

**CITY OF SHELBYVILLE
ADA TRANSITION PLAN**



**ADOPTED BY THE BOARD OF PUBLIC WORKS AND SAFETY
DECEMBER 18, 2012**

Prepared By:

City of Shelbyville Engineering Department &

City of Shelbyville Law Department

44 W. Washington Street

Shelbyville, IN 46176

317-392-5102

TABLE OF CONTENTS

Introduction.....	3
Purpose.....	3
ADA Compliance Responsibilities.....	4
ADA Implementation Team.....	5
Standards and Methodology for Evaluations.....	9
Summary of City Self-Evaluation Findings.....	17
Plan and Schedule for Improvements.....	23
Training.....	27
Monitoring and Status Reporting.....	28
Appendix A List of Acronyms & Glossary of Terms.....	29
Appendix B Notice of Nondiscrimination.....	34
Appendix C City of Shelbyville Grievance Procedure.....	36
Appendix D Public Hearing Notices & Minutes.....	38
Appendix E Notes from Meetings with Community Advocacy Groups.....	45
Appendix F Evaluation Data Provided by Shelby Senior Services.....	51
Appendix G ADA Curb Ramp Field Evaluation Data.....	159

INTRODUCTION

This transition plan reflects The City of Shelbyville's intent to meet and exceed the minimum requirements established under the ADA and its implementation regulations.

The City of Shelbyville prepared this self-evaluation and plan in accordance with Title II of the Americans with Disabilities Act of 1990, as amended (ADA) and its implementing regulations. The purpose of this self-evaluation is to examine The City of Shelbyville's current facilities, policies and practices to identify and correct those items that create artificial access barriers for persons with disabilities. This transition plan outlines the recommended procedures for implementing and scheduling remedial work needed to comply with the ADA.

This plan details the methods and procedures The City of Shelbyville will use to monitor its activities and facilities for compliance with the ADA. The City of Shelbyville will use this plan to determine under the ADA what changes it needs to make to its programs and/or the design and construction of its facilities to ensure persons with disabilities are not excluded from programs, services and activities because the programs or facilities are inaccessible.

The City of Shelbyville will periodically review and update its self-evaluation inventory and transition plan. The ADA Coordinators will coordinate ADA reviews of The City of Shelbyville's core program areas, districts and buildings periodically. If it is determined that items need to be added or removed from The City of Shelbyville's self-evaluation inventory of buildings and related elements or public rights of way, The City of Shelbyville will update this transition plan as needed within the discretion of the ADA Coordinators.

PURPOSE

The purpose of this plan shall be to:

1. Comply with the administrative requirements of the ADA and Section 504 of the Rehabilitation Act of 1973; and
2. Serve as an informational document for any persons interested in The City of Shelbyville's ADA compliance efforts.

ADA COMPLIANCE RESPONSIBILITIES

A. Mayor

The Mayor's office is the executive branch of city government. The Mayor is the chief executive for The City of Shelbyville. The Mayor appoints department heads and designates ADA coordinators. In 2011 the Mayor designated the City Attorney and the City Engineer as ADA coordinators.

B. City Attorney

The City Attorney manages the legal affairs of the city. The City Attorney's responsibilities include giving legal advice to the officers and agencies of the city, investigating the legality of city actions and validity of public complaints, drafting proposed legislation or other legal papers for the city and its agencies, and promptly commencing all proceedings necessary or advisable for the protection or enforcement of the rights of the city or the public.

C. City Engineer

The City Engineer plans and manages city capital improvement projects, including roads, storm and sanitary sewers, and other public works infrastructure. The City Engineer's responsibilities include monitoring construction activities within the city, reviewing plans for private development projects to ensure compliance with city design standards, serving on the City Plan Commission, maintaining and updating city technical standards, and providing engineering support to various city departments and boards.

The ADA Coordinators are responsible for the oversight and coordination of The City of Shelbyville's compliance with the ADA and Section 504 and all related statutes, regulations, and directives. General responsibilities of the ADA Coordinators include:

1. Implementing The City of Shelbyville's ADA Transition Plan
2. Developing processes and procedures for the investigation of complaints filed under the ADA
3. Preparing required reports
4. Participating in the design, development, and dissemination of ADA information to the public
5. Periodically updating The City of Shelbyville's self-evaluation and transition plan.

