

2023

ANN ARBOR PARKS AND RECREATION ADA TRANSITION PLAN



Parks & Recreation
CITY OF ANN ARBOR



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ACKNOWLEDGEMENTS

Many individuals were involved with the development of the City of Ann Arbor Ann Arbor Parks & Recreation Unit Self-Evaluation and Transition Plan

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Executive Summary

GOAL STATEMENT

This Americans with Disabilities Act (ADA) Transition Plan is intended to benefit the City of Ann Arbor Ann Arbor Parks & Recreation Unit in implementing and further establishing a culture of inclusivity for all residents regardless of their disability. This Transition Plan (Plan) will draw from the Parks and Recreation Service Unit’s existing mission of “together we enrich life by cultivating exceptional experiences.” By undertaking this Transition Plan process, The Ann Arbor Parks & Recreation Unit will provide opportunity and remove barriers which will maximize the talents and contributions of the community to fulfil the Ann Arbor Parks & Recreation core values of “stewardship, exceptional customer service, innovative improvements, integrity, community, excellent parks and spaces, and fun!”.

The Plan will focus on providing access to Ann Arbor Parks & Recreation programs, services, and activities (PSAs) and facilities to persons with disabilities. By removing potential barriers to the department’s services, it will be easier for residents with disabilities to participate in the Parks and Recreation Service Unit’s many recreational opportunities. As such, the Plan’s goal is to establish a department-wide culture of accessibility, which will place ADA access at the forefront of Ann Arbor Parks & Recreation planning, construction, and policy-making efforts.

PROJECT OVERVIEW

Development of the Transition Plan began in May 2022 with site assessments and was completed in November 2023. Altura Solutions (Altura) is based in Austin, Texas and serves as the sole consultant providing project management and accessibility consulting services to develop a plan to include stakeholder participation through public meetings, open houses, and online surveys, and provide staff training opportunities regarding ADA Title II compliance.

Approximately 100 existing PSAs have been collected through interviews and feedback from 13 Parks divisions. This document includes a sample of specific recommendations for modification of PSAs based on detailed analysis by Altura. For more information see Chapter 4.1: Programs, Services, and Activities.

From May to July 2022, 160 Ann Arbor Parks & Recreation-owned parks and facilities were evaluated for architectural barriers using the 2010 Standards for Accessible Design and the Americans with Disabilities Act Accessibility Guidelines. Inspection reports were developed for each facility that include items such as identification of barriers, recommendations for remediation, and actions for the recommended remediation.



Program access as defined in the ADA: “A public entity’s services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities.”¹ In essence, not every park facility that contains barriers must be altered for The Ann Arbor Parks & Recreation Unit to meet ADA requirements; The Ann Arbor Parks & Recreation Unit can move or duplicate programs from facilities with barriers to barrier-free facilities. In situations where physical barriers will need to be addressed, the Parks should implement temporary solutions until a permanent alteration is made. For more information, see Chapter 4: Recommendations.

An ADA Transition Plan is a living document that can be modified over time based on The Ann Arbor Parks & Recreation Unit’s priorities and available resources. The Plan should serve as the starting point and outline for Ann Arbor Parks & Recreation to remove identified architectural barriers to achieve program access. The Plan may be modified to reflect the community’s evolving needs and, as funding and other resources become available, to assist in the implementation of the Plan.

City of Ann Arbor Ann Arbor Parks & Recreation Unit Transition Plan can be adjusted via an Annual Update Report that the department will produce starting one year from the Plan’s adoption. The Annual Update Report will capture The Ann Arbor Parks & Recreation Unit’s efforts in reaching program access such as number of parks and facilities altered to remove barriers as well as programs and services created to provide added accessibility to residents and staff. Based on the availability of resources, Ann Arbor Parks & Recreation will report that the Plan is on schedule or can adjust the expected timeline for completion. More information on the Annual Update Report can be found in Section 5.4.

SUMMARY OF RECOMMENDATIONS

The Plan provides recommendations to facilitate the City’s Parks and Recreation Unit in complying with ADA Title II requirements. The detailed recommendations can be found in Chapter 4. The following actions are the recommendations that the City can take to have an immediate impact of ADA compliance:

1. Appoint a full-time ADA Coordinator or person responsible for implementing the Plan
2. Formalize an ADA Liaison system within the department
3. Commit consistent funding annually for the next 30 years to achieve program access
4. Create a system to track ADA requests from residents and track the progress of the request

Accomplishing these four actions will serve as a catalyst for the Parks and Recreation Unit in terms of initiating policy and procedure to ensure effective and consistent follow-through in achieving compliance. Timely implementation will provide the department with the foundation needed to then begin the process, outlined later in this document, of determining budgets and timelines for the highest priority facility alterations and improvements.

¹ 28 CFR Part 35.150 www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#subpartd



Plan Organization

Chapter 1 – Introduction This chapter discusses why The Ann Arbor Parks & Recreation Unit undertook the creation of the Plan. While there are federal legal requirements, more importantly The Ann Arbor Parks & Recreation Unit seeks to ensure equal access to all individuals regardless of disability. In that spirit, this chapter outlines the federal requirements to demonstrate how the department’s goals align with providing access and inclusivity.

Chapter 2 – Public Engagement and Input This chapter discusses the process in gathering public input. The public input process includes both virtual online meetings as well as surveys.

Chapter 3 – Self-Evaluation This chapter presents the self-evaluation process for PSAs and for parks and facilities, which included a cooperative methodology between Ann Arbor Parks & Recreation staff and Altura. The process relied heavily on designated ADA Liaisons from Ann Arbor Parks & Recreation divisions to provide accessibility related information specific to each department. The findings of the self-evaluations will be presented and discussed.

Chapter 4 – Recommendations This chapter will provide recommendations for addressing the findings of the self-evaluations, including PSAs and Parks facilities. It includes recommendations, associated budgets, and a timeframe to reach program accessibility.

Chapter 5 – Implementation This chapter discusses the implementation process for achieving program accessibility. The federal mandates for implementation are covered and customized for The Ann Arbor Parks & Recreation Unit and recommended processes are presented. Some of the implementation processes will apply at Ann Arbor Parks & Recreation-wide level while others will be department specific.

Chapter 6 – Resources contains a directory of disability organizations, guidelines, and resources for addressing the recommendations included in the Plan.

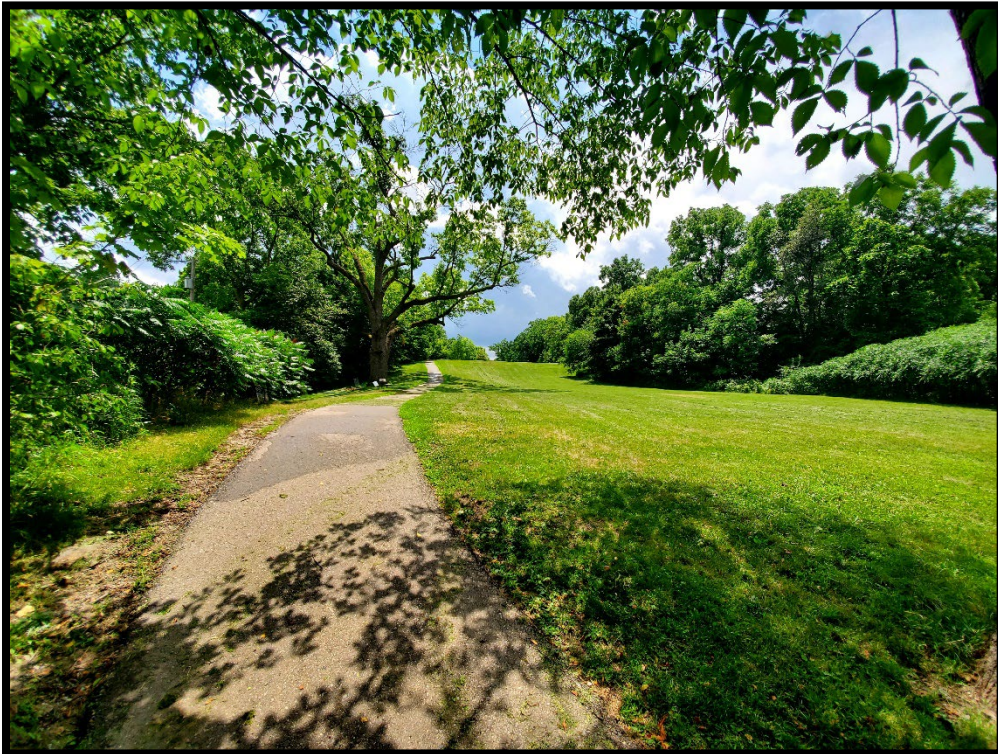
CHAPTER 1: INTRODUCTION

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in providing access to participation in activities such as jobs, public accommodations, government services, the built environment, public transportation, and communications. The Ann Arbor Parks & Recreation Unit has undertaken a self-evaluation of its PSAs and built environment to determine the extent to which individuals may face barriers to access.

