



WIDE AWAKE WYLIE

ADA Self-Evaluation and Transition Plan

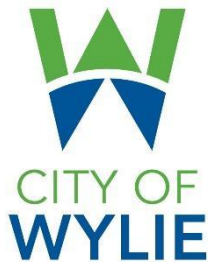




TABLE OF CONTENTS

CHAPTER 1.0 EXECUTIVE SUMMARY	3
1.1 Introduction	3
1.2 Federal Accessibility Requirements	3
1.3 State of Texas Accessibility Requirements	4
1.4 Declarations	4
CHAPTER 2.0 COMPLIANCE WITH TITLE II REQUIREMENTS	5
2.1 Notification	5
2.2 Designation of Responsible Employee	5
2.3 Self-Evaluation and Transition Plan	6
2.4 Establishment of Grievance Procedure	6
2.5 Emergency Management	6
CHAPTER 3.0 EVALUATION AND STEPS TAKEN	6
3.1 Self-Evaluation	6
3.2 Action Taken to Improve Access	7
CHAPTER 4.0 GRIEVANCE PROCEDURE AND INSTRUCTIONS	8
4.2 File a Grievance Form	9
4.3 Investigation Process	9
4.4 Resolution	9
CHAPTER 5.0 EMERGENCY MANAGEMENT	10
5.1 Access to 9-1-1 Services	10
5.2 Functional Needs Assessments	10
5.3 Functional Needs Planning	10
CHAPTER 6.0 CONCLUSION	Error! Bookmark not defined.1
APPENDIX A - PUBLIC NOTICES AND POSTINGS	
APPENDIX B - GRIEVANCE FORM	
APPENDIX C - ACKNOWLEDGEMENT LETTER FOR RECEIPT OF GRIEVANCE	
APPENDIX D - GENERAL FINDINGS AND SUMMARY FROM STAFF EVALUATION	
APPENDIX E - GENERAL FINDINGS AND SUMMARY FROM PUBLIC SURVEY	

CHAPTER 1.0 EXECUTIVE SUMMARY

1.1 Introduction

The Americans with Disabilities Act was passed in 1990 as a step towards the disestablishment of discrimination against individuals with disabilities. ADA Title II requires communities to establish self-evaluations and/or transition plans, as determined by community employee size, for updating public facilities. Title II covers programs, activities, and services of government entities with a specific focus on protecting citizens from discrimination on the basis of disability. The goal of this act is to afford every individual the opportunity to benefit from businesses and services and to afford businesses and services the opportunity to benefit from the patronage of all Americans. This document will guide the planning and implementation of necessary program and facility modifications in the years to come. The ADA Transition Plan is significant in that it establishes the City of Wylie's (the "City") ongoing commitment to the development and maintenance of policies, programs and facilities that include all residents and visitors to the City of Wylie.

1.2 Federal Accessibility Requirements

The development of a transition plan is a requirement of the Federal regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Act, which became known as the "civil rights act" of persons with disabilities, states:

No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
(Section 504)

Subsequent to the enactment of the Rehabilitation Act of 1973, Congress passed the Americans with Disabilities Act on July 26, 1990 (the "ADA"). Title II of the ADA prohibits disability discrimination by all public entities. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act. The legislative mandate, therefore, prohibits the City from, either directly or through contractual arrangements:

- Denying persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered to others, even if the City offers permissibly separate or different activities.
- Selecting facility locations that have the effect of excluding or discriminating against persons with disabilities.

The City of Wylie is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the ADA Access Guidelines (ADAAG) that apply to facilities and other physical holdings. Details of the Americans with Disabilities Act of 1990 can be found on the ADA website at www.ada.gov.

Administrative Requirements, Locations of Information

- The ADA can be found at: www.ada.gov/pubs/ada.htm
- Department of Justice ADA regulations for Title II, 28 CFR Part 35, can be found at: <http://www.ada.gov/regs2010/ADAREgs2010.htm>
- Section 504 can be found at: <https://www.hud.gov/programdescription/sec504>

Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Designation of a person who is responsible for overseeing Title II compliance;
- Development of an ADA grievance procedure;
- Completion of a self-evaluation; and
- Development of a transition plan if the self-evaluation identifies any structural modifications necessary for compliance. Modification records must be retained for three years.

1.3 State of Texas Accessibility Requirements

In addition to complying with ADA requirements, the City will also comply with the Texas Accessibility Standards, Elimination of Architectural Barriers as contained in Texas Government Code, Chapter 469. Details can found on their website:

<http://www.statutes.legis.state.tx.us/Docs/GV/htm/GV.469.htm>

1.4 Declarations

Compliance with the Americans with Disabilities Act

In accordance with the requirements of Title II of the ADA, the City will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment

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

Effective Communication

The City will, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they may participate equally in the City's programs, services, and activities, including but not limited to, qualified sign language and/or language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairment

Modifications to Policies and Procedures

The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of the City's programs, services, and activities. Anyone who requires auxiliary aid or service for, or has a complaint related to, effective communication, or a modification of policies or procedures to allow participation in a program, service, or activity in the City should contact:

City of Wylie ADA Coordinator
Attn: Joe Tidwell
300 Country Club Rd, Building 100
Wylie, TX 75098
972-516-6010
Email: Joe.tidwell@wylietexas.gov

Surcharges and Fees

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services to accommodate access to or participation in programs or services.

Undue Burden

The ADA does not require the City to undertake any action that would represent an undue financial and administrative burden. This determination is to be made by the ADA Coordinator and must be accompanied by a statement citing the reason(s) for reaching that conclusion. The determination that undue burdens would result must be based on an evaluation of all resources available for use in the programs.

