



**Summary of Americans with Disabilities Act (ADA) – Section 504
Review of Accessibility of City of Menifee Programs, Services
Activities, Facilities, and Public Rights-of-Way**

**Americans with Disabilities Act (ADA) Title II
Section 504 of the Rehabilitation Act of 1973**



**29714 Haun Road
Menifee, CA 92586**

**Prepared by
Disability Access Consultants
(800) 743-7067 in Collaboration and Assistance of the City of Menifee**

TABLE OF CONTENTS

PURPOSE OF THE CITY OF MENIFEE ADA/504 SELF-EVALUATION AND TRANSITION PLAN 1

BACKGROUND 1

PRIOR ADA SELF-EVALUATION AND TRANSITION PLANS 2

DATES OF SELF-EVALUATION AND TRANSITION PLANS 2

ADA SELF-EVALUATION AND TRANSITION PLAN 2

REGULAR SELF-EVALUATION UPDATES 2

CLASSIFICATION OF THE CITY OF MENIFEE 3

FOCUS OF THE UPDATED CITY OF MENIFEE ADA SELF-EVALUATION 3

LOCATION OF SELF-EVALUATION 4

DESIGNATED ADA/504 COORDINATOR 4

SELF-EVALUATION FORMAT 4

GENERAL INFORMATION ABOUT THE CITY OF MENIFEE 4

CITY ORGANIZATION, DEPARTMENTS, COMMITTEES 5

METHODOLOGY FOR SELF-EVALUATION 5

TRANSITION/BARRIER REMOVAL PLAN 5

NOTICE TO THE PUBLIC OF THE SELF-EVALUATION 7

SUMMARY OF FINDINGS AND RECOMMENDATIONS 7

DESIGNATION OF ADA/504 COORDINATOR 7

POSTING OF IDENTITY OF ADA/504 COORDINATOR AND NOTICE OF RIGHTS 8

STATEMENT OF ACCOMMODATIONS ON PUBLIC NOTICES 9

STATEMENT OF NONDISCRIMINATION 9

INPUT INTO THE SELF-EVALUATION PROCESS 10

GRIEVANCE/UNIFORM COMPLAINT PROCEDURES 10

ACCESS TO PROGRAMS, SERVICES AND ACTIVITIES 11

CITY POLICIES 11

ELIGIBILITY CRITERIA 12

ACCOMMODATIONS TO ACCESS PROGRAMS, SERVICES AND ACTIVITIES 12

EQUALLY EFFECTIVE COMMUNICATION 12

AUXILIARY AIDS AND SERVICES 13

INTERPRETER SERVICES 13

TELECOMMUNICATIONS DEVICES FOR THE DEAF 13

WEBSITE 14

ALTERNATE FORMATS 14

AVAILABILITY OF ONLINE INFORMATION AND SERVICES 14

TERMINOLOGY 15

STAFF TRAINING 15

NEW EMPLOYEE AND VOLUNTEER ORIENTATION 16

OUTREACH MATERIALS AND ACTIVITIES 16

DISTRIBUTION AND LOCATION OF PUBLICATIONS 17

FEES AND SURCHARGES 17

EMERGENCY EVACUATION PROCEDURES 17

ORGANIZATIONS REPRESENTING PERSONS WITH DISABILITIES 18

POLICIES FOR THE USE OF CITY FACILITIES 18

FACILITIES LEASED BY THE CITY 18

SELECTION OF CONTRACTORS AND CONTRACTED SERVICES 19

MAINTENANCE OF ACCESSIBLE FEATURES 19

PLANNING AND BUDGETING FOR ACCESSIBILITY 19

OPPORTUNITIES FOR INPUT 20

SURVEYS FOR FACILITY USERS 20

RESPONSES TO SURVEYS BY PROGRAM AND FACILITY USERS 21

SURVEY FOR PROGRAM AND SITE ADMINISTRATORS 23

IMPLEMENTING COMPLIANCE RECOMMENDATIONS 27

APPENDIX - PUBLIC NOTICES, POSTINGS AND SURVEYS 28

The City of Menifee ADA Title II Self-evaluation was prepared by Disability Access Consultants, with the collaboration and assistance of City of Menifee staff and input by other interested individuals and community members.

Mr. Carlos Geronimo, Senior Civil Engineer, served as the primary contact and facilitator for the Americans with Disabilities Act (ADA) Self-evaluation of programs, services, activities and events of the City of Menifee and the updated ADA transition/barrier removal plan for City of Menifee buildings, parks, public rights-of-way and parking lots.

Mrs. Sarah Manwaring, City Clerk, is the designated Americans with Disabilities Act (ADA) and Section 504 Coordinator for the ADA/504 Self-evaluation and Transition Plan.

A copy of the Self-evaluation and Transition Plan is available from the ADA/504 Coordinator. Accessible alternate formats are available.

Disability Access Consultants (DAC)
(800) 743-7067

Purpose of the City of Menifee ADA/504 Self-evaluation and Transition Plan

The purpose of the City of Menifee Americans with Disabilities Act (ADA) Title II and Section 504 Self-evaluation is to document the results of the City of Menifee’s review of access to programs, services, activities, events, facilities, parks, and public rights-of-way by individuals with disabilities in order to determine if any discriminatory or potentially discriminatory practices, policies or procedures exist. This report contains findings and recommendations based on the review of the City of Menifee.

As evidenced by this study and update, the City of Menifee is committed to complying with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 (504), and other federal, state statutes and regulations to provide accessible for persons with disabilities. The update further serves to demonstrate the ongoing compliance efforts by the City.

The City of Menifee contracted with Disability Access Consultants (DAC) to conduct a review of City buildings and parks, and select public rights-of-way to update the City of Menifee ADA Self-evaluation and Transition Plan in accordance of Title II of the ADA. The study includes accessibility requirements for the Americans with Disabilities Act (ADA) Title II, Title 24 of the California Building Code, Caltrans requirements, California Manual on Uniform Traffic Control Devices (CAMUTCD) and the Public Right-of-Way Accessibility Guidelines (PROWAG).

The City of Menifee has demonstrated a commitment from the highest level of leadership with coordination of compliance activities and involvement of persons with disabilities and methodologies for compliance procedures. As evidenced in the ADA/504 Report, the City of Menifee understands that the ADA/504 Compliance Plan is not a static document, but requires ongoing implementation and periodic updates.

Background

The ADA and Section 504 of the Rehabilitation Act requires state and local governments, such as city and county governments (referred to as public entities in this document) to ensure that their facilities, public rights-of-ways, policies, procedures and practices are accessible and do not discriminate.

In addition to the Department of Justice (DOJ), the Federal Highway Administration's (FHWA) Americans with Disabilities Act (ADA) and Section 504 program plays an important role to ensure that pedestrians with disabilities have an equal opportunity to use the transportation system in an accessible and safe manner.

As part of FHWA's regulatory responsibility under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (504), the FHWA is required to ensure that recipients of Federal aid and State and local entities that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any highway transportation program, activity, service or benefit they provide to the general public; and to ensure that people with disabilities have equitable opportunities to use the public rights-of-way system. Furthermore, laws and regulations require accessible planning, design, and construction to integrate persons with disabilities and that the public entity does not discriminate.

As Caltrans is a recipient of federal funds and cities, counties and other public entities are subrecipients of the flow through funding, public entities are required to demonstrate their compliance with the ADA and Section 504 of the Rehabilitation Act. A component of the requests is the development of a comprehensive ADA/504 Self-evaluation and Transition Plan.

Section 504 of the 1973 Rehabilitation Act (Public Law 93-112) prohibits discrimination on the basis of disability in federally assisted programs. Section 504 requirements for USDOT administrations are covered under 49 CFR Part 27 (USDOT), Nondiscrimination on the Basis of Disability in Programs and Activities Receiving or Benefiting from Financial Assistance. The Americans with Disabilities Act (ADA, 1990, Public Law 101-336) is a broader civil rights statute that prohibits discrimination against people with disabilities.