ADA IMPLEMENTATION TEAM

The City of Shelbyville's ADA Implementation Team consists of members based on their authority and ability to solicit, collect, and report on current activities within their respective departments, boards, and program areas. The team members also possess the authority to implement changes, if needed, to ensure The City of Shelbyville's compliance with the ADA nondiscrimination laws.

The implementation team has a four-part mission, which includes the following:

1. To use an interdisciplinary team approach to ensure compliance with ADA and related nondiscrimination laws in the implementation of The City of Shelbyville's programs and activities
2. To remove programmatic and architectural barriers from The City of Shelbyville's programs and activities in accordance with the above-listed nondiscrimination laws
3. To ensure meaningful access to The City of Shelbyville's services and programs to minorities and low-income persons
4. To develop, continually review and update the effective ADA transition and implementation plans for The City of Shelbyville.

A. Implementation Team Responsibilities

The ADA Implementation Team shall:

- Foster awareness of The City of Shelbyville's responsibilities under the ADA;
- Assist with conducting ADA evaluations of city program areas;
- Develop and maintain city procedures for the collection of data of participants in, and beneficiaries of city programs;
- Participate in the development, revision and implementation of the self-evaluations and transition plan;

- Complete a department risk assessment for the respective departments that identifies and prioritizes risk areas and the need to formulate mitigation strategies; and
- Prepare a periodic report of accomplishments within the department and state goals for the near and distant future. The report shall be submitted to the ADA Coordinators as needed.

B. Implementation Team Members

Name	Department / Program Area	Phone	Email
Trent Meltzer	Law	317-398-6624	tmeltzer@cityofshelbyvillein.com
Rodger Keller	Engineering	317-392-5102	rkeller@cityofshelbyvillein.com
Rob Springer	Redevelopment	317-398-6624	rspringer@cityofshelbyvillein.com
Jody Branum	Human Resources	317-398-6624	jbranum@cityofshelbyvillein.com
Dann Bird	Plan Commission	317-392-5102	dbird@cityofshelbyvillein.com
Chris Hext	Building Commission	317-392-5102	chext@cityofshelbyvillein.com
Jennifer Jones	Street Department	317-392-5169	jjones@cityofshelbyvillein.com
Karen Martin	Parks & Recreation	317-392-5128	kmartin@cityofshelbyvillein.com
Robbie Stonebraker	Fire	317-392-5119	rstonebraker@cityofshelbyvillein.com
Keith England	Police	317-392-5106	kengland@cityofshelbyvillein.com

Darrell Shrader	Airport	317-392-1284	dfshrader@comcast.net
Brad Fix	WWTP	317-392-5131	befix@cityofshelbyvillein.com
Derrick Byers	MS4	317-392-5102	dbyers@cityofshelbyvillein.com
Keith Barrett	Animal Shelter	317-392-5127	kbarrett@cityofshelbyvillein.com

C. ADA Community Advisory Committee

Effective 2012, The City of Shelbyville shall form a city-wide ADA Community Advisory Committee composed of the ADA Coordinators, as well as key city staff, individuals with disabilities, disability advocates and those who provide services to persons with disabilities.

1. Membership

Membership shall be representative of different disability groups including: groups representing physical, sensory, developmental and cognitive disabilities. The ADA Coordinators shall be responsible for soliciting members throughout the city. Membership shall also include key city staff.

2. Purpose

It shall be the mission of the ADA Community Advisory Committee to:

- Provide public input to The City of Shelbyville to help ensure The City of Shelbyville's compliance with the ADA;
- Increase awareness of the challenges faced by persons with disabilities; and
- Brainstorm and discuss possible solutions to problems of accessibility in the community.

3. Responsibilities

The ADA Community Advisory Committee shall assist The City of Shelbyville by providing input regarding the development and implementation of The City of Shelbyville's transition plan. Furthermore, the ADA Community Advisory Committee shall provide information to The City of Shelbyville regarding specific concerns of the disability community regarding the roadways and facilities that are within The City of Shelbyville's jurisdiction.

4. Meetings

This shall be an on-going group that shall hold meetings periodically. The ADA Coordinators shall schedule all meetings and keep the minutes or notes.

