance.

### 6.2.6 Transit Stops

The City of Centerville has constructed sidewalk connections from the curb to the sidewalk at RTA bus stops. A self-evaluation will be conducted at these locations, and compiled using GIS.

### 6.2.7 Traffic Signals

Locations and accessibility of traffic signals has been mapped using GIS. Reference Appendix I. The City of Centerville operates traffic signals in

compliance with the Ohio Manual of Uniform Traffic Control Devices. In response to requests, traffic signal operation is evaluated for upgrades to feature audible signal indications and/or full Accessible Pedestrian Signals capabilities. By 2022, all traffic signals with pedestrian signal indications will have countdown timers.

### 6.3 Prioritization and Funding

Prioritization of projects and efforts to make transportation facilities accessible are essential to effectively use funding where the need is most critical and urgent. Priority is given to those locations serving public facilities (governmental, educational, etc), as well as those where alternative options are not as safe due to such factors as traffic volumes, traffic speeds, and sight distance. The Transition Plan guides the use of funding to remove physical barriers. Each year, the City develops a Capital Improvement Plan that identifies the scope, schedule and budget for City projects. Accessibility improvements are typically integrated within the scope of work of a larger transportation project. Less costly efforts can be funded through the Operating Budget.

## 7.0 Facilities

Under Title II of the ADA, the City of Centerville must assure all of its physical assets are ADA compliant, including existing and newly constructed features. Public facilities include City properties, buildings, equipment, etc.

ADA compliant facilities are designed and constructed in a manner readily accessible and usable by individuals with disabilities. Examples of non-compliant accessibility barriers include steps or steep ramp slopes that might hinder a person in a wheelchair, lack of handrails along stairway, or non-compliant equipment such as non-accessible drinking fountains and restroom facilities. The Self-Evaluation and Transition Plan for Facilities is located in Appendix J.

### 7.1 Design Standards and Construction Procedures

Americans with Disabilities Act Accessibility Guidelines (ADAAG)  
ADAAG

<https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/background/adaag>

### 7.2 Inventory data Collection (Self-Evaluation)

A Self-Evaluation of physical assets is necessary to indicate where physical barriers limit accessibility within City of Centerville facilities. The Self-Evaluation provides a baseline against which progress can be measured, making the process critical to the success of the Transition Plan.

### 7.3 Barrier Mitigation

The Transition Plan provides guidance to remove barriers on City properties.

### 7.4 Prioritization and Funding

Prioritization is an important step in addressing physical barriers that do not comply with ADA requirements. The barrier prioritization process identifies the most critical ADA needs and assists in implementing the Transition Plan in future years. ADA implementing regulations (28 CFR 35.150{d}{2}) note transition plans should give priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas. Both Capital and Operating funds can be used for modifications to achieve ADA compliance.

## 8.0 Programs

Under Title II of the ADA, the City of Centerville must assure all of its programs are accessible to those with disabilities. Such programs can include public meetings, payment of taxes, and recreation programs. The City responds to requests and complaints by making programs to the extent practical.

### 8.1 Inventory Data Collection (Self-Evaluation)

The City of Centerville is beginning a Self-Evaluation of programs to determine accessibility. The City of Centerville will complete the Self-Evaluation of all programs, public facilities, and Right-of-Way facilities by December 31, 2021.

### 8.2 Transition Plan

The City of Centerville will continue to develop the Transition Plan. The City will include the results from the Self-Evaluation and provide the updated Plan within 1 year of completing the Self-Evaluation. The Plan will be a living document that shall be amended as improvements towards compliance are made.

## 9.0 Next Steps

This Section includes a series of goals that the City of Centerville can undertake to support the phased-in approach to compliance discussed at the outset of this document. As mentioned earlier in the Plan, this Plan is intended to be a living document that will be updated regularly.