The Department of Justice (DOJ) has rulemaking authority and enforcement responsibility for Title II, while USDOT is legally obligated to implement compliance procedures relating to transportation, including those

for highways, streets, and traffic management. The Federal Highway Administration (FHWA) Office of Civil Rights oversees the DOT requirements in these areas.

In order to ensure compliance, Caltrans conducts reviews to ensure that:

- FHWA recipients and subrecipients are informed of their responsibilities to provide accessibility in their programs, activities, facilities and public rights-of-way
- Recipients and subrecipients are in compliance with the ADA and Section 504
- Recipients and subrecipients are applying appropriate accessibility standards to all public rights-of-way and transportation facilities
- All complaints filed under Section 504 or the ADA are processed in accordance with established complaint procedures

Prior ADA Self-Evaluation and Transition Plans

The 2017 study conducted by Disability Access Consultants updates and/or augments selected accessibility surveys and studies that were conducted previously.

Dates of Self-Evaluation and Transition Plans

The ADA self-evaluation and transition/barrier removal plans were prepared using information and input collected between February and May of 2017. As the City understands the commitment for regular updates and annual reports, the City will continue to update its plan on a regular basis.

ADA Self-evaluation and Transition Plan

To further the City's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the City decided to conduct an updated Americans with Disabilities Act (ADA) and Section 504 Self-evaluation of programs, services, activities, parks and facilities.

The updated ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the City and provides an updated framework for implementation. The current study also incorporates recent updates in the ADA, California Building Code, Caltrans and accessibility trends.

The Self-evaluation of policies, procedures and activities was conducted in 2017 under the direction of Carlos E. Geronimo, Senior Civil Engineer for the City of Menifee. Disability Access Consultants (DAC) was contracted to conduct a comprehensive survey of all City buildings, parks, parking lots and selected public rights-of-way. The goal of the City is that all potential physical and programmatic barriers for accessibility are identified and removed.

Regular Self-Evaluation Updates

The City understands that the ADA/504 plan is a living, on-going document and requires regular updates to keep it current. In its continuing efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the Self-evaluation. The City's designated ADA/504 Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA, Section 504 and related accessibility standards and regulation. The City also has the use of web based accessibility management software called DACTrak to document and track the findings and the implementation of the plan, including progress reports.

Although the City actively solicited comments and surveys of programs, services and activities from City staff, community organizations and members of the public during April and May of 2017, it is anticipated that additional comments and input may be received.

As public input is important to develop and prioritize the plan, the City conducted extensive public outreach and as described in the public outreach portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable and realistic plan.

Updates may also be necessitated by changes in the ADA, the California Building Code, PROWAG or MUTCD. An example is the court case regarding on-street parking. Another example is the FHWA and memorandum clarifying what is maintenance and what is an alteration.

Classification of the City of Menifee

The City of Menifee is classified as a “public entity” pursuant to Title II of the Americans with Disabilities Act which applies to state and local governments. A public entity covered by Title II is defined as:

- 1) Any State or local government;
- 2) Any department, agency, special purpose district, or other instrumentality of a State or local government; or
- 3) Certain commuter authorities as well as AMTRAK.

As defined, the term "public entity" does not include the Federal Government. Title II, therefore, does not apply to the Federal Government, which is covered by sections 501 and 504 of the Rehabilitation Act of 1973. Title II is intended to apply to all programs, activities, and services provided or operated by State and local governments. As Section 504 of the Rehabilitation Act applies to programs or activities receiving Federal financial assistance, the City understands that compliance with Section 504 is required.

Title II of the ADA covers programs, activities, and services of public entities. Title II is divided into two subtitles. This study focuses on subtitle A of Title II, which is implemented by the Department of Justice's Title II regulation. Subtitle B, covering public transportation, and the Department of Transportation's regulation implementing that subtitle, are not addressed in this study. The City did, however survey and incorporate findings from City owned and maintained public rights-of-way. In accordance with the ADA and Section 504, public rights-of-way are considered programs, services and activities of the public entity.

Subtitle A, the focus of the City of Menifee self-evaluation, is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination on the basis of disability established by section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance. By law, the Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under section 504, and incorporates specific prohibitions of discrimination from the ADA. Section 508 standards for website accessibility are also incorporated into the study.

Focus of the Updated City of Menifee ADA Self-Evaluation

Barriers that deny or limit access to programs, services or activities may be structural or nonstructural. Nonstructural barriers may be due to policies, practices or procedures that may inadvertently limit, segregate or discriminate against individuals with disabilities.

The focus of the City of Menifee ADA/504 Self-evaluation and Transition Plan targets access to the City's programs, services and activities in nonstructural or programmatic areas as defined by Title II of the ADA and Section 504 of the Rehabilitation Act. Structural barriers are referenced in the transition plan by site and are contained in detail in individualized Transition/Barrier Removal reports of sites inspected and are available from the ADA Coordinator and in the DACTrak Accessibility Management System. It is important to note that some structural barriers may be addressed by using a programmatic methodology if they did not involve new construction or new remodeling and renovation. Findings, recommendations and other pertinent information from the study has been loaded into the web based DACTrak Accessibility Management System developed by Disability Access Consultants (DAC) and licensed to the City of Menifee.

Using the features available in the DACTrak accessibility management software, the City is able to generate compliance assessment reports that provide the following information:

- A description of the non-compliant physical element
- Identification of the reason(s) a physical element is considered non-compliant
- Applicable federal and state accessibility code references that apply to the element

- Digital photographs of the non-compliant physical element
- Summary and detail aerial maps depicting the location of the non-compliant physical element, which are able to be exported into an ArcGIS file format
- Recommended method to bring the item into compliance
- A construction cost estimate when applicable
- A list of compliant elements found for each facility

Location of Self-Evaluation

The ADA/504 Self-evaluation and Transition Plan will be maintained and made available for public inspection by the City's ADA Coordinator, Sarah Manwaring. The ADA/504 Self-evaluation and Transition Plan is available in alternate formats, as requested. Accommodations are also made by the City as requested.

Designated ADA/504 Coordinator

Mrs. Sarah Manwaring is designated as the ADA/504 Coordinator for the City of Menifee. The address and contact information for the ADA/504 Coordinator is:

Sarah Manwaring
City of Menifee
City Clerk
29714 Haun Road
Menifee, CA 92586
Phone: (951) 672-6777
Email: smanwaring@cityofmenifee.us
TTY: 711

The City offers alternate methods and accommodations to provide access to review or provide input into the City's plan.

Requests for information from the ADA/504 Coordinator can be sent by email, phone, mail, and made in person. The ADA/504 Coordinator currently does not have a direct TTY number, but uses the California relay system. Information is available in alternate formats upon request.

Requests for copies or information about the City of Menifee ADA/504 Self-evaluation and Transition Plan can be obtained from the ADA/504 Coordinator.

Self-Evaluation Format

This Self-evaluation provides an overall summary and profile of findings and recommendations. Findings and recommendations for potential physical barriers are found in the web based DACTrak software program. DACTrak has photographs of barriers, GIS information, findings, recommendations, estimated costs and other information. Custom reports and transition plan information can be generated from DACTrak to monitor and track the implementation of the plan.

General Information about the City of Menifee

The City of Menifee is located in southwestern Riverside County approximately 30 miles southeast of the City of Riverside, California. The city encompasses approximately 50 square miles with an overall population of 89,004. The City of Menifee includes the communities of Sun City, Quail Valley, and portions of Romoland.

On June 3, 2008, the residents of the communities encompassing the City of Menifee voted to incorporate Menifee into Riverside County's 26th city. The new City of Menifee was officially established on October 1, 2008.