STANDARDS & METHODOLOGY FOR EVALUATIONS

A. Overview

1. Applicable Reference Codes, Standards and Guidance

a) Public Rights of Way

- City of Shelbyville Construction Standards
- City of Shelbyville Unified Development Ordinance
- ADA Public Right-Of-Ways Guidelines (PROWAG)
- Indiana Code
- INDOT Design Manual
- INDOT Standard Specifications (Most Recent Version)

b) Buildings and Related Site Elements

- Indiana Building Code (Most Recent Version)
- ADA Accessibility Guidelines (ADAAG)

c) Communications (includes public involvement)

- Indiana's Section 508 Web Accessibility Coding Solutions and Requirements
- Section 508 of the Rehabilitation Act of 1973 as amended by 1998 the Work Force Investment Act (section 1194.22 and its subsequent amendments) as minimum requirements for web accessibility
- INDOT Public Involvement Procedures Manual (2009)

2. Self-Evaluation

The City of Shelbyville's completed self-evaluation shall include an analysis of all its programs and services, including communications, employment and its facilities.

The City of Shelbyville plans to complete its ADA self-evaluation in four phases:

- Phase I: Infrastructure Standards & Programs Evaluations

In 2011, the Mayor appointed the City Attorney and City Engineer as ADA Coordinators. The ADA Coordinators immediately initiated the process of creating the city's ADA transition plan and bringing the city into compliance with ADA regulations. The ADA Coordinators created a grievance procedure and public notice form and began the process of giving public notice. Additionally, the ADA Coordinators drafted Ordinance #11-2681 to add Chapter 100 in Title IX of the City Code in order to incorporate ADA compliance and standards into the City Code. This ordinance was adopted by the Shelbyville Common Council on December 5, 2011.

The City of Shelbyville drafted a Unified Development Ordinance in 2011. The ADA Coordinators worked with the Plan Commission to incorporate provisions for ADA compliance within the standards set forth in the Ordinance. Compliance with ADAAG and PROWAG standards is set forth in this Ordinance. The Unified Development Ordinance was adopted by the Shelbyville Common Council on January 18, 2012.

In August 2011, the City Engineer presented the revised Shelbyville Construction Standards to the Board of Public Works and Safety for approval. The Construction Standards included revisions to the ADA curb ramp standards to bring them into compliance with current ADA standards. The Board of Public Works and Safety approved the revised standards on August 9, 2011. In October 2011, the City Engineer's Office began a further revision of the Shelbyville Construction Standards that will include explicitly requiring compliance with ADAAG and PROWAG Standards for all site and right-of-way construction. This revision is currently in progress and is planned to be presented to the Board of Public Works and Safety for approval in early 2013.

In January 2012 the City Street, Planning and Engineering Departments began revising the process for obtaining Right-of-Way Permits for work within City right-of-way. This updated process increases city oversight and inspection for all construction work within

the right-of-way. An updated Right-of-Way Ordinance was adopted by the Shelbyville Common Council on May 7, 2012 incorporating these changes. This ordinance is already paying dividends as the city has required utility companies to bring several street corners into ADA compliance with enforcement of the new ordinance and increased coordination between city departments.

As of September 2012, the City Street and Engineering Departments are in the process of establishing an annual street maintenance program with resurfacing, sidewalk, curb & gutter, and ADA curb ramp elements included. Bringing pedestrian crossings into ADA compliance will be included in all future street maintenance programs in which road surface elevation changes $\frac{3}{4}$ " or greater are involved.

- Phase II: Right-Of-Way Evaluations

In March 2012, the Engineering Department began planning the process for conducting ADA evaluations for facilities within city right-of-way. Right-of-way facilities were divided into three categories: intersections, driveways, and sidewalk / path route segments.

Due to workload and budget cuts, personnel would not be available to begin conducting field evaluations of right-of-way facilities until the City Engineering Intern began the summer work term in May 2012. Field evaluations of right-of-way facilities began in May 2012 and are currently in progress. Priority is being given to intersections, followed by driveways, and then sidewalk / path route segments. As of September 2012, all curb ramp locations within City right-of-ways have been evaluated.