## 9.1 Ongoing Goals/Activities

- Work to identify and appropriate funding for barrier removal.
- Conduct site inspections of facilities as needed.
- Conduct yearly reviews by the ADA Advisory Committee to evaluate progress of the Transition Plan.
- Engaging those in the disabled community in the process and begin assembling an external advisory group/stakeholder group to be involved in future Self-Evaluation and Transition Plan efforts, as a requirement of the Transition Plan.
- Include ADA upgrades in programmed projects.
- Update the ADA inventory database.
- Amend the ADA 504/Transition Plan based on ongoing inventory efforts and accomplishments.
- Update ADA 504/Transition Plan (All sections if applicable).
- Conduct training activities on ADA compliance.

## 9.2 Short Term Goals (1-5 years)

- Complete an initial Self-Evaluation of all ROW pedestrian facilities and public building facilities.
- Disseminate educational materials.
- Expand training activities on ADA compliance.
- Update TTY (Text telephone) or TDD (Telecommunication Device for the Deaf) system.
- Assure auxiliary aids are available upon request.
- Develop stronger awareness by publicizing the Title II/Section 504 program and activities within the City, including establishing a presence on the City of Centerville Intranet/Internet.
- Develop a schedule for the ADA Advisory Committee of periodic meetings—including training and/or refresher courses.
- Update ADA 504/Transition Plan (All sections if applicable).
- Conduct training activities on ADA compliance.

## 9.3 Long Term Goals (6+ years)

The long-term goal is to achieve the highest level of compliance with ADA regulations and incorporate ADA-related activities into the day-to-day activities of the City of Centerville.



# **Appendix A**

## **Glossary of Terms**



## Glossary of Terms

**ABA:** See Architectural Barriers Act.

**ADA:** See Americans with Disabilities Act.

**ADA Transition Plan:** Transportation system plan that identifies accessibility needs, the process to fully integrate accessibility improvements, and aims to ensure that all transportation facilities, services, programs, and activities are accessible to all individuals.

**ADAAG:** See Americans with Disabilities Act Accessibility Guidelines.

**Accessible:** A facility that provides access to people with disabilities using the design requirements of the ADA.

**Accessible Pedestrian Signal (APS):** A device that communicates information about the WALK phase in audible and vibrotactile formats.

**Alteration:** A change to a facility in the public right-of-way that affects or could affect access, circulation, or use. An alteration must not decrease or have the effect of decreasing the accessibility of a facility or an accessible connection to an adjacent building or site.

**Americans with Disabilities Act (ADA):** Civil rights legislation passed in 1990 and effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

**Americans with Disabilities Act Accessibility Guidelines (ADAAG):** Contains scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990.

**APS:** See Accessible Pedestrian Signal.

**Architectural Barriers Act (ABA):** Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

**Capital Improvement Program (CIP):** The CIP for a public agency typically includes an annual capital budget and a five-year plan for funding the new construction and reconstruction projects on the agency's transportation system.

**Detectable Warning:** A surface feature of truncated domes, built in or applied to the walking surface to indicate an upcoming change from pedestrian to vehicular way.

**DOJ:** See United States Department of Justice.

**Federal Highway Administration (FHWA):** A branch of the U.S. Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges.

**FHWA:** See Federal Highway Administration.

**Pedestrian Access Route (PAR):** A continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility.

**Pedestrian Circulation Route (PCR):** A prepared exterior or interior way of passage provided for pedestrian travel.

**PROWAG:** An acronym for the *Guidelines for Accessible Public Rights-of-Way* issued in 2005 by the U.S. Access Board. This guidance addresses roadway design practices, slope and terrain related to pedestrian access to walkways and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking and other components of public rights-of-way.

**Right-of-Way:** A general term denoting land, property, or interest therein, usually in a strip, acquired for the network of streets, sidewalks and trails creating public pedestrian access within a public entity's jurisdictional limits.

**Section 504:** The section of the Rehabilitation Act that prohibits discrimination by any program or activity conducted by the federal government.

**Uniform Federal Accessibility Standards (UFAS):** Accessibility standards that all federal agencies are required to meet; includes scoping and technical specifications.

**United States Access Board:** An independent federal agency that develops and maintains design criteria for buildings and other improvements, transit vehicles, telecommunications equipment, and electronic and information technology. It also enforces accessibility standards that cover federally-funded facilities.