The Plan describes the process developed to complete the evaluation of the Parks and Recreation Service Unit's PSAs and facilities, and it will guide the implementation of necessary modifications in the future. By adopting the Plan, The Ann Arbor Parks & Recreation Unit takes another step in its ongoing commitment to, and history of, access and inclusion for all people living in, working in, and visiting the City of Ann Arbor Ann Arbor Parks & Recreation facilities.

What is to Come:

- 1.1 Background of the ADA
- 1.2 Legislative ADA Mandates





1.1 Background of the ADA

The ADA is a civil rights law, enacted on July 26, 1990, that broadly prohibits discrimination on the basis of disability. “Disability means, with respect to an individual:

- (i) A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- (ii) A record of such an impairment; or
- (iii) Being regarded as having such an impairment...”²

The ADA mandates that the above definition “be construed broadly in favor of expansive coverage, to the maximum extent permitted by the terms of the ADA.”³ Based on that broad construction, the ADA protects individuals from discrimination based on disability whether the individual currently has a disability; does not currently have a disability but did at one time; never had a disability but is perceived as having a disability; or never had a disability but is related to, or otherwise associated with, an individual who has a disability.

The ADA ensures equal opportunity for all individuals with disabilities in the areas of employment, state and local government services, public accommodations, and telecommunications, as outlined in the five titles of the legislation:

- **Title I: Employment** – Prohibits employment discrimination against otherwise qualified individuals with disabilities.
- **Title II: State and Local Governments** – Prohibits discrimination in accessing services provided by state and local government entities, including transportation. Services may include employment to the extent not already covered by Title I.
- **Title III: Public Accommodations** – Prohibits discrimination in places of public accommodation, commercial facilities, and transportation.
- **Title IV: Telecommunications** – Mandates that telecommunication devices be placed for persons with hearing or speech impairments.
- **Title V: Miscellaneous**

² 28 CFR Part 35.108(a)(1) www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35108

³ 42 U.S.S. 12132 www.ada.gov/pubs/adastatute08.htm#12132



Title II of the ADA, which specifically addresses state and local governments, protects qualified individuals with disabilities because of their disability from being “excluded from participation in or ... denied the benefits of services, programs or activities of a public entity, or be subjected to discrimination by any such entity.”⁴ Title II regulations, which include the requirement for the creation of an ADA Transition Plan, went into effect on July 26, 1991. The transition plan requirement had a completion deadline of July 26, 1992. Title II regulations were further revised on March 5, 2011, with compliance required by March 15, 2012, and again on October 11, 2016.

In accordance with the ADA, state and local government agencies with 50 or more employees are obligated to conduct a self-evaluation of their facilities, PSAs, and policies and procedures. Entities then must create a Transition Plan to address those barriers identified in the assessment by providing suggested remedies, timeframes for which to eliminate any identified barriers, and the

official responsible for implementing the Plan. An ADA Transition Plan is a document that guides government entities’ transition towards compliance with the ADA in a set timeframe. Importantly, although the ADA requires that facilities, PSAs, and policies and procedures be accessible in the most integrated manner possible, it does not require that agencies make structural changes to existing facilities if compliance can be achieved by alternative means.

While this Plan is intended to meet all technical requirements, it also utilizes a large geographic information system (GIS) component to capture existing site conditions and perform more complex analysis of the data. The findings documented in the Plan can also be used as an asset management tool to identify and plan for alterations of existing infrastructure in addition to coordinating the PSAs provided by The Ann Arbor Parks & Recreation Unit.

⁴ 28 CFR Part 35.150(a) www.ada.gov/regs2010/titleII-2010/titleII_2010_regulations.htm#a35150



1.2 Legislative ADA Mandates

As previously mentioned, Title II of the ADA prohibits discrimination by public entities on the basis of disability by requiring that PSAs and the facilities that house them be accessible to persons with disabilities. To accomplish this, the Department of Justice developed regulations requiring government agencies to self-evaluate its PSAs to identify barriers to accessibility. The Ann Arbor Parks & Recreation Unit is obligated to remove physical barriers to accessibility when program changes cannot ensure access to PSAs in existing facilities. The ADA requirements apply even when a Ann Arbor Parks & Recreation-owned facility is leased to a third-party concessionaire or provider of a PSA.

Title II regulations were amended on March 15, 2012, and those amended requirements can be found in Part 35 of Title 28 of the Code of Federal Regulations (CFR). Highlights of the Title II requirements applicable to The Ann Arbor Parks & Recreation Unit as part of the scope of work for the Plan include, but are not limited to:

- Part 35.105 Self-evaluation
- Part 35.106 Notice
- Part 35.107 Designation of responsible employee and adoption of grievance procedures
- Part 35.150 General prohibitions against discrimination
- Part 35.133 Maintenance of accessible features
- Part 35.149 Discrimination prohibited
- Part 35.150 Existing facilities
- Part 35.151 New construction and alterations
- Part 35.163 Information and signage

With the understanding that the structural changes to facilities would take time and funding, the regulations allow for the creation of a Transition Plan to implement the changes over time. The ADA regulations provide that if a public entity that employs 50 or more persons plans to make structural changes to facilities in order to achieve program accessibility, it must develop a Transition Plan setting forth the steps necessary to complete such changes.

The Transition Plan must, at a minimum, contain the following:

- Identify and list physical barriers in the public entity's facilities that limit the accessibility of its programs or activities for individuals with disabilities;
- Describe in detail the methods that will be used to remove the barriers and make the facilities accessible;
- Provide a schedule to achieve compliance with Title II, with annual updates on the progress of the Plan; and
- Identify the official responsible for implementation of the plan.⁵

⁵ 28 CFR Part 35.150(d)(3) www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#a35150



ADA TITLE II PROGRAM ACCESS

Title II provides guidance on how a government entity such as The Ann Arbor Parks & Recreation Unit can achieve compliance. A public entity is required to provide each PSA in a manner that, “when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.”⁶ The key phrase is “when viewed in its entirety.” In other words, not every single service or facility must be made accessible. Instead, the overall network of services and facilities must be made accessible. While a more detailed discussion is provided in Section 3.1, anything that The Ann Arbor Parks & Recreation Unit provides to the public or to internal staff is considered a PSA. Examples include the ability to pay bills online and at physical locations, trash pick-up, employment opportunities, police and fire services, and transit services.

Title II does not require a public entity to make each of its existing facilities accessible, take any action that would threaten or destroy the historic significance of a property, or take any action that would result in a fundamental alteration to the nature of the PSA or cause undue financial and administrative burdens. The regulations provide further guidance on the process for determining undue financial and administrative burdens:

“In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with §35.150(a) of this part would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of a public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion.”⁷



Altura will apply a program access test to the PSAs offered by The Ann Arbor Parks & Recreation Unit in conjunction with the facility self-evaluations when developing recommendations. Briefly, the program access test analyzes the PSAs offered at a facility and looks for access and compliance in the context of the overall system. The recommendations in this Plan will be aimed at satisfying the program access test. However, the scope of work for the Plan excluded an analysis of the City’s website and digital media communications.

The Ann Arbor Parks & Recreation Unit provides a broad array of PSAs at various physical location and via virtual means. The Plan provides recommendations for improving existing PSAs, relocating PSAs to accessible physical locations, or making alterations to the parks and facilities where the PSAs are provided. The self-assessment process and recommendations are outlined later in this document.

⁶ 28 CFR Part 35.150(a) www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#35150

⁷ 28 CFR Part 35.150(a) www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm#35150

CHAPTER 2: PUBLIC ENGAGEMENT AND INPUT

We recognize that vital role public engagement plays in facilitating communication, engaging stakeholders and communities, and achieving the goals set out in this document. Providing various formats for engagement to the Ann Arbor community for this project helped to gain support for this project that will impact the quality of life for so many in this community.

