



## **Americans with Disabilities Act (ADA) Self-Evaluation Report**

City of Coachella, CA



December 2024

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## 1 Introduction

According to Title II of the Americans with Disabilities Act (ADA), all programs, activities, and services offered to the public by the City of Coachella must be accessible for people with and without disabilities. Accessibility applies to all aspects of a program or service. Under Title II, public entities are required to evaluate their programs, activities, and services, make modifications to potentially discriminatory practices, and provide the opportunity for individuals with disabilities or organizations representing people with disabilities to participate in the process. The self-evaluation process identifies barriers and makes recommendations to correct policies and practices that are inconsistent with Title II requirements. When a public entity has 50 or more employees, it is required to maintain a record of the examination, describe the issues identified, describe the modifications made, and list the interested individuals consulted as part of the process (28 CFR 35.105). As programs and facility uses change, a re-review of accessibility practices should be conducted. If a public entity is the recipient of federal funds, a system for tracking program and service deficiencies, as well as periodically reviewing and updating the self-evaluation is required (29 U.S.C. 794; 49 CFR 27.121 (b)).

The City of Coachella does not currently have written policies or procedures for review as part of the self-evaluation. As the City grows, the need for formal documentation of policies will increase. An Accessible Policies and Procedures Memo, with recommendations for ensuring that policies created by the City of Coachella comply with the requirements of the ADA, is provided under a separate cover. In lieu of reviewing formal policy documents, this report summarizes the results of a staff questionnaire issued to representatives from 11 City of Coachella departments:

- Development Services
- Human Resources
- Finance
- Engineering
- City Manager's Office
- City Clerk
- Economic Development
- Finance
- Code Enforcement
- City Manager's Office
- IT Division

The questionnaire asked staff to answer questions regarding practices within their own department, to the best of their knowledge. Results summarized in this report provide a snapshot of the City's efforts to make its programs, services, and activities accessible to the public, and identifies opportunities for staff training and areas where changes to City policies and practices are required.

The ADA Coordinator or designee will follow up with department managers to review the ADA Self-Evaluation Report information and Accessible Policies and Procedures Memo recommendations relevant to their department. In those situations where a policy, program, or procedure creates a barrier to accessibility, the ADA Coordinator or designee will coordinate with the department head or program manager to address the removal of the barrier.

## 2 Questionnaire Results and Recommendations

Examples of policies include administrative rules, public documents, forms, applications, and the City's municipal code. This section is organized into the following categories based on the requirements of Title II of the ADA

- Notice
- Responsible Employee and Grievance Procedure
- Customer Service
- Staff Training
- Contracting, Licensing, or Other Arrangements
- Public Meetings
- Program Participation
- Transportation Services
- Tours and Trips
- Accessible and Adaptive Equipment
- Printed and Online Materials
- Website
- Televised and Audiovisual Information
- Telecommunications
- Emergency Planning
- Facilities

*Required actions* are based on legislative requirements found in the ADA, or other published standards for accessibility. Some actions are always required, such as posting a notice of nondiscrimination, while other actions are only required when requested, such as providing alternative formats (for example, large print or braille documents). In many cases, the City has multiple options for providing accessible programs, activities, and services. This section also includes implementation strategies and links to the Department of Justice's online best practices tool kit. The Tool Kit should be considered a helpful supplement to – not a replacement for – the regulations and technical assistance materials that provide more extensive discussions of ADA requirements. For the full “Best Practices Tool Kit for State and Local Governments,” see <https://www.ada.gov/pcatoolkit/toolkitmain.htm>.

### 2.1 Notice

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities (28 CFR 35.106). It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice is not a one-time requirement. Public agencies should provide the information on an ongoing basis and update the information whenever necessary. ([www.ada.gov/pcatoolkit/chap2toolkit.htm](https://www.ada.gov/pcatoolkit/chap2toolkit.htm))

#### Questionnaire Response Summary

The majority of the ten respondents of the Self-Evaluation were not aware of an official nondiscrimination statement, with only three of the ten respondents reporting yes. Of the three affirmatives, two pointed to the City employee handbook and MOU, and one pointed to

the City of Coachella Personnel Rules and Regulations. One of the respondents also noted that nondiscrimination statements were posted in common areas like the kitchen and breakroom.

### **Required Actions**

- Provide public notice of the City's commitment to providing accessible services (28 CFR 35.106).

### **Implementation Strategies**

- Ensure staff are aware of the public locations of the nondiscrimination statement and the procedure for filing a disability discrimination or grievance complaint.
- Provide notice of the availability of program modifications, alternative formats of materials, and auxiliary aids. Include contact information for staff who can provide assistance. Establish a standardized advanced notice requirement and publicize.
- Include a nondiscrimination notice in department publications, similar to the following with up-to-date ADA Coordinator contact information:
  - *The City of Coachella does not discriminate on the basis of disability in the admissions or access to its programs or activities. An ADA Coordinator has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. 12131-12134), which prohibits discrimination on the basis on disability by public agencies.*
- Republish and rebroadcast radio, newspaper, television, or mailings of the notice periodically, as applicable.
- Increase outreach to people with disabilities and the organizations that serve them to provide information about available modifications and the accessibility of services, programs, and activities.