Menifee is one of the few communities in Southern California with available land in an economic development corridor. This business-friendly city is also investing more than \$100 million in infrastructure and traffic improvement projects over the next five years and has a growing population, with a median age of 38 years. Menifee's newly created economic development corridor includes more than 2,000 acres of land ready for retail/commercial development.

City Organization, Departments, Committees

Organization and Departments

The main City of Menifee departments and divisions include:

- Administrative Services
- Building and Safety
- City Attorney
- City Clerk
- City Manager
- Code Enforcement
- Community Development
- Community Services
- Economic Development
- Engineering
- Finance
- Fire Department
- Human Resources
- Police Department
- Public Works

Methodology for Self-Evaluation

A City of Menifee staff member was designated to provide oversight representation and direction regarding the study of City programs, services, activities and events. Mr. Carlos Geronimo, was designated as the City staff member to serve as the City contact for the ADA/504 Self-evaluation. Mrs. Sarah Manwaring is designated as the ADA/504 Coordinator.

Several methods have been used to provide comprehensive input regarding the public’s accessibility to programs, services and activities offered by the City, including:

- Review of policies, procedures and other documents
- Survey of facility users
- Survey for program and site administrators
- Survey of organizations representing individuals with disabilities
- Review of the previous efforts by the City
- Visits to selected sites
- Inspection of City of Menifee sites, facilities, parks, public rights-of-way and other areas
- Information posted on the website
- Public postings and notices requesting input at City locations in conspicuous locations
- Public input - phone calls, meetings

Relevant policies, procedures and documents are continually being reviewed. Data is being collected regarding programs, services and activities for compliance with the requirements of Title II of the ADA and Section 504 of the Rehabilitation Act. Surveys have been distributed as one measure to determine the level of ADA/504 compliance within the organization. Public postings and notices are displayed in City locations asking for input in the study. Announcements have also been made on the City of Menifee website.

Transition/Barrier Removal Plan

The term “transition plan” comes from the terminology in the 1990 Americans with Disabilities Act (ADA) that describes how public entities would be “transitioning” into compliance during the timelines of 1992 to 1995. The term barrier removal plan is used in addition to the term transition plan, as public entities are no longer transitioning into compliance during the three years set aside in the law. The transition/barrier removal plan identifies the noncompliant barrier that may deny access to goods and services, the proposed method to remove the barrier, the identity of the responsible person to oversee the implementation of the plan and the projected schedule for barrier removal of “structural” barrier. The self-evaluation, on the other

hand focuses on programmatic barriers that may deny access to programs services and activities. The two plans work congruently to remove the structural and programmatic barriers.

Public entities, such as the City of Menifee, are required to provide access to City programs, services and activities for the recipients of services. Thus, the City must provide access for individuals with disabilities and document areas of noncompliance. Documentation is incorporated into the plan as barriers are removed. Plans are updated, for example, as the City acquires additional properties, remodels facilities or removes properties from its inventory list.

The following facilities were inspected by Disability Access Consultants:

- **Facilities and Parks**

- Audie Murphy Ranch Sports Park
- City Hall
- E.L. Pete Peterson Park
- Menifee Fire Station #68
- Sun City Fire Station #7
- Kay Cenicerros Senior Center
- La Ladera Park
- Lazy Creek Park and Recreation Center
- Lyle Marsh Park
- Menifee Lakes Fire Station #76
- Nova Park
- Quail Valley Fire Station #5
- Rancho Ramona Park
- Spirit Park
- New Menifee Fire Station #7 was under construction during the time of the survey period

- **Sidewalks**

- Antelope Road - Newport Road To Holland Road
- Bradley Road - End To Holland Road
- Bradley Road - McCall Boulevard To Potomac Drive
- Chambers Avenue - Murrieta Road To Bradley Road
- Cherry Hills Boulevard - Portsmouth Drive To Bradley Road
- Encanto Drive - McCall Boulevard To Cul-de-sac
- Evans Road - Lazy Creek Road To La Piedra Road
- Holland Road - Menifee Road To Briggs Road
- Huan Road - La Piedra Road To New Hub Drive
- La Piedra Road - Antelope Road To Menifee Road
- Lazy Creek Road - Bradley Road To Gifhorn Court
- McCall Boulevard - Valley Boulevard To Encanto Drive
- Menifee Road - Aldergate Road To Garbani Road
- Murrieta Road - Park City Avenue To Newport Road
- Murrieta Road - Rouse Road To Ridgemoor Road
- New Hub Drive - Huan Road To Huan Road
- Newport Road - Haun Road to Murrieta Road
- Newport Road - Menifee Road To Haun Road
- Newport Road - Murrieta Road to Goetz Road
- Ridgemoor Road - Murrieta Road To Boulder Crest Way
- Sun City Boulevard - Chambers Avenue To Portsmouth Drive

Findings

The City of Menifee has demonstrated its ongoing commitment to enhance its accessibility to City programs, services and activities by conducting an Americans with Disabilities Act (ADA/504) Self-evaluation and transition/barrier removal plans.

The findings and recommendations for the City buildings, parks and public rights-of-way (PROW) inspected are contained in the DACTrak Accessibility Management Software. The DACTrak software program provides the City with a web based tool to update its plan, document progress, estimate costs and schedule barrier removal. DACTrak allows the user to prioritize in a variety of methods. Different report formats can be printed from the DACTrak Accessibility Management Software provided by Disability Access Consultants.

Although the funding for the removal of accessibility barriers is incorporated into existing projects, the City can plan to set aside funds for an ADA Budget to augment other ADA activities. Accommodations, for example, that are needed but are not a part of a current project, may be able to be addressed with a dedicated ADA Budget.

Recommendations

The City should develop methods and procedures to update and maintain a current plan, budget funds, schedule, implement, document, and monitor barrier removal activities.

The City should develop internal oversight procedures and methods to monitor new construction to verify that the work completed is compliant with accessibility standards.

Funds should be allocated for ADA projects and removal of ADA/504 and Title 24 barriers to accessibility, in addition to components of the Public Right of Way Accessibility Guidelines (PROWAG) and the California Manual on Uniform Traffic Control Devices (CMUTCD).

Notice to the Public of the Self-Evaluation

Public notices of the Self-evaluation process and study were posted in March, April and May 2017 in conspicuous locations throughout the City, as well as on the City's website. A copy of the notice is located in Appendix A.

Summary of Findings and Recommendations

This section of the Self-evaluation contains findings by Disability Access Consultants about the extent to which the City of Menifee's policies and practices provide access to the City's programs, services and activities. It also includes recommendations by Disability Access Consultants.

The results from the ADA/504 Self-evaluation demonstrate not only the commitment by the City to provide access to City programs, services and activities, but the overall compliance by the City of Menifee. The findings from the review of policies, procedures and practices demonstrate a high level of compliance with the requirements of the ADA/504. Only a few recommendations are included in this report that will enhance compliance with the ADA/504.

Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the updated City of Menifee ADA/504 Transition/Barrier Removal Plan that is detailed in the DACTrak Accessibility Management Program. Access to information contained in the DACTrak program is available from the City of Menifee ADA/504 Coordinator.

Designation of ADA/504 Coordinator

The regulations implementing the ADA/504 require any public entity with fifty or more employees to designate at least one employee to coordinate ADA/504 compliance (28 CFR §35.107(a)).

Findings

The City has a designated ADA/504 Coordinator to oversee the development, implementation and monitoring of the ADA/504 Self-evaluation and Transition Plan. The City has designated Sarah Manwaring, Senior Administrative Analyst, as the ADA/504 Coordinator.

The City has posted the identity of the ADA/504 Coordinator on the City website and by a posting in selected City buildings.

Recommendations

Information regarding the identity of the City's ADA/504 Coordinator should continue to be provided to staff, posted at all City locations, incorporated into new employee orientation packets, and placed in frequently used publications, on the website and in staff and public directories.