The ADA has been a critical tool in advancing the rights and needs of people with disabilities. It helps to shift public attitudes toward greater acceptance and understanding. Sharing the intent and progress of this project with the Ann Arbor community through virtual meetings, in-person meetings, and online surveys assists Altura and City staff members with relevant usage of the park system and program offerings.

What is to Come:

- 2.1 Public Engagement Efforts for the Development of the ADA Transition Plan



2.1 Public Engagement Efforts for Development of the ADA Transition Plan

Public engagement is critical to obtaining the community’s input and for the ultimate adoption of the Plan, as well as to meet the federal requirement that stakeholders be included in the process. Altura developed an outreach strategy to obtain feedback on prioritizing parks and facilities and elements within those facilities, prioritizing PSAs, and in identifying opportunities to improve existing policies. This strategy made use of social media, the Parks and Recreation Service Unit’s multi-media outreach, and flyers shared with various advocacy groups.

Several avenues were created for the public to provide input and interact with Altura and Ann Arbor Parks & Recreation staff during the process including two open houses, the posting of online surveys and an interactive GIS pin map. The results of the public input process help to determine which types of parks, facilities and elements to prioritize.

OPEN HOUSE EVENTS

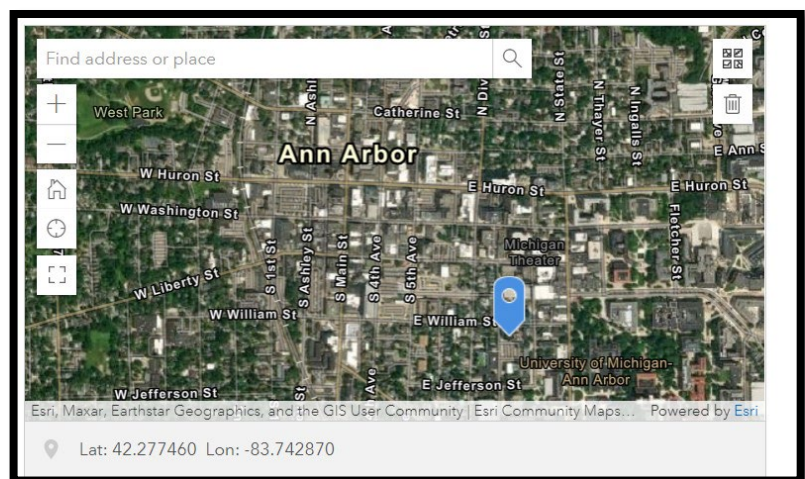
To support the open house events, digital flyers were created and distributed to community stakeholders. The first open house was held on July 14, 2022, virtually using an interactive platform due to the ongoing Covid-19 pandemic. The second open house was both a virtual and in-person event held October 12, 2022 at the public library downtown.

ONLINE SURVEY

Digital flyers and social media posts directed stakeholders to a website where they were able to access the online survey. The public was asked to provide information on the programs and services that they use, the types of parks and facilities they frequent, and the elements within facilities that they use the most. These responses helped identify the needs and wishes of the community. A detailed summary of the input received from the survey is found in Appendix 1.

GIS PIN MAP

The City of Ann Arbor created an interactive map in which members of the community can geolocate exact locations within the park system where they believe improvements to ADA access should occur. This map provides the community with the opportunity to pinpointing exact locations of requested improvements. Comments and requests can be tracked across the City’s park system.





CHAPTER 3: SELF-EVALUATION

As required by the ADA, The Ann Arbor Parks & Recreation Unit must conduct a self-evaluation of Ann Arbor Parks & Recreation-owned parks and facilities, PSAs, and policies and procedures. While PSAs are what The Ann Arbor Parks & Recreation Unit provides, policies and procedures outline how the PSAs are to be provided. The self-evaluation process for PSAs and policies and procedures included in-person interviews with staff and collection of information from Ann Arbor Parks & Recreation departments. 13 divisions of the Ann Arbor Parks & Recreation Unit provided lists of PSAs for analysis, though it is understood that those lists are in no way exhaustive, but rather represent a sample of PSAs provided by The Ann Arbor Parks & Recreation Unit at the time of this Transition Plan process.

The self-evaluation process for parks facilities involved the development of a GIS database, the development of an inspection computer application, coordination with Ann Arbor Parks & Recreation staff to provide access to the facilities, and physical inspection of the facilities. Development of the GIS application was conducted with Ann Arbor Parks & Recreation staff approval to allow for integration of the data into existing Ann Arbor Parks & Recreation GIS systems. The inspection data will be integrated into Ann Arbor Parks & Recreation software which will allow The Ann Arbor Parks & Recreation Unit to track the recommended facility alterations as part of the existing project management tool. The Plan presents the findings of the 160 parks and facilities inspected.

What is to Come:

- 3.1 Programs, Services, and Activities
- 3.2 Parks and Facilities



3.1 Programs, Services, and Activities

PSAs as they pertain to the ADA are activities, events, and actions undertaken by a Title II entity, such as the Ann Arbor Parks & Recreation, in the regular course of business. These PSAs can be provided to both the public as well as internally to staff.

Examples of PSAs include, but are not limited to:

- Conducting meetings such as Parks Advisory Commission Meetings
- Administering programs such as the Kayaking for Seniors
- Providing rental and event space
- Communications with residents, including digital communications
- Collecting public input for items such as Park and Recreation Open Space (PROS) Plan
- Providing educational programs such as the Park Steward Program
- Conducting regular park maintenance
- Implementing park development projects and renovations
- Youth programs and activities

FINDINGS

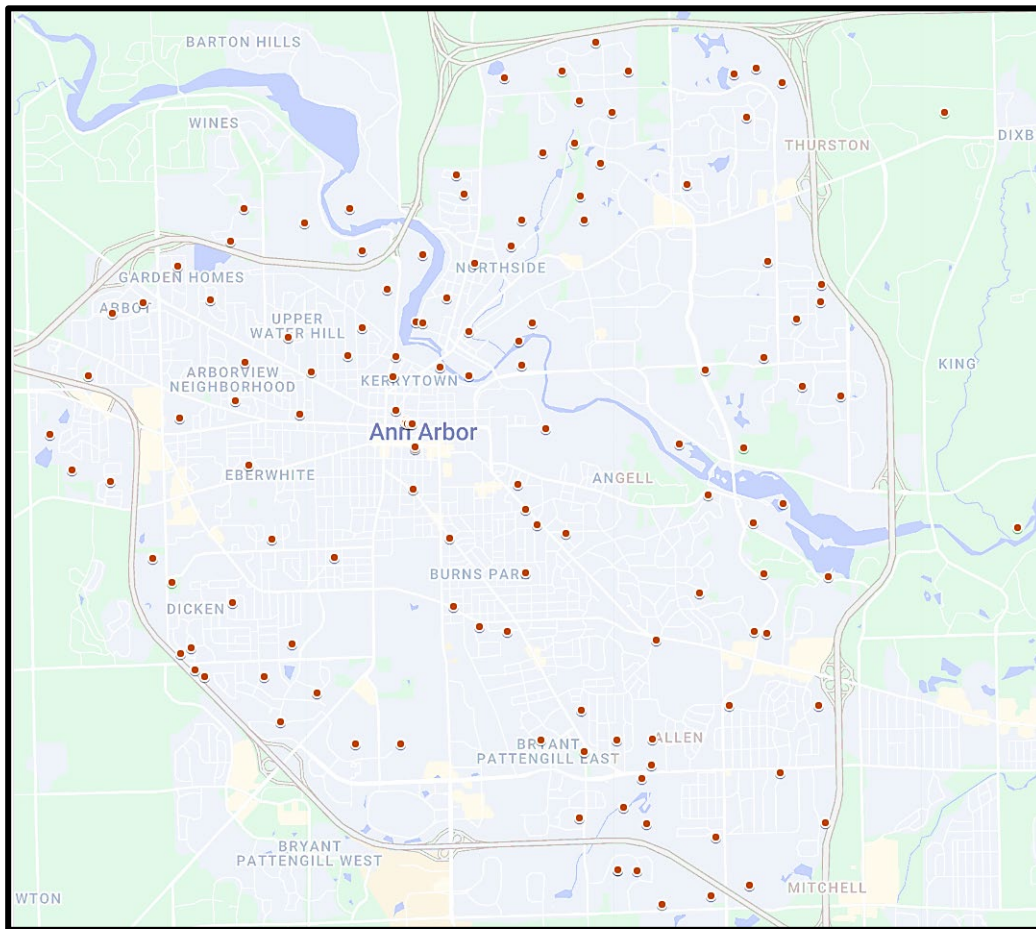
The Ann Arbor Parks & Recreation Unit provides a broad spectrum of PSAs that support the Parks and Recreation Service Unit's mission of delivering quality public services and promoting the safety, health, and quality of life of its citizens. It is understood that PSAs are constantly changing as outdated programs are no longer provided, existing PSAs are modified to meet current needs, and new programs are added.