## **2.2 Responsible Employee and Grievance Procedure**

Title II of the ADA requires a state or local government agency that employs 50 or more people to develop and publish an ADA grievance procedure and to designate at least one employee to track and respond to complaints. In Coachella, the ADA Coordinator is responsible for the coordination of the City's efforts to implement the self-evaluation and transition plan. The ADA Coordinator is responsible for investigating any complaints that the City has engaged in an action prohibited by Title II, and is often responsible for communicating the City's efforts to comply with and fulfill its responsibilities under Title II of the ADA.

### **Questionnaire Response Summary**

Of the ten respondents in the Self-Evaluation, four answered that yes, they knew who was the designated individual responsible for ensuring the City meets ADA obligations. Respondents were split between Lizzandro Diaz and Celina Jimenez as the designated employee while

another named Human Resources personnel as the designated individuals. The remaining six respondents were uncertain of who the City of Coachella coordinator was, with one of the six noting that there was no official designated personnel but that the building official (Lizzandro Diaz) was currently taking the lead.

When asked if there was a process for a discrimination complaint or grievance four of the ten respondents answered that they were unaware of any procedures. The rest of the respondents answered that the proper channels involved submitting a complaint through Human Resources and Risk Management, while one noted that anyone can submit a comment on the City's website.

Regarding if their department had someone specifically assigned to manage accessibility accommodation requests, four of the ten respondents answered yes, pointing to the various individuals like Human Resources, Celina Jimenez, and Andrew Simmons. The rest of the respondents answered that their department did not have an assigned person to manage accessibility accommodation requests.

When asked if they had staff to rely on for expertise regarding disability issues, three responded that they were unaware or had no such personnel. The rest of the respondents identified someone within their department as having some expertise on ADA and disability issues.

### **Required Actions**

- Provide the name, office address, and telephone number of the employee or employees responsible for ensuring the City meets its ADA obligations under Title II to staff and the public (28 CFR 35.107).
- Publish the grievance procedure to provide fair and prompt resolution of accessibility-related complaints (28 CFR 35.107).
- Ensure that people claiming a violation of Title II are not retaliated against or discriminated against for making such a claim (28 CFR 35.134).
- If applicable, Department of Transportation fund recipients and subrecipients must keep complaints on file for one year and maintain a record, which may be in summary form, for five years (49 CFR 27.121 (b)).

### **Implementation Strategies**

- Refine the role and responsibilities of the ADA Coordinator and determine whether additional employees need to be identified to support this position.
  - Provide training for this position and employees supporting this position with regard to knowledge of the ADA and other laws addressing the rights of people with disabilities.
  - Provide training on the various alternative formats and technologies that enable people with disabilities to communicate, participate, and perform tasks.

- Ensure that the employee in this position has or receives adequate training to negotiate and mediate topics involving the grievance process.
- Ensure that grievances are documented effectively and addressed in a timely manner.
- Maintain a citywide page to address and inform the public on the city's obligation under Title II of the ADA. The citywide page serves to provide a one-stop portal for access to the ADA notice, ADA Coordinator, requests for auxiliary aids and services, program modifications, the complaint process, self-evaluation and transition plan documents, and other city efforts regarding accessibility.
- Provide an ADA barrier removal request form on a City web page. This barrier removal request form can provide an opportunity for a person with a disability to report a need or concern related to programs, activities, or services provided by the City without filing a formal complaint.
- When requested, provide information identifying locations for pending or in-progress grievances that have already been reported.

## 2.3 Customer Service

In-person interaction with the public is one of the primary functions of most City departments. To meet ADA standards for in-person interactions, staff should be aware of the formal and informal procedures for accommodating people with disabilities, including appropriate responses to requests for program modifications and guidelines for accommodating service animals. Only dogs are recognized as service animals under Title II of the ADA; in limited cases, miniature horses that are individually trained to perform tasks for people with disabilities may also qualify to provide services. Emotional support, therapy, comfort, or companion animals are not considered service animals under the ADA.

### Questionnaire Response Summary

Except for two respondents, the rest of the surveyed representatives said that they did not receive training in interacting with people with disabilities. Of the survey respondents, 7 of 10 said that they either don't know or do not make changes to standard operating procedures to include people with disabilities. The remaining three representatives surveyed responded that yes, their departments do make changes to standard operating procedures, citing that public events are always held in accessible venues. However, when asked if there was a formal procedure for making changes, only one responded affirmatively, saying that staff would most likely have to prepare a draft for the City Manager and City Attorney's review and City Council's approval. The other surveyed individuals marked "no" or "don't know."

No staff reported tracking accessibility requests, and one noted that they do charge an additional fee to people with disabilities for modifying programs or providing additional services. Every surveyed individual reported that they do not consult or work with outside organizations or groups that assist people with disabilities.

Half of respondents reported that their department allows service animals to accompany people with disabilities while the other half of those surveyed responded that they did not know. None of the surveyed individuals reported knowing the two questions they may ask regarding service animals.

### **Required Actions**

- Be prepared to make appropriate modifications to regular practices to accommodate individuals with disabilities' needs when providing customer service (28 CFR 35.130).
- Ensure an additional fee is not charged to people requesting a program modification due to their disability (28 CFR 35.130(f)).
- Ensure that service animals are allowed in City facilities (28 CFR 35.136).
- Make reasonable modifications for people with disabilities who rely on a miniature horse that is individually trained to assist them (28 CFR 35.130(i)).