It is recommended that the City continue to publish the name, address, e-mail address and phone numbers of the City of Menifee ADA/504 Coordinator in appropriate public notices, brochures, pamphlets and other documents frequently distributed to the general public. Publications should also include the Telecommunications Device for the Deaf or Teletypewriter (TDD/TTY) and/or the California relay phone number.

At the time of the ADA/504 Self-evaluation the ADA/504 Coordinator did not have a designated and posted TDD/TTY number.

Posting of Identity of ADA/504 Coordinator and Notice of Rights

Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA/504 coordinator (28 CFR §35.107(a)).

In addition, Section 35.106 requires a public entity to disseminate sufficient information to applicants, participants, beneficiaries and other interested persons to inform them of the rights and protections afforded by the ADA/504. Furthermore, in providing for notice, the City must comply with the requirements for effective communication in Section 35.160.

A copy of the public rights notice is located in Appendix A.

Findings

The identity of the ADA/504 Coordinator and the notice of the rights afforded individuals with disabilities were posted and noticed at the commencement of the study. The identity of the ADA/504 Coordinator, address, phone number, and email address were noticed and posted.

The City's website does not currently include this information or a link to such a document.

Recommendations

The City should provide ongoing notice of the identity of the City of Menifee ADA/504 Coordinator on its website and in frequently used publications or documents accessed by the general public and by recipients of programs, services and activities.

The notice may also be provided in newspaper advertisements, on applications, at program sites, in program handbooks, in regular mailings, on legal notices, on radio announcements, in requests for proposals/qualifications, on facility use agreements, and in contracts.

The notice should include the name, title, address and phone numbers of the ADA/504 Coordinator. The notice should include a TDD/TTY number and/or California Relay number to ensure equally effective communication. Although not required, it is recommended that the notice include the e-mail address for the ADA/504 Coordinator.

Notices should be posted in conspicuous locations on a regular basis.

Information regarding the requirement to post the identity of the ADA/504 Coordinator, notice of rights in accordance with the ADA/504 and related information should be sent to each department by the ADA/504 Coordinator or other appropriate official. A standard notice should be given as an example. Each department could add specific information applicable to the provision of programs, services and activities.

Posting and notice requirements should be updated if the identity of the ADA/504 Coordinator changes or if more than one ADA/504 Coordinator is designated.

Statement of Accommodations on Public Notices

Statements of accommodations should be available on public notices and agendas. The City is required to provide Title II information in alternative formats to ensure that that information is accessible to people with disabilities.

Findings

Public City Council Agendas and other public postings and notices currently have an ADA/504 compliance statement. A sample of an ADA/504 compliance statement from a City of Menifee City Council agenda is:

“If you need special assistance to participate in this meeting, you should contact Sarah Manwaring, City Clerk at (951) 672-6777. Notification 72 hours prior to the meeting will enable the City to make reasonable arrangements to assure accessibility to this meeting. “

Similar statements as above were also found on the agendas for the Planning Commission and the Parks, Recreation & Trails Commission.

Recommendations

Another sample statement may include the following statement with the phone and TDD/TTY numbers:

“Individuals who need auxiliary aids and or services for effective communication or to participate in programs and services of the City of Menifee are invited to make their needs and preferences known to the ADA/504 Coordinator or the alternate Contact Person. This notice is available in accessible alternate formats from the ADA/504 Coordinator.”

It is recommended that the City continues to include a statement of accommodation and compliance on all future council and committee agendas.

Statement of Nondiscrimination

All public entities are required to provide information to applicants, participants, beneficiaries, employees and other interested persons of the rights and protections afforded by Title II of the ADA (26 CFR §35.106).

Findings

General statements of nondiscrimination were found in several City documents, agendas, and in the terms and conditions on applications and forms. A stand alone Nondiscrimination Notice that includes the identity of the City’s ADA/Section 504 Coordinator, along information for contact by mail, email, phone, fax and TTY was not found on the City’s website.

Recommendations

Nondiscrimination statements should be posted on frequently used publications for the public. A sample ADA Public Notice of nondiscrimination and accommodation is included in the Appendix.

A sample nondiscrimination notice should also be utilized. A notice, such as the following sample, could be utilized:

“The City of Menifee does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services or activities. The City does not discriminate on the basis of disability in its hiring or employment practices. Questions, concerns, complaints or requests for additional information regarding the Americans with Disabilities Act may be forwarded to the City’s ADA/504 Coordinator (provide contact information).”

Policies, practices and procedures for nondiscrimination should refer to members of the public, in addition to employees, and address nondiscrimination in regards to access to all programs, services and activities for individuals with disabilities and not be limited to employment. The City should consider adopting a general nondiscrimination policy for access to programs, services, activities, applicants and employees.

Statements of nondiscrimination should be included on selected publications, brochures describing programs, services and activities offered by the City, new employee materials, recruitment materials; publications and frequently used forms and documents.

Departments should be directed to include the statement in selected publications, documents and forms.

Contracts and vendors that provide printing and publication services should be notified of required statements, required font and required contrast for accessible publications.

The new employee orientation packet and volunteer information should include a statement of nondiscrimination by the City in regards to the public's access to programs, services, activities, recruitment and employment.

Input into the Self-Evaluation Process

The regulations which implement the ADA require public entities to provide an opportunity to interested persons and organizations to participate in the Self-evaluation process. For three years after completion of the Self-evaluation, the public entity must keep records of any problems identified. (28 CFR §35.105)

Findings

The City of Menifee provided numerous opportunities using different methodologies to solicit input into the City plan. The public input process was comprehensive. Public input surveys were available in hard copy format at several high public use City facilities. In addition to formal surveys, the phone number, email address and mailing address of the City of Menifee ADA/504 Coordinator was posted publically offering several further methods for citizens to offer comments. The City also distributed surveys to staff targeting input from City program and site administrators.

Recommendations

Although no additional activities are required, the City may wish to conduct periodic customer satisfaction surveys or gather input from recipients of services as an ongoing activity. An additional emphasis may include outreach activities to collect and integrate input from individuals with disabilities and organizations representing individuals with disabilities on an ongoing basis.

Grievance/Uniform Complaint Procedures

A public entity that employs fifty or more people must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA (28 CFR §35.107(b)).

Findings

While City's website does not have a page specifically addressing ADA Grievances, with a description of the procedure and a form to complete, there is a link on the home page entitled "Request a Service". From this link, the user is directed to a page from where they are able to report an issue for a variety of categories. However, ADA is not currently a choice. A user would most likely need to select General, or perhaps Building & Safety to report an ADA issue.

Recommendations

The City could use their current electronic system of reporting an issue, and add ADA Grievance as one of the choices from the category icons, and then also add ADA Grievance to the Issue Selected drop down menu on the fillable online form.

Additionally the City should make efforts to inform staff and the public of the existence of the City's ADA/504 Coordinator, grievance procedures, the steps for handling grievances, and the City policies for remediation of grievances.

Information regarding complaint procedures should be readily available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.

Grievance procedures should be a part of the new employee orientation packet.

Grievance procedures should be available in accessible alternate formats.

A method to collect data and collect a profile of complaints should be developed. The status of the complaint and the time from complaint to resolution should be documented to assist with interventions and staff development to reduce or eliminate repeated complaints.

Complaint procedures and forms should be available at all City buildings and in all departments.

The City might consider the centralization of complaint handling to assist with the tracking of complaint resolution. A centralized database and analysis of types and locations of complaints may also assist with developing profiles to assist with targeting quality control and training measures. Centralized record keeping of such information will help the City to regularly update its compliance efforts, and plan for additional compliance implementation for training and budget considerations.

The ADA/504 Coordinator or designated staff can develop updated reports based on a profile of concerns or complaints to determine the needs for proposed training materials, agenda items, and proposed budget expenditures.

Procedures should continue to be developed, implemented and institutionalized to provide consistency for complaint resolution and record keeping.

