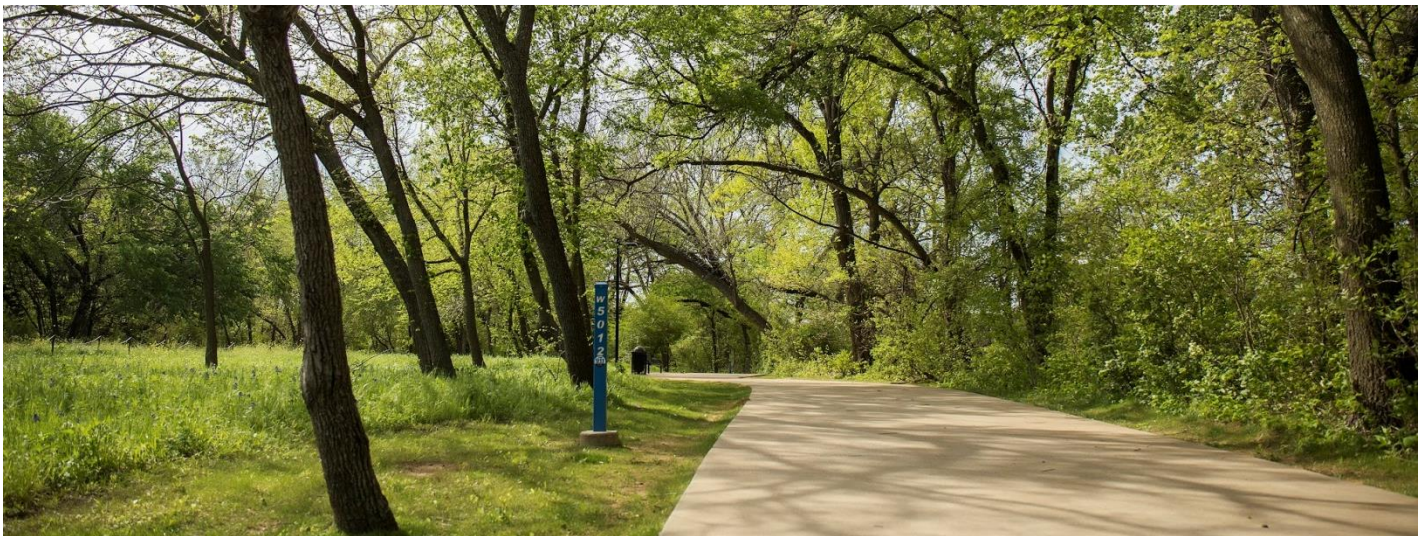


City of Mansfield ADA Self-Evaluation and Transition Plan



September 2023



ACCESSOLOGY

Prepared by Accessology Too, LLC

This page is intentionally left blank

Table of Contents

Abbreviations	ii
1.0 Introduction	1
1.1 Legislative Mandate	1
1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process	1
1.3 Discrimination and Accessibility	1
1.3.1 Physical Barriers	2
1.3.2 Programmatic Barriers	2
1.3.3 Ongoing Accessibility Improvements	2
1.3.4 City of Mansfield's Approach	2
2.0 Public Outreach	3
2.1 Public Access Survey	3
2.2 Web Map	4
3.0 Self-Evaluation and Summary of Findings	4
3.1 Legislative Mandate	4
3.1.1 Interactive Survey Process	5
3.1.2 ADA/504 Coordinator(s) (Title I / Title II)	7
3.1.3 Roles and Responsibilities of the ADA/504 Coordinator(s)	7
3.1.4 ADA Liaison Committee	8
3.1.5 ADA Grievance Policies, Procedures and Forms with Appeals Process	9
3.1.6 Reasonable Accommodation/Modification Request Forms	9
3.1.7 Service Animal Guidance	10
3.1.8 Public Notice Under the ADA	10
3.1.9 Non-Discrimination Language	11
3.1.10 Responsibility/Acceptance Disclaimer	12
3.1.11 Employment Practices Review	12
3.1.12 Title II ADA/504 Assurances	12
3.1.13 ADA Transition Plan Updates and Corrections	13
3.1.14 Previous ADA Complaints Review	13
3.1.15 Emergency Management Plan Review	13
3.1.16 City Ordinance Review	13
3.1.17 Documents, Forms and Videos Reviewed	13
3.1.18 Effective Communication Guidance	14
3.1.19 Alternate Format Policy, Procedure and Request Form	14
3.1.20 Wrap-Up and Conclusions	14
3.2 Parks and Amenities	15
3.3 Prioritization	17
3.3.1 Prioritization Factors for Facilities	17
4.0 Staff Training	18
5.0 Conclusion	19