### **Implementation Strategies**

- Ensure that staff members are aware of the City's policy regarding service animals and are trained to implement this policy appropriately. Make sure staff know the two questions they are permitted to ask regarding service animals:
  - Is the dog a service animal required because of a disability? And
  - What work or task has the dog been trained to perform?
- Develop a process for determining reasonable modifications as people with disabilities request them. The process should address the following considerations:
  - Ensure the public has easy access to information about requesting modifications and understanding who to contact.
  - Ensure all staff can direct a person requesting the modification to the appropriate staff member.
  - Ensure requests can be accepted from someone on behalf of the person with a disability and are not required to be in writing.
  - Ensure that requests and outcomes are tracked.

## **2.4 Staff Training**

As a part of the City's ongoing staff development and training, the incorporation of disabilities awareness, standards, and resources is encouraged for all staff interfacing with the public or who maintain the facilities used by the public.

### **Questionnaire Response Summary**

Every respondent noted that they have contact with the public. Over half (60%) of those surveyed were not aware of any staff training to include people with disabilities. Others cited that employees are given annual training on discrimination and disability sensitivity, as well as

how to provide accommodations for hearing, visual, and/or physically impaired members of the public.

**Required Actions**

- Ensure that city staff are knowledgeable about obligations, policies, and procedures for providing accessible services, programs, and activities to the public (28 CFR 35.130; 28 CFR 35.160).
- Ensure that city staff are knowledgeable about procedures for responding to requests for modifications (28 CFR 35.160).
- Ensure that the relevant city staff are knowledgeable about the construction and maintenance of accessible facilities (28 CFR 35.133).

**Implementation Strategies**

- Develop and disseminate best practice resources for staff to formalize the City's approach to addressing accessibility concerns.
- Provide training to design and maintenance staff regarding accessibility standards and maintaining facilities in an accessible condition.
- Provide all department staff with ongoing awareness and sensitivity training.
- Develop a comprehensive disability access training program. Educate staff about their responsibilities under the ADA. The City's ADA Coordinator or City supervisors should be responsible for ensuring that staff members receive training. Staff members who have contact with the public should receive additional training about the process of providing modifications and assistive devices to make their programs, activities, and services accessible. Ensure that training also includes information about responding to a variety of disabilities and the availability of program-specific adaptations, assistive devices, and modifications.
- Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the city's policy on inclusion and nondiscrimination. Staff members should receive training in using the guidelines effectively.
- Offer training to staff members that have contact with the public and wish to learn basic ASL communication skills. Training should emphasize basic communication and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.

**2.5 Contracting, Licensing, or Other Arrangements**

All events on public property should be accessible to people with disabilities. Many public agencies rely on contractors, licensees, consultants, and other entities to deliver City services. These entities are considered an extension of the City's services and must adhere to the same ADA regulations.

### **Questionnaire Response Summary**

Four out of ten surveyed representatives reported using contractors or consultants to conduct programs, activities, or services on behalf of the City. These ranged from consultants engaging in organizing public outreach events to independent contractors that provide services such as marketing, photography, or videography. Two of those surveyed reported that their department organizes special events or facilitates private events at City facilities, like organizing public outreach events for capital projects.

Regarding informing contractors, consultants, and event organizers of their obligation to ensure programs, services, and activities are accessible, only three surveyed individuals stated that they do ensure that information is communicated. According to one representative, all outreach events are required to be held in ADA accessible locations.

### **Required Actions**

- Ensure that contractors, licensees, consultants, and other entities providing or delivering services for the city adhere to the same ADA regulations as the City (28 CFR 35.130).
- Ensure the City selects procurement contractors using criteria that does not discriminate on the basis of disability (28 CFR 35.130).
- Maintain City facilities in an accessible order to help ensure the accessibility of events held by public and private organizations (28 CFR 35.133).

### **Implementation Strategies**

- Ensure contractors, licensees, and other entities providing services to the public are aware of their obligation to make City programs and activities accessible. Provide checklists, resources, contractual language, or other means to help them understand and meet their obligations.
- Monitor public programs and activities provided by contractors, licensees, and other entities to ensure continued accessibility. Provide staff with resources for conducting this review.
- Inform organizations that coordinate or sponsor events at City facilities about applicable ADA requirements.

## **2.6 Public Meetings**

Public meetings are a regularly occurring activity for public agencies. Any public meeting's main objective is to impart and solicit information on issues of importance to the local government. Where these meetings are held is one of the essential considerations for meetings under the ADA requirements.

### **Questionnaire Response Summary**

Seven out of ten surveyed individuals reported that their department does hold public meetings. All the seven departments that host public meetings are required to hold these

meetings in accessible locations. Three out of the seven departments that hold public meetings either don't know or do not provide American Sign Language interpretation, readers, or adaptive equipment when requested for meetings, interviews, and conferences. Of the four departments that do provide accommodation, three did not respond or are unsure of the required advanced notice to provide accommodations, while one reports a necessary advanced period of 72 hours. Only two of the seven departments surveyed ensure that individuals with hearing disabilities who do not read sign language can participate effectively in meetings, conferences, and hearings.

When asked if staff who coordinate or facilitate public meetings were provided with resources for ensuring the accessibility of meetings, only two of the seven relevant departments responded yes, one of which saying that resources were given during an annual training for staff.