"Undue hardship" means an action requiring significant difficulty or expense, when considered in light of the following factors: (1) The nature and cost of the accommodation needed. (2) The overall financial resources of the facilities involved in the provision of the reasonable accommodations, the number of persons employed at the facility, and the effect on expenses and resources or the impact otherwise of these accommodations upon the operation of the facility. (3) The overall financial resources of the covered entity, the overall size of the business of a covered entity with respect to the number of employees, and the number, type, and location of its facilities. (4) The type of operations, including the composition, structure, and functions of the workforce of the entity. (5) The geographic separateness, administrative, or fiscal relationship of the facility or facilities.

CHAPTER 2.0 COMPLIANCE WITH TITLE II REQUIREMENTS

This section makes reference to various parts of the Code of Federal Regulations (CFR), section 35 as it pertains to ADA requirements that the City must comply with or address as part of the transition plan. The details of which can be found on the ADA website: www.ada.gov/reg2.html.

2.1 Notification

Applicants, participants, beneficiaries, and other interested persons have been notified of their rights and the City's obligations under Title II of the ADA as required by 28 CFR §35.106. This notification appears on the City's website: www.wylietexas.gov. Public meetings notices and agendas also include this notification.

2.2 Designation of Responsible Employee

The City has designated a responsible employee to coordinate its efforts to comply with and carry out the City's ADA responsibilities in accordance with 28 CFR §35.107(a). The ADA Coordinator has been designated to oversee compliance with the non-discrimination requirements and can be contacted at: City of Wylie ADA Coordinator, Attn: Joe Tidwell, 300 Country Club Rd, Building 100, Wylie, TX 75098 Telephone: 972-516-6010, or joe.tidwell@wylietexas.gov.

2.3 Self-Evaluation and Transition Plan

Title II of the ADA requires that the City conduct a self-evaluation of its services, policies, and practices and make modifications as necessary to comply with 28 CFR §35.105. A self-evaluation is an assessment of the City's current policies and practices, identifies, and corrects those policies and practices that are inconsistent with Title II requirements. The ADA Transition Plan continues the process of identifying any barriers to accessibility that might be present. The City has completed the self-evaluation process and will continue the process through solicitation of public comment. This transition plan is a living document that will be updated periodically to reflect the ongoing assessment and resolution/response to public comment. Updates will be provided as amendments to the plan, inclusion of additional annexes, and/or updates to the City's website: www.wylietexas.gov.

2.4 Establishment of Grievance Procedure

The City has established a grievance procedure for resolving complaints of violations in accordance with 28 CFR §35.107(b). Refer to Section 4.0 below.

2.5 Emergency Management

The City of Wylie Emergency Management Coordinator (EMC) develops, maintains and facilitates the all-hazard Emergency Management Plan as required by Local, State and Federal statutes and laws. During all emergency planning (Mitigation, Preparedness, Response, and Recovery), the City is committed to be in compliance with the ADA requirements as outlined in Chapter 7 under Title II (<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.htm>) of the ADA. The EMC ensures that all parties with responsibilities under the Emergency Management Plan are aware of ADA requirements and that all programs and third party agreements are in compliance with ADA.

CHAPTER 3.0 EVALUATION AND STEPS TAKEN

3.1 Self-Evaluation

The self-evaluation is the City's assessment of its current policies, practices and procedures to determine compliance with the ADA. As part of this assessment, the City will conduct an ongoing evaluation review of physical barriers in its buildings and facilities with the assistance of representatives from various departments housed in those facilities (i.e. Parks and Recreation, Library, Senior Center, Public Safety Building, etc.).

The City evaluated its programs, services, and activities for compliance with the ADA in the following areas:

- Identified all programs, activities and services
- City-wide Events
- Employee Safety
- Reviewed all of the policies, practices and procedures that govern the administration of the City's programs, activities and services.

Recognizing that the City has limited funds, staff will utilize a variety of criteria for prioritizing the removal of physical barriers. These criteria may include but not be limited to the following:

- Frequency of public use;
- Nature of the programs offered at the facility;
- Public feedback obtained through the public input and grievance processes;
- Availability of funding (Grants, Development Agreements, Interlocal Agreements, etc.);
- Policy modifications to ensure nondiscrimination; and
- Planning of future construction activity – Capital Improvement Plan/Annual Sidewalk Budgeting.

3.2 Action Taken to Improve Access

In 2009 the City implemented a citywide Sidewalk Improvement Plan as part of the Neighborhood Accountable Communities Through the Involvement Of Neighborhoods (A.C.T.I.O.N.) Plan adopted in 2007. The plan included assessing existing conditions of sidewalks and streets and implementing recommendations to improve walkability to comply with ADA regulations.

The City of Wylie established a Safety Committee in January 2010 for the purpose of recommending improvements to our workplace safety program and to help in the identification of corrective measures needed to eliminate or control recognized safety and health hazards. The Safety Committee consists of one representative from each department plus five subject matter experts that includes the Fire Chief, Emergency Management Coordinator, Purchasing Manager, Facilities Manager. The City added an ADA Coordinator to the list of subject matter experts in 2021.

The Safety Committee is responsible for these tasks:

- Provide safety activities including required quarterly and annual training as outlined in the adopted safety manual.
- Set goals concerning safety performance within the assigned department(s).
- Enforce all safety rules in coordination with the department management and supervisory staff.
- Review accident reports and recommend corrective actions.
- Attend and participate in quarterly safety meetings.

