



**CITY COUNCIL WORK SESSION MEETING NOTICE**

**CITY HALL COUNCIL CHAMBERS**

**109 E. OLIVE, BLOOMINGTON, IL 61701**

**MONDAY, NOVEMBER 9, 2015, 6:30 PM**

1. **CALL TO ORDER**
2. **ROLL CALL**
3. **PUBLIC COMMENT**
4. **ADA Transition Plan 2015 Update** (*Alex McElroy, Assistant to the City Manager, Presentation 5 minutes, Council Discussion 10 minutes*)
5. **ADJOURN** (*estimated time 6:45p.m.*)



# ADA Title II Transition Plan Update

## Table of Contents

Glossary of Terms	4
Introduction	5
Transition Plan Elements	6
Five Titles of the ADA	7
Application of the ADA to the City of Bloomington	8
Officials Responsible	9
ADA Coordinator	9
Public Works Director	9
Implementation Committee	10
Mayor, City Manager, and City Council	10
Public Involvement	11
ADA Compliance- Title II	12
General Requirements	12
1. Designate an ADA Coordinator	12
2. Develop an ADA Grievance Procedure	12
3. Provide ADA Notice	14
4. Develop an ADA Transition Plan	14
5. Retain the Self-Evaluation for Three Years	14
Self-Evaluation Requirements	15
1. Transition Plan	15
2. Program Access	15
3. Communications with Persons with Disabilities	15
4. Auxiliary Aids and Services	16
5. Emergency Preparedness	16
6. Language Sensitivity	16
7. Historic Preservation	16
8. Fundamental Alterations	17
9. Access to Public Meetings	17
10. Employment Practices	17
11. Building and Construction	18

12. ADA Training for Staff	18
13. Drug Usage	18
Transition Plans	19
Future Exhibits	
Exhibit A – 911 Emergency Communication Checklist	
Exhibit B – Website Accessibility Checklist	
Exhibit C – Emergency Management Checklist	
Exhibit D – List of City-Owned Buildings	
Exhibit E – Comprehensive City-Owned Facilities Assessment	

DRAFT

## Glossary of Terms

**ADA:** See Americans with Disabilities Act.

**Accessible:** A facility that provides access to individuals with disabilities using the design requirements of the ADA.

**Americans with Disabilities Act:** A comprehensive, federal civil rights law that prohibits discrimination on the basis of disabilities in employment, state, and local government programs, activities, services, public accommodations, transportation, and telecommunications.

**Americans with Disabilities Act Accessibility Guidelines (ADAAG):** The ADAAG contains scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the ADA.

**Disability:** With respect to an individual: A physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

**Illinois Accessibility Code (IAC):** This Code is intended to ensure that the built environment, including all spaces and elements of all applicable buildings and facilities in the State of Illinois is so designed, constructed, and/or altered to assure the safety and welfare of all members of society and to be readily accessible to, and usable by, environmentally limited persons.

**Program, activity, or service:** The programs, activities, and services offered by the City in fulfillment of its mission. It spans all offerings open to any of the audiences served by the City.

**Public Right-of-Way:** ADA-related facilities in the public right-of-way are defined as a network of streets, sidewalks, and trails creating public pedestrian access within the City of Bloomington limits. Some examples of public rights-of-way include: curb ramps, sidewalks, crosswalks, pedestrian signals, and parking.

**Self-evaluation:** An assessment of the City's current policies and practices to identify which ones are inconsistent with title II's requirements.

**Transition Plan:** Addresses physical barriers which can limit the accessibility of a City's programs, activities, and services to individuals with disabilities.

**U.S. Department of Justice (USDOJ):** Federal agency that is responsible for enforcing titles II and III of the ADA.

## Introduction

The Americans with Disabilities Act (ADA) is a law enacted by the U.S. Congress in 1990. It was signed into law on July 26, 1990, and later amended with changes effective January 1, 2009 which further expanded eligibility. The ADA is a wide-ranging civil rights law that prohibits discrimination based on disability. When the ADA was adopted in 1990, public entities with more than 50 employees were required to develop a plan for compliance by July 26, 1992. The City of Bloomington adopted its ADA Compliance Plan on July 27, 1992, which focused on title I (employment), title II (public entities at the local and state level), and title III (public accommodations). There are a total of five titles to the ADA and many requirements, regulations, and guidelines under the ADA law.