### **Required Actions**

- Provide agendas and other meeting materials in alternative formats upon request (28 CFR 35.160).
- Provide flexibility in the time limit on speaking for individuals with communication difficulties (28 CFR 35.160).
- Ensure that assistive listening devices are available for public meetings where the sound at the meeting is amplified (28 CFR 35.160; 2010 Standards 219.2 Required Systems).
- Continue to provide the opportunity to participate in public meetings remotely using technology such as a telephone, video, or other digital means and when oral and written testimony is allowed, provide a similar means of participation remotely (OR HB 2560-A).

### **Implementation Strategies**

- When possible, share meeting content before the meeting and allow the submission of questions in advance of the meeting.
- Ensure a consistent advanced notice requirement and communicate this to both staff and the general public.
  - Ensure the City allows for longer than three minutes of speaking time at City Council meetings when requested for a disability.
- Display a notice on meeting agendas and web pages providing agendas and other meeting materials, indicating the availability of alternative formats of meeting materials and other elements of meeting participation.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings or the relocation of meetings as needed upon request.
- Maintain a list of on-call ASL interpreters who can attend meetings upon request to assist individuals who are deaf or have hearing loss.
- Develop a checklist and provide instruction to staff on ensuring the accessibility of meetings. Guidelines should include examples of the types of modification requests that

may be made by people with different types of disabilities, including assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like real-time captioning. Other considerations include the layout of the room and the locations of the sign-in and refreshments tables, bathrooms, and other elements to ensure these features are accessible.

- Assign a member of staff as a greeter at public meetings and events. Identify this person as a resource for people who may require assistance.

## **2.7 Program Participation**

The public must be able to access all programs, services, and activities, regardless of disability, unless a modification would result in a fundamental alteration to the nature of a service, program, or activity, or impose undue financial and administrative burdens (28 CFR 35.164). Admission criteria, ability to complete forms, and participation in interviews must be available to all public members by providing reasonable modifications.

### **Questionnaire Response Summary**

Only one department identified as having programs for public participation. The programs provided by this department had no eligibility requirements and had no limitations or ratios for the number of people with disabilities who may participate. This department chose participants based on residency and requires the use of forms for admission or selection to the program. No interviews are required and people with disabilities are integrated into programs, services, and activities.

### **Required Actions**

- No required changes to the current program participation process have been identified. Additional information regarding requirements for any new programs developed in the future has been provided in the Accessible Policies Memo.

## **2.8 Transportation Services**

Many public agencies provide public transportation services. The public accommodation standards for these services are set forth by the Federal Transit Administration. The requirements under Title 49 CFR Parts 27, 37, 38, and 39 ([www.ecfr.gov/current/title-49](http://www.ecfr.gov/current/title-49)) include a broad spectrum of legislation that addresses nondiscrimination policies, vehicle and equipment use, programs and services, and transit routes, as well as oversight, complaints, and monitoring (FTA C 4710.1). The scope of the review of this self-evaluation addresses any potentially discriminatory practices under Title 28 CFR Part 35 – Nondiscrimination on the Basis of Disability in State and Local Government Services.

### **Questionnaire Response Summary**

No surveyed representative reported managing transportation services for the public.

**Required Actions**

- No required changes have been identified. Additional information regarding requirements for public transportation services has been provided in the Accessible Policies Memo.

**2.9 Tours and Trips**

Many public agencies provide or facilitate tours and trips as part of their service. These tours and trips are subject to Title II regulations. The City is responsible for ensuring that people with disabilities can experience the tour by making modifications upon request.

**Questionnaire Response Summary**

One survey representative said they provide tours of the city for developers. Two departments provide facility tours or organize trips for members of the public, such as tours of the city for small businesses. All but one surveyed individual didn't know or did not have procedures to make tours and trips accessible to persons with disabilities.

**Required Actions**

- Modify tours and trips upon request to enable people with disabilities to participate (28 CFR 35.130).

**Implementation Strategies**

- Incorporate opportunities to request accessibility modifications in registration materials for tours or trips.
- Provide information to participants in advance of a tour or trip regarding the destination, transportation method, and other characteristics of the activity so that informed requests for modifications can be made.
- Evaluate the destination of tours or trips and the means of transportation to determine accessibility and any modifications that may be required. If a tour route or a portion of a route is inaccessible and modifications are requested, reroute the tour or provide program modifications that will allow the tour to be experienced (for example, photographs, videos with closed captioning).
- Consider developing alternate accessible tour materials such as braille handouts or screen reader versions of pamphlets, captioned videos or audio transcripts, and having ASL interpreters available by request, and things like touchable materials and maps can enhance the accessibility of the tour.

**2.10 Accessible and Adaptive Equipment**

Adaptive aids are devices, controls, appliances, or items that make it possible for people with disabilities to improve their ability to function independently and participate in programs, services, and activities offered by the City. For example, a pen, note pad, and clipboard provided to a person with a speech disability to write notes for brief communication or

electronic equipment such as an accessible computer station are considered adaptive equipment.

### **Questionnaire Response Summary**

No department representative reported public use of any equipment.

### **Required Actions**

- No required changes have been identified. Additional information regarding requirements for accessible and adaptive equipment has been provided in the Accessible Policies Memo.