- Phase III: Building and Facility Evaluations

The City of Shelbyville owns and operates a number of buildings and facilities to provide city services. City-owned facilities include City Hall, 3 Fire Stations, Parks Department Building, Street Department Building & Garages, Wastewater Treatment Plant, Airport, Intelliplex Conference Center, Accel-IN Building, and 9 Parks with various buildings and structures. The City of Shelbyville and Shelby County jointly own and operate the Animal Shelter and the Jail / Police Station Building. Each of these facilities will be evaluated for compliance with ADAAG and PROWAG standards.

- Phase IV: Program and Activity Evaluations

The City of Shelbyville administers a number of programs and activities to provide city services and to carry out its statutory duties. Public meetings, the city website, and press releases are included in administrative functions. Most departments are involved in various educational or outreach programs. The Parks Department administers many sports and recreation activities and programs. Each of these programs and activities will be evaluated for ADA compliance. Barriers to accessibility will be identified for removal.

B. Field Evaluations

1. Inventory Methodology

The purpose of the field evaluation of The City of Shelbyville's facilities is to create a baseline of existing pedestrian facilities within the city.

2. Summary of Areas to Be Surveyed and Priorities

a) Right-of-Way Facilities

Level 1 (High Priority)

- All roadway intersections

Level 2 (Intermediate Priority)

- All driveways and alley entrances

Level 3 (Low Priority)

- Sidewalk and multi-use path route segments

b) Buildings and Site Facilities

Level 1 – High public use facilities (High Priority)

- Parks and Recreation buildings and facilities

- City Hall
- Airport
- Intelliplex Conference Center
- Accel-IN Building

Level 2 - Medium public use facilities (Intermediate Priority)

- Police Station / Jail
- Animal Shelter
- Fire Station 1

Level 3 – Low public use facilities (Low Priority)

- Street Department Building & Garages
- Fire Stations 2 & 3
- Wastewater Treatment Plant

3. Survey

A completed field survey shall consist of an onsite visit to each location using a detailed survey questionnaire to capture the measurements of specific elements to evaluate ADA compliance in accordance with the applicable design standards.

Currently, the surveys are manually completed and the information temporarily maintained in project file folders. The City and County are in the process of developing tools and data layers that will allow personnel to enter ADA survey data directly into the City/County GIS System.

The surveys and the GIS map will document barriers identified during the field surveys. As the City remedies the ADA deficiencies identified during the self-evaluation, the GIS map will be updated. Additionally, the City's ADA Coordinators will periodically update The City of Shelbyville's

transition plan to include information showing the City's compliance efforts.

During the field evaluations, City personnel evaluated each facility under the requirements of the 2010 ADA standards. Where the 2010 ADA standards were silent, they used the Proposed Accessibility Guidelines for pedestrian facilities in the Public Right of Way (PROWAG). The City of Shelbyville plans to use the same standard of review for the remainder of its field evaluations unless the standards or law changes.

4. ADA Data Collection Items

The ADA field evaluation teams will collect and analyze data from the following elements to determine if these elements are in compliance with the applicable ADAAG and PROWAG standards:

a) Right-of-Way Facilities

Intersections

- Curb Ramps
 - Whether curb ramps are present at any of the corners within the intersection
 - Whether truncated domes are present
 - If truncated domes are present, the dome location, size, type and color
 - Slopes (Running, Cross, Side, Transition)
 - Whether or not the surface is slip resistant
 - Width
- Crosswalks
 - Whether crosswalks are present at any or all crossings
 - If present, the width, type, islands and access for persons with disabilities
- Obstacles
 - Whether there are abrupt changes in sidewalk level of greater than ½ inch, paving obstructions or accessibility obstacles immediately adjacent to the corner. Evaluators will record

information regarding any obstacles near a corner (e.g. utility pole, traffic light pole, drain inlet, fire hydrant, street furniture and newsstands.)

- Sidewalk Connectivity
 - Whether a sidewalk leading to and from the curb is present
 - If present, the paved sidewalk width at the intersection

- Pedestrian Signals
 - Whether visual and accessible pedestrian signals are present
 - If present, the type, size, height and location of the actuator buttons
 - The location parameters
 - Whether the pedestrian push button is parallel to the crosswalk alignment
 - Connecting Sidewalks / Paths

- Islands
 - If present, whether there are curb ramps and push buttons

Driveways and Alley Entrances

- Whether curb ramps are present at either side of the driveway / entrance. If curb ramps are not present, whether they are required for the sidewalk / path to comply with the applicable ADA standards.