Appendix A:	Facility Reports
Appendix B:	Sample Action Log

List of Tables

Table 1:	Summary of Parks/Facilities Reviewed
Table 2:	Identified Issues & Possible Solutions
Table 3:	Prioritization Factors for Buildings/Parks

Abbreviations

ADA	Americans with Disabilities Act
ADAAG	Americans with Disabilities Act Accessibility Guidelines
CART	Computer-aided Real-time Transcription
CFR	Code of Federal Regulations
CIP	Capital Improvement Projects
DOJ	United States Department of Justice
EITA	Electronic and Information Technology Accessibility
FHWA	Federal Highway Administration
MUTCD	Manual on Uniform Traffic Control Devices
PROWAG	Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way
PSA	Program, Services, and Activities
TTY	Teletypewriter
VRI	Video Remote Interpreting
VIS	Video Interpreting Services
WAVE	Web Accessibility Evaluation Tool

1.0 Introduction

1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Mansfield is beginning this process by evaluating the Parks and Recreation Department as the first phase.

1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Mansfield is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Mansfield's Parks and Recreation Department including the associated facilities and provides possible solutions to remove physical barriers. Additionally, this Transition Plan document is designed for the later inclusion of additional facility evaluations, including public rights-of way and Programs, Services and Activities that were not included in this phase. This information will guide the planning and implementation of necessary program and facility modifications over the next 20 years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of facilities to accommodate all its citizenry.

1.3 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also for individuals with sensory and cognitive disabilities.

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

The following are examples of elements that should be evaluated for barriers to accessibility:

1.3.1 *Physical Barriers*

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.3.2 *Programmatic Barriers*

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

1.3.3 *Ongoing Accessibility Improvements*

City parks and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

1.3.4 *City of Mansfield's Approach*

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Mansfield's Parks and Recreation Department within a reasonable timeframe. The City's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Mansfield residents seek to enjoy, and guides future improvements. This Plan has been prepared after careful study of all the City's parks and their related facilities.

The City of Mansfield should also make reasonable modification to their Program, Services and Activities (PSAs) when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The evaluation of the City PSAs was not part of this phase but will be completed in another phase of this plan. The City of Mansfield will not place surcharges on individuals with disabilities to cover the cost involved in providing accessibility or modifications to existing programs.

The City of Mansfield has evaluated each park property for physical compliance with all aspects of the ADA. Each park report and all related details are located in Appendix A of this report.

2.0 Public Outreach

The City of Mansfield has not yet developed their public outreach program but is aware of the requirement and will be adding this to an upcoming project phase. They will begin the planning process to receive feedback on any concerns related to accessibility. In addition, the City will contact local disability organizations to form an ADA Advisory Committee and host the ADA Advisory Committee meetings. The City of Mansfield will continue to solicit feedback from the public on the Transition Plan as it's further developed.

2.1 Public Access Survey

As part of a future phase, the City will develop a web survey open to the public.

2.2 Web Map

The City will also develop an online map to allow the public to identify specific locations where they experience issues related to accessibility, safety, connectivity, or suggestions for accessibility improvements that are needed in Mansfield.

Both will remain online through the end of 2030 and serve as a tool to solicit feedback from the public on the Transition Plan.

3.0 Self-Evaluation and Summary of Findings

The City of Mansfield's Parks and Recreation Department ADA Transition Plan will also reflect the results of a comprehensive review of the PSAs provided to employees and the public and evaluated in a future phase. The review will identify programmatic barriers to individuals with disabilities interested in participating in any of the PSAs offered by the Mansfield Parks and Recreation Department.

3.1 Programs, Services, and Activities Review

Under the ADA, the City of Mansfield is required to complete a Self-Evaluation of the City's facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City's PSAs, as well as the policies and practices the City uses to implement its various programs and services. For this phase, only a limited number of PSAs were evaluated. Additional PSAs will be evaluated in a later phase.

To comply with requirements of the plan, the Parks and Recreation Department must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

- (1) Relocation of programs to accessible facilities;
- (2) Modifications to existing programs so they are offered in an accessible manner;
- (3) Structural methods such as altering an existing facility;
- (4) Policy modifications to ensure nondiscrimination; and
- (5) Auxiliary aids provided to produce effective communication.

When choosing a method of providing program access, the Mansfield Parks and Recreation Department should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

PSAs offered by the Mansfield Parks and Recreation Department to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the Mansfield Parks and Recreation Department does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the Director of the Mansfield Parks and Recreation Department or his/her designee and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.