All employees of every level are responsible for maintaining a workplace free from recognized hazards that could result in injuries or accidents. Compliance training is provided to educate employees on identifying hazards and how to report hazards and other safety related concerns.

As new City facilities have been constructed or existing buildings remodeled, the City has complied with State of Texas design requirements through review by the Texas Department of Licensing and Regulation (TDLR).

As part of the self-evaluation process, the following list summarizes activities related to evaluating existing conditions and implementing ADA required improvements and compliance:

- 2010 Established an employee Safety Program
- 2011 provided devices for the hearing impaired to be used during public meetings
- 2018 adoption of the City's Thoroughfare Plan to guide street improvements in the City for the following decades.
- 2019 Civic Engagement to provide the citizens of Wylie an opportunity to learn about city departments and how we work together to make Wylie a great place to live, work, and shop.
- 2020 Downtown Strategic Plan with assistance from The North Texas Council of Governments
 - Data collection
 - Stakeholder and public involvement
 - Strategic Plan Development
- 2021 Appointed an ADA Coordinator
- 2021 Comprehensive Plan Update
 - City Council appointed 14 citizens to serve on the committee
 - Joint Workshop with City Council
 - Joint Public Hearing with City Council
- 2021 Citizen Bond Committee
 - City Council appointed 14 citizens to serve on the committee
 - Four public meetings
 - 2021 GIS inventory of City's sidewalks, signalized and unsignalized intersections, crosswalks at major intersections.
- 2021-22 Citywide Sidewalk Repair Program through Public Works
 - Completed 5,750 linear feet of concrete
 - Approximately \$350,00 spent on sidewalk repair

One of the key findings of these public involvement exercises is that the residents of Wylie support improvements to sidewalks and streets throughout the City, which led to the citywide Sidewalk Repair Program along with additional studies, which are currently underway. Additionally, the City of Wylie continues to work closely with TxDOT and the NCTCOG as part of the City's Downtown Strategic Plan. All of these projects comply with TxDOT's Self Evaluation and Transition Plan for compliance with the Americans with Disabilities Act (dated January 2004).

CHAPTER 4.0 GRIEVANCE PROCEDURE AND INSTRUCTIONS

4.1 Purpose of Guidelines

The City of Wylie utilizes many different approaches in removing barriers in the public right of way, including proactively identifying and eliminating the barrier, responding to public grievances and ensuring that discrimination complaints are handled promptly, effectively, and equitably. Under the Americans with Disabilities Act, users of City facilities and services have the right to file a grievance if they believe the City has not provided reasonable accommodation.

4.2 File a Grievance Form

The complainant should fill out the ADA Complaint/Grievance Form (refer to Attachment B), giving all of the information requested. Under the grievance procedures, a formal complaint must be filed as soon as possible, but no later than 30 calendar days of the alleged occurrence. Upon request, reasonable accommodations will be provided in completing the form, or alternative formats of the form will be provided. The ADA Complaint/Grievance Procedure and Form may be obtained from and sent to the City of Wylie ADA Coordinator, Attn: Joe Tidwell, 300 Country Club Rd, Building 100, and Wylie, TX 75098. Contact the ADA Coordinator at the address listed above, via telephone 972-516-6010, or email joe.tidwell@wylietexas.gov with additional questions.

The ADA Coordinator is required to acknowledge receipt of the grievance within 15 days (refer to Attachment C). If the response of the ADA Coordinator does not satisfactorily resolve the issue, the complainant may appeal the response, to the City Manager's Office for a final determination. If at any time the complainant is not satisfied with the City of Wylie's handling of the grievance, the complainant may file directly with the U.S. Department of Justice.

4.3 Investigation Process

Following the filing of a grievance, the ADA Coordinator or another authorized representative shall determine whether, and to what extent, an investigation of the grievance is warranted. The ADA Coordinator or their designee shall conduct any resulting investigation. A thorough investigation affords all interested persons and their representatives an opportunity to submit evidence relevant to a grievance. The ADA Coordinator will complete the investigation within 60 calendar days of receipt of the grievance. If appropriate, the ADA Coordinator will arrange to meet with the complainant to discuss the matter and attempt to reach a resolution of the grievance.

4.4 Resolution

Any resolution of the grievance shall be documented in the ADA Coordinator file and the case will be closed. All written complaints and resolutions shall be kept on file for seven years. The resolution of any specific grievance will require consideration of varying circumstances, such as the specific nature of the disability; the nature of the access to facilities; the safety of others; and the degree to which an

accommodation would constitute a fundamental alteration to the facility, or cause an undue hardship to the City. Accordingly, the resolution by the City of any grievance does not constitute an admission of liability, guilt or a precedent upon which the City is bound or upon which other parties may rely. The ADA Coordinator or other authorized representatives shall maintain the confidentiality of all files and records relating to grievances filed, unless disclosure is authorized or required by law. Any retaliation, coercion, intimidation, threat, interference or harassment for the filing of a grievance, or used to restrain a complainant from filing, is prohibited and should be reported immediately to the ADA Coordinator or their designee.

CHAPTER 5.0 EMERGENCY MANAGEMENT

A priority of the City's Office of Emergency Management is helping people prepare for and respond to emergencies. Making local preparedness and response programs accessible to people with disabilities is a critical part of this responsibility.

5.1 Access to 9-1-1 Services

The City partners with Collin, Dallas, and Rockwall Counties for all 9-1-1 services.