## **2.11 Printed and Online Materials**

Many public agencies develop and distribute a wide range of materials in printed and online formats. To meet the ADA's effective communication standards, (28 CFR 35.160-164) the City must be able to provide alternative formats such as easy-to-understand language, braille, large print, audio files, computer media, or other formats, when requested. Documents published online must also meet the web content standards described in Section 2.12. This responsibility extends to outside contractors and vendors who develop materials on behalf of the City.

### **Questionnaire Response Summary**

Six out of ten of surveyed respondents confirmed that they produce or provide printed or online materials that are available to the public. Of the six confirmed representatives, four of them were aware of their responsibility to provide accessible documents. Some departments were able to provide audio recordings or a digital copy of their printed media upon request for individuals with visual disabilities, while others reported that they have not provided alternative formats when requested.

Four of the six respondents made printed and online content in simple easy-to-understand language for individuals with learning disabilities. None of the self-identified departments generating printed or online materials were able to report if they include images of individuals with disabilities in their printed and online materials.

### **Required Actions**

- Ensure alternative formats to printed and online information are made available upon request, addressing each request on an individual basis (28 CFR 35.160).
- Ensure assistance is provided upon request in filling out forms when alternative formats are unavailable or infeasible (28 CFR 35.130).
- Continue to ensure that costs for alternative formats and modifications are not assigned to a person with a disability making the request (28 CFR 35.130).

### **Implementation Strategies**

- Include a notice on public materials printed by the City, similar to the following that contains up to date ADA Coordinator contact information:

*This publication can be made available in alternative formats, such as large print, braille, or electronic format. Requests can be made by calling the ADA Coordinator at [telephone] (voice) or by using the 711 Telecommunications Relay Service, or email [access coordinator email]. Please allow 72 hours for your request to be processed.*

- Develop a formal standard for the accessibility of printed and online materials and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created materials and strategies for making existing online materials accessible.
- Develop and implement standard templates for producing accessible City materials that are consistent with City branding and style.
- Train staff to provide printed and online information in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner. Incorporate strategies for materials with complex language or other elements such as charts, graphs, maps, and other images.
- Include images of people with disabilities when images of people are included in City printed materials.

## 2.12 Website

As people turn to the internet as their primary source of information regarding services, programs, activities, and facilities, the City's website takes on increased importance as a communications tool. Providing public access to City publications online is an effective means of reaching people with disabilities ([www.ada.gov/websites2.htm](http://www.ada.gov/websites2.htm)).

On April 24, 2024, the Federal Register published the Department of Justice's final rule updating its regulations for Title II of the ADA. The final rule has specific requirements about how to ensure that web content and mobile applications (apps) are accessible to people with disabilities. The ruling identifies Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA as the technical standard for state and local governments' web content and mobile apps. The requirements take full effect in April of 2026 or 2027, depending on the size of the Title II entity.

### Questionnaire Response Summary

All but two representatives surveyed identified their department as having a website. Four respondents confirmed that they were responsible for managing their own website. However, no department was able to name policies to ensure their website was usable by individuals with disabilities.

### Required Actions

- Take appropriate steps to ensure that the City's online communication with people with disabilities is as effective as other communications with the public and ensure compliance with WCAG 2.1 digital accessibility standards (28 CFR 35.160).

- Ensure that people with disabilities are not excluded from participating in or benefitting from the City's online services, programs, or activities (28 CFR 35.160).

**Implementation Strategies**

- Provide information on the city website about the accessibility of facilities.
- Acquire technological resources, staffing expertise, or on-call consultant contracts to create accessible digital documents for posting on the city website.
- Develop a formal standard for website accessibility and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created web pages and incorporates strategies for making accessibility updates to existing web pages.
- Periodically conduct web accessibility analyses to measure the accessibility of the city's websites periodically. Consider adopting standards that meet or exceed WCAG 2.0 AA for the accessibility of electronic information.

**2.13 Televised and Audiovisual Information**

Televised and audiovisual information is a means for disseminating public information through presentations produced by the City. All televised and audiovisual information, including PowerPoint presentations, must be accessible to people with disabilities. As more communication is done remotely through the internet, it is increasingly important that all communication tools maintain accessibility as technology changes.

**Questionnaire Response Summary**

Of the ten representatives surveyed, three produced audiovisual or televised media for the public. All three departments relied on automatic captioning through their host sites, and one department also utilized captioning and transcription services.

**Required Actions**

- Provide alternative formats upon request to audiovisual presentations produced by the City or its contractors or vendors (28 CFR 35.160).
- Continue to ensure that televised and audiovisual communications with people with disabilities is as effective as televised and audiovisual communications with others (28 CFR 35.160).

**Implementation Strategies**

- Review City presentations, videos, and recordings of meetings to identify potential barriers to accessibility and corresponding solutions.
- Ensure auto-captioning of online video content is edited for accuracy.
- Encourage presenters to read presentation slides and describe the graphic content when presenting PowerPoint or other visual presentations.

## 2.14 Telecommunications

Technological advances such as cell phones, texting, and instant messaging are changing the tools that many people use to communicate. However, the provision of alternative communication technologies such as teletypewriters (TTY), telecommunication display devices (TDDs), or relay services (TRS) is still required under the ADA for communicating with the public.