- Whether the width and cross slope of the traveled way through the driveway / entrance complies with the applicable ADA standards.

Sidewalk and Multi-Use Path Route Segments

- Trip hazards (abrupt change in sidewalk elevation > ½ inch, etc.)
- Physical barriers blocking routes
- Continuity
- Width
- Maximum 2% cross slope

- Profile slopes compliant with applicable ADA standards. Also, whether long uphill grades have flat landing / rest areas that comply with the applicable ADA standards

- Slip resistance

b) Buildings and Site Facilities

- Whether the route of travel (exterior path that a person with a disability must take to access the good and services) is accessible
- Whether the parking and drop off areas are accessible
- Whether the interior of the building is accessible (restrooms, public areas, etc.)

5. Self Evaluation Database

Paper records filled out by field personnel shall be kept on file in City Hall. Data will be transferred to the GIS database once the process is established for field personnel to enter data into the GIS system.

6. Field Evaluator Duties

The basic duties:

- Travel to the assigned project area
- Visually inspect, measure and record observations using a level, a tape measure, and standard data collection forms
- Report to the ADA Coordinator(s) at regular intervals or when the assigned locations were completed, input collected data into the GIS database, return completed data forms and obtain new assignments
- Exercise sound discretion and judgment consistent with the ADA and City policies when encountering unusual circumstances

SUMMARY OF CITY SELF-EVALUATION FINDINGS

In 2011, the City of Shelbyville began to assess its core program areas and assist the ADA Coordinators and City Department Heads in reporting their respective department compliance efforts.

As part of the assessment process, all core department and program areas will collaborate with the ADA Coordinators to determine whether the department/program area is in compliance with the ADA and to ascertain instances where the ADA Coordinators may provide training and technical assistance to help the department/program area achieve its goals and maintain compliance. Furthermore, the ADA Coordinators periodically review the data collection procedures for each department/program area to ensure compliance with the ADA.

The most recent summary of the City's findings appears below. Field evaluations are currently in progress and this summary of findings will be updated as more data becomes available. The Plan and Schedule for Improvements are outlined in the subsequent section of this plan.

A. ADA Coordinators

The ADA Coordinators are City Attorney Trent Meltzer and City Engineer Rodger Keller. The ADA Coordinator office is located at 44 W. Washington Street, Shelbyville IN 46176.

B. Assurances

The City's ADA assurances are included in its Title VI Assurances. Under its Title VI Assurances, The City of Shelbyville guarantees that it will comply with Title VI of the Civil Rights Act of 1964 and all related laws such that no person in the United States shall on the grounds of race, color, sex, age, national origin, disability, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which The City of Shelbyville receives federal financial assistance from the United States Department of Transportation (DOT) including the FHWA. Additionally, The City's contracts and agreements with subrecipients include a statement of written assurance by the subrecipient that it will comply with the law and not discriminate based on disability in any of its programs, services, activities, or benefits extended to participants.

C. Public Notice of Nondiscrimination

In 2011, The City of Shelbyville approved its Notice of Nondiscrimination under the ADA. It is the City's policy to update its notice of nondiscrimination if there is a change in the City Attorney or ADA Coordinators. The City's notice of nondiscrimination is in the process of being posted on the City website at www.cityofshelbyvillein.com. A copy of the Notice of Nondiscrimination is located in Appendix B.

Furthermore, the City maintains a copy of its notice of nondiscrimination at City Hall and in the Employee Handbook and distributes copies to all new hires and to anyone who requests a copy. The City is constantly exploring new and varied ways to disseminate its notice of nondiscrimination.

D. Grievance Procedure

The City of Shelbyville adopted and implemented a revised grievance procedure in 2011. The grievance procedures are available online and in print. The City's grievance procedure includes due process protections for the complainant and the respondent and provides for prompt and equitable resolution of complaints. A copy of the grievance procedure is located in the Appendix C.