5.2 Functional Needs Assessments

A functional needs assessment of the local residents will assist in ensuring that emergency management procedures are in compliance with the ADA. Functional needs assessments are encouraged as part of the City's Emergency Operations Plan in order to facilitate the notification, evacuation and sheltering phases of an emergency incident. The State of Texas currently has a functional needs registry that is available to any individual who may require additional assistance. This is a voluntary, confidential registration and individuals may apply through the Texas Information Referral Network (2-1-1) or online through the State of Texas Emergency Assistance Registry ("STEAR"):

<https://www.txdps.state.tx.us/dem/stear/public.htm>

STEAR will provide the City with a list of individuals requiring assistance. All information will remain confidential and at no time will names, addresses or other personal information be published, sold or provided to any third parties unless otherwise required by law. The City will utilize public outreach to educate citizens regarding this registration process.

5.3 Functional Needs Planning

Planning for local residents with Functional Needs is contained in the City of Wylie Emergency Operations Plan in Annexes A Warning, B Communication, C Shelter and Mass Care, E Evacuation, I Emergency Public Information, O Human Services, and S Transportation. The Emergency Operations Plan can be found online at <http://www.Qgtx.org/291/Emergency-Operations-Plan>

CHAPTER 6.0 CONCLUSION

Services and programs offered by the City to the public must be accessible for all citizens and reasonable accommodations must be made for those with disabilities. The process of making City facilities and programs accessible to all individuals will be ongoing and the City will continue to review accessibility issues through self-evaluation, resolution of complaints, and by making reasonable modifications to various programs. The City has made progress towards improving accessibility as seen by the following actions:

- Designation of an ADA Coordinator
- Implementation of an ADA grievance procedure
- Conducting an ongoing self-assessment to identify issues needing to be resolved
- Complying with Federal and State requirements as facilities are modified or constructed
- Planning future improvements through the capital improvement program

6.1 Next Steps

The City intends to budget for and complete the Self-Evaluation of programs, services, activities, and facilities identified in this document. Our next steps are:

- Develop an Implementation Plan, including a schedule for completing the recommended facility improvements and the funding sources to be used.
- Complete any remaining Self-Evaluation phases and update the City's ADA Transition Plan after each additional phase.
- Continue to update the City's ADA Transition Plan as projects are implemented and citizen requests/complaints are received.
- Create and maintain facility reports with the compliance status of each element evaluated based on the 2023 ADA Transition Plan.
- Provide additional staff training regarding needs of persons with disabilities in emergency situations.

It is imperative that the City collaborate with the community to work together to identify and resolve accessibility issues. Periodic updates will be made to the Plan and published on the City's website going forward.

APPENDIX A – PUBLIC NOTICES AND POSTINGS

City of Wylie Seeks Public Input on Facility and Program Accessibility

Citizens are Encouraged to Complete the Online Survey

Under Title II of the Americans with Disabilities Act (ADA), the City of Wylie must complete a self-evaluation, including a citizen survey, of our public facilities, programs, and activities, to determine compliance with the ADA and barriers to accessibility. Once the self-evaluation is complete, the City of Wylie will prepare an action plan to address identified barriers to accessibility.

Citizens are encouraged to provide input on the City's accessibility by completing the online survey at WylieTexas.gov/ADA. The survey takes approximately ten minutes and may be submitted anonymously.

For more information about the ADA self-evaluation process or for accommodation to complete the survey, please contact our ADA Coordinator, Joseph Tidwell, 972-516-6000 or email joe.tidwell@wylietexas.gov. Go to WylieTexas.gov/ADA for updates and details on the City's ADA program

ADA Citizen Survey (Direct Link to Survey)

APPENDIX B – GRIEVANCE FORM

City of Wylie - ADA Complaint / Grievance Form

Complainant: _____

Person Preparing Complaint (if different from Complainant): _____

Relationship to Complainant (if different from Complainant): _____

Street Address & Apt. No.: _____

City: _____ State: _____ Zip: _____

Phone: (_____) _____ E-mail: _____

When did the discrimination occur? Date: _____

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

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

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

Please attach additional pages as needed.

☐ Please do not contact me personally.

Signature: _____ Date: _____

Return to: City of Wylie ADA Coordinator, Attn: Joe Tidwell, 300 Country Club Rd, Building 100, Wylie, TX 75098. Upon request, reasonable accommodation will be provided in completing this form or copies of the form will be provided in alternative formats. Contact the ADA Coordinator at the address listed above, via telephone 972-516-6010, or e-mail joe.tidwell@wylietexas.gov.

APPENDIX C – ACKNOWLEDGEMENT LETTER FOR RECEIPT OF GRIEVANCE



{Date}

{Complainant Name or Name of Representative}
{Address}

Re: Acknowledgement of Receipt of Grievance

Dear Mr./Ms. {Complainant Name or Name of Representative}:

This letter is to inform you that Mr. Joe Tidwell, City of Wylie ADA Coordinator, received your grievance on {date} regarding {insert brief statement of Complainant's grievance}. Please find enclosed a description of the City of Wylie Grievance Process, including notification of your right to request a State hearing at any time during the grievance process.

We take your grievance very seriously and are continuing to work toward resolving the issue to your satisfaction.

Within 90 calendar days of receiving your grievance, Wylie City staff will provide you with a written response about the findings of the investigation and the action taken to resolve the grievance. If you feel that waiting 90 calendar days represents a serious health threat, we will expedite the review process to a decision within 72 hours of receiving your grievance.

You may contact Lynn Fagerstrom at 972-516-6040 at any time for information about your grievance. The hearing impaired may call 711, which is the relay service provided by the FCC.