3.1.1 *Interactive Survey Process*

The interactive survey process was not conducted as part of the evaluation of programs, services, and activities (PSAs) for this phase.

Mansfield Parks and Recreation Department: Programs, Services and Activities

Although the City of Mansfield Parks and Recreation Department has not fully evaluated the Programs, Services and Activities as part of this phase of their Self-Evaluation, the following documents were evaluated and altered as necessary as part of the first phase scope:

- The City of Mansfield Alternate Format policy was reviewed and updated.
- The Department's Reasonable Modification form was reviewed.
- The Department does not have a consistent City-wide non-discrimination statement, although the current non-discrimination statement for the Parks and Recreation Department was revised as part of this phase.

Parks and Recreation Department

Self-Evaluation Observations

1. The Department currently defers to the City for ADA grievances for Title I. However, the Department has an ADA grievance policy and procedure, with an appeals process in place for Title II, but no form is provided.
2. The Department currently defers to the City for reasonable accommodation policy, procedure, and form for Title I. However, the Department has a reasonable modification policy, procedure, and form in place for Title II.
3. The Department does not currently have an out-of-order policy and procedure or guidelines in place.
4. The Department has a Park Services and Operations Handbook that provides maintenance standards, policies, procedures and guidelines for managing City assets. This handbook was not evaluated as part of this phase.
5. The Department does not currently have guidelines in place regarding special events to address ADA compliance.

Possible Solutions

1. For the Department ADA grievance policy, procedures, and form with appeals process for Title I and Title II, see **Section 3.1.5 ADA Grievance Policy, Procedure, and Form with Appeals Process**. The Parks and Recreation Department has a Title I procedure in place but does not offer a form online. The addition of a form on the ADA Compliance page is advised.
2. For the Department reasonable accommodation policy, procedures, and form for Title I and Title II, see **Section 3.1.6 Reasonable Accommodation and Modification Request Policy, Procedure, and Request Form**. The consultant team suggests providing information to Parks and Recreation employees about the City's "Reasonable Accommodation" process, generally found in the Employee Handbook. Additionally, a "Reasonable Modification" form should be added to the ADA Compliance web page, so the public has a way of notifying the Department of a request for a modification to a program, service or activity offered.
3. The Department should develop an out-of-order policy and procedure or guidelines to assist City staff in ensuring that ADA elements are repaired and in working condition in a timely manner. While this policy and procedure or guidance is not a specific ADA requirement, as a

Title II entity, the City is obligated to ensure all ADA elements are in working order and are readily accessible. This policy and procedure or guidelines provide guidance to employees and the tools needed to ensure ADA compliance.

4. The Department should continue reviewing its adopted Park Services and Operations Handbook annually to assist City staff in maintaining ADA elements in ADA compliance. While this policy and procedure or guidance is not a specific ADA requirement, as a Title II entity, the City is obligated to ensure all ADA elements are maintained in an accessible manner and are readily accessible.
5. The Department should develop ADA-specific guidelines for special events. While these guidelines are not a specific ADA requirement, the City is obligated to provide equal access to programs, services, and activities. These guidelines would provide guidance to employees and provide the tools needed to ensure ADA compliance.

Additional Observations

1. Department staff should attend annual ADA-specific training regarding Title I and Title II. This training should include policies and procedures developed from this transition plan process and employee rights and obligations under the ADA. While training is not a specific ADA requirement, as a Title II entity, the City is obligated to provide equal access to programs, services, and activities. Furthermore, this training would provide individuals with the tools needed to ensure ADA compliance.

As described in section 4.0, training was provided to Parks and Recreation staff as part of this phase of the project.

2. The City should develop a City-wide alternate format policy and procedure for providing access to existing public records.
3. The City should develop a City-wide Non-Discrimination Statement Policy.
4. The City should develop and maintain logs regarding ADA complaints and requests for accommodations/modifications that include an internal complaint number, details about the complaint, and details regarding the resolution.
5. The City should develop and use guidance to include language within Department contracts and agreements that clarify the City's obligations and responsibilities under the ADA and lay out a third party's responsibility.

Boards, Commissions, Committees, and Councils Review

The evaluation of the City Boards, Commissions, Committees and Councils was not included in this phase of the evaluation.