Grievance procedures should also provide an alternate point of contact other than the ADA/504 Coordinator.

Access to Programs, Services and Activities

A public entity may not adopt official policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have a discriminatory effect (28 CFR §35.130(b)(3)).

Findings

City programs, services and activities were reviewed and none were found to be discriminatory. Public input was sought regarding access to programs, services and activities as described in the opportunities for public input section of this summary.

Recommendations

The ADA/504 Coordinator should continue to monitor and receive information regarding concerns or issues about access to programs, services and activities and take the appropriate action regarding any potential discriminatory practices for persons with disabilities.

City Policies

Findings

City policies, procedures and practices were reviewed and none were found to be discriminatory. DAC has noted a few comments and recommendations for consideration by the City.

Recommendations

The City should continue to provide programs, services and activities that include individuals with disabilities.

The ADA/504 Coordinator should continue to monitor programmatic access.

Additional and ongoing training should be provided regarding the requirements of the Americans with Disabilities Act and accommodations that provide equal access to programs, services and activities.

Meetings and events open to the public should be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.

Information regarding the facility should include information regarding accessible features and elements of the site. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the website. Indicating accessible paths of travel and accessible entrances

also provides valuable information for individuals with disabilities. A contact number and email address should be provided for additional assistance.

Eligibility Criteria

Public entities cannot use eligibility criteria that tend to exclude or screen out persons with disabilities (28 CFR §35.130(b)(8)).

Findings

No discriminatory practices were noted regarding eligibility criteria for program access.

Recommendations

Program eligibility criteria should be reviewed as they are drafted or modified to ensure that eligibility criteria do not put additional burdens or requirements on individuals with disabilities.

The City should continue to ensure that all eligibility criteria allow for accommodations for individuals with disabilities.

Accommodations to Access Programs, Services and Activities

The ADA/504 prohibits public entities from excluding persons with disabilities from programs, activities or services offered by the public entity. The law allows a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services and activities (28 CFR §35.150(a)(1); (b)(1)).

Findings

Reasonable accommodations statements were found on agendas for multiple City departments and commissions.

The City Council and City committee agendas continue to include a statement regarding requests for accommodations for compliance with the ADA/504 be directed to the City Clerk or specific department representative. However, the statement does not list a phone or TTY/TDD number.

An ADA/504 accommodations statement was noted on the City Council agendas.

Recommendations

Information about how to request accommodations should appear on all public notices, announcements and agendas. Information should be disseminated to all departments and divisions regarding the statement for accommodations requirement.

The City should provide training for staff and volunteers regarding accommodations for individuals with disabilities. All staff, and in particular frontline staff such as receptionists and staff with high public contact, should receive training on interacting and accommodating individuals with disabilities.

Additional training materials and videos should be purchased or developed to assist with training efforts.

Citizens requesting ADA/504 Accommodations specifically for participation in a City Meeting are directed to contact the City Clerk or department representative by phone with their request. The ADA/504 Coordinator should maintain records of requests, concern and comments and the status and method to provide the accommodation or resolve the concerns.

The City should assist departments with planning and budgeting for selected accommodations, such as large print, cassettes, CD-roms, Braille materials, etc.

A centralized method for producing alternate formats may provide a cost savings and reduce the timelines for the production of alternate formats.

Equally Effective Communication

Public entities must ensure that applicants, participants and members of the public with disabilities have communication access that is equally effective as that provided to persons without disabilities (28 CFR §35.160(a)).

Auxiliary Aids and Services

Findings

The City does have selected auxiliary aids and services available to persons with disabilities.

Recommendations

The City should provide staff training and information regarding auxiliary aids and effective communication to employees and volunteers.

The City's policy directives should require equally effective communications for programs, services and activities provided for the public by the City of Menifee.

The City could purchase a portable indoor-outdoor assistive listening system that could be checked out from the ADA/504 Coordinator on an as-needed basis. Information should be sent to departments regarding the availability of assistive listening systems.

Interpreter Services

Findings

Interpreter services are generally handled individually by departments.

Recommendations

Interpreters should be provided as determined through the request for accommodation process or in circumstances where an interpreter is known to be required. The City may want to inquire about a contract for City-wide interpreter services for departments to utilize as needed to provide a quicker response at a lower cost.

The City must ensure that those individuals utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.

The City may consider the use of a video relay interpreter system to augment the current contract and arrangements for interpreters.

Telecommunications Devices for the Deaf

Findings

TTY/TDD numbers were not found to be available in some departments, City publications, website pages or in staff or service directories.

Recommendations

All staff responsible for responding to incoming telephone calls should be trained in the proper use and protocol of TDD/TTYs. Information and training should be provided on an ongoing basis.

The City should install additional telecommunications devices for the deaf (TTY/TDD) phone lines in several areas or purchase a network compatible system that would reside on the server.

Departments with high public use should purchase a unit or a network system. The City might consider the purchase of a network PC compatible TTY/TDD system that would allow individual computers to be networked and access TTY/TDD calls, instead of purchasing separate TTY/TDD units that require a dedicated line. The advantages of the networkable system are allowing the user to transfer calls, conduct conference calls and utilize voice mail.

Employees who communicate with the public should become familiar with the use of TDD/TTY communications and how to maintain the TDD/TTY in an operable condition. The development of TDD/TTY help sheets noting abbreviated words commonly used in TDD/TTY communications would be helpful to staff when communicating via TDD/TTY. Posting the help sheet near TDD/TTY's would also be helpful to the user.

Procedures should be developed and institutionalized to ensure that TDD/TTY and other communication devices are maintained in working and operable order at all times.

The City may wish to purchase additional back up TDD/TTYs for replacement, in the event that permanently located TDDs may be temporarily out of commission.

Publication of all TDD/TTY numbers must be provided in program literature, in phone directories and on selected publications.

Website

Findings

The City website was found to be reasonably compliant regarding website accessibility to meet W3C protocols.

Very few errors were found, but one common error that was discovered on many site pages are empty links, which means that the link contains no text. When a link contains no text the function or purpose of the link will not be presented to the user, which can cause confusion to persons using keyboard navigation or screen readers.

Recommendations

The City should attempt to add suitable text descriptions to “Empty Links” or remove them. A few other items that would help make the City’s site more accessible would be to ensure all headings are properly structured and labeled and that there are no broken links. Broken links can commonly occur when time sensitive data is removed from the site, but a link to the information or document is not removed from other pages on the site. This can easily happen when a notice or flyer for an event is removed, but a link to the document still exists on other pages on the City website.

The City should continue to monitor its website accessibility.

The City should ensure that the website vendor/contractor provide a compliant website and issue a statement of accessibility.

Alternate Formats

Findings

Statements of accommodations do not specify to persons with disabilities that alternate formats are available and it is not known what alternate formats may be available for public documents.

Recommendations

The City should consider a method to centralize a department, possibly connected to information services or printing, that would provide documents and materials in alternate accessible formats. The centralized approach to developing and maintaining alternate accessible formats may be more cost effective and timely.

The City should continue to provide staff training regarding the requirements for accessible alternate formats, what accessible alternate formats are and how to provide accessible alternate formats. Procedures should be put in place for the development of accessible alternate formats.

The City should produce accessible alternate formats for high use areas where the probability for a request for an alternate format is high. Examples include provision of audiocassettes, large print, information that sent via e-mail, screen readers, Braille, and pictograms.

Public meeting broadcasts should be captioned and interpreters made available when requested.

It is recommended that the City consider contracting out selected services to organizations that have the ability to develop Braille documents for brochures, pamphlets, applications, documents and other public information written in text.

Availability of Online Information and Services

Information regarding City of Menifee programs, services and activities should be available in alternate formats to assist individuals with disabilities.