**United States Department of Justice:** Federal executive department responsible for enforcement of the law and administration of justice (also referred to as the Justice Department or DOJ).



# **Appendix B**

## **ADA Coordinator**



## **City of Centerville ADA Coordinator**

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# **Appendix C**

## **Notice**



## **NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT**

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

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

***Effective Communication:*** the City of Centerville 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 of Centerville programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Centerville, should contact the City Manager's Office at 937-433-7151 as soon as possible but no later than 48 hours before the scheduled event.

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

Complaints that a program, service, or activity of the City of Centerville is not accessible to persons with disabilities should be directed to Taylor Schindler - *ADA Coordinator* at 937-427-4727.

The City of Centerville 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.





# **Appendix D**

## **Grievance Procedure**



## **City of Centerville Grievance Procedure under The Americans with Disabilities Act**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the **City of Centerville**. **The City of Centerville's** Administrative Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to: **Taylor Schindler, ADA Coordinator, City of Centerville, 7970 South Suburban Road, Centerville, OH 45458**.

Within 15 calendar days after receipt of the complaint, the ADA coordinator or designee will arrange to meet with the complainant to discuss the complaint and the possible resolutions. An information investigation, as may be appropriate, shall follow the filing of a complaint. The ADA Coordinator or appropriate designee shall conduct the informal investigation with 30 days after the initial receipt of the grievance.

Within 15 calendar days of the meeting or the conclusion of the informal investigation, whichever occurs later, the ADA coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of City of Centerville, determine the validity of the grievance, if any, and offer options for substantive resolution of the complaint.

If the response by the ADA coordinator or designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager or his designee.

Within 15 calendar days after receipt of the appeal, the City Manager or his designee will arrange to meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager or his designee will respond in writing,

and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA coordinator or designee, appeals to the City Manager or his designee, and responses from these two offices will be retained by City of Centerville in the Human Resource Department.

The right of a person to a prompt and equitable resolution of the complaint filed under this Grievance Procedure shall not be impaired by the person's pursuit of other remedies, such as the filing of an ADA complaint with the responsible federal and/or state department or agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.



**Taylor Schindler**  
ADA Coordinator  
7970 South Suburban Road  
Centerville, Ohio 45458  
tschindler@centervilleohio.gov  
TEL: (937) 428-4727      FAX: (937) 433-0286

**Title II of the Americans with Disabilities Act  
GRIEVANCE FORM**

**1. COMPLAINANT INFORMATION:**

Name of Complainant:

\_\_\_\_\_

Last

MI

First

Address:

\_\_\_\_\_

City

State

Zip

Telephone Number: \_\_\_\_\_ E-mail address: \_\_\_\_\_

Preferred Method(s) of Communication: (Check all that apply)

Voice Telephone     TTY     E-mail     US Mail    Other: \_\_\_\_\_

2. **DESCRIBE YOUR COMPLAINT OF DISCRIMINATION BASED UPON DISABILITY:** Be specific and give date(s), time(s) and location(s). Use the reverse side of this sheet or attached pages, if needed
  
3. **PERSONS NAMED IN YOUR COMPLAINT:** List the names of (or describe) all persons involved in your complaint. Indicate the job title and City Department if possible.
  
4. **WITNESSES TO YOUR COMPLAINT:** List the names of (or describe) all persons involved in your complaint. Indicate the job title and City Department, if possible.
  
5. **EVIDENCE AND DOCUMENTATION:** List and provide any physical evidence, written or recorded documents, or any other information that directly supports your specific claim of discrimination.
  
6. **CASE REMEDY AND/OR RESOLUTION:** What remedies or resolutions are you seeking?

---

**CERTIFICATION**

**I hereby certify that the information and statements provided above are true.**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

If Complainant is not the individual completing this form, please provide:

Representative's Printed Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

For more information or assistance in completing this form, please contact Taylor Schindler –  
ADA Coordinator via phone 937-428-4727, (fax) 937-433-0286 or  
(email) [tschindler@centervilleohio.gov](mailto:tschindler@centervilleohio.gov).