Thank you for working with us to resolve this matter.

Sincerely,

Lynn Fagerstrom
Human Resources Risk Administrator

Enclosures

APPENDIX D

GENERAL FINDINGS AND SUMMARY FROM STAFF EVALUATION INTRODUCTION

Accessibility applies to all aspects of a program, activity or service, including but not limited to advertisement, eligibility, participation, physical access, provision of auxiliary aids, policies and communication.

SELF-EVALUATION BY DEPARTMENTS

With an added and concerted effort beginning in 2021, the City of Wylie conducted a self-evaluation of the accessibility of all City offered programs and events. The questionnaire provided the bases of identifying barriers and creating solutions to remove such barriers. The questionnaire was distributed to the following department liaisons:

- City Secretary's Office
- Code Compliance
- Communications and Marketing
- Emergency Management
- Facilities Management
- Fire
- Human Resources
- Information Technology
- Law Enforcement
- Library
- Municipal Court System
- Parks and Recreation
- Planning
- Public Works
- Purchasing
- Utility Billing

In addition, the City conducted a physical audit of City facilities to identify barriers and then form recommendations and alterations in order to meet state and federal accessibility standards. The list of facilities surveyed include:

- City Hall
- City owned parking lots
- City owned curb ramps
- City programs housed in city owned and leased facilities
- Rita Smith Public Library
- Senior Recreation Center
- Wylie Recreation Center

Findings from these surveys can be found in the Self-Evaluation Findings and Recommendations section.

SELF-EVALUATION/FINDINGS/RECOMMENDATIONS

Public Meetings:

Findings	Recommendations
ADA verbiage is posted on the City's website 72 hours before meetings and prefer a 48-hour notice if ADA accessibility is required. Microphones and the podium are ADA accessible and can be moved for accessibility. City hall and the council chamber allow for plenty of room to maneuver a wheelchair. ADA seating is also available.	Verbiage announcements regarding ADA accommodations will be reviewed for future meetings. Will also look into training staff to recognize potential ADA needs to be addressed prior to the meetings.
Video communication is not closed caption. The current video system does not include audio descriptors. Anyone needing Assistive Listening Devices are available upon request.	Closed caption options are currently in review and quotes have been requested to modify the current system.
Access to the City buildings are wheelchair accessible and are clearly marked. Each City building has conveniently marked handicapped parking at each parking lot. The side door of city hall is for employee use only.	
Regarding hearing impaired accommodations, the city does not currently have a sign language interpreter on staff and a contract sign language interpreter can be pre-arranged with prior notice. Staff is available to assist with speaker cards when requested for individuals wishing to communicate public comments. Public comments are limited to three minutes and additional time is allotted for those with disabilities.	

Public City-Wide Events:

The City currently does not have a checklist prior to any events to recognize any ADA modifications needed, nor is staff trained in advance to recognize these needs. However, employees are always available to make accommodations. Should an emergency occur during an event the incident commander takes charge and the public will be notified through Nixle alerts.	The City is currently implementing a checklist for future use.
---	--

Findings	Recommendations
In the event of an evacuation, local hospitals have been identified for transport, along with other transportation. The emergency operations team takes charge in emergency situations.	
The City has a historical home within the downtown historic district that is open to the public. The home includes a wheelchair access ramp. During public events at the City's historical home, the Public Works department assists in setting up and makes modifications for the public, volunteers and employees.	

Employment:

Currently the City does not contract with an agency that recruits or seeks employees with disabilities.	The HR Director and HR Analyst over recruitment are currently researching other special job posting websites.
The City of Wylie displays ADA notices in all work areas along with an ADA grievance process. ADA notices are posted in the common areas in each department and in the employee's break room area.	
Job descriptions as well as job advertising postings include detailed information about job requirements, both physical and related to job duties. When setting up an interview, the candidate is asked if any accommodations are needed prior to the interview. If so, accommodations are arranged at that time. The city does not have a service for those applicants that are deaf or hard of hearing.	<p>The HR Director will continue to train hiring managers to ask applicants if any accommodations are required for the interview process.</p> <p>The HR Director will look into a process to offer a service for those applying who may be hearing impaired or hard of hearing.</p>
The HR Director conducts annual supervisor training that covers topics in etiquette and legal question formation for the hiring selection panel. This information is sent to each hiring manager upon a job being posted to make certain these areas are covered during the selection panel. Supervisors are trained on a case-by-case matter with ADA accommodations.	

Findings	Recommendations
Current job openings inform candidates of reasonable accommodations that are available and appropriate during the selection process.	
Medical, ADA and Worker Compensation employee records are kept separate from regular personnel files and maintained in a confidential manner. The City is in Compliance with ADA record keeping regulations in regards to health and special needs.	
The Department of Labor and ADA website are resources used in the decision-making process for reasonable accommodation. HR has steps in place to determine employees with disabilities.	
Policies for reasonable accommodations are not readily available to employees or candidates for employment.	A policy is currently in review and upon approval by the City Manager.
The City Employee Handbook contains information on reasonable accommodations policy, to include performance of essential functions, the selection process and the receipt of benefits and privileges of employment. The City benefits are outlined in the handbook and do not change outside of those policies. HR does address accommodations for performing essential functions in the handbook via training.	
The reasonable accommodation policy requires an interactive process which includes; disability disclosure, interactive problem solving, accommodation selection, accommodations implementation and ongoing follow up to ensure effectiveness. This process is assigned to HR personnel and filed in the employee's confidential medical file that is kept separately from other employees.	
Supervisor training is ongoing and includes training for recognizing an employee's needs with reasonable accommodations. Training includes that supervisors should be observant and not wait for an employee to request a specific ADA accommodation.	