The City of Bloomington is considered an ADA title II public entity. Under the provisions of title II's administrative requirements, public entities with 50 or more employees are required to perform a **self-evaluation**. A self-evaluation is an assessment of our current policies and practices. The self-evaluation identifies and corrects those policies and practices that are inconsistent with title II's requirements. In addition to a self-evaluation, public entities with 50 or more employees are required to comply with the following administrative requirements:

- Develop a grievance procedure;
- Designate an individual to oversee title II compliance;
- Develop a **transition plan** if structural changes are necessary for achieving program accessibility; and
- Retain the self-evaluation for three years.

As part of the City's 1992 Compliance Plan, a comprehensive self-evaluation was completed, a grievance procedure was implemented, an ADA Coordinator was designated, the elements of a transition plan were put in place, and the self-evaluation records were retained.

In September 2010, the Department of Justice published revised regulations for Titles II and III of the Americans with Disabilities Act of 1990. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessibility Design or "2010 Standards". The 2010 Standards set minimum requirements – both scoping and technical – for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and useable by individuals with disabilities.

In response to the changes made by the 2010 Standards and in an effort to assure continued compliance, the City is preparing to update its ADA self-evaluation and transition plan. This update will evaluate the City's compliance in terms of best practices and standards.

## Transition Plan Elements

A transition plan addresses physical barriers which can limit the accessibility of a City's programs, activities, and services to individuals with disabilities. The minimum elements of an acceptable transition plan include:

- ✓ A list of the physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- ✓ A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
- ✓ The schedule for taking the necessary steps to achieve compliance with Title II. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period; and
- ✓ The name of the official responsible for the plan's implementation.

This ADA Transition Plan will include an outline of a schedule and budget for performing assessments of our buildings, public rights-of-way, communication needs, etc. to identify any physical barriers to accessibility that might be present.

DRAFT

## Five Titles of the ADA

### ***Title I - Equal Employment Opportunity for Individuals with Disabilities***

This title is designed to remove barriers that would deny qualified individuals with disabilities access to the same employment opportunities and benefits available to others without disabilities. Employers must reasonably accommodate the disabilities of qualified applicants or employees, unless an undue hardship would result.

### ***Title II - Non-discrimination on the Basis of Disability in State and Local Government Services***

This title prohibits discrimination on the basis of disability by public entities. The public entity is required to provide access to programs, activities, and services provided by the state or local government, when viewed in their entirety.

### ***Title III - Non-discrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities***

This title prohibits discrimination on the basis of disability by private entities in places of public accommodation. Examples include: hotels, restaurants, golf courses, private schools, day care centers, health center, etc.

### ***Title IV - Telecommunications***

This title requires telephone companies to have developed interstate and intrastate telephone relay services in every state.

### ***Title V - Miscellaneous Provisions***

The final title contains a variety of provisions relating to the ADA as a whole, including its relationship to other laws and its impact on insurance providers and benefits.



## Application of the ADA to the City of Bloomington

The City of Bloomington is covered under ADA, title I (employment) and title II (programs, activities and services). The ADA requires the City to make all its programs, activities, and services readily accessible and useable by qualified persons with a disability when the programs, activities, and services are viewed in their entirety. The updated self-evaluation and transition plan are cornerstones to documenting and ensuring the City's effort to create and maintain inclusion as mandated by the ADA.

This document will guide the planning and implementation of necessary program, facility, and public rights-of-way modifications over the next several years. The ADA self-evaluation and transition plan update are significant in that they establish the City's ongoing commitment to the development and maintenance of policies, programs, and facilities that includes all citizens. The final product is considered a "*working*" or "*living*" document and will be modified when barriers are removed or alterations are made.

It should be noted that in the 2010 ADA Standards for Accessible Design (Department of Justice, Section 35.151 of 28 CFR Part 35), there is the inclusion of a **safe harbor** clause. It states that "if a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel." In other words, if elements in existing facilities already comply with corresponding elements in the 1991 Standards and are not being altered, then entities are not required to make changes to those elements to bring them into compliance with the 2010 Standards.

It goes on to state that a **path of travel** "includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility."

## Officials Responsible

For the duration of the self-evaluation and transition plan schedule, the City has designated the ADA Coordinator and the **Public Works Director** as the officials responsible to oversee the implementation of the ADA Transition Plan. The **Public Works Director** has been designated responsible for the implementation of the barrier-mitigation schedule within the public rights-of-way; and also support the City's ADA Coordinator, where appropriate, in the planning, prioritization, and coordination of site improvements within City facilities. Any comments, additions, or suggestions about this plan may be directed to the ADA Coordinator or to the **Public Works Director**.