Findings

The accessibility of City of Menifee information, meetings, agendas and minutes is significantly enhanced due to the online availability of documents for meetings that are archived. The City's website has a page for upcoming and archived meetings that includes agendas, minutes and video files of previously held meetings. A video archive of meetings provides a significant step to accessibility of actual meetings, in addition to other methods of providing information to members of the public.

Recommendations

Public notices regarding meetings and other methods for input should have a statement of accommodations that includes who to contact for an accommodation. A TTY/TDD number should also be included. Meetings and videos should be closed captioned. The methods for submitting information should also be expanded to include a method for online input in addition to appearing in person and submitting written comments.

Terminology

City publications should be reviewed to see if the word "handicapped" is used. The words "individuals with disabilities" or "persons with disabilities" should replace "handicapped". The term "disabled person" should also be avoided. Information regarding acceptable terminology in "people first language" should also be provided to City staff. Publications should be updated as they are reprinted.

It is recommended that the ADA/504 Coordinator disseminate information regarding acceptable terminology to be utilized by departments and agencies.

Staff Training

On-going compliance with the ADA/504 can only be achieved if City staff and officials receive ongoing and updated training about the rights of persons with disabilities and the obligations of public employees under the ADA/504. Although training is not required by the ADA/504, training regarding the requirements of the ADA/504 is recommended.

Findings

There was evidence of training provided within the City and all City staff who completed responses to the survey for program and site administrators answered that they would like additional training on the Americans with Disabilities Act. DAC is available to provide consultation for administrative and facilities staff.

Recommendations

The City should continue to provide ongoing training regarding the ADA/504 for facilities, public rights-of-way and outdoor recreation standards. Suggested training topics should include, but are not limited to:

- Requirements of the ADA/504 for the City of Menifee
- Individuals with Disabilities
- Acceptable Terminology and Expressions
- Noncompliance Consequences
- Accessible vs. Compliant
- Barriers – Programmatic or Physical
- Providing Services for Individuals with Disabilities
- Leased Sites
- Special Events
- Accessible Locations for Meetings
- Events & Voting
- Auxiliary Aids and Services
- Construction & Remodeling
- Maintenance of Accessible Features
- Community Donations and Construction Projects
- City of Menifee Responsibilities
- Notice of the ADA/504 Coordinator

- Notice and Rights Posted for individuals with disabilities
- TDD/TTY
- Assistive Listening
- Grievance Complaint Procedures
- Statement of Accommodations
- Individuals with Disabilities Participation
- Use of City Facilities By Organizations and Individuals
- Reasonable Accommodations
- Statement of Accommodations
- Effective Communication
- Alternate and Accessible Formats
- Accessible Websites
- Volunteers
- Staff Development

The City should provide staff training in additional formats other than a classroom session, if needed. Training methodologies could include videos (captioned) that could be viewed at the training or checked out by departments and agencies.

Additional training videos should be purchased and maintained for checkout, or borrowed from a variety of agencies, such as the Department of Rehabilitation.

Handouts and training materials should be prepared, if needed, in alternate accessible formats.

The ADA/504 Coordinator should continue to provide or coordinate additional ADA/504 training to all management and staff who have regular contact with the public.

New Employee and Volunteer Orientation

Findings

City job descriptions and job opportunities documents include a Reasonable Accommodation statement. Neither the City's volunteer handbook nor application includes a statement of nondiscrimination or reasonable accommodations.

Recommendations

The City should add information as to the identity, title, address, phone number and e-mail address of the ADA/504 Coordinator to new employee orientation and volunteer information.

The City should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and Section 504. Materials could also be offered on providing accommodations for individuals with disabilities.

Outreach Materials and Activities

The ADA/504 does not specifically state how a public entity provides for accessibility to the City's programs, services and activities. One method is to disseminate information in a variety of locations and formats to enhance the access to programs, services and activities of the City.

Findings

No specific outreach activities were noted regarding providing activities and materials for individuals with disabilities.

Recommendations

The City should consider including additional pictures and references to individuals with disabilities in publications, brochures and materials.

Organizations representing individuals with disabilities and areas with an increased population of individuals with disabilities could be targeted for input regarding additional methods to disseminate information regarding programs, services and activities of the city.

In City publications, areas or services that are accessible should be indicated with descriptive text and the International Symbol of Accessibility (ISA). For example, accessible restrooms and routes can be designated on the website, on maps and in publications.

Distribution and Location of Publications

Publications, documents and brochures are required to be accessible for individuals with disabilities.

Findings

Most publications, brochures and documents are displayed in departments and areas that were accessible for individuals with disabilities. Displays should also allow for retrieval of the information without utilizing a tight pinching or grasping motion and be within a compliant reach range.

Recommendations

Provide information to departments regarding the placement of brochures, pamphlets and information in accessible locations and in accessible containers or displays for individuals with disabilities. Requirements for reach ranges and clear floor space to access publications would be helpful.

Counters and areas that are lowered for access by individuals with disabilities should be maintained and kept clear of display and work items.

Fees and Surcharges

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services or activities accessible to persons with disabilities. (28 CFR §35.130(f)).

Findings

There was no evidence of fees charged to individuals with disabilities that were not charged to individuals without disabilities to access programs, services and activities.

Recommendations

The ADA/504 Coordinator should continue to randomly review policies and practices to ensure that fees and surcharges are not charged to individuals with disabilities that are not charged to individuals without disabilities.

Emergency Evacuation Procedures

The City is required to plan to meet the needs of persons with disabilities in an emergency and provide access to emergency shelter services.

Findings

The City of Menifee website contains Emergency Services and Preparedness information and plans for a variety of natural disasters, such as earthquakes, flooding and fires. No specific information regarding assisting persons with disabilities in the event of a natural disaster were found. Information regarding the plans is available from the City's Emergency Services Coordinator.

Emergency evacuation routes were posted at the majority of the sites inspected.

Recommendations

The City should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities. Within this information, a provision should be noted to allow service animals where pets are prohibited, and training should be provided to shelter staff to understand the difference between pets and service animals.

The City should make sure that evacuation routes and procedures continue to be posted at all City sites in accordance with ADA/504 regulations.

All staff should be made aware of the location of the posted evacuation routes within their facilities.

The City should develop procedures and a mechanism to monitor the posting of emergency evacuation routes and procedures.

The City should consider the development of a voluntary registry for individuals that may need additional assistance that may not have access to technology.

Shelters should be surveyed to determine that they are accessible for individuals with disabilities prior to be designated as an evacuation shelter. Noncompliant findings for designated shelters can be found in the City of Menifee ADA/504 Transition/Barrier Removal Plan.

Designated evacuation shelter sites should also be inspected on a regular basis to determine that the shelter continues to be accessible for persons with disabilities.

Organizations Representing Persons with Disabilities

The ADA/504 does not require the City staff or teams to directly participate with organizations representing persons with disabilities. The City of Menifee, however, has an opportunity to network and develop collaborative partnerships with individuals and organizations representing persons with disabilities. Through the network, partnerships, and the City of Menifee ADA/504 Committee, the City has provided an additional mechanism for public input to ensure that current and future programs, services and activities are accessible.

Findings

Information regarding the representation of individuals with disabilities on committees was not available.

Recommendations

The City should continue to include individuals with disabilities on committees and advisory boards.

Policies for the Use of City Facilities

Findings

The City's Community Services Department notes that select parks and park facilities are able to be reserved. The City's website includes terms and conditions for reserving a facility or park, however there is no nondiscrimination notice or information on accessibility in the terms or in the rules and regulations for facility use.

Recommendations

The City should consider the inclusion of a nondiscrimination clause in their rental policy. The inclusion of non-discriminating language in policy and on forms would help ensure that outside groups and organizations would agree to abide by all applicable local, state and federal laws and City policy regarding nondiscriminatory practices during the utilization of City facilities.