In general, The Ann Arbor Parks & Recreation Unit provides PSAs with accessibility as a consideration. Staff appear to have a strong desire to accommodate people with disabilities, frequently stating that accommodations are made "on a case-by-case" basis. However, as with most government agencies, there are opportunities for The Ann Arbor Parks & Recreation Unit to improve accessibility in its PSAs. Altura identified several elements to verify to ensure ADA compliance, such as verifying meetings are held in facilities that meet ADA standards for accessibility.

The recommended modifications to PSAs, detailed in Section 4.1, will help ensure that the Parks and Recreation Service Unit's PSAs are provided without barriers to people with disabilities. These modifications vary from requesting that Ann Arbor Parks & Recreation staff verify that certain components are in-place to providing a specific ADA requirement.

3.2 Parks and Facilities

As part of the Plan, a self-evaluation survey of 160 Ann Arbor Parks & Recreation-owned parks and facilities was performed over a two-month period from May 2022 through July 2022. The map below indicates the location of all facilities included in the self-evaluation. Park types inspected include regional parks, nature areas, neighborhood parks, trail systems and sports facilities.



Map of Inspected Ann Arbor Parks and Facilities

A full list of parks and facilities will be provided in Appendix 2.

TECHNICAL STANDARDS

There were two different technical accessibility standards used based on the date of construction. The 2010 Standards for Accessible Design (2010 Standards) were applied to parks and facilities that were constructed or renovated after March 15, 2012, and the Americans with Disabilities Act Accessibility Guidelines (ADAAG) were applied to parks and facilities that were constructed or renovated between 1991 and March 2012. Technical accessibility standards refer to different types of architectural elements and how to make them compliant, for example, how much knee space is required at a lavatory.

The federal accessibility technical design standards changed on March 15, 2012, when the 2010 Standards took effect. Facilities constructed or permitted before the effective date should have complied with the previous standards, the ADAAG. Facilities constructed, altered, or permitted after the effective date must comply with 2010 Standards. Elements that were constructed before the effective date are safe harbored from compliance with the new standards if the constructed elements fully complied with the ADAAG at the time of construction. If those elements did not comply with the ADAAG, those elements must now comply with the 2010 Standards. Facilities that pre-dated the ADA standards and were constructed prior to 1991 are not granted safe harbor and must comply with current ADA requirements.

Several elements that were not previously scoped in the ADAAG now have technical requirements within the 2010 Standards. Those elements are not safe harbored by the ADA and must comply with the latest standards. Example elements that are not safe harbored include dwelling units and recreation facilities such as playscapes/play areas, pools, amusement rides, boating facilities, fishing piers, golf and miniature golf courses, and exercise equipment. Where dates of construction and alterations of the facilities could not be determined, the 2010 Standards were used as the technical standard for those facilities.

SELF-EVALUATION AND FIELD SURVEY METHOD

On-site assessments were coordinated with Ann Arbor Parks & Recreation staff. Altura provided The Ann Arbor Parks & Recreation Project Managers a schedule of parks and facilities to be inspected and coordinated with onsite staff to ensure that facility access would be available. When applicable, an Ann Arbor Parks & Recreation staff member/ADA liaison also accompanied the Altura Team during some assessments to help navigate and ensure access throughout.

An Altura field team of between 2-5 people was assigned to each park or facility in the project scope. The team included accessibility staff deeply knowledgeable with the 2010 Standards and experienced GIS data collection technicians. All members of the team had architectural, engineering, or GIS backgrounds. The team used tape measures and digital levels as measurement tools and an iPad to collect the data. GIS protocols were established and finalized with Ann Arbor Parks & Recreation input, then the data was collected via a GIS-enabled collector application. The field team identified noncompliant elements that are architectural barriers at each facility to produce a report listing the noncompliant elements, element priority per violation, associated recommendations for compliance, and a budgeted cost for the proposed alteration.





A GIS layer has been produced that maps the identified architectural barriers found in the facility self-evaluations. The database is non-proprietary and can be implemented into the Parks and Recreation Service Unit's existing GIS infrastructure, as well as any project management software The Ann Arbor Parks & Recreation Unit may use. The information contained in the hardcopy reports will be available on the GIS map and within the GIS database.

SELF-EVALUATION REPORT METHODOLOGY

The reports contain information as outlined in this section. The reports are included in Appendix 3 and include a more detailed description of the recommended actions that will assist in describing the proposed solution to the identified barrier. It should be known, however, that there is typically more than one option to address barriers. The final decision will be taken by the Ann Arbor Parks & Recreation Unit, or the design professional tasked with developing the construction documents.

PHOTOGRAPHS

A photograph of the individual barrier is typically provided. The photo is intended to demonstrate the element that is not in compliance with the standards and the element's location within its immediate surroundings. One photo per element was included in the report. The photo does not always provide all information to understand the complete issue, so all aspects of the row should be consulted to understand the depth of the element.

REPORT ID

Each element will have a unique number per facility report. The number will start at 1 for each facility and will only be unique within the facility. This number will not be present in the GIS database and is only provided for navigating each facility report. A single number may be provided to an element with multiple code sections of noncompliance, where the recommended action will resolve multiple barriers.

LOCATIONS

Each element will have a general description of its location. Although the location is also available in the GIS map and database, a specific location will be provided in the report. Location descriptions can include interior versus exterior, the floor, list a specific room title if posted or if room identification was provided by Ann Arbor Parks & Recreation staff, or may be more generic such as "Men's Restroom".

ELEMENT AND CODE REFERENCE

Each element will list a physical barrier such as "ramp", "drinking fountain", or "door". Each element will identify at least one specific 2010 Standards or ADAAG code section that makes the element a barrier. The code will include headings from the scoping section and the technical section of the standards. Code heading examples are "208.2.4 Van Parking Spaces" and "403.3 Slope". In some instances, there could be more than one code for the specific violation. Some elements are in noncompliance of more than one code section.

BARRIER

Each barrier will be defined with a brief explanation of why it is noncompliant. Examples of barriers include "Reach range, not between 15 and 48 inches" and "Walking Surface-Running slope greater than 1:20". There are some instances where the element has more than one violation. In those situations, "Multiple Barriers" will be noted.

A licensed professional designer should be consulted to develop the final solution for each identified barrier and should develop the required construction documents to ensure compliance with all applicable code requirements.

AS-BUILT CONDITION

Each barrier will include the “as-built” or existing field condition. The information can include quantities, dimensions such as heights or widths, and slope measurements.

FINDINGS

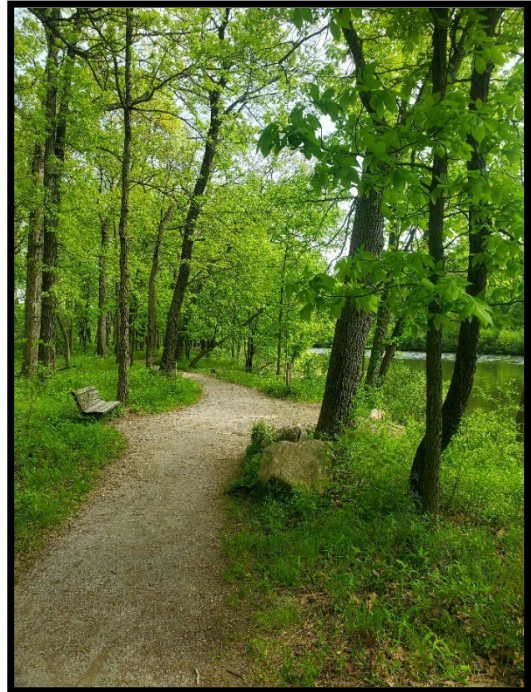
The findings of barriers at parks and facilities show a pattern based on the age of the facility and any associated alterations. In general, parks and facilities constructed before 1990 tend to have more noncompliant elements. As alterations occurred in these parks and facilities, those specific elements were typically brought into compliance, while elements that have not been altered remain noncompliant.