### Questionnaire Response Summary

All but one department communicates by telephone with the public. All surveyed department representatives were unaware of or did not use telecommunication or teletypewriter services that aid individuals with hearing or speech disabilities. For public use of phones, phones were either not allowed for public use, or the department representative didn't know or didn't provide TTYs for individuals with disabilities. No one was aware of providing a TTY number in materials where a phone number is listed.

### Required Actions

- Ensure that staff is proficient in the use of alternative communication technologies such as TTY, TDDs, or TRS, or are able to direct the public to knowledgeable staff (28 CFR 35.161).
- Ensure that city publications that list phone numbers also include information on how people who are deaf or who have hearing loss or speech disorders can communicate with the city by phone (28 CFR 35.161; 28 CFR 35.163).
- Ensure that telecommunications with people with disabilities is as effective as communications with others (28 CFR 35.161; 28 CFR 35.163).
- Ensure that responses to calls from a telecommunications relay service are handled in the same manner as responding to other telephone calls (28 CFR 35.161).

### Implementation Strategies

- Train staff on the use of alternative communication technologies.
- Explore options for Video Remote Interpreting Services (VRI) for communicating with people who are deaf, have hearing loss, or speech disorders. There are many situations where a live interpreter is required, such as in medical situations, but VRI can be a convenient, flexible, lower-cost alternative to live interpreters.

## 2.15 Emergency Planning

Life and safety protocols and procedures are required to include plans for people with disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency. Issues that have the greatest impact on people with disabilities include:

- Notification;
- Evacuation;
- Emergency transportation;

- Access to medications, refrigeration, and back-up power;
- Access to their mobility devices or service animals while in transit; and
- Access to information.

In planning for emergency services, the City is required to develop strategies for notifying and assisting people with the widest range of disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency.

### **Questionnaire Response Summary**

All but one surveyed department self-identified as being responsible for planning, coordinating, or assisting in the City's emergency response. The majority of departments didn't know if their contracts with third-party services ensured compliance with ADA requirements; one department did report having an ADA-compliant contract, while for another department the question was not applicable. No department representative was able to name any written procedures for including people with disabilities in the development of emergency procedures, but one department representative did report that they seek input from people with disabilities or representative organizations for feedback on emergency simulations.

None of the departments had staff trained in notifying and assisting people with disabilities in emergency situations. Moreover, no department was aware of whether members of the public who use TTYs and computer modems had direct access to telephone emergency services.

### **Required Actions**

- Include strategies for people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Train staff to safely evacuate people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Provide direct access to telephone emergency services, including 911 services, for people who use TDD's and computer modems (28 CFR 35.162).
- If the City becomes involved in providing emergency shelters, provide emergency sheltering programs that are accessible to people with disabilities (28 CFR 35.130; 28 CFR 35.149).

### **Implementation Strategies**

- Review existing procedures dealing with emergencies to ensure that people with disabilities can be alerted and that they can alert emergency service providers.
- Work with disability organizations to explore the use of technologies such as audible exit signs for orientation and direction or vibrating paging systems.
- Develop plans that consider the needs of people using mobility aids such as wheelchairs, walkers, canes, crutches, or other power-driven mobility devices, or those with limited stamina. Plans should also address those who use oxygen or respirators, those who are

blind or have low vision, people who are deaf or have hearing loss, people who have a cognitive disability, people with mental illness, and those with other types of disabilities.

- Test the City's emergency plan and evacuation procedures with periodic drills, both announced and unannounced. Enlist people with different disabilities to role-play during emergency simulations.
- Incorporate the following elements into emergency planning for individual facilities:
  - Address what to do when an alarm is triggered;
  - Establish meeting places for assistance and evacuation chairs;
  - Provide direction on what to do if assistance is not available; and
  - Establish floor captains.

## 2.16 Facilities

City facilities should be accessible to people with different types of disabilities. A public entity is not necessarily required to make each of its existing facilities accessible, where other methods are effective in achieving program access. However, they must ensure that each service, program, or activity, when viewed in its entirety (28 CFR 35.160), is readily accessible to and usable by individuals with disabilities. The identification of structural barriers in facilities such as buildings, parks, and the public rights-of-way are required elements of an ADA Transition Plan.

### Questionnaire Response Summary

No department representative reported having information on their website or printed materials about accessibility of facilities where the programs and services they offered. There were also no reports of requests to improve the accessibility of their associated facilities.

### Required Actions

- Ensure that the public can obtain information regarding the existence and location of accessible facilities, entrances, and elements within facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of facilities required to be accessible and usable for people with disabilities (28 CFR 35.133).
- Ensure that people with disabilities are not excluded from programs due to the inaccessibility of City facilities (28 CFR 35.149).
- Prioritize methods of achieving facility accessibility that offer the most integrated setting appropriate for people with disabilities (28 CFR 35.149).
- Design and construct new facilities or new parts of facilities to meet accessibility requirements (28 CFR 35.151(a)).
- Ensure that alterations to facilities meet accessibility requirements to the maximum extent feasible (28 CFR 35.151(b)).
- Make reasonable modifications to permit the use of mobility devices, including other power-driven mobility devices, unless they cannot be operated in accordance with the City's adopted safety requirements for pedestrian facilities (28 CFR 35.137(b)(1)).