The City should make the application form and facility use agreement available in multiple formats, ensuring at least one is accessible, and offer multiple methods to submit the application. A policy that would prohibit pets in a facility or park should include a notice allowing service dogs, when appropriate.

Facilities Leased by the City

Under Title II of the ADA, the City is responsible for providing access to its programs, services and activities in both owned and leased facilities.

Findings

Noncompliant findings for leased spaces can be found in the City of Menifee ADA/504 Transition/Barrier Removal Plan.

Recommendations

The City should review the accessibility of sites that are and may be leased in the future prior to engaging in a lease or renewal, and establish a procedure for a pre-lease inspection.

When considering a leased space, the ADA/504 Coordinator should be trained to conduct or have a designee or consultant conduct a field inspection of the prospective building to assess the building for a general, functional level of accessibility. The ADA/504 Coordinator could utilize an abbreviated checklist to determine general accessibility of facilities that the City is considering to lease. A more comprehensive inspection could be conducted if the initial review appears to be favorable.

Selection of Contractors and Contracted Services

Public entities cannot use contract procurement criteria that discriminate against persons with disabilities (28 CFR 35.130(b) (5)). Contractors should be held to the same nondiscrimination rules that apply to City employees.

Findings

No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.

Recommendations

The City should continue to monitor use of standard agreements and leases by all City departments.

It is recommended that the City consider one or more of these avenues to maintain compliance when contracting for services or when leasing facilities:

- Include ADA/504 compliance requirements in new requests for proposals.
- Review ADA/504 requirements when contracts or leases are negotiated, revised or renewed.

Maintenance of Accessible Features

The ADA requires (35.133) public entities to maintain their accessible features and elements.

Findings

No formal policies or procedures to maintain accessible features were found. There is evidence, however, of maintenance of some accessible features at City sites.

Recommendations

The City should consider developing procedures or policies to maintain accessible features that require general maintenance. A few examples include re-stripping of parking, trimming vegetation or items that interfere with sidewalks, elevators and paths of travel.

Planning and Budgeting for Accessibility

There is not a specific requirement in the ADA/504 for planning and budgeting for barrier removal. There is a requirement for public entities to incorporate a projected schedule for barrier removal into the transition/barrier Removal plan. A City that is budgeting or seeking funds to use for ADA/504 barrier removal and to improve access to programs, services and activities shows intent to implement the barrier removal/transition plan.

Findings

There is evidence that the City of Menifee is incorporating the removal of barriers to accessibility on an ongoing basis and plans to remove additional barriers to City programs, services and activities.

Recommendations

The City should develop a method to maintain an ongoing barrier removal implementation plan and document the City's progress, initiatives and funds expended.

It is recommended that the City contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA) and Title 24 of the California Building Code. It is important and required that the accessibility barrier removal efforts meet federal and state accessibility codes.

The ADA/504 Coordinator, or designated staff, should be empowered with the authority to make recommendations and monitor the current City of Menifee ADA/504 Self-Evaluation and Transition Plan.

In addition to the removal of structural barriers, departments should consider budgeting for accessibility items, especially in the area of communication, such as TTY/TDD's and alternate formats.

Opportunities for Input

Title II of the ADA/504 requires opportunity for input into the self-evaluation process by individuals with disabilities, organizations representing individuals with disabilities and other interested individuals.

Findings

Many opportunities were provided for input into the self-evaluation process. Input collected from within the City's organizational structure through selected interviews, document reviews, selected site assessments and surveys. Notices requesting input and the identity of, and contact information for, the ADA/504 Coordinator (Appendix A) were posted at City sites and on the City website.

The content of the notice is included in the public notice section of this Self-evaluation.

Notices with information regarding the rights of individuals with disabilities (Appendix) were posted at City sites and were placed on the City website.

Notices and postings regarding the ADA Self-evaluation and opportunities were posted on the City of Menifee website and at City locations.

Survey forms (Appendix) were available at City sites to afford members of the public an opportunity to provide input. Those surveys were available in alternate formats. In addition to posted City contact phone numbers, email addresses were also provided. The phone number, address and email information was also provided for Disability Access Consultants to provide an alternate and additional contact.

The public comment period for the Self-evaluation was advertised for responses to be returned prior to May 22, 2017. In addition to offering respondents a City of Menifee address to return completed surveys, alternative contact information to reply to Disability Access Consultants was also provided.

Surveys for Facility Users

Surveys were available for facility users to provide input. Surveys were made available to the users of City facilities. Surveys were available at city locations and on the website. The surveys included questions regarding accessibility, signage, accommodations, and the availability of auxiliary aids and equipment. The survey also asked the respondent to rate the City's attitude towards individuals with disabilities.

Survey questions included:

1. What is your relationship to the City of Menifee?
2. Check all programs, services or activities in which you participate at the facility, site or location.
3. Do you know who to contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service or event:
4. Have you ever requested an accommodation for a disability?
5. Have you experienced any exterior barriers, non-accessible areas, or non-accessible programs? (Examples: no accessible parking spaces, difficulty reaching an accessible entrance, steep ramps, uneven sidewalks, etc.).
6. Have you experienced any interior barriers, non-accessible areas, or non-accessible programs inside the facility? (Examples: stairs only to the facility, narrow doorways, protruding objects in the hallways, lack of assistive devices, missing or inappropriate signage, lack of interpreters, etc.)
7. Have you attended any special events in the City? If yes, did you encounter any barriers to accessibility?
8. Is accessible seating provided for individuals with disabilities at programs, community events, etc. held at the facility?

9. Are you aware of any programs, services, or activities that are not accessible to individuals with disabilities?
10. Are you aware of any areas and elements of the facility that are not accessible to individuals with disabilities?
11. Is information provided regarding accommodations, auxiliary aids, assistive listening systems, interpreters, alternate formats, specialized equipment, or assisted services, etc.?
12. Is there adequate directional and informational signage provided at the facility?
13. If you have requested auxiliary aids, an interpreter or specialized equipment, was your request accommodated?
14. Is the attitude of the City of Menifee towards you, or someone you know with a disability, generally helpful, supportive, positive, and proactive in solving accessibility issues?
15. Other comments:
16. What do you feel is the highest priority for accessibility in the city of Menifee Accessibility Plan?

Responses to Surveys by Program and Facility Users

The City received two completed survey in response to their request from program and facility users during the advertised window. Information from the response is contained in the following summary:

1. What is your relationship to the City of Menifee?
 - Resident
 - Resident, participant of a program, service or activity (trainings)
2. Check all programs, services or activities in which you participate at the facility, site or location.
 - Other (Customer)
 - Classes, meetings, seminars, emergency preparedness advisory committee, SCCA organizer, Menifee CERT (Community Emergency Response Team) organizer
3. Do you know who to contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service or event:
 - No
 - No
4. Have you ever requested an accommodation for a disability?
 - No
 - Yes
5. If an accommodation was requested, was your accommodation made by the City?
 - No (no accommodation was requested)
 - Yes, at my initial CERT training, I said I would be using a walker. A chair [was placed] near the front with a close by space for my walker. At a MCERT meeting which met in a small conference room, [a City staff member] helped guide my power chair down a narrow hall to the restroom, then he guided me back moving things as needed.
6. Have you experienced any exterior barriers, non-accessible areas, or non-accessible programs? (Examples: no accessible parking spaces, difficulty reaching an accessible entrance, steep ramps, uneven sidewalks, need for assistive listening devices, large print, etc.).
 - Yes, I use a scooter, I had difficulty opening the door to enter and exit City Hall. I had difficulty maneuvering inside the Postal Annex. There is no safe way to cross the parking lot to the Sun City Post Office as a pedestrian.
 - Yes, Doors are heavy and hard to open for people with canes, walkers and wheelchairs. Door jams are high and we have to go in backwards to clear them, then we can't see where we are

going. There are only a few accessible parking spaces. Navigating restrooms is a real challenge. My arms are short so closing the door to the ADA stall can be a challenge. My attendant is male, so I prefer unisex restrooms so he can help me. Some towel dispensers are hard to use as one or two hands are needed to pull out the towel. Hallways are often narrow.