# **Appendix E**

## **Complaint Form**

Annual Log of ADA Complaints (20\_\_)

Complaint ID	Complainant	Basis of Complaint	City Action	Date of Complaint	Date of Response	Date of Resolution





# **Appendix F**

## **ADA Advisory Committee**



## **ADA Advisory Committee**

City Manager

Assistant City Manager

ADA Coordinator/Staff Engineer

Human Resources Manager

City Engineer

Public Works Director



# **Appendix G**

## **Equal Employment Opportunity**



## **EQUAL EMPLOYMENT OPPORTUNITY**

## **SECTION 2.00**

A. The City of Centerville is an Equal Employment Opportunity Employer. It is the policy of the City not to unlawfully discriminate against any qualified employee, qualified applicant for employment, or eligible beneficiary of services on the basis of race, color, religion, sex, national origin, disability, veteran's status or other protected class regarding the following:

- |                             |   |
|-----------------------------|---|
| 1. Recruitment              | 7. Layoff and recall                      |
| 2. Selection                | 8. Termination                            |
| 3. Placement                | 9. Disciplinary action                    |
| 4. Testing                  | 10. Social and recreational programs      |
| 5. Training                 | 11. Employee benefits and compensation    |
| 6. Promotions and transfers | 12. Tangible program service and benefits |

B. The City Manager and department heads shall maintain responsibility for their actions in regard to affording equal opportunities to each City employee or job applicant.

C. An employee who feels he or she has been discriminated against because of race, creed, color, sex, age, national origin, military or veteran status, or other non-merit factors or physical/mental disability may seek redress internally by filing a complaint with the employee's supervisor or the Personnel Officer. If the employee's supervisor or the Personnel Officer is the source of the alleged discrimination, the complaint may be filed with the City Manager. If the complaint is not addressed through the internal grievance procedure, an employee may file a charge with the Ohio Civil Rights Commission or the Equal Employment Opportunity Commission as appropriate.

D. The City shall make reasonable accommodations for qualified individuals as required by regulations issued under the Americans with Disabilities Act.

E. In accordance with the Americans with Disabilities Act, the City has appointed an ADA Coordinator and has undergone a self-evaluation of its employment practices, accessibility to programs, services and buildings, and has developed complaint resolution procedures. The City seeks to assure that no employee entitled to participate in any program is inadvertently excluded from the benefits, services, programs or activities offered by the City of Centerville. Employee input, particularly that of individuals with disabilities and all employees solicit representative organizations to assist in identifying potential barriers to participation and to ensure full and equal enjoyment of programs and services. Continued input is encouraged

and desired from all who are interested.

## **AMERICANS WITH DISABILITIES ACT**

## **SECTION 2.01**

The City of Centerville fully supports the intent of the Americans with Disabilities Act. The City will not engage in any form of illegal discrimination, including discrimination toward any individual with a disability. If any employee or applicant for employment is disabled and requires an accommodation, he should make this known to his supervisor or to the Personnel Officer. Reasonable accommodations for eligible individuals will be furnished provided it does not involve undue hardship to the organization. An employee who feels he or she has been discriminated against because of a physical/mental disability may seek redress internally by filing a complaint with the employee's supervisor or the Personnel Officer. If the employee's supervisor or the Personnel Officer is the source of the alleged discrimination, the complaint may be filed with the City Manager.



# **Appendix H**

## **Communications, Information, & Facility Signage**



## **Communications, Information & Facility Signage**

Title II of ADA includes the following requirements regarding Communications.

### **General** ([28 CFR Sec. 35.160](#))

- A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.
- A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.
- In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities.

### **Information and Signage** ([28 CFR Sec. 35.163](#))

- A public entity shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.
- A public entity shall provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

In recent years, the City has implemented the following accessibility improvements with regard to communications, information and facility signage:

- Accessible Pedestrian Signals installed at the intersections of:
  - Main Street and Franklin Street
  - West Franklin Street and Virginia Avenue
  - Loop Road and Alex Bell Road
- Launched a new accessible website in October 2018.