Additional City Departments

Additional PSA evaluations will need to be completed for all departments in the City of Mansfield. This includes:

Animal Care and Control	Financial Services	Neighborhood Services
Building Safety	Fire	Planning
Communications and Outreach	Geographic Information Systems	Police
Convention and Visitors Bureau	Historical Services	Public Records and Transparency
Economic Development	Human Resources	Public Works
Emergency Management	Jail	Regulatory Compliance
Engineering	Library	Street Operations
Environmental Services	Municipal Court	Water Utilities

3.1.2 *ADA/504 Coordinator(s) (Title I / Title II)*

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

Self-Evaluation Observations

The City of Mansfield has appointed Amanda Alms as ADA/504 Coordinator Parks & Recreation. Below is her contact information. However, this information is not consistently published on the City's website or in other City documents. On the Parks and Recreation page, Amanda Alms is listed as the person a grievance should go to, but she does not have the Title of ADA Coordinator. Sarah Speer is listed on the site as the person an appeal would go to, but she also is not listed as the ADA Coordinator. Listed below is what is on the ADA Page for the Parks and Recreation Department.

Title II:

Amanda Alms, Assistant Director of Parks & Recreation
1164 Matlock Road
Mansfield, TX 76063
(817) 728-3395
amanda.alms@mansfieldtexas.gov

Possible Solutions

- The ADA/504 Coordinator(s) information should be prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator(s) contact information must be included in all information that is distributed by the City. If there is a City-wide ADA Coordinator appointed for the entire City, then that person's information should be included in this document and in all public-facing points of communication. This includes posting this information on the website.
- All other observations need to be addressed in a future phase of the ADA Transition Plan development.

3.1.3 *Roles and Responsibilities of the ADA/504 Coordinator(s)*

Below is a list of qualifications for ADA/504 Coordinator(s) that are recommended by U.S. Department of Justice:

- Familiarity with the entity's structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

Self-Evaluation Observations

- No information regarding the roles and responsibilities of the ADA/504 Coordinator(s) was provided.

Possible Solutions

- The City should document the roles and responsibilities of the ADA/504 Coordinator(s), then determine how the City would like to see this role, especially through the remediation phase.
- The City should add use the Title “ADA/504 Coordinator” for the person named City-wide.

3.1.4 ADA Liaison Committee

The ADA Liaison Committee should be comprised of representatives from each City department, including Mansfield Parks and Recreation. These individuals will work closely with the ADA/504 Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinator works closely with each of the ADA Liaison Committee members to coordinate the implementation of plans, programs, policies, and procedures.

Since the first phase was only for the Mansfield Parks and Recreation Department, this committee has not been established and Amanda Alms is the named ADA Coordinator for this Department.

Self-Evaluation Observations

- The City of Mansfield has not established an ADA Liaison Committee at this time.

Possible Solutions

- The City’s ADA Liaison Committee should be comprised of a representative from each City department and should meet periodically to ensure that the City is practicing good faith efforts to achieve ADA compliance in all departments. The committee representatives should be tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator regarding all ADA issues impacting their department.
- The ADA Coordinator should develop a process to log all ADA complaints and modifications/accommodations and be responsible for keeping a detailed log for all ADA inquiries within their department. This log should be shared with the ADA/504 Coordinator and be retained for at least three (3) years.
- The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and areas open to the public, such as the City’s website and internal bulletin boards. While this is not a specific ADA requirement, this information would not only assist the ADA/504 Coordinator in ensuring ADA compliance but would also assist staff in contacting a specific division liaison for ADA guidance.

3.1.5 ADA Grievance Policies, Procedures, and Forms with Appeals Process

Title I

Title I of the ADA prohibits private employers, state and local governments, employment agencies, and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees based on an entity-wide employee total count, including state and local governments.

The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level.

Self-Evaluation Observations

- The Title I grievance procedure was not part of this phase.

Title II

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA.

Self-Evaluation Observations

- An ADA grievance policy, procedure, with appeals process for Title II is provided on the City of Mansfield Parks and Recreation Department and ADA Compliance page, but there is no form for people to use to make the submittal.
- The Mansfield Parks and Recreation Department should maintain an ADA complaint log. This log shall be confidential and should include an internal complaint number, details about the complaint, and specifics regarding the resolution.

Section 508 of the Rehabilitation Act

Section 508 of the Rehabilitation Act of 1973 requires that all electronic and information technologies developed and used by any federal government agency must be accessible to individuals with disabilities. This includes websites, video and audiotapes, electronic books, televised programs, and other such media. Individuals with disabilities may still have to use special hardware and/or software to access the resources. This law pertains to the federal government. However, each state can adopt these regulations for state use. The State of Texas has officially adopted these technology requirements. The City of Mansfield should utilize the State's stance on websites and other digital media policies and procedures.

3.1.6 Reasonable Accommodation/Modification Request Policy, Procedure, and Request Form

Title I

The reasonable accommodation request process plays a very important role when ensuring that the City of Mansfield Parks and Recreation Department does not discriminate based on disability. A reasonable accommodation is any modification to a job, the work environment, or the way things are usually done that allows an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits available to other individuals in the workplace.