Parks and facilities constructed and/or altered after 1994 tend to be more compliant than parks and facilities constructed earlier, however, there are still noncompliant elements. Some barriers can be attributed to smaller alterations that were likely performed without consultation with a design professional. For example, fixed elements such as AED cabinets or flat-screen televisions become protruding objects which are barriers for people with visual disabilities.

Nature Areas tended to have some amenities such as parking and had undeveloped natural trails through the area. The trails at these nature areas do not meet the ADA technical requirements for surface materials and slopes. See Chapter 4.2 for recommendations to address Nature Areas.

The identified barriers represent any findings that are not in compliance with the technical elements of the ADA standards. However, some of the identified barriers may not be a violation of the ADA. For example, the ADA exempts certain elements within employee work areas from compliance. As Altura captured information, it is possible that an identified barrier is not an actual violation of the ADA based on use of the facility.

The information presented in this Plan is based only on the self-evaluations conducted by Altura. Conditions are subject to change as scheduled alterations progress and routine maintenance continues.



CHAPTER 4: RECOMMENDATIONS

This Transition Plan provides the preliminary recommendations for PSAs and for facility alterations which are aligned with achieving the Parks and Recreation Service Unit’s goal of accessibility, inclusion, and equal access for all. The Parks and Recreation Service Unit’s culture of going above and beyond extends to meeting accessibility requirements and should be commended.

The recommendations for PSAs are based on achieving program accessibility. As such, the goal of the recommendations is for The Ann Arbor Parks & Recreation Unit to meet the ADA requirements while also meeting best practices for achieving accessibility compliance.

The recommendations for parks and facilities are based on addressing all the identified barriers that we found in the self-evaluation and analysis of the parks and facilities.

To meet the ADA Title II requirements, we recommend that an ADA Coordinator be appointed to implement the Plan’s recommendations. The ADA Coordinator can be a City-wide position or be specific to the Parks and Recreation Service Unit. Furthermore, we recommend creating an ADA Liaison system to assist the ADA Coordinator in the Plan’s implementation.

What is to Come:

- 4.1 Programs, Services, and Activities
- 4.2 Parks and Facilities
- 4.3 Projected Budgets



4.1 Programs, Services, and Activities

Altura created a checklist that existing and new Ann Arbor Parks & Recreation PSAs can be compared against to help ensure ADA compliance. The checklist, available in Appendix 4, should be used as PSAs are being created or altered to cross-reference ADA compliance. While not all comments may apply to each PSA, the checklist will provide guidance on aspects to be considered when developing PSAs. The checklist elements were applied to the PSAs provided by Ann Arbor Parks & Recreation staff, and recommendations for modifications noted. Appendix 5 has the PSA recommendations.

The Plan’s recommendation is to have Ann Arbor Parks & Recreation staff review each PSA for ADA compliance by using the checklist in conjunction with the details in this section. While the ADA does not place a priority on any specific type of PSA, there are minimum requirements that must be met for compliance. Those minimum requirements, along with best practices, are discussed in this section.



PROGRAM ACCESSIBILITY

The City of Ann Arbor should reach program accessibility in looking at the self-evaluation of both PSAs as well as Ann Arbor Parks & Recreation-owned facilities. After analyzing the information provided by Ann Arbor Parks & Recreation staff, we have identified parks and facilities that have PSAs located within them. These parks and facilities will be scored higher in the priority matrix as explained in Section 5.1. The top 10 parks and facilities with the highest number of PSAs is presented below.

Facility	Number of PSAs
VETERANS MEMORIAL PARK & POOL & ICE	17
ARGO NATURE AREA -- 4 FACILITY USE	14
ARGO NATURE AREA LIVERY	14
HURON HILL GOLF COURSE	12
ANN ARBOR FARMERS MARKET	11
BUHR PARK -- 6 FACILITY USE	10
BUHR PARK - POOL AND ICE ARENA	10
ANN ARBOR SENIOR CENTER	10
GALLUP PARK -- 10 FACILITY USE	9
GALLUP PARK LIVERY	9

Table 4.1.1 Parks and facilities with most PSAs



The analysis presented includes recommendations for the possible moving of PSAs to different locations to improve accessibility to the community.

Looking at PSAs, it is recommended that an Ann Arbor Parks & Recreation-wide procedure for modifying policies, practices, and procedures be developed for PSA participation. The policy should comprise a process for requesting and reviewing program participation and circumstances for denial. This policy should also consist of a service animal policy for the public. To enhance program participation, Altura also strongly recommends disability awareness training, specifically for staff interacting with the public.

PROVIDE PUBLIC NOTICE

All public entities must provide information to the public, program participants, program beneficiaries, applicants, and employees about the ADA and how it applies to the public entity. The Ann Arbor Parks & Recreation Unit currently does not have accessibility information on its website, including the grievance procedure, and a Notice of Compliance. This Notice of Compliance should include the provision of alternative formats and be included in other venues and outlets such as:

- Social media (i.e. Twitter and Facebook)
- Ann Arbor Parks & Recreation website, including the Community Relations Committee page
- Information panels at each facility
- Local newspapers
- Local radio and television stations public service announcements

Examples of Alternative Formats include:

- Captioned public service announcements on television
- Sign Language Interpreters
- Large print
- Recommended: sans-serif typeface, 18-point size
- If a request is made for a specific font size, provide notice in that size
- Braille
- Text file on a thumb drive or emailed to the person
- HTML format on an accessible website
- Audio recording
- Radio announcement

Include the Notice of Compliance in program announcements and applications. The following are examples:

- Job announcements
- Program applications
- Boards and commission meetings



EMERGENCY PREPAREDNESS AND EVACUATION

Making sure that people with disabilities have full access to The Ann Arbor Parks & Recreation emergency preparedness and response programs is a critical ADA obligation.

Emergency issues that have an impact on people with disabilities include:

- **Notification** – Many traditional emergency notification methods are not accessible to or usable by people with disabilities. People who are deaf or hard of hearing cannot hear radio, television, sirens, or other audible alerts. Those who are blind or have low vision may not be aware of visual cues such as flashing lights. Warning methods should be developed to ensure that all citizens have the information necessary to make sound decisions and take appropriate, responsible action.
- **Evacuation** – People with a mobility disability may need assistance leaving a building without a working elevator. People who are blind may not be able to use traditional orientation and navigation methods. A person who is deaf may be trapped and unable to communicate because the only communication device relies on voice. Procedures should be in place to ensure that people with disabilities can evacuate the physical area under different conditions.
- **Emergency transportation** – Accessible transportation may be needed to evacuate people with disabilities. Some communities have used lift-equipped school buses to evacuate people with mobility disabilities during floods. Of course, this would require significant coordination with local transit authorities or school districts. For example, bus drivers’ job descriptions will need to include working during emergencies.
- **Locations of accessible emergency shelters and other shelters with specific features** – The public should be notified about the location of emergency shelters. Emergency personnel need lists of accessible locations, and information should be easily found on websites.
- **Service animals** – People with disabilities who use service animals should not be separated from their service animal, even if pets are not permitted. Service animals are the responsibility of their handlers, who must always keep them under control.
- **Access to information** – Communication must be accessible for all people, regardless of disability, and staff and volunteers should be trained in basic ways to provide accessible communication.

TRAINING

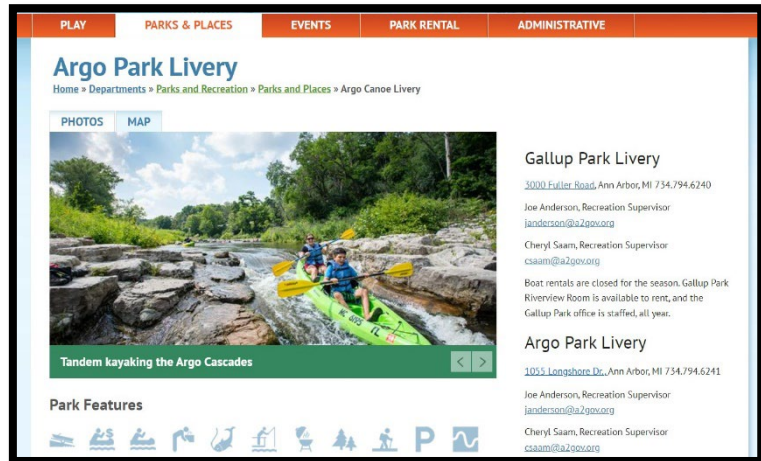
During the staff interview process, it was discovered that Ann Arbor Parks & Recreation does not have an ongoing ADA training program. Nearly all staff expressed a desire for additional ADA training and were eager to learn more about how to best serve their residents. Training will be offered to Ann Arbor Parks & Recreation staff on topics to be determined based on interest and need. Below is a list of training sessions for Parks and Recreation staff.