### **ADA Coordinator**

Ernestine Jackson  
Human Resources Office  
109 E. Olive Street  
Bloomington, IL 61701  
(309)434-2218

### **Public Works Department**

Kevin Kothe  
Public Works Engineer  
115 E. Washington Street  
Bloomington, IL 61702-3157

## Implementation Committee

Multiple City of Bloomington staff members have been responsible for the creation of this plan. Each of these staff members provide essential perspective and communication for different areas of the City's day-to-day operations. The ADA laws require state and local governments to make their goods, services, and facilities accessible to clients, customers, and employees with disabilities. The following individuals are working together and efficiently to produce the best results for this ADA Transition Plan update:

- ✓ Robert Coombs, Supervisor of Inspections, Community Development Department
- ✓ Angela Fyans-Jimenez, Assistant Corporate Counsel, Legal Department
- ✓ Nicole Kohler, Recreation Program Manager, Parks and Recreation Department
- ✓ Ernestine Jackson, Equal Employment Associate, Human Resources Department
- ✓ Kevin Kothe, Engineer, Public Works Department
- ✓ Craig McBeath, Webmaster, Information Services
- ✓ Alex McElroy, Assistant to the City Manager, City Manager's Office
- ✓ Cherry Lawson, City Clerk, City Clerk's Office

## Mayor, City Manager, and General City Council

The Mayor, City Manager, and City Council have reviewed and endorsed this plan. Those individuals include:

- ✦ Tari Renner, Mayor
- ✦ David Hales, City Manager
- ✦ Kevin Lower, Ward 1 Alderman
- ✦ David Sage, Ward 2 Alderman
- ✦ Mboka Mwilambwe, Ward 3 Alderman
- ✦ Amelia Buragas, Ward 4 Alderman
- ✦ Joni Painter, Ward 5 Alderman
- ✦ Karen Schmidt, Ward 6 Alderman
- ✦ Scott Black, Ward 7 Alderman
- ✦ Diana Hauman, Ward 8 Alderman
- ✦ Jim Fruin, Ward 9 Alderman

## Public Involvement

In accordance with title II requirements for ADA, a public entity with more than 50 employees must provide an opportunity to interested persons, including individuals with disabilities, to participate in the development of the transition plan by submitting comments.



**Action Item** - Once staff has performed the draft self-evaluation and any necessary transition plans an ad hoc group of interested citizens, local agencies, and community stakeholders will be selected to review the documents and provide any comments, suggestions or guidance in finalizing the plans. Upon the ad hoc group review a series of public open houses will be held as another opportunity for citizens to review the draft ADA Transition Plan, as well as to ask any questions or express any concerns. Upon conclusion of the open houses, the evaluation documents will be presented to the City Council for acknowledgement. Subsequent public involvement will be ongoing.

DRAFT

## ADA COMPLIANCE – TITLE II

The U.S. Department of Justice (USDOJ) serves as the primary enforcement agency for the ADA and the USDOJ has suggested 13 points of program access (taken from the Title II Technical Assistance Manual which can be found at [www.ada.gov](http://www.ada.gov)) for the Self-Evaluation Review. These 13 points, along with the five General Requirements, were used to set the scope of the review for the City of Bloomington.

As stated above, title II ADA Administrative Requirements can be divided into two major categories:

1. General Requirements (5)
2. Self-Evaluation Requirements (13)

### General Requirements

- 1) **Designate an ADA Coordinator.** The City has an ADA Coordinator designated to address compliance issues.



**Action Item - Complete.** Since 1992, the City has satisfied the ADA requirements of designating an ADA Coordinator. Information regarding the City's ADA coordinator may be found on the City's website:

<http://www.cityblm.org/index.aspx?page=170>

Community Relations Division  
ATTN: Ernestine Jackson, ADA Coordinator  
109 E. Olive Street  
Bloomington, IL 61701  
or by calling (309) 434-2218 or 434-2468.