### **Implementation Strategies**

- Provide information about the accessibility of City-owned and operated facilities on city publications, including city websites. This can include details about accessible entrances, bathrooms, and other elements.
- Provide information about the accessibility of non-City facilities hosting City programs and services and City-owned facilities that are leased to other entities.
- Record and monitor requests relating to facility access. The ADA Coordinator can analyze accessibility requests periodically to look for global issues that can be addressed and problems that can be solved proactively.
- Develop formal standards for integrating ADA requirements into the design, construction, maintenance, and inspection of all City of Coachella facilities. As part of this effort, develop and implement standards for enforcing accessibility provisions for contractors, consultants, vendors, etc. who design, construct, maintain, and inspect City facilities.
- Identify or hire staff members tasked with accessibility plan review.

## **2.17 Accessibility Practices in the Right-of-Way**

Management, maintenance, and construction of facilities in the public right-of-way is often handled separately from other construction and maintenance projects. It is important to ensure that public right-of-way facilities comply with current standards and provide equal access to people with disabilities.

Note that although the questionnaire summary below shows that City staff is confident in their policies and procedures addressing accessibility in the public right-of-way, City sidewalks, crosswalks, and curb ramps was a primary concern for some participants in the ADA Stakeholders Feedback sessions held with community members who have disabilities or are caretakers for persons with disabilities. Community members described frustration with discontinuous accessible routes, barriers and obstacles in sidewalks, and missing or inadequate curb ramps. The discrepancy between self-reported practices in the Right-of-Way and the experiences of community members with disabilities may indicate that while design and implementation for new projects are handled effectively, existing right-of-way facilities need evaluation for repair and replacement. Further investigation into the City's pedestrian infrastructure network and accessibility practices in the right-of-way is needed to address resident complaints.

### **Questionnaire Response Summary**

Only one surveyed representative provided services related to the construction and maintenance of City facilities in the right-of-way. They noted that they conduct internal and external plan checks by trained and license professionals to ensure compliance with ADA requirements. No non-compliant projects are allowed to be installed and if something is missed in the plan checks, then it will be adjusted to meet compliance in the field. Although temporary

pedestrian access routes (TPARs) are not required, if TPARs are installed, daily inspections will take place to ensure continued access.

The department does use third-party entities and to ensure ADA responsibilities are met, the department will conduct internal and external plan checks by licensed professionals. To communicate ADA requirements to third parties, they host regular pre-development team (PDT) meetings before construction and preconstruction meetings paired with daily inspections during construction.

The representative surveyed did not see any difference between accessibility components as designed versus when constructed. They also noted that they need no further staff and have adequate internal resources to meet ADA compliance and resolve issues.

### **Required Actions**

- Ensure that the public can obtain information regarding the existence and location of accessible transportation facilities, entrances, and elements within right-of-way facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of right-of-way elements required to be accessible and usable for people with disabilities (28 CFR 35.133).

### **Implementation Strategies**

- Identify and delegate staff responsibilities for updating public communications regarding accessible right-of-way facilities, temporary pedestrian access routes, and maintenance disruptions.
- Follow accessible communication requirements and strategies described in sections 2.11 Printed and Online Materials, 2.12 Website, and 2.14 Televised and Audiovisual Information, as applicable.

## **3 Summary and Conclusion**

The self-evaluation survey reveals successful components and areas for improvement in City of Coachella policies and practices. The Required Actions from Section 2 have been compiled below:

### **Required Actions List**

#### **Notice**

- Provide public notice of the City's commitment to providing accessible services (28 CFR 35.106).

**Responsible Employee and Grievance Procedure**

- Provide the name, office address, and telephone number of the employee or employees responsible for ensuring the City meets its ADA obligations under Title II to staff and the public (28 CFR 35.107).
- Publish the grievance procedure to provide fair and prompt resolution of accessibility-related complaints (28 CFR 35.107).
- Ensure that people claiming a violation of Title II are not retaliated against or discriminated against for making such a claim (28 CFR 35.134).
- If applicable, Department of Transportation fund recipients and subrecipients must keep complaints on file for one year and maintain a record, which may be in summary form, for five years (49 CFR 27.121 (b)).

**Customer Service**

- Be prepared to make appropriate modifications to regular practices to accommodate individuals with disabilities' needs when providing customer service (28 CFR 35.130).
- Ensure an additional fee is not charged to people requesting a program modification due to their disability (28 CFR 35.130(f)).
- Ensure that service animals are allowed in City facilities (28 CFR 35.136).
- Make reasonable modifications for people with disabilities who rely on a miniature horse that is individually trained to assist them (28 CFR 35.130(i)).

**Staff Training**

- Ensure that city staff is knowledgeable about obligations, policies, and procedures for providing accessible services, programs, and activities to the public (28 CFR 35.130; 28 CFR 35.160).
- Ensure that city staff is knowledgeable about procedures for responding to requests for modifications (28 CFR 35.160).
- Ensure that the relevant city staff is knowledgeable about construction and maintenance of accessible facilities (28 CFR 35.133).

**Contracting, Licensing, or Other Arrangements**

- Ensure that contractors, licensees, consultants, and other entities providing or delivering services for the city adhere to the same ADA regulations as the City (28 CFR 35.130).
- Ensure the City selects procurement contractors using criteria that does not discriminate on the basis of disability (28 CFR 35.130).
- Maintain City facilities in an accessible order to help ensure the accessibility of events held by public and private organizations (28 CFR 35.133).