ADA Title II Overview	Role of the ADA Coordinator
Effective Communication	Accessibility Awareness – Etiquette
Outdoor Developed Area Standards	Implementing the ADA Transition Plan



ANN ARBOR PARKS & RECREATION WEBSITE

The Parks and Recreation Service Unit’s website is a component of the Parks and Recreation Service Unit’s overall information communications technology (ICT) system. At the time of the report, the City of Ann Arbor was in the process of creating a new website. The scope of this Plan did not include a review of the Department’s website and digital media content. However, the Ann Arbor Parks & Recreation Unit should implement a plan to maintain the website’s Website Content Accessibility Guidelines (WCAG) compliance moving forward. Define, create, and implement a strategy for systematically addressing accessibility across the Parks and Recreation Service Unit’s ICT products and services and integrating the strategy into daily operations.



- Develop methods using testing tools and resources to identify and address accessibility gaps in ICT for programs and services.
- Identify and acquire tools and resources needed to support staff efforts to include accessibility in the development of ICT for programs and services. Such tools and resources may include:
 - Web and PDF testing tools, checklists, and how-to videos for developers
 - Libraries of accessible web and PDF templates
 - Code libraries of accessible widgets
 - Color contrast analyzer tools
 - Scan tool for systematically auditing and tracking compliance and remediation of web resources

ACCESSIBILITY COMMUNICATIONS PLAN

The accessibility communications plan should be developed with approval from management and follow the Parks and Recreation Service Unit’s overall communication practices. The elements of the recommended plan include:

- Appoint or hire an Accessibility Communications Coordinator to oversee communications accessibility compliance in the organization, chair the accessibility workgroup, identify gaps in compliance, and make recommendations for training and accessibility expenditures.
- Develop an Accessibility Policy that defines the governance structure and identifies the guidelines that the Ann Arbor Parks & Recreation will adhere to.



- Create a governance structure within the organization, sanctioned by executive leadership, to include an Accessibility Steering Committee.
- Develop procedures which insert accessibility into the communications business structure of the Ann Arbor Parks & Recreation.
- Identify key roles and specific training to support accessibility in each communications area.
- Develop an Electronic and Information Resources (EIR) Accessibility Policy to clearly govern the process for creating and distributing electronic information. This will include, but not be limited to website content, social media governance, video production requirements, and emergency preparedness communication.
- Develop a communications grievance procedure to address complaints or inquiries from the public. The procedure should include the process for removing or addressing noncompliant content.
- Invest in an automated tool to scan websites and documents on a regular schedule to track compliance. The tool will be managed by the Parks and Recreation Service Unit's webmaster and regularly generate report findings to the steering committee.

COMMUNICATIONS GOVERNANCE STRUCTURE

Creating the Accessibility Communications Plan is the first step in establishing the required policies and procedures to help guarantee accessible communications. However, there is also a need for supporting infrastructure to ensure that the Plan is implemented and followed successfully. The governance structure helps to ensure that the Plan is not just partially followed or eventually abandoned.



GOVERNANCE STRUCTURE COMPONENTS

The Accessibility Workgroup

The Accessibility Workgroup enacts policies and makes recommendations for communications compliance. The workgroup will address accessibility issues and update departments on the communications decisions, acting as a conduit for information to and from individual departments.

The Accessibility Workgroup consists of:

- Communications Department Liaison
- Ann Arbor Parks & Recreation Webmaster
- ADA Coordinator
- Division ADA Liaisons



The Departmental ADA Liaisons consist of the existing Liaisons that have been working throughout the Plan process. The Liaisons would have the added responsibility of serving on the workgroup. The liaison training is especially important because communications accessibility is technical in nature. The Liaisons will be responsible for:

- Acting within their business area as accessibility point of contact for staff
- Acting as the gatekeeper for any departmental changes made to the Ann Arbor Parks & Recreation website
- Attending regularly scheduled meetings of the Accessibility Workgroup or ensuring that a representative from their department attends the meeting when their attendance is not possible.
- Identifying existing, planned, or new electronic communications products within their business area
- Participating as voting members of the Accessibility Workgroup to address and improve business processes for accessibility compliance
- Improving staff awareness within their department

The many responsibilities placed on the Parks and Recreation Service Unit's ADA Coordinator means that they must have the required support system and infrastructure to effectively manage Ann Arbor Parks & Recreation-wide ADA compliance on an ongoing basis. The ADA Coordinator must ensure that all Ann Arbor Parks & Recreation policies and procedures, PSAs, and physical infrastructure be made accessible. For more information regarding the role of the Parks and Recreation Service Unit's ADA Coordinator, see Section 5.3.



4.2 Parks and Facilities

PARKS AND FACILITIES

The parks and facilities in the self-evaluation were found to be in varying degrees of compliance.

The barriers that have been identified include items that can be addressed by staff as part of ongoing maintenance. These include fixed elements that can be relocated to compliant locations such as fire extinguishers, first aid kits, television monitors, toilet paper dispensers, and coat hooks. Other barriers require a more complex solution, and it is recommended that a professional designer be contracted to address the alterations required to achieve accessibility compliance.

Where architectural barriers are to be addressed in the future, Ann Arbor Parks & Recreation staff must develop temporary solutions to ensure program access. For example, if a facility's main entrance is not accessible, the public can be directed to use an accessible side entrance until the barrier at the main entrance is removed.

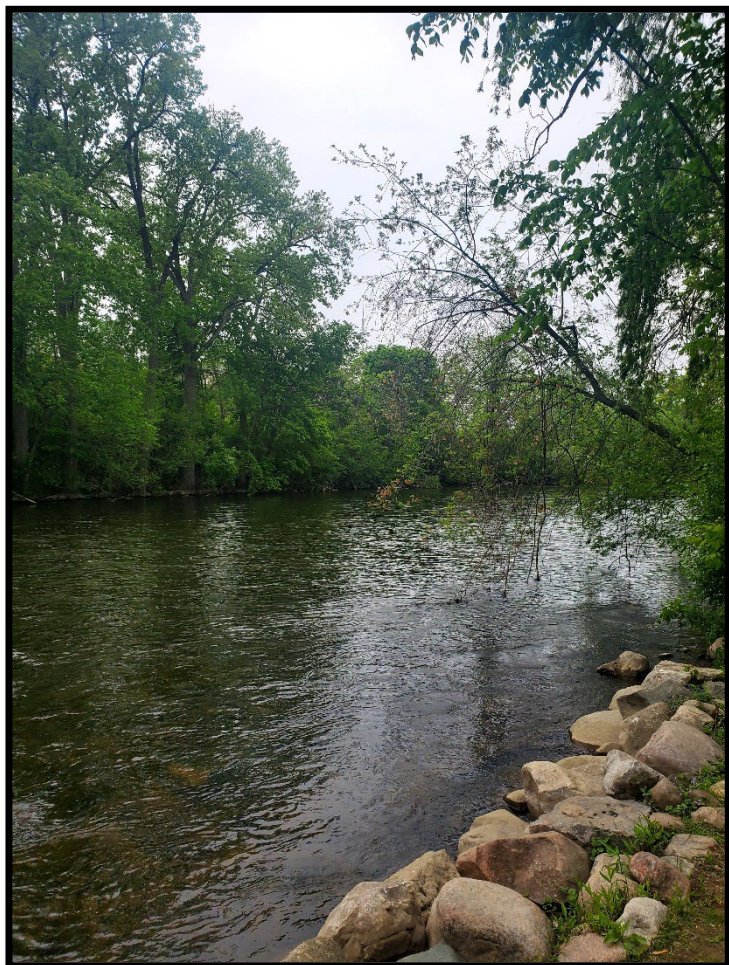


NATURE AREAS

The City's Nature Areas tend to have minimal amenities such as parking, a trailhead, or map of the trail system. However, almost all inspected Nature Areas were found to have barriers within the generally undeveloped trail system. Since not every Nature Area needs to be fully compliant, it is recommended that a portion of the trail system within some Nature Areas be made to be compliant with the ADA's accessibility standards for Outdoor Developed Areas. These standards provide the requirements for trail systems such as those in the Nature Areas.