- 2) **Develop an ADA Grievance Procedure.** The City of Bloomington has a Grievance Procedure that meets the ADA requirements. It includes a description of how and where a complaint is filed. It includes a statement notifying potential complainants that alternative means of filing is available. The procedure includes time frames and processes to be followed, information on how to appeal an adverse decision, and a statement of how long a complaint file will be retained. The Grievance Procedure are as follows and may be found on the City's website at: <http://www.cityblm.org/index.aspx?page=616>

1. **Person Making Complaint:** Any person, including employees of the City, may make a complaint.
2. **Filing Timeframe:** A complaint should be filed within fourteen (14) business days after the complainant becomes aware of the alleged violation. In City employment matters, applicable grievance procedures will be followed.
3. **To Whom Complaint is Made:** Complaints can be made verbally or in writing to the ADA coordinator or to a City department head. If the complaint is made verbally, the ADA coordinator or the City department head shall reduce the complaint to writing.

If the complaint is made to the department head, such department head shall gather all information relative to the complaint and forward the information gathered to the ADA coordinator.

The complaint shall at a minimum contain the following information: name, address and phone number of complainant; a brief description of the complaint; requested or suggested relief; and the date of the complaint.

4. **Further Investigation:** Upon receipt of the information, the ADA coordinator shall review the information and determine whether additional information is needed from City staff or the complainant. If further information is required, the ADA coordinator shall request the information within a period of time, not to exceed fourteen (14) calendar days.
5. **Recommended Disposition:** The ADA coordinator shall review the information gathered with the Deputy City Manager and jointly arrive at a written disposition of the complaint.
6. **Review by City Manager:** The City Manager will review the disposition of the complaint if requested to do so by the complainant. Any such request to review shall be made within fourteen (14) calendar days after the disposition was sent or was given to the complainant.
7. **Communications with Complainant:** The ADA coordinator shall communicate either by phone or in writing to the complainant at a minimum of once every two (2) weeks, while the complaint is pending, to advise the complainant as to the status of the complainant.

The disposition of the complaint shall be reduced to writing and communicated at a meeting between the complainant and the ADA coordinator. The disposition shall additionally inform the complainant that the City Manager will review the disposition if so requested within fourteen (14) days after the disposition has been given or sent to the complainant.

If the disposition refers to activities that will take place in the future, the ADA coordinator will inform the complainant at the time the corrective measures have been fully implemented.

8. **Timeframes:** The time frames in the complaint procedure shall be adhered to unless the Deputy City Manager allows an extension of the times due to unusual or unforeseen circumstances. Whenever the times have been extended, Deputy City Manager shall notify the ADA coordinator, who in turn shall notify the complainant.

All written complaints received by the ADA Coordinator (currently Ernestine Jackson), appeals to the City Manager or his or her designee, and responses from the ADA Coordinator and City Manager or his or her designee will be kept by the City of Bloomington for at least three (3) years.

The City of Bloomington complies with the requirements of the American with Disabilities Act in its facilities, activities, programs and services. Upon request, the City can provide auxiliary aids and services to persons with disabilities at no charge.



**Action Item - Complete.** Since 1992, the City has satisfied the ADA requirements of having a Grievance Procedure.

- 3) **Provide ADA Notice.** A Notice of ADA Compliance exists and can be found on the City's website at <http://www.cityblm.org/index.aspx?page=616>



**Action Item - Complete.** The City updated its online Notice of ADA Compliance in August 2015 in an effort to provide more in-depth information and direction to the community. The updated notice includes all pertinent information recommended by the Department of Justice

- 4) **Develop an ADA Transition Plan.** If structural changes are necessary for achieving program accessibility, a public entity must develop an ADA Transition Plan. The City completed its first Transition Plan as part of the 1992 ADA Compliance Plan requirements.



**Action Item – Requires An Update.** The City will update the 1992 ADA Transition Plan as part of this project. This is explained in further detail starting on **page 19** of this document.

- 5) **Retain the self-evaluation for three years.** The City has retained a copy of its self-evaluation from 1992.



**Action Item - Complete.** The City will also retain a copy of the updated ADA Transition Plan. A draft copy of this document will be retained on the City's website. Once the final updated plan becomes adopted by Council, it will replace the draft copy on the website.

## Self-Evaluation Requirements

- 1) **Transition Plan.** The City must examine each program to determine whether any physical barriers to access exist. It will identify steps that need to be taken to enable programs to be made accessible when viewed in its entirety. If structural changes are necessary, they will be included in the **Transition Plan**.