**Public Meetings**

- Provide agendas and other meeting materials in alternative formats upon request (28 CFR 35.160).
- Provide flexibility in the time limit on speaking for individuals with communication difficulties (28 CFR 35.160).
- Ensure that assistive listening devices are available for public meetings where the sound at the meeting is amplified (28 CFR 35.160; 2010 Standards 219.2 Required Systems).
- Continue to provide the opportunity to participate in public meetings remotely using technology such as a telephone, video, or other digital means and when oral and written testimony is allowed, provide a similar means of participation remotely (OR HB 2560-A).

**Program Participation**

- No required changes have been identified.

**Transportation Services**

- No required changes have been identified.

**Tours and Trips**

- Modify tours and trips upon request to enable people with disabilities to participate (28 CFR 35.130).

**Accessible and Adaptive Equipment**

- No required changes have been identified.

**Printed and Online Materials**

- Ensure alternative formats to printed and online information is made available upon request, addressing each request on an individual basis (28 CFR 35.160).
- Ensure assistance is provided upon request in filling out forms when alternative formats are unavailable or infeasible (28 CFR 35.130).
- Continue to ensure that costs for alternative formats and modifications are not assigned to a person with a disability making the request (28 CFR 35.130).

**Website**

- Take appropriate steps to ensure that the City's online communication with people with disabilities is as effective as other communications with the public and ensure compliance with WCAG 2.1 digital accessibility standards (28 CFR 35.160).
- Ensure that people with disabilities are not excluded from participating in or benefitting from the City's online services, programs, or activities (28 CFR 35.160).

**Televised and Audiovisual Information**

- Take appropriate steps to ensure that the City's online communication with people with disabilities is as effective as other communications with the public and ensure compliance with WCAG 2.1 digital accessibility standards (28 CFR 35.160).
- Ensure that people with disabilities are not excluded from participating in or benefitting from the City's online services, programs, or activities (28 CFR 35.160).

**Telecommunications**

- Ensure that staff are proficient in the use of alternative communication technologies such as TTY, TDDs, or TRS, or are able to direct the public to knowledgeable staff (28 CFR 35.161).
- Ensure that city publications that list phone numbers also include information on how people who are deaf or who have hearing loss or speech disorders can communicate with the city by phone (28 CFR 35.161; 28 CFR 35.163).
- Ensure that telecommunications with people with disabilities are as effective as communications with others (28 CFR 35.161; 28 CFR 35.163).
- Ensure that responses to calls from a telecommunications relay service are handled in the same manner as responding to other telephone calls (28 CFR 35.161).

**Emergency Planning**

- Include strategies for people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Train staff to safely evacuate people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations (28 CFR 35.130; 28 CFR 35.149).
- Provide direct access to telephone emergency services, including 911 services, for people who use TDD's and computer modems (28 CFR 35.162).
- If the City becomes involved in providing emergency shelters, provide emergency sheltering programs that are accessible to people with disabilities (28 CFR 35.130; 28 CFR 35.149).

**Facilities**

- Ensure that the public can obtain information regarding the existence and location of accessible facilities, entrances, and elements within facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of facilities required to be accessible and usable for people with disabilities (28 CFR 35.133).
- Ensure that people with disabilities are not excluded from programs due to the inaccessibility of City facilities (28 CFR 35.149).
- Prioritize methods of achieving facility accessibility that offer the most integrated setting appropriate for people with disabilities (28 CFR 35.149).

- Design and construct new facilities or new parts of facilities to meet accessibility requirements (28 CFR 35.151(a)).
- Ensure that alterations to facilities meet accessibility requirements to the maximum extent feasible (28 CFR 35.151(b)).
- Make reasonable modifications to permit the use of mobility devices, including other power-driven mobility devices, unless they cannot be operated in accordance with the City's adopted safety requirements for pedestrian facilities (28 CFR 35.137(b)(1)).

**Accessibility Practices in the Right-of-Way:**

- Ensure that the public can obtain information regarding the existence and location of accessible transportation facilities, entrances, and elements within right-of-way facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of right-of-way elements required to be accessible and usable for people with disabilities (28 CFR 35.133).

**Conclusion**

The ADA coordinator or designee will follow up with department managers to review the Self-Evaluation Questionnaire findings as well as the Accessible Policies and Procedures Memo's recommendations. In those situations where a policy, program, or procedure creates a barrier to accessibility that is unique to a department or a specific program, the ADA Coordinator or designee will coordinate with the department head or program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

Many of the apparent omissions and errors in City policies discovered through the staff questionnaire can be resolved with improved communication. City staff need clear communication about accessibility requirements, processes, and resources available to them in order to effectively and consistently deliver accessible programs, activities, and services to the public. Publishing information in an easy-to-find location, and providing recurring staff training, is recommended to ensure that City staff remain up to date on accessibility policies and can reference written information or reach out for assistance when needed.

Likewise, residents of the City of Coachella need clear communication of the City's intent to uphold Title II of the ADA, as well as access to information about the policies, facilities, program modifications, adaptive equipment, communication methods, and individualized services available to them upon request. Publishing and updating this information in an easy-to-find location helps residents with disabilities plan their participation in City programs and services with confidence and conveys the City of Coachella's bona-fide commitment to equitable and inclusive practices.