The City's Nature Area Preservation (NAP) works to protect and restore Ann Arbor's natural areas and to foster an environmental ethic within the community. This involves conducting plant and animal inventories, ecological monitoring, and stewardship projects in Ann Arbor parks. As such, NAP has outlined



recommendations for alterations to provide accessible trails within existing Nature Areas.

NAP recommends a goal of 15-20% of the City's Nature Areas being altered to reach ADA compliance over a 30-year timeframe. NAP has also identified (1) existing Nature Areas that comply or nearly comply with ADA requirements and (2) existing Nature Areas that may be suitable for ADA compliance improvements. NAP identifies seven existing Nature Areas that comply or nearly comply with ADA requirements and nine existing Nature Areas that may be suitable for ADA compliance improvements.

This Plan recommends that NAP be followed to reach the 30-year goal of making 15-20% of the City's Nature Areas accessible to people with disabilities. NAP's 20-year goal matches this Plan's schedule to achieve Program Access for the overall park system.

4.3 Projected Budgets

The projected budgets will be based on the projected costs for The Ann Arbor Parks & Recreation Unit to remove architectural barriers, which includes design, project management fees and contingency calculations.

The projected budget for the City of Ann Arbor Parks & Recreation Unit to reach ADA Program Access is approximately \$19 million. The projected budget does not include escalation over the proposed 30-year period to reach program access.

The proposed budget will change based several factors including, but not limited to the following:

- Changes to unit prices used in developing the budgets
- Changes to cost factors applied to the facility budgets
- Input from staff on adding/deleting barrier listings from parks and facilities
- Parks and facilities recommended for barrier removal that might be on existing capital improvement projects

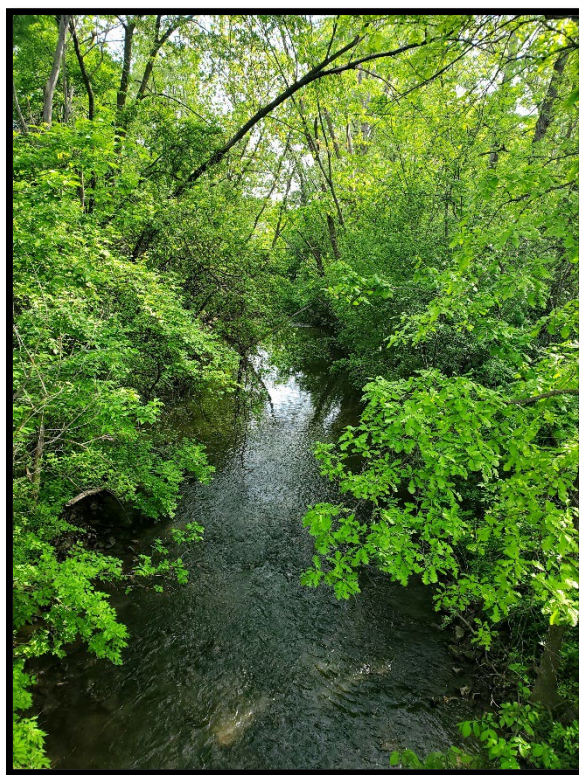


CHAPTER 5: IMPLEMENTATION

This chapter will present the suggested method by which to achieve compliance with the ADA Title II requirements for program accessibility. The Ann Arbor Parks & Recreation Unit can follow the proposed method and adjust the methodology, schedule, and budget as warranted by changes in the Parks and Recreation Service Unit's financial situation. However, any changes should be documented and recorded as an amendment to this Plan. The recommendations provided are a snapshot of the Parks and Recreation Service Unit's accessibility standing as of 2023.

What is to come:

- 5.1 Prioritization Process
- 5.2 Implementation Schedule
- 5.3 Official Responsible for Implementation
- 5.4 Annual Update Process





5.1 Prioritization Process

The prioritization of elements within parks and facilities and the facilities themselves allows Altura to develop budgets and schedules that provide the greatest impact for City of Ann Arbor.

PRIORITIZATION PROCESS FOR FACILITY ELEMENTS

Element prioritization is used as a metric to understand the importance of the noncompliant elements. Element ranking within a facility was developed by combining the recommendations in Title II of the ADA with input gathered from the Department interviews, public Open House feedback, and the online survey. If The Ann Arbor Parks & Recreation Unit decides to address only specific barriers within a park or facility instead of addressing all barriers at the same time, element rankings could be utilized. For example, The Ann Arbor Parks & Recreation Unit could elect to focus on only the Priority 1 barriers in certain parks and facilities due to budget constraints.

Priorities were divided into five levels, with Priority 1 being the highest. Each individual park or facility report documents noncompliant elements, the applicable ADA standard and a priority ranking. A summary of the priorities with elements is provided in the list below.

Priority	General Comment	Sample Elements
Priority 1	The top priority is providing an accessible route in and out of a park or facility while protecting people with low vision from protrusions that are not cane detectable.	<ul style="list-style-type: none"> • Entrances and Emergency Exits • Exterior Routes to Entrances • Protruding Objects
Priority 2	The second priority is providing accessible parking and routes within the park or facility.	<ul style="list-style-type: none"> • Accessible Routes • Parking • Doors
Priority 3	The third priority is providing accessible amenities of parks and buildings such as restrooms and drinking fountains.	<ul style="list-style-type: none"> • Restrooms • Drinking Fountains • Dressing/Fitting/Locker Room
Priority 4	The fourth priority is providing accessible amenities that are less common within parks and facilities.	<ul style="list-style-type: none"> • Showers • Room Signage • Appliances
Priority 5	The fifth priority is providing accessible amenities that are not integral to the park or facility's use.	<ul style="list-style-type: none"> • Pay Phones • Windows • Vending Machines

PRIORITIZATION PROCESS FOR INDIVIDUAL PARKS AND FACILITIES

To develop the recommended schedule for park and facility improvements, individual facilities will be scored to develop priorities for performing architectural modifications. This sample prioritization process will involve the consideration of factors with weighted averages to generate a final score for each facility. The factors and weighted values used for this initial analysis will be developed by the Altura Team based on input from Ann Arbor Parks & Recreation staff and stakeholders. The following provides a framework



that can be finalized with staff input. The proposed factors utilized in the prioritization, in order of weighted value are:

- **Number of Programs, Services, or Activities at a facility** – Parks and facilities that host a high number of total PSAs are scored according to Table 5.1.1 below with a 45% weighted value.

Number of PSAs	Score
0-7	2
8-10	4
11-13	6
14-16	8
17+	10

Table 5.1.1 Number of PSAs at a Park or Facility

- **Type of Facility** – Parks and facilities are also scored based on designation and use. Parks and facilities are categorized by type and scored according to Table 5.1.2 below with a 10% weighted value.

Facility Category	Score
Community Center (gs)	10
Pool Ice Arena (cs)	10
Special Use (ps)	9
Nature Area (le)	8
Park (cf)	8
N/A (pg)	5

Table 5.1.2 Type of Park or Facility

- **Public Input** – Parks and facilities mentioned as a priority in the public input process are given a score according to Table 5.1.4 below with a 10% weighted value.

Public Input	Score
Yes	5
No	0

Table 5.1.4 Parks and Facilities as Priorities from Public Input



- **Facility Use Score** – Parks and facilities that host a high number of users are scored according to Table 5.1.5 below with a 35% weighted value

Facility Use	Value
0-99	2
100-499	4
500-899	6
900-1199	8
1200+	10

Table 5.1.5 Facility Use Value

Below is a table with the top ten prioritized parks and facilities based on the criteria mentioned above. In effect, these are parks and facilities that the City should consider as a priority for addressing the removal of barriers identified in the parks and facilities reports.

The priorities can be adjusted by modifying the weighted averages or scoring system mentioned earlier.