**Action Item – Requires An Update.** The City Manager’s Office is updating the 1992 Transition Plan as part of this project. The updated Transition Plan will be made up of a list of barriers within the physical environment and a statement of methods for removal of those barriers. This requirement is explained in further detail starting on **page 19** of this document.

- 2) **Program Access.** The City must not exclude or limit the participation of individuals with disabilities in its program, activities, or services.



**Action Item – Requires An Update.** The City is creating a **Policy for ADA**, which will include information regarding program access for individuals with disabilities. Additionally, the City is creating a **City of Bloomington Disability Resource Handbook** (which will be presented as **Exhibit A**). The Handbook will include information regarding program access for individuals with disabilities.

- 3) **Communications with Persons with Disabilities (also includes Website Accessibility requirements).** The City must ensure that it communicates with applicants, participants, and members of the public with disabilities in a manner that is as effective as its communications with others.



**Action Item – Requires An Update.** With regards to the policies portion of this requirement, the City is creating a **Policy for ADA**, which will include information regarding communications with persons with disabilities. Additionally, the City is creating a **City of Bloomington Disability Resource Handbook**, which will include information regarding effective communication with persons with disabilities.



**Action Item – Requires An Update.** The City’s Communications division is addressing the **emergency services** requirements. A **911 Emergency Communication Checklist** from the USDOJ’s ADA Best Practices Tool Kit for State and Local Government is being utilized when assessing this requirement. The final checklist will be presented as **Exhibit A**.



**Action Item – Requires An Update.** The Information Technology Department is addressing the website accessibility requirements. A **Website Accessibility Checklist** from the USDOJ’s ADA Best Practices Tool Kit for State and Local Government is being utilized when assessing this requirement. The results of the assessment will be attached as **Exhibit B**.



- 4) **Auxiliary Aids & Services.** The City must provide provisions for readers for individuals with visual impairments; interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments; and amanuenses for individuals with manual impairments.



**Action Item – Requires An Update.** The City is creating a *Policy for ADA*, which will include information regarding auxiliary aids and services for individuals with disabilities. Additionally, the City is creating a *City of Bloomington Disability Resource Handbook* (which will be presented as *Exhibit A*). The Handbook will include information regarding auxiliary aids and services for individuals with disabilities.

- 5) **Emergency Preparedness.** One of the most important roles of local government is to protect their citizenry from harm, including helping people prepare for and respond to emergencies. Making local government emergency preparedness and response programs accessible to individuals with disabilities is a critical part of the City of Bloomington’s responsibility.



**Action Item – Requires An Update.** The Fire Department is addressing the emergency preparedness requirement. An *Emergency Management Checklist* from the USDOJ’s ADA Best Practices Tool Kit for State and Local Government is being utilized when assessing this requirement. The results of the assessment will be attached as *Exhibit C*.

- 6) **Language Sensitivity.** The USDOJ suggests an examination of the manner in which persons with disabilities are portrayed in City publications. “People-first language” should be utilized, and the City should avoid using words that reduce individuals to a series of labels, symptoms, or medical terms.



**Action Item – Requires An Update.** The City is creating a *City of Bloomington Disability Resource Handbook*, which will include information regarding language sensitivity.

- 7) **Historic Preservation.** Historic preservation is an endeavor that seeks to preserve, conserve, and protect buildings, objects, landscapes, or other artifacts of historical significance. Alterations to a qualified historic building or facility must comply with ADAAG unless it is determined in accordance with procedures described in ADAAG 4.1.7(2) that compliance with certain requirements would threaten or destroy the historic significance of the building or facility.



**Action Item – Requires An Update.** The City is creating a *Policy for ADA*, which will include information regarding historic preservation.

- 8) **Fundamental Alterations.** Programs, activities, and services must be accessible to individuals with disabilities unless to do so would fundamentally alter a program, activity, or service, or result in undue financial or administrative burdens. A **fundamental alteration** is a change that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered. Accessibility can then be achieved in other ways, e.g., relocate the program or activity to an accessible facility; provide the activity, services, or benefit in another manner that meets ADA requirements.



**Action Item – Requires An Update.** The determination of an undue burden must be based on all resources available (must consider all municipal finance resources) when viewed in its entirety. Determinations will be addressed by using the ADAAG (American’s with Disabilities Act Access Guide) and PROWAG (Public Right-of-Ways Accessibility Guidelines). Any situations that potentially require the use of undue burden will require a written justification and approval by the ADA Coordinator, finance department, & legal department. The City is creating a **Policy for ADA**, which will include information regarding fundamental alterations.