This was not evaluated as part of the Phase 1 scope of work but will need to be completed on a City-wide basis during a future phase.

Title II

The reasonable modification request process allows an individual from the public to request a modification that will provide equal access to any City of Mansfield Parks and Recreation Department program, service, and/or activity. A public entity must reasonably modify its policies, practices, or procedures to avoid discrimination unless the modification will fundamentally alter the nature of its program, services, or activity.

The “Reasonable Modification” process was not evaluated under Phase 1 of this process. It will need to be completed on a City-wide basis during a future phase.

3.1.7 *Service Animal Guidance*

City-wide Service Animal Guidance and policy was not part of the scope for this phase of the evaluation process. Mansfield Parks and Recreation does have a departmental policy that was reviewed and commented on and can be found in the Appendix. Determination of a City-wide policy and consistency will be evaluated under the full PSA evaluation process in a future phase.

Possible Solutions

- The City of Mansfield Parks and Recreation Department should work with other Departments to develop a consistent City-wide policy for staff to reference when responding to requests for service animals as reasonable accommodations or modifications for applicants, employees, and the public. Eventually, each City department should integrate this policy into their department-specific standard operating procedures for consistency throughout the City.
- In doing so, this policy and procedure should also be customized to fit each department's situations and provide guidance as to when a service animal is an effective reasonable accommodation or modification.

3.1.8 *Public Notice Under the ADA*

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entities' PSAs. This notice is required to include information regarding Title II of the ADA and how it applies to the PSAs of the public entity. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary.

Self-Evaluation Observations

- This notice was not evaluated as part of the Phase 1 scope. However, it was noted that the Public Notice is also not on the ADA Compliance Plan page.

Possible Solutions

- The City's public notice should be prominent and easy to find on the ADA Compliance page.

3.1.9 *Non-Discrimination Language*

All public entities must ensure that no qualified individuals with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

Public entities should develop the following:

A. Non-Discrimination Statement Policy

This policy documents the requirement to include a non-discrimination statement in any City publication or document distributed to employees or to the public.

Self-Evaluation Observations

- Evaluation of the Non-Discrimination Policy was not part of this phase.

Possible Solutions

- The City should develop a consistent City-wide non-discrimination statement for Title I - employment activities and Title II - programs, services, and activities administered by the City.
- The City should incorporate both non-discrimination statements into a stand-alone policy that provides guidance to City staff on the application of non-discrimination statements for Title I and Title II. This policy should be accessible to all employees and used in City materials that are distributed by the City.

B. Non-Discrimination Contract Clause

This clause documents the requirement to include a non-discrimination clause in all funding agreements that the City employs to pass federal funds to other agencies, entities, or municipalities, but not contractors.

Self-Evaluation Observations

- No information regarding a non-discrimination contract clause was evaluated as part of this phase.

Possible Solutions

- The City should develop a consistent non-discrimination contract clause.
- The City should develop staff guidance regarding the application of a non-discrimination contract clause. This policy would only be accessible to applicable City staff who may initiate federally funded contracts or any joint use agreements with other entities.

C. Non-Discrimination Language for Contracts, Agreements, and Waivers

This language clarifies ADA obligations for both parties.

Self-Evaluation Observations

- No contracts, agreements or waivers were evaluated as part of Phase 1 scope.

3.1.10 Responsibility/Acceptance Disclaimer for other Entities' Links, Forms, Documents, and Videos

Under the ADA, a public entity is responsible for providing ADA accessible alternate formats, including any documents or information that is distributed by the City of Mansfield Parks and Recreation Department but obtained from another entity. For example, if there is a link to an external site on City's website that leads to additional information. However, it may not be feasible for the City to obtain the original from the source to create an alternate format. Therefore, the City should add a disclaimer where external sources are referenced stating that the City of Mansfield is not responsible for ADA compliance of external content, and any requests for alternate formats of external content should be directed to the source entity.

Evaluation of this disclaimer was not completed as part of the Phase 1 scope of work.

3.1.11 Employment Practices Review

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity, including employment. Public entities must provide an equal opportunity for employment.

Evaluation of employment practices was not included in the Phase 1 scope of work.

Volunteer/Reserve/Intern Program Review: Self-Evaluation Observations

The City of Mansfield Parks and Recreation Department does have an organized volunteer program, but it was not evaluated as part of the Phase 1 scope. This is required to be evaluated in a future phase.