Findings	Recommendations
Undue hardship for reasonable accommodations and cost associated, how is this budgeted?	A SOP is drafted for the determination process. Cost of hardships are on a case by case basis. Budget should fall under Special Services. Steps are taken to ensure the requirements for specific job functions are job related.
Employment postings include a description of nondiscrimination policy for all jobs listed. Guidance from EEOC are also used to identify employees who might need assistance.	
Emergency plans are carried out with the current staff in place and coordinated with the Fire Department. The Safety Coordinator plans drills for the department safety liaisons. These drills are scheduled annually.	The safety committee is exploring whether or not persons with disabilities are involved with the planning of drills.

Evacuations/Safety:

Evacuations for City events and safety processes are evaluated, conducted, and carried out with the Emergency Operations Task Team. This team determines the safest process with all persons and ADA requirements. This is a cooperative effort with Fire and Police.	More actions and procedures are needed to communicate with event employees during such an event.
The City has a mandated new hire orientation for all employees that includes emergency evacuations, as well as Stop the Bleed and active attacker training. Classes are held quarterly.	
The City has a safety committee in force to prepare departments on the safest direction to evacuate, however, little consideration has been made for those with disabilities such as wheelchairs, blindness and hearing.	The city will work with the Fire Department to prepare a plan for such events for those with ADA needs.
Drills for emergency preparedness are held annually. In 2022, the Emergency Management Coordinator conducted the table top drills. Ongoing annual drills will be performed by the safety committee.	
If prolonged sheltering in place is necessary, is there a means of obtaining accessible cots, medications, and medical supplies? Are there professionals who can help?	The City has an agreement with WISD for the use of facilities, reception and care during emergencies.

Communications:

Findings	Recommendations
Public notices are displayed in Franklin Gothic font size 11. This is the preferred standard print for city communication.	
Closed caption is auto generated with social media and not currently on the City website. The Boards and Commission board is currently seeking to develop a closed caption meeting.	Areas of closed captioning for city and public notices will be explored in the future to accommodate the ADA guideline suggestions.
The city does not currently have computer access for the public, however, there is access to computers at the library.	These computers do not have visual accessibility at this time and will be explored for the FY 23-24 budget cycle
City publications are sent out monthly in the form of a newsletter, and the City has daily social media posts. As needed, press releases are published. Staff is trained in appropriate use of "person first language." Staff review publications to ensure no offensive images or language. Materials sent out are not offered in alternative formats.	
The main phone line is automated to route callers to specific departments. Phone lines are in English. No services are offered on a touch screen unless on a personal tablet or cell phone. Currently there is no option for a second language or hearing-impaired callers.	
The website offers live and recorded video for the public meetings. The meetings are an audio/video recording.	Research for a captioned meeting will be looked into in the near future. Currently there is no policy in place to secure video remote interpreting services (VRI).
The Public Information Officer does not have an on staff sign language interpreter nor is one used each time a press release is published. A sign language interpreter has been used in critical situations. The interpreter is often situated next to the speaker.	
City hall has a TV video message display. Messages include upcoming events, hours of operation and other general messages. This TV video display is not audio, nor closed caption, the	

Findings	Recommendations
City hall does not utilize a public address system with interactive devices for the hearing impaired. Sign language is available on elevators, doors and public restroom areas. Assistive listening devices are available through the video/audio system in the Council Chambers.	The operations department (IT/facilities) has previously budgeted for an intercom system for city hall. No action has been taken at this time.
Announcements are distributed electronically in a PDF format. PDF format is distributed through online and email distribution. Word documents are a preferred format.	

Website:

The Public Information Officer is currently redesigning the website.	Update and redesign the City website to be compliant with ADA requirements.
Website information conveyed is typically in black and white. Information and documents are organized and easy to read without an associated style sheet. Columns and headers are identified for data tables. Updates are addressed the same way for all City public web sites.	Information on the website is not available in color. At this time, we will have to research if redundant text links are available for each active region of a server-side image map.
Are systems in place that may time out while a person is giving a response? If yes, is there a way that the user is warned and can obtain more time without losing data?	Currently we are not aware of any systems that time out. Will need to investigate this more closely.
Has the City reviewed Title II of the ADA to ensure their website and programs are compliant with ADA?	Systems have been reviewed, and are not in compliance. Staff is working on bringing the site into compliance.

EE Policy:

The City does not have a mobility policy in place, and currently not prohibited, the Council Chambers does have an area accessible for such devices.	No policy is in place and has not yet been updated as required by 28 CFR 35.137. Staff will work on implementing a policy.
How does the City research purchases of new equipment and how is access determined?	The City does not have a process in place to determine what new equipment is accessible for communication and transportation, etc. These policies will go into review and update with findings and changes.

Findings	Recommendations
The City does not currently have a policy in place to prohibit discrimination of former illegal drug usage.	The City is considering updating such policies.

EE Training:

The City employee handbook manual gives clear instructions on etiquette, language, and City's legal disability civil rights mandates. The City Employee Handbook is reviewed consistently and updated as needed.	
City vendors are expected to hold the same standards as employees.	The City is in the process of adding this to its policy.
City maintenance staff are trained to recognize access and safety issues. Training is always ongoing.	
Law enforcement employees receive disability training from the OSS Academy.	
Are there any areas noted above that should be studied with this self-evaluation?	There are no specific areas; however, safety and recognizing areas of access for disability is consistent for any modification if needed.