- 9) **Access to Public Meetings.** The City must review its policies and procedures to ensure that individuals with mobility impairments are provided access to public meetings.



**Action Item – Requires An Update.** The City is creating a **Policy for ADA**, which will include information regarding access to public meetings for individuals with mobility impairments. Additionally, the City is creating a **City of Bloomington Disability Resource Handbook**, which will include information regarding access to public meetings for individuals with mobility impairments.

- 10) **Employment Practices.** A public entity should review its employment practices to ensure that they comply with other applicable nondiscrimination requirements, including section 504 of the Rehabilitation Act and the ADA regulation issued by the Equal Employment Opportunity Commission.

The ADA prohibits discrimination in all employment practices, including job application procedures, hiring, firing, advancement, compensation, training, and other terms, conditions, and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits, and all other employment-related activities.



**Action Item – Requires An Update.** The City is creating a **Policy for ADA**, which will include information regarding employment practices. Additionally, the City is creating a **City of Bloomington Disability Resource Handbook**, which will include information regarding employment practices.

- 11) **Building and Construction.** The City must review its building and construction policies to ensure that the construction of each new facility or part of a facility, or the alteration of existing facilities after January 26, 1992, conforms to the standards designated under the title II regulation.



**Action Item** – In May 2013, the City contracted with Faithful+Gould, Inc. to complete a **Comprehensive Facility Condition Assessment** of all 49 City buildings. This included facilities administered by the Police and Fire Departments, Public Works and Water Department, Parks and Recreation and Facility Management. Each assessment provides a review of building conditions pertinent to the 2010 ADA Design Standards. Copies of these assessments will be presented as **Exhibit E**. Compliance will remain an ongoing effort.

The City also conducts plan checks of new construction projects to identify compliance issues before permits are issued and any construction begins. The City's use of the Illinois Accessibility Code (IAC) and Public Rights-of-Way Accessibility Guidelines (PROWAG) will assist and provide means to meet the requirements of the ADA.

- 12) **ADA Training for Staff.** ADA training provides City staff with a better approach to interacting, guiding, and assisting individuals with disabilities. Training can benefit managers, supervisors, and all employees, especially those that have direct contact with the public, and teach them skills such as disability etiquette, how to be more comfortable around people with disabilities, and awareness about issues faced by people with disabilities.



**Action Item – Requires An Update.** The **City of Bloomington Disability Resource Handbook** is being created to provide assistance to employees. During the course of updating the City's policies an ADA staff committee has been established with all city departments represented. This ADA staff committee will assist in reaching out to the public to seek input as well as training staff members on ADA issues.

- 13) **Drug Usage.** ADA requires that persons who formerly engaged in the use of illegal drugs be protected from discrimination if they have been rehabilitated and no longer using drugs illegally.



**Action Item – Requires An Update.** The City is creating a **Policy for ADA**, which will include information regarding drug usage.

## Transition Plan

As a mandatory element of ADA title II compliance, the City of Bloomington must examine each program to determine whether any **physical barriers** to access exist. This is a product of the self-evaluation as described in the previous section. The City is then required to identify steps that need to be taken to enable these programs to be made accessible when viewed in their entirety. If structural changes are necessary, they should be included in a transition plan. If the time period for achieving this compliance is longer than one year, the City is required to identify the interim steps that will be taken during each year of the transition period.

Many of the required elements of a transition plan were included in the City's 1992 Compliance Plan. However, in response to 2010 ADA regulation changes and in an effort to assure continued compliance, updated assessments will be conducted. The completed transition plan will be made up of a list of barriers within the physical environment, and a statement of methods for removal of those barriers.

DRAFT



## **ADA Complaint / Grievance Form**

Complainant:

Person Preparing Complaint (if different from Complainant):

Relationship to Complainant (if different from Complainant):

Street Address:

Unit #:

City:

State:

Zip:

Phone:

E-mail:

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

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

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

---

*Please attach additional pages or documentation as needed.*

**Signature:**

**Date:**

This form will be submitted electronically to:

Community Relations Division

ATTN: Ernestine Jackson, ADA Coordinator

109 E. Olive Street

Bloomington, IL 61701

Upon request, reasonable accommodation will be provided in completing this form, or copies of the form will be provided in alternative formats. Contact the ADA Coordinator at the address listed above, via telephone (309) 434-2218 or 434-2468.