Job Description Review

No job descriptions were reviewed as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.12 Title II ADA/504 ADA Assurances

Every applicant for federal financial assistance shall provide a written assurance stating that all PSAs are being conducted or operated in compliance with all laws and regulations. As a recipient of federal funds, the City must include a written Title II ADA/504 Assurance in all funding agreements and joint use agreements to receive federal financial assistance. In turn, the City must require that any sub-recipient who receives federal financial assistance from the City provide an annual written Title II ADA/504 Assurance. This includes funding agreements and all joint use agreements with other agencies, entities, or municipalities.

Assurances were not reviewed as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.13 ADA Transition Plan Updates and Corrections (Title I / Title II)

Tracking ADA Transition Plan updates and corrections for Title I and Title II is important in showing progress toward barrier removal and should be done using a systematic approach to ensure all updates and corrections are documented.

No policies and procedures for ADA transition plan updates and corrections for Title I / Title II were evaluated as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.14 Previous ADA Complaints Review (Title I / Title II)

All public entities must ensure that no qualified individual with disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, service, or activity administered by that entity.

No review of previous ADA complaints from the past five (5) years were evaluated as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.15 Emergency Management Plan Review

Emergency planning and management have become increasingly important today. All community emergency plans, and emergency management teams must include the necessary information on how to properly assist citizens in the community who may have a disability. Identifying the citizens with disabilities is paramount to rescuing them. The City of Mansfield should have an Emergency Management Plan in place that details how to help citizens with disabilities in the event of a local emergency.

Disabilities manifest themselves in varying degrees, and the functional implications of the variations are important for emergency evacuation. A person may have multiple disabilities, while another may have a disability whose symptoms fluctuate. Everyone needs to have a plan to be able to evacuate a building, regardless of their physical condition.

Emergency plans were not evaluated as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.16 City Ordinance Review

City ordinances were not reviewed for consistency with current accessibility requirements and standards as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.17 Documents, Forms, and Videos Reviewed

No Documents, Forms or Videos were evaluated as part of the Phase 1 scope of work. This is required to be evaluated in a future phase.

3.1.18 *Effective Communication Guidance*

The ADA requires that all Title II entities communicate effectively with people who have communication disabilities by providing auxiliary aids and services. The goal is to ensure that communication with individuals with disabilities is equally effective as communication with people without disabilities.

Auxiliary aids and services are ways to communicate with individuals with disabilities. The type of auxiliary aids and services are assessed on a case-by-case basis. Auxiliary aids and services must be provided free of charge and provided in accessible formats, in a timely manner, and must be provided in a way that ensures individual privacy and independence. Examples of common auxiliary aids and services include, but are not limited to:

- Sign Language Interpreters
- Oral Interpreters
- Cued Speech Interpreters
- Video Remote Interpreting (VRI)
- Video Interpreting Services (VIS)
- Written materials
- Closed Captioning
- Real-time captioning
- Audio recordings
- Teletypewriters (TTYs)
- Telephone Relay Services
- Computer-aided Real-time Transcription (CART)
- Materials and displays in braille
- Large print materials
- Accessible electronic and information technology
- Assistive listening devices and systems

Auxiliary aids were not evaluated as part of the Phase 1 scope. This is required to be evaluated in a future phase.

3.1.19 *Alternate Format Policy, Procedure, and Request Form*

Under the ADA, a public entity is responsible for providing ADA accessible communications. This includes any documents or information that is distributed by the City of Mansfield. If a request for an alternate format is received, the City must have an action plan to accommodate the request. For example, the Department of Justice does not expect entities to have Braille copies of all documents; however, Braille copies are expected to be readily available. Readily available means that once a request is received, a policy and procedure is in place to make a reasonable accommodation or modification to the document or information requested. This document must be provided to the requestor in a reasonable amount of time.

No Alternate Format Policies were evaluated as part of the Phase 1 scope. This is required to be evaluated in a future phase.

3.1.20 *Wrap-Up and Conclusions*

When choosing a method of providing program access, the Mansfield Parks and Recreation Department should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

PSAs offered by the Mansfield Parks and Recreation Department to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication. However, the Mansfield Parks and Recreation Department does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the Director of the Mansfield Parks and Recreation Department or his/her designee and must be accompanied by a written statement detailing the reasons for reaching the determination.

3.2 Parks and Amenities

Under the ADA, the City of Mansfield is required to complete a Transition Plan for the remediation of barriers that will take more than a year to resolve. The Transition Plan is a master plan for accessibility and identifies and provides possible solutions to those barriers found in each park facility. For this phase, only the City of Mansfield parks, facilities and their associated amenities were evaluated, and other facilities will be evaluated in future phases.