EE ADA:

The City utilizes EEOC published guidelines regarding lawful means of identifying employees who might need assistance during emergency evacuations due to their disability.	Initial training took place July 12, 2022 with ongoing training taking place quarterly. Currently establishing a redundancy plan for the absence of the department liaison. All emergency plans are coordinated with the Fire Department and continue being facilitated by the safety liaisons.
How are staff and visitors accounted for after an evacuation?	The Emergency Management Coordinator is working with safety liaisons to establish plans and ongoing training.
ADA compliance is posted in all work areas.	

Findings	Recommendations
Supervisors are responsible for the reasonable accommodation request for employees with ADA needs when requested by the employee. Included in these requests are medical inquiries.	Supervisors attend a regular supervisors training organized by Human Resources that include ongoing training and the procedure for making requests for medical or ADA accommodations. Included in training are any legal requirement training essentials.
Employees needing reassignment of a position are reviewed on a case by case basis by the HR Director. The reassigned employee must be able to perform the essential functions of the new position with or without reasonable accommodations. The reasonable accommodations process is handled with a full ADA Interactive process in place through HR.	No policy is in place for prohibiting staff from competing for the position they are being assigned to.
Has the guidance for employers issued by the EEOC, concerning identifying staff with disabilities that may need assistance in an emergency been used? If yes, how often is it used?	No, however, HR has steps in place to identify staff with disabilities.
Is a statement disseminated to all staff annually putting them on notice that the City of Wylie has prohibited disability discrimination or harassment including jokes or inappropriate language?	Training was added to the 2022 in-service day agenda and will be covered each year in all employee in-service day training.
HR has drafted a guideline to follow in determining undue hardship and reasonable accommodation process. Steps are taken into place to determine that the requirements of a position are met and are job related.	An SOP document in HR has the guidelines.
Steps are taken to ensure alternative formats are available for applicants with various disabilities.	These formats are reviewed case by case. Various accommodations are made, such as hiring a tutor and allowing extra time, etc.
All job postings/openings are announced with the nondiscrimination policy concerning persons with disabilities.	

Findings	Recommendations
The City uses guidelines published by EEOC regarding lawful means of identifying employees who might need assistance during an emergency due to their disability.	
<p>Are persons with disabilities involved in emergency plan creation, drills and debriefings?</p> <p>Michael Grubbs, the safety coordinator liaison, has partnered with Debbie Buccino, the Emergency Management Safety Coordinator, for further action on this issue. Emergency plans are also coordinated with the Fire Department.</p>	<p>Michael Grubbs, the safety coordinator liaison, has partnered with Debbie Buccino, for further action on this training. They will be looking into adding persons with disabilities to complete training.</p> <p>HR will revisit this concern once the ADA plan is in place.</p>
How are safety coordinator liaison coordinating with departments in assisting persons with disabilities during emergencies.	Currently there is no action plan, however, training continues in 2023 for an action plan and for redundancies made in the assignment.

City Wide Events:

Reverse 911 System Notification Alerts.	The City has a Nixle Alert system that can identify alerts for areas, sections or a portion of the city to alert those areas of any emergencies, delays, etc.
Emergency Events are at the command of the Incident Commander.	Evacuations and safety processes are at the command of the Incident Commander.
In the case of an evacuation where accessible vehicles, drivers, fuel, and appropriate destinations are needed, the City does have procedures in hand. Evacuations of buildings are conducted with a public safety check to ensure the area is clear.	
How is new staff oriented regarding the emergency plan? Are drills held? Do emergency plans drills involve persons with disabilities? Are safety drills held and do they involve different incidents? Is the ADA coordinator involved with these drills?	All new City employees attend an orientation that involves mandated courses in active attacker, severe weather and fire. The City has held active drills that have included staff with disabilities in the past. The ADA Coordinator position is new and will be involved in future drills.

Findings	Recommendations
In response to bomb threat evacuations the site is checked for explosives before it is populated. If the need arises for decontamination before leaving, a procedure is in place to hold all parties on site until decontamination has been completed. Emergency response team has procedures set in place to evacuate and decontaminate areas in case of emergency.	
How are emergency evacuations handled?	Emergency response teams have travel and routes pre-planned with the Fire Department, as well as staging for emergency equipment and needed ADA.

Law Enforcement:

Have the City of Wylie first responders been trained regarding disability civil rights mandates, under State and Federal laws?	Wylie first responders attend Crisis Intervention Training.
The Public Safety Building has ADA standards in the holding and booking areas of the jail. Visitor areas of the holdings also are ADA accessible. Service animals of inmates cannot be accommodated at the holding area.	Inmates have access to a phone system; however, it is not ADA compatible. Inmates needing an interpreter may request an interpreter be called in. Service animals of inmates will be released to family members or animal services.
Wylie Police Officers have access to a sign interpreter through the 911 Dispatch Center. Dispatch has TTY and training is implemented every six months.	
Officers are trained in best techniques for communication with persons with disabilities and officer safety. Areas of training include hard of hearing, mental impairment, crisis intervention and drug impairment.	
Wylie public safety staff are training in crisis management to address competing disabilities (<i>i.e. someone is on the bus with a service dog and another person on the bus has a phobic response to the dog and wants it removed as an accommodation. Both have rights to be considered. The passengers are in conflict.</i>)	

Findings	Recommendations
In the case of an emergency, a registry of persons with disabilities is kept on file. The City does not refer to the US Department of Justice guidance regarding disasters.	
If prolonged sheltering in place is necessary, what procedures are in place?	Procedures are coordinated through the Safety Coordinator; emergency cots, medication and other necessary items will be made available.