Facility	Number of PSAs	PSAs Score	Facility Category Score	Facility Use Score	Public Input Score	FINAL SCORE
VETERANS MEMORIAL PARK & POOL & ICE	17	10	10	10	5	950
ANN ARBOR FARMERS MARKET	11	6	9	10	0	735
GALLUP PARK -- 10 FACILITY USE	9	4	9	10	5	715
GALLUP PARK LIVERY	9	4	9	10	5	715
ARGO NATURE AREA -- 4 FACILITY USE	14	8	9	4	0	625
ARGO NATURE AREA LIVERY	14	8	9	4	0	625
BUHR PARK -- 6 FACILITY USE	10	4	10	6	5	620
BUHR PARK - POOL AND ICE ARENA	10	4	10	6	5	620
HURON HILL GOLF COURSE	12	6	9	6	0	615
FULLER PARK POOL	7	2	10	8	5	610

Table 5.1.5 Parks and facilities as Priorities from Public Input

5.2 Implementation Schedule

ADA Title II states:

“Time period for compliance. Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of the effective date of this part (January 26, 1992), but in any event as expeditiously as possible,” 28 CFR §35.150(c).

It is recommended that corrective actions take place immediately and continue with a goal for completion by a set deadline. **A schedule of 30 years to achieve ADA Program Access is proposed.** While The Ann Arbor Parks & Recreation Unit has existing schedules to perform maintenance, a specific ADA Maintenance Schedule should also be developed and added into the existing schedule.

The proposed schedule can be adjusted over time as the Parks and Recreation Service Unit’s financial and labor resources change. As part of the annual update process described in Section 5.4, the ADA Coordinator should perform an assessment of the Parks and Recreation Service Unit’s financial resources to adjust the schedule accordingly and document any changes.

As required by ADA Title II, annual updates to this plan shall be generated by the Ann Arbor Parks & Recreation, demonstrating the progress made that year, with a listing of projects undertaken, projects completed, and expenditures made to reach compliance. The annual updates are a federal requirement and are intended to be used internally as a means of tracking progress. The Ann Arbor Parks & Recreation Unit must ensure the annual updates are readily available as proof of annual progress. The self-evaluation reports for parks and facilities should be amended as alterations are completed. It is recommended that a process be created to ensure that the facility alterations are made in compliance with ADA standards prior to altering any data within this Plan, such as adoption of a formal Ann Arbor Parks & Recreation policy requiring completion of an ADA-specific inspection before acceptance of any new construction.



The ADA inspection could be performed by The Ann Arbor Parks & Recreation Unit project manager or a member of the Building Division. With proper training, a member of the design team, or a qualified third-party ADA inspector can also perform the ADA inspection. Once ADA compliance has been verified, the project is reported as completed to the ADA Coordinator and the GIS layer is updated. With this additional inspection process, there is less likelihood of the existing pattern of barriers to continue in Ann Arbor Parks & Recreation-owned parks and facilities.

As required by the ADA, the Plan should be made available for viewing by the public for the duration of the alteration schedule and for a minimum of three years after Plan completion.

5.3 Official Responsible for Implementation

Per Title II requirements, a person must be assigned to be responsible for implementing the Plan. The title for this person is typically the ADA Coordinator. The responsibility of ensuring ADA compliance across the whole organization is a difficult task for a single person. As mentioned in Chapter 4, it is recommended that The Ann Arbor Parks & Recreation Unit create an ADA Program and formalize Departmental ADA Liaisons to provide the required support to the person responsible for implementing the Plan. This will help The Ann Arbor Parks & Recreation Unit meet federal ADA requirements and ensure the Plan becomes a living document that creates a culture of accessibility across the organization.

A person from each division of the Parks and Recreation Service Unit should be appointed to act as an ADA Liaison to assist the ADA Coordinator in reaching ADA compliance. The appointed Liaisons should be familiar with each division’s operations within the larger Parks and Recreation Service Unit.



There are several responsibilities placed on the ADA Coordinator depending on the position’s role within the organization. The position can be a City-wide role or can be specific to the Parks and Recreation Service Unit. The minimum responsibilities placed on the City-wide and departmental ADA Coordinator are listed below:

- Coordinate the City’s / Parks and Recreation Service Unit’s efforts to comply with ADA Title II
- Manage the City’s / Parks and Recreation Service Unit’s ADA Grievance Procedure

Other typical responsibilities associated with the designated person to ensure implementation of the Plan include, but are not limited to:

- Act as the Parks and Recreation Service Unit’s single point of contact regarding ADA compliance
- Chair monthly ADA Liaison meetings
- Participate in the Communications Plan process
- Participate in the Parks and Recreation Service Unit’s reasonable accommodation process



- Conduct ongoing reviews of policies and procedures for ADA compliance
- Perform annual updates to the Parks and Recreation Service Unit’s ADA Transition Plan
- Ensure that resources are being provided to ADA Transition Plan efforts
- Supervise ongoing ADA training to staff
- Ensure that new infrastructure is constructed to meet accessibility requirements
- Remain up to date on changing ADA trends and interpretations
- Interact with City Legal staff on ADA related matters
- Interact with the community and act as a source of information regarding City activities

The responsibility of implementing the Plan typically falls to the ADA Coordinator. However, there is no official Ann Arbor Parks & Recreation Service Unit ADA Coordinator at the time of this report. It is recommended that The Ann Arbor Parks & Recreation Unit fund the position and install an ADA Coordinator as soon as possible or appoint a City-wide ADA Coordinator.





5.4 Annual Update Process

The annual update is an ADA requirement that demonstrates the Parks and Recreation Service Unit's progress on the Plan. It is recommended that appropriate infrastructure be provided to effectively produce the federally mandated annual update to the plan. To have a seamless annual update process, it is critical to have the support of Ann Arbor Parks & Recreation Unit management and cooperation of staff.

While the update is a requirement, it can also serve to instill a culture of ADA compliance within the Parks and Recreation Service Unit's existing systems and processes. The update process is useful in keeping ADA compliance at the forefront of staff's job duties, thus ensuring that it is effectively interwoven into other departmental systems.

The annual update process involves gathering and reporting on information across all Ann Arbor Parks & Recreation Unit's divisions and functions. The validity and accuracy of the annual update is only as strong as the information provided by the ADA Liaisons. The annual update also provides The Ann Arbor Parks & Recreation Unit with the opportunity to make modifications to the Plan's schedule or budget, or both. At a minimum, the following components should be updated every year:

- Self-evaluation reports for any construction projects completed within the year and their associated costs, including:
 - Architectural barriers addressed
 - Curb ramps and linear feet of sidewalk constructed
 - Amount of accessible on-street parking added
- Update the GIS layer to reflect the alterations to parks and facilities confirmed to be compliant
- Document the budget expenditures for the year
- If required, make changes to the schedule which should include:
 - Defendable reason(s) for making the change
 - Shift in the Plan's budget due to changes in resources or market conditions
 - Shift in the scheduled parks and facilities to be altered
- Summary of ADA Training
 - Modifications, if any, made to original training plan
 - Results of attendance goals and metrics
- Report on changes to PSAs, policies, and procedures
- Status of the Parks and Recreation Service Unit's website regarding ADA compliance
- Report on number of ADA grievances and resolutions



The annual update involves the coordination of every Ann Arbor Parks & Recreation Unit division and their efforts in making progress on the Plan. The recommendations for the Parks and Recreation Service Unit’s ADA Program and ADA Liaison structure greatly facilitate the annual update process. For example, the Liaison from the Facilities Management Division would be responsible for providing the division’s update for the items listed above. The Liaison would work with each division to ensure that the information is being captured on an ongoing basis and provided annually, at a minimum. The first annual update is due on the anniversary of the adoption of the Plan. Depending on the size and structure of each division, the Liaisons will require varying levels of effort to produce the required annual update report.

It is recommended that The Ann Arbor Parks & Recreation Unit produce quarterly update reports until the process is ingrained as part of the Parks and Recreation Service Unit’s standard workflow. The quarterly reports will demonstrate the required effort, at every level, to capture and report the information. The quarterly updates will also allow for adjustments to be made in the process in preparation for the annual update.





APPENDIX

Appendix 1 – Public Input Summary

Appendix 2 – List of Parks & Facilities Inspected

Appendix 3 – Inspection Reports

Appendix 4 – PSA Checklist

Appendix 5 – PSA Reports

Appendix 6 – List of Prioritized Facilities