The list below indicates the list of facilities reviewed as part of this project phase. A detailed report can be found in the appendices for each park.

Table 1: Summary of Parks/Facilities Reviewed

Park/Facility Name	Rank	# of Barriers	Cost
Big League Dreams	High	63	\$ 168,337
Donald R. Barg Park	High	5	\$ 9,990
Elmer W. Oliver Nature Park	High	15	\$ 178,645
Hawaiian Falls Mansfield	High	39	\$ 136,013
James McKnight Park East	High	33	\$ 79,718
Mansfield National Golf Club	High	59	\$ 161,595
Michael L. Skinner Sports Complex	High	126	\$ 345,643
Philip Thompson Soccer Complex	High	3	\$ 27,675
The LOT Downtown	High	13	\$ 40,635
Clayton W. Chandler Park	Medium	24	\$ 41,580
FieldhouseUSA Mansfield	Medium	1	\$ 675
Harold M. Bell Park	Medium	1	\$ 2,970
James McKnight Park West	Medium	4	\$ 7,695
Katherine Rose Memorial Park	Medium	11	\$ 16,200
Lucretia & Gary Mills Park	Medium	4	\$ 25,650
Mansfield Activities Center	Medium	7	\$ 18,360
McClendon Park East	Medium	13	\$ 29,229
StarCenter Mansfield	Medium	13	\$ 22,951
Town Park	Medium	16	\$ 38,543
Walnut Creek Linear Park	Medium	10	\$ 54,675
Hardy Allmon Soccer Complex	Low	2	\$ 8,775
Julian Feild Park	Low	2	\$ 13,500
Killian Park	Low	1	\$ 2,025
Mans Best Field Dog Park	Low	1	\$ 3,375
McClendon Park West	Low	7	\$ 8,100
Piedmont Park	N/A	0	\$ 0
Pond Branch Linear Park	N/A	0	\$ 0
		473	\$1,442,554

NOTE: Costs are rounded up to the nearest dollar

Parks: Self-Evaluation Findings and Possible Solutions

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. A complete list of issues is provided in the facility reports (see **Appendix A**).

Below is a list of common issues and potential solutions for non-compliant areas in the parks, but not an exhaustive list. Each violation may have more than one possible solution and the City is free to develop its own list of options. Keep in mind, however, that the City's responsibility under the ADA is to provide access to the "Maximum Extent Feasible" so possible solutions should not just be the least expensive solution.

Table 2: Identified Issues and Possible Solutions

Identified Issues		Possible Solutions	
Non-Compliant Accessible Parking			
<ul style="list-style-type: none">1. The running slope (long dimension) of the accessible parking access aisle is over 2.08 percent.2. The access aisle is missing at the accessible parking stall.3. There are no van accessible parking spaces.4. The accessible parking signage is mounted below 60 inches to the bottom most character.		<ul style="list-style-type: none">1. Resurface the existing access aisle to ensure compliance with the 2.08 percent maximum requirement.2. Repaint the existing accessible parking spaces to include a fully compliant access aisle.3. Reconfigure the accessible parking to ensure each space has the proper access aisle and the proper number of van accessible space is provided.4. Raise the signage so that the bottom of the sign is a minimum of 60 inches above the ground.	
No Accessible Route			
<ul style="list-style-type: none">1. Broken concrete is causing a 1-inch change in elevation along the accessible route.2. There is a cross slope along the accessible route that goes up to 2.5 percent for a distance of about 50 feet.		<ul style="list-style-type: none">1. Alter or replace concrete to ensure there are no level changes over ¼ inch along the accessible route.2. Alter or replace the sidewalk to ensure the cross slope is no more than 2.08 percent for the entire distance of the path of travel to the sports courts.	
No Accessible Amenities			
<ul style="list-style-type: none">1. The accessible playground equipment does not provide the same experiences for children with disabilities.2. No accessible fishing dock is provided.3. There are no accessible picnic tables.		<ul style="list-style-type: none">1. The playground offers five different types of experiences for children but only three different types of experiences for children using a mobility aid. Install accessible elements that provide the experience of swinging and spinning for children in wheelchairs. Ensure each one is on an accessible route.2. The fishing dock has a level change over ½ inch to get onto the dock and does not have compliant guardrails. Alter the path of travel to the dock to ensure there is no more than ¼ inch level change. Lower 25% (cumulative) of the guardrail to 34 inches to ensure compliance with the requirements. If more than one section is lowered, each such section must be at least 30 inches wide.3. Ensure at least one picnic pavilion or area in each location where picnic tables are provided has an accessible route to it. Furthermore, ensure each accessible picnic area has at least one accessible picnic table provided.	
Non-Compliant Restroom			
<ul style="list-style-type: none">1. There is a 1.4-inch level change to get into the restrooms.2. There are no fully accessible stalls in either the men's or women's restrooms.3. The urinal is mounted so the rim is above 17 inches.		<ul style="list-style-type: none">1. Alter the threshold to ensure a level area to get into the restrooms.2. Reconfigure the restroom to ensure at least one fully accessible stall is provided in both the men's and women's restrooms.3. Lower the urinal so the rim is no higher than 17 inches above the floor or ground.	