ADA Programs:

The City of Wylie has a plan for ADA Notice and Grievance dissemination. The ADA Coordinator handles the fact finding in grievance administration.	Currently the ADA Notice of Compliance is under review and will be updated by the Deputy City Manager.
Does the ADA Coordinator Office have access to City senior management?	ADA Coordinator and City Management are both located in the same building for easy and quick access for civil rights and disability issues.
ADA Coordinator and Risk Management are both responsible for reasonable accommodations to applicants and employees in accordance with U.S. Equal opportunity Employment Opportunity Commission under Title 1 of the ADA.	
Undue hardship is determined by the ADA Coordinator and a panel. The determination is based upon its nature and whether it meets the definition contained within the regulation.	Currently there is no anti-surge policy in place and will be adopted in the future by the City of Wylie.
There is no language in place to hold vendors applicable with State and Federal disability civil rights mandates.	This is currently in review.
A person with disability who believes they have been discriminated against by a city vendor, will go through the City's complaint procedures.	The City will need to research procedures for events, to make certain there is a checklist prior to events that cover any persons with disability and assure proper access is not denied.

Findings	Recommendations
Service animals on City property are addressed by individual departments. Should an animal need to relieve itself they would be required to step outside the building. Incidents involving service animals should be addressed with immediate supervision.	At this time no policy is in place to address these incidents. The Deputy City Manager is currently working on city-wide amendments to Chapter 18 of City Code.
Policy is not yet in place to address policy modifications and determination of undue burden; nor to address direct threat; or maintenance of accessible features.	These policies will need to go under review with assistance from the ADA Coordinator.
Guidance is always available from staff to accommodate the needs of the public, volunteers and employees. The City and its employees are committed to serving the access ability for those who are in need due to a disability or mobility issue. Not limited to moving furniture, making more room for access or reach access.	



APPENDIX E

ADA Self-Evaluation and Transition Plan

Public Outreach Survey

The City of Wylie is in the process of completing its Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan which is required by the ADA Title II (28 CFR §35.105(a)). As part of this process, the City is asking for your input by completing this questionnaire that addresses accessibility of programs, services, and activities offered to the public.

Our goal is that each City program, service or activity is readily accessible to and usable by persons with disabilities when viewed in its entirety.

Submissions will be accepted through [DATE].

1. How would you rate the City of Wylie's accessibility? This includes communication, programs, services, events, access to government facilities, parks, parking, trails, etc.

- ☐ Highly accessible
- ☐ Accessible with few challenges
- ☐ Generally accessible, but could be improved
- ☐ Not at all accessible

Additional comments:

2. How well do City of Wylie's policies and procedures support people with disabilities?

- ☐ Very well
- ☐ Somewhat
- ☐ Needs improvement
- ☐ Not sure

3. Do you know who to contact if you need assistance, have a concern or complaint, or need accommodations to access a facility or service?

- ☐ No, I do not know who to contact
- ☐ Yes, I know who to contact



If yes, please list who you would contact

APPENDIX E

ADA Self-Evaluation and Transition Plan

Public Outreach Survey

4. Have you ever experienced or observed a situation when you or another individual were unable to participate in a program, access information, or obtain services due to any of the following circumstances? (check all that apply)

- | | |
|---|---|
| <input type="checkbox"/> Building not accessible | <input type="checkbox"/> Activity or event not accessible |
| <input type="checkbox"/> Educational program not accessible | <input type="checkbox"/> Activity or event not accessible |
| <input type="checkbox"/> Services not accessible | <input type="checkbox"/> Material not available in alternate format |
| <input type="checkbox"/> Website not accessible | <input type="checkbox"/> Interpreter not provided |
| <input type="checkbox"/> Not applicable | |
| <input type="checkbox"/> Other (please specify) | _____ |
- _____

5. Have you ever requested an accommodation for a disability from the City?

- ☐ Yes ☐ No

6. If an accommodation was requested, was your accommodation provided?

- ☐ Yes ☐ No ☐ Not applicable

If no, were you given a reason why it was not provided? Please describe: _____

7. Check all programs, services or activities in which you participate at a City facility.

- | | | | |
|-----------------------------------|-------------------------------------|--|--|
| <input type="checkbox"/> Classes | <input type="checkbox"/> Recreation | <input type="checkbox"/> Meetings | <input type="checkbox"/> Sporting events |
| <input type="checkbox"/> Seminars | <input type="checkbox"/> Volunteer | <input type="checkbox"/> Work (Employee) | <input type="checkbox"/> Other |

If other, please describe: _____

8. What do you feel should be the City's highest priority to improve accessibility for persons with disabilities? _____



APPENDIX E ADA Self-Evaluation and Transition Plan Public Outreach Survey

9. What role most adequately describes your association with the City and the representation you are providing?

- ☐ Member of the public with a disability
- ☐ Member of the public without a disability
- ☐ Relative or caregiver of a person with a disability
- ☐ City volunteer
- ☐ Other: _____

OPTIONAL CONTACT INFORMATION:

Name _____ Telephone _____

Address _____

Email Address _____

Thank you for your time and consideration.

City of Wylie ADA Coordinator
Attn: Joe Tidwell
300 Country Club Rd, Building 100
Wylie, TX 75098
972-516-6100

Email: Joe.tidwell@wylietexas.gov

DRAFT