E. Employee Relations/Personnel

The Personnel Department is responsible for recruiting a diverse pool of qualified candidates to fill vacancies at the City of Shelbyville. The City also provides ongoing staff training to ensure that all staff understands the City's policy of nondiscrimination based on disability. Additionally, during the application, interviewing, hiring and employment process the City provides reasonable accommodation to applicants and employees with disabilities. The City's practice of non-discrimination is stated in the City of Shelbyville Employee Handbook which is distributed to all new hires.

F. Public Involvement

1. Policies and Procedures

The City of Shelbyville's policies and procedures for providing reasonable accommodations for persons with disabilities were incorporated by ordinance (Ordinance #11-2681, adopted 12/5/2011) in Chapter 100 in

Title IX of the City Code. To accommodate individuals with hearing, speech, vision or mobility impairments, the City's requirements include:

- (1) Holding public meetings and hearings in places accessible to individuals in wheelchairs;
- (2) Upon advance request, assisting people with physical disabilities who wish to participate and give testimony in public meetings and hearings. Such assistance shall include: the use of sign language interpreters, listening assistance mechanisms, a telecommunications device for the deaf, recording devices, or providing documents in an alternative (e.g. large print, tape recordings, Braille or electronic formats, or individuals to explain the content of visual displays); and
- (3) Providing a contact person's telephone number in all meeting and hearing notices and advertisements for individuals to contact regarding any requests for assistance or reasonable accommodation.

2. ADA Community Advisory Committee

The City of Shelbyville does not currently have a dedicated ADA community advisory group. The City is currently in the process of forming an ADA Community Advisory Committee to provide input from the public regarding the accessibility of its programs and facilities, act as a sounding board for proposed projects, and provide feedback on the City's transition plan.

3. Website

Information and resources concerning the City's ADA compliance are currently not posted on the City website. The ADA coordinators are currently working with the City's IT contractor to make this information available to the public on the website. The website will include a link to this Transition Plan, the grievance procedure, relevant laws, the City's nondiscrimination statement, and ADA-compliant City Construction Standards. ADAAG and PROWAG standards will also be posted on the website. The City's website is www.cityofshelbyvillein.com.

G. Effective Communication and/Auxiliary Aids

The City of Shelbyville will make every available effort to provide reasonable accommodations for individuals in need of auxiliary aids in order to ensure effective communication. Requests for auxiliary communications aids should be made by contacting the City Attorney at least 48 hours in advance of the meeting or event in which the auxiliary communications aid will be required. The City Attorney may be contacted at:

Trent Meltzer
City Attorney
44 W. Washington Street
Shelbyville, IN 46176
317-398-6624
tmeltzer@cityofshelbyvillein.com

H. Buildings, Facilities, & Related Site Elements

1. Overview

The City of Shelbyville has various buildings and site facilities with public access through which it provides essential city services:

- City Hall
- Wastewater Treatment Plant
- Street Department
- Police Station & Jail
- Fire Stations 1, 2, & 3
- Parks Department Facilities:
 - Parks Dept. & McNeeley Civic Center
 - Porter Center
 - Meridian Aquatic Center
 - Morrison Park
 - Clearwick Park
 - Blue River Memorial Park
 - Animal Shelter
 - Public Square
 - Accel IN Building
 - Intelliplex Conference Center
 - Airport
 - Roger Shaw Park
 - Pioneer Park
 - Sunset Park
 - Sunrise Park
 - Kennedy Park

The City does not consider its storage buildings, pump stations, or maintenance buildings as public access facilities.

It is the City's practice to bring its facilities into compliance when we renovate buildings or hire a person with a disability who requires reasonable accommodation.

Building & Site Facility assessments are currently planned for 2013. Facility assessments will be conducted by the Engineering Department, Parks Department, and Building Commission.

2. Policies and Procedures

Building and site facility assessment data will be stored in project folders and subsequently incorporated into the GIS map. The City uses the International Building Code and ADAAG Standards to evaluate its buildings and site facilities. The Building Commission reviews the City's building and site facility assessment criteria periodically to ensure compliance with the current ADA requirements.

Once the building and site facility assessment is complete, facilities that need improvements to become ADA compliant will be added to the City's Capital Improvement Plan. The Capital Improvement Plan is currently a work in process, but will include a plan for improvements for right-of-way facilities as well as building and site facilities. The Capital Improvement Plan will place a high priority on facilities with the greatest need for improvement to become ADA compliant.