** A more complete list of possible solutions is provided in the park facility reports (see **Appendix A**).

3.3 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings and parks. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

3.3.1 Prioritization Factors for Facilities

Buildings and parks were prioritized on a 12-point scale, which is defined in **Table 3**. This prioritization methodology was developed by the consultant team to aid the City in determining how the parks should be prioritized for improvements based on the severity of non-compliance with ADA.

Table 3: Prioritization Factors for Buildings/Parks

Priority	Criteria
1 (high)	Complaint known or imminent danger present
2 (high)	Element is more than twice the allowable requirement. No known complaint. and (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.
3 (high)	Element is more than twice the allowable requirement. No known complaint. and (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.
4 (high)	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
5 (medium)	Issues with access to goods and services (DOJ level 2) – severely out of compliance
6 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – moderately out of compliance; • Parking or exterior conditions (DOJ level 1) – minimally out of compliance; or <ul style="list-style-type: none"> • Restrooms (DOJ level 3) – severely out of compliance
7 (medium)	Issues with: <ul style="list-style-type: none"> • Access to goods and services (DOJ level 2) – minimally out of compliance; • Restrooms (DOJ level 3) – moderately out of compliance; or <ul style="list-style-type: none"> • Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance
8 (medium)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
9 (low)	Issues with restrooms (DOJ level 3) – minimally out of compliance
10 (low)	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
11 (low)	<ul style="list-style-type: none"> • Client is a Title II agency; and <ul style="list-style-type: none"> • Elements out of compliance but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability.
12 (low)	Element is fully compliant with an older standard (safe-harbored) but will need to be brought into compliance with current standards if altered

4.0 Staff Training

Training was provided to City Parks and Recreation staff to address some of the issues identified in the Self-Evaluation and specific ADA Park and Recreation information. The following training sessions were provided by the Consultant Team:

- August 29, 2023 – Accessible Recreational Facilities – 2.5 hours
- August 29, 2023 – Maintaining Access – 2.5 hours
- September 6, 2023 – Customer Contact Overview - 3 hours

Descriptions of each training course are provided below:

Accessible Recreational Facilities

A park can be almost anything. It can be as small as a green space or as large as a theme park. But regardless of its size, it is required to be accessible, and accessibility can be challenging. This class is designed to highlight the nuances parks may have and detail the requirements for accessibility. Whether the park has water features, sporting options, hike/bike trails, or amusement rides, accessibility will be needed to serve all patrons.

Number of City Staff in Attendance: 13

Maintaining Access

The law requires entities to maintain accessible features and maintenance staff are on the front lines in achieving access compliance. Staff will learn to identify problem areas, such as moving furniture, repairs, and landscaping issues, before they become hazards and know how to mitigate them. Taking into consideration that staff often have limited resources, the training will focus on increasing the knowledge of requirements and liabilities instead of augmenting staff or increasing budgets.

Number City Staff in Attendance: 13

Customer Contact Overview

This training provides an overview of the access criteria and requirements mandated for state and local government staff interacting with the public, and best practices for sensitive and respectful interactions. Communication topics include correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concludes with a brief overview of maintaining accessibility for people with disabilities.

Number of City Staff in Attendance: 14

5.0 Conclusion

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the City of Mansfield, Texas. In developing the Transition Plan, programs, services, and activities were not reviewed for compliance with ADA guidelines and no City-owned facilities were evaluated other than Park-related building within the scope of this phase.

The recommended improvements were prioritized, and an implementation plan was developed to provide guidance for the City's improvement projects in the coming years. Public outreach was not part of this phase but will be included in future phases to complete this plan.

The City is taking the actions referenced and will continue to look for and remedy barriers to access to ensure that Mansfield citizens who are disabled are given access to all the City has to offer.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the governing body of the City, the ADA Action Log will be updated on an annual basis.

The ADA Action Log should be available upon request. See example of ADA Action Log provided in **Appendix B**.

Appendix

Appendix A: Facility Reports

Park Reports

Appendix B: Sample Action Log