The City will conduct a detailed evaluation of its communications, information and facility signage with regard to the ADA Title II requirements.



# **Appendix I**

## **Public Right-of-Way**





## **Public Rights-of-Way**

The City shall conduct a detailed accessibility evaluation of pedestrian facilities within the agency's public rights-of-way. The results shall be reported as follows.

### **Inventory**

The City shall evaluate all sidewalks, curb ramps, traffic control signals, multi-use trails, bus stops, and other facilities that would be used by pedestrians. Critical areas to evaluate include pedestrian paths/facilities that provide access to government offices, medical facilities, public buildings, commercial and business areas, school zones, libraries, residential areas, parks, etc.

When this evaluation is complete, a detailed cost estimate and schedule shall be developed and implemented to bring all pedestrian facilities into compliance. The City intends to have made substantial completion of compliant pedestrian facilities by 2040, at which time curb ramps would have been integrated in resurfacing projects that have covered the entire city street network. The City's evaluation shall determine the following information.

- XX% of sidewalks meet accessibility criteria
- XX% of curb ramps meet accessibility criteria
- XX% of intersections have curb ramps that do not meet current ADA criteria
- XX% of crosswalks met accessibility criteria
- XX% of bicycle/pedestrian trails meet accessibility criteria
- XX% of traffic control signals have push buttons that are accessible, or have the pedestrian indications on recall
- XX% of traffic control signals have [Accessible Pedestrian Signals \(APS\)](#)
- XX% of bus stops (and/or other transit facilities) meet accessibility criteria
- XX% of bus stops (and/or other transit facilities) have amenities that meet accessibility criteria

### **Progress**

The City has mapped all sidewalks, shared use paths, and traffic signals within the City using GIS. The City shall also map all street crossings, curb ramps, and accessible pedestrian signals using GIS.



# **Appendix J**

## **Facilities**



## **Facilities**

The City shall conduct a detailed accessibility evaluation of each of its buildings, based on the [ADA Checklist for Existing Facilities](#) publication.

### **Inventory**

The City shall inventory all of its public buildings for ADA compliance. The City maintains the following facilities:

- City Municipal Building, 100 West Spring Valley Road, Centerville, OH 45458
- Centerville Public Works Center, 7970 South Suburban Road, Centerville, OH 45458
- Centerville Police Department, 155 West Spring Valley Road, Centerville, OH 45458
- The Golf Club at Yankee Trace, 10000 Yankee Street, Centerville, OH 45458
- Benham's Grove, 166 North Main Street, Centerville, OH 45459
- Annex Building, 104-108 West Spring Valley Road, Centerville, OH 45458
- Stubbs Park, 255 West Spring Valley Road, Centerville, OH 45458

For each facility, the City shall determine items of incompliance to be addressed in the following order of priority.

- Priority 1 – Accessible approach and entrance, including parking lots
- Priority 2 – Access to goods and services
- Priority 3 – Access to public toilet rooms
- Priority 4 – Access to other items such as water fountains and public telephones

When this inventory is complete, a detailed cost estimate for each improvement and a schedule of implementation shall be established to bring all non-compliant findings into compliance.

### **Progress**

To date, there have been several projects to bring City owned facilities into compliance. These include:

- Municipal Building Elevator Modernization 2017 – All push buttons at ADA compliant height and location, jamb Braille plates at each hoist-way entrance, infrared door safety edge, interior aesthetic improvements
- ADA pushbutton entrance installation – Completed at City Municipal Building, Centerville Public Works Center, Police Department, Annex Building, and The Golf Club at Yankee Trace.
- Stubbs Park Pedestrian Bridge Replacement and Paving Projects – 19 pedestrian bridges replaced since 2005 for ADA accessibility. Existing gravel walking paths were paved to provide ADA accessibility.
- Stubbs Park Accessible Playground Installation – City’s Public Works crew installed an ADA accessible GameTime® playground at Stubbs Park in 2017.