3. Funding

All city-owned buildings and site facilities are 100% locally funded, with the exception of the Airport. The Airport receives federal funding from the FAA.

I. Accessibility of Pedestrian Rights-of Way-Facilities (PROW)

Pedestrian Right-of-Way Facilities are currently under evaluation as of September 2012. All curb ramps within city limits have been measured and evaluated in the field, but the field data has not yet been analyzed to determine the extent of ADA compliance. Field personnel will continue to evaluate intersection signals & crosswalks, driveway & alley entrances, and sidewalk & path segments. Sidewalk connectivity will also be evaluated. As funding and resources permit, these items will be evaluated for ADA compliance and input into the county GIS system. As of October 2012, the curb ramp evaluation data is being prepared for input into the GIS system. Data from the curb ramp field evaluations is included in this plan in Appendix G.

PLAN AND SCHEDULE FOR IMPROVEMENTS

Upon careful ongoing review of the ADA self-evaluation findings outlined above, as evaluations progress, The City of Shelbyville proposes to make the following changes to its practices to improve the accessibility of its programs and facilities to persons with disabilities. The City of Shelbyville will continue to review and evaluate its practices and facilities to identify other methods, means and resources for improving overall accessibility to ensure compliance with the ADA.

A. Notice of Nondiscrimination

In 2012, the ADA Coordinators will commence publishing The City of Shelbyville's notice of nondiscrimination in the following media outlets:

Internet – City of Shelbyville Website

Radio – WSVX (96.5 FM, 1520 AM)

Newspaper – The Shelbyville News

Utility Bill Inserts

Local Public Bulletin Boards, especially in places with significant traffic of citizens with disabilities

The City of Shelbyville will make the notice of nondiscrimination available in alternative formats upon request.

The ADA Coordinators shall coordinate having the notice of nondiscrimination published at least once a year and retain a copy of the publications in which the notice appears.

B. Public Rights of Way

1. Curb Ramps & Crossings

The City of Shelbyville shall implement a curb ramp schedule to provide for the installation of accessible curb ramps along its public rights of way. This schedule will be incorporated into the Capital Improvements Plan and Annual Overlay Programs.

Priority for the implementation of improvements may be determined based on the same priority system used in conducting the inventory as well as the schedule of related city capital improvement projects. Furthermore, the City

will use the data collected during the inventory of curb ramps and intersection crossings to commit available resources to the reconstruction of existing curb ramps and crossings not currently in compliance with the ADA.

The City will determine actual ADA improvements by the condition of the facility at the time of the project. The absence of the facility from the inventory will not prohibit ADA work from being completed.

Additionally, a person with a disability or his or her representative may make a complaint or request concerning the accessibility features of City public rights of way (e.g. curb ramps). If the City receives a valid and meritorious request or complaint from a person about a substandard access ramp, then the City may, at its discretion, move that ramp up in priority on the improvement schedule or document if it is structurally impracticable to make the curb ramp fully compliant with the ADA. If structurally impracticable to achieve full compliance, the City will make ADA improvements to the maximum extent possible.

2. Sidewalks & Paths

The City of Shelbyville currently has an annual sidewalk replacement program. Property owners can voluntarily sign up to be included in the program. Additionally, the City proactively responds to complaints of sidewalk obstacles or tripping hazards. When a hazardous or non-compliant section of sidewalk is reported, the City adds these sections to the list of sidewalks to be replaced and reconstructs these sections as soon as resources permit.

In May 2012, the Mayor and City Department Heads began the process of developing an expanded sidewalk program in order to accelerate the reduction of trip & fall hazards and to expand efforts to bring the sidewalk & path network into ADA compliance. This expanded program will involve revising the City sidewalk ordinances, developing a funding strategy, and integrating sidewalk & path improvements with planned capital improvement projects. Prioritization of sidewalk segments to be improved will be developed from the ADA field evaluation of sidewalks & obstacles as described previously in the “Standards and Methodology” section of this transition plan. Complaints and reports of hazardous and non-compliant conditions will also be included in the prioritization of sidewalk improvements.

The City Street and Engineering Departments are currently studying ways to even further expand the efforts to bring sidewalk segments into ADA compliance. In July 2012, the City scheduled a contractor to perform a low-

cost trip hazard removal demonstration. With this new construction technique, many trip hazards and non-compliant segments of sidewalk could potentially be brought into compliance for a significantly lower cost. If such techniques continue to prove successful, the City would have additional resources freed up to increase the scope of annual trip-hazard removal and compliance efforts.

C. Buildings and Related Site Facility Elements

The City of Shelbyville Building Commission will continue to conduct building assessments. Based on the Capital Improvements Plan and data collected, the City will make physical modifications as necessary to ensure that parking, entrances, pedestrian access routes, customer service areas, public telephones, restrooms and drinking fountains are accessible.

D. Employment

The City of Shelbyville will continue to monitor its employment policies and practices annually through ADA assessments and implement changes as necessary to comply with the ADA.

E. Public Outreach

Effective 2012, The City of Shelbyville began collecting data to monitor its ADA compliance activities and to initiate public outreach for ADA-related activities. Furthermore, the City will make its transition plan available to the public online and in alternative formats upon request. Additionally, the City will form and commence holding meetings with its ADA community advisory committee.

On November 29, 2012, the City ADA Coordinators met with representatives from the Shelbyville Central School District in order to gather input on the accessibility of students with disabilities within City right-of-ways and measures that could be taken in the future to make right-of-ways accessible in the area of school facilities. Notes from this meeting are incorporated into this transition plan in Appendix E.

On November 30, 2012, the City ADA Coordinators met with Shelby Senior Services to gather input on the accessibility of senior citizens with disabilities within City right-of-ways. Notes from this meeting are incorporated into this transition plan in Appendix E. Additionally, Shelby Senior Services provided data collected from senior citizen volunteers who performed a previous

empirical evaluation of accessibility within City right-of-ways. This information is also incorporated into this transition plan in Appendix F.

On December 3, 2012, the City of Shelbyville held a public hearing at its regular Board of Public Works and Safety Meeting to receive input on the accessibility of public right-of-ways for disabled citizens. Notices and minutes of this meeting are incorporated into this transition plan in Appendix D.

F. Communications

The City of Shelbyville will continue to make improvements to the website as part of the regular website development and maintenance cycle. Furthermore, The City will make information on the website that is not in an accessible format available upon request within a reasonable time in an alternative format accessible to the requesting party or by an alternative means that allows the individual to use the data or information.

TRAINING

The City of Shelbyville's goal is to have a sufficient number of trained persons with technical knowledge and expertise performing field evaluations and monitoring new construction and alteration inspections to collect complete and accurate information. Therefore, the City plans to seek assistance from the FHWA, INDOT, advocacy groups and educational institutions to identify needed training opportunities and to develop a curriculum for a regular and comprehensive training program to include modules, which may include the following:

- Title II ADA overview
- Inventory collection
- Technical training regarding the PROWAG, curb ramps, Accessible Pedestrian Signals (APS) and intersection geometrics
- Accessible communication including documents and website development and public meetings
- Pedestrian design and planning
- Maintenance (e.g. snow and ice removal and maintenance agreements)
- Policies and procedures (e.g. public involvement, employment contracting and licensing, and complaint procedures)

MONITORING AND STATUS REPORTING

A. Introduction

The City of Shelbyville will review and update its transition plan periodically as resources permit, and include an update of the status of its ongoing self-evaluation. If the City determines that it should add or remove items from the self-evaluation inventory, the City will update or correct the transition plan as needed and in accordance with the ADA. The ADA Coordinators will monitor the City's active public facilities and major program areas through periodic reviews to ensure satisfactory progress in accordance with this transition plan.

B. Field Inspections and Monitoring

In accordance with the City of Shelbyville Construction Standards, The City shall inspect all curb ramps and sidewalks using the following recommended procedures:

1. Visually inspecting the site and dimensions
2. Using a tape measure to obtain dimensions
3. Recording all measurements on the appropriate inspection form and verifying that the project meets or exceeds the ADA standards

C. Tracking and Status Reporting

The ADA Coordinators shall oversee the development, maintenance and updating of the tracking and reporting data in project files and on the Shelby County GIS System with the assistance of the interdisciplinary team members as needed.