7. Have you attended any special events in the City? If yes, did you encounter any barriers to accessibility?
 - No
 - Yes, I was to represent MCERT at the fall festival at the sports park. I did not have the right clearance to get into the nearly empty vendors parking lot. There was only street parking, it was already full. Dial-a-ride would not take me out there because it was a weekend and no regularly scheduled bus had service at that time. Also, I later heard MCERT booth was grass.
8. Is accessible seating provided for individuals with disabilities at programs, community events, etc. held at the facility?
 - Don't know
 - Yes, at City Hall and at Key Ceniceros Senior Center we just pull out a chair and I move in my wheel chair. Sometimes the aisles are too narrow for me to get to my seat.
9. Are you aware of any programs, services, or activities that are not accessible to individuals with disabilities?
 - Don't know
 - Yes, anything that takes place in a park as we don't do well on grass. The restrooms may be hard to use or not enough accessible parking. I will use Dial-a-ride for the 5/8 Health Fair because parking is limited.
10. Are you aware of any areas and elements of the facility that are not accessible to individuals with disabilities?
 - Yes, if using a mobility device, it is difficult to enter City Hall and turn around in Annex
 - Yes, only small rooms with full seating or limited parking.
11. Is information provided regarding accommodations, auxiliary aids, assistive listening systems, interpreters, alternate formats, specialized equipment, or assisted services, etc.?
 - Don't Know
 - No
12. Is there adequate directional and informational signage provided at the facility?
 - No
 - Don't Know
13. If you have requested auxiliary aids, an interpreter or specialized equipment, was your request accommodated?
 - Not Applicable
 - Not Applicable
14. Is the attitude of the City of Menifee towards you, or someone you know with a disability, generally helpful, supportive, positive, and proactive in solving accessibility issues?
 - Not Applicable
 - yes
15. Other comments:
 - I moved to Menifee 8 months ago after serving on the city of San Diego's Accessibility Advisory Board. I am mindful of accessibility issues. I have yet to participate in programs or classes.

16. What do you feel is the highest priority for accessibility in the city of Menifee Accessibility Plan?

- To have people with disabilities on the team that is developing the plan.
- 1. Restrooms: easy to get to, space to get in the door, how do I pull the door shut? 2. Parking: enough spaces, more than required by code. 3. Doors that are easy to open.

The City also received general comments via email from in response to the public input notice:

- I would like to request more disabled and senior services not only about this [ADA program] but others having to do with Meals on Wheels and reasonable rates and assistance with transportation and light housekeeping duties for many of us that are homebound and can't drive. Background checks should also be a requirement for all services.
- [In addition to the City developing internal oversight procedures and methods to monitor new construction and verify that work is completed to compliant standards] I would encourage the City to consider forming an Accessibility Advisory Board, the purpose of which is "to serve as an advisory body to the Mayor and Council on policies and issues related to accessibility for persons with a disability and on compliance with federal, state and local disability access codes, rules, regulations and laws." (San Diego Municipal Code Chapter 2: Government §26.34)

The City will still continue to welcome comments and responses from facility users at any time.

Survey for Program and Site Administrators

A survey was distributed to the City of Menifee staff to gauge the current level of knowledge regarding providing ADA accommodations and services to program users and customers of the City. The City received four responses from different City staff. The responses are summarized as follows:

1. Are there any recent or current complaints from employees, members of the public or other stakeholders regarding accessibility for individuals at your site?
 - Not that I am aware of.
 - None that I am aware of.
 - Yes, usually residents in senior communities. The complaints are mainly regarding the lack of pedestrian ramps at cross-walks and the visibility of them.
 - If I remember correctly, there was a resident complaint regarding the concrete walkway leading into the Lazy Creek Rec Center and no ADA walkway to the portable restroom at Lazy Creek Park.
2. Are you aware of any barriers to program accessibility?
 - No
 - None that I am aware of.
 - Lack of pedestrian ramps, poor signage at cross-walks, missing sidewalks
 - None that I'm aware of.
3. What would you consider to be the highest priority to make programs, services, activities or events offered by the City more accessible for individuals with disabilities?
 - (No answer)
 - None that I am aware of.
 - Upgrade all pedestrian ramps, Install pedestrian ramps where non-existent, upgrade cross-walks, install sidewalks and fix those areas that are non-compliant, develop a proper ADA transition plan
 - ADA accessibility into City Parks and accessibility to the park benches and tables.
4. Do you know who the designated ADA Coordinator is for the City? If yes, name person:
 - Yes, Colin McNie
 - Yes, Carlos Geronimo
 - Not Applicable
 - Yes, City Clerk
5. Have you posted and noticed the name and address of the ADA Coordinator? If yes, where:

- Don't Know
 - No
 - Not Applicable
 - Yes, At City Hall in public noticing area.
6. Have you posted and noticed the rights afforded individuals with disabilities? If yes, where:
- Don't Know
 - No
 - Not Applicable
 - Yes, at City Hall break room
7. Do you have access to current City policies, procedures or practices?
- Yes
 - Yes
 - No
 - Yes, Employee Handbook
8. Are grievance procedures or uniform complaint procedures noticed and posted at your site? If yes, where:
- Don't Know
 - No
 - No
 - Don't Know
9. Are accessibility grievance procedures available for employees and members of the public?
- Don't Know
 - Don't Know
 - No
 - Don't Know
10. Do you have emergency evacuation plans posted at your site that includes procedures for individuals with disabilities? If yes, where.
- Don't Know
 - Yes
 - No
 - Yes, at the doorways
11. Are assistive listening devices available for individuals with hearing impairments at your site? If yes, state location, number fixed or portable, and if they are operable.
- Don't Know
 - Don't Know
 - Don't Know
 - Yes, at the City Council Dais
12. Do you have a Telecommunications Device for the Deaf (TDD/TTY) at your site? If yes, state location, number, and if they are operable.
- Don't Know
 - No
 - No
 - Don't Know
13. Is your staff trained regarding the use of a TDD/TTY? If yes, state when and how.
- Don't Know
 - No

- No
 - Don't Know
14. Have you reviewed your website for accessibility for persons with vision impairments? If yes, when.
- No
 - No
 - Not Applicable
 - Don't Know
15. Do you have a statement of accommodations in your literature or on public notices?
- Don't Know
 - Don't Know
 - Don't Know
 - Yes
16. Are individuals with disabilities included in, or have an opportunity to participate in, all programs, activities, and services provided by your site?
- Yes
 - Don't Know
 - Not Applicable
 - Don't Know
17. Are individuals with disabilities served or located in segregated areas of your facility?
- No
 - No
 - Don't Know
 - Don't Know
18. Do you require persons with disabilities to receive or participate in services at an alternate location? If yes, describe.
- No
 - No
 - Not Applicable
 - Don't Know
19. Do you provide public transportation for your programs, services or activities? If yes, describe transportation and its accessibility.
- Don't Know
 - Don't Know
 - Not Applicable
 - Don't Know
20. Do you offer programs at your site that are not offered at other sites in the City? If yes, describe.
- Don't Know
 - Don't Know
 - Not Applicable
 - Don't Know
21. Do you follow a specific procedure or policy for use of the facility by organizations or members of the public? If yes, describe.
- Don't Know
 - Don't Know
 - Not Applicable
 - Don't Know

22. Are you aware of any community members or recipients of services with disabilities who utilize your site?
- No
 - Don't Know
 - No
 - Don't Know
23. Have you made accommodations for individuals with disabilities (employees, patrons, members of the public, etc.)? If yes, describe.
- Don't Know
 - Don't Know
 - Not Applicable
 - Don't Know
24. Do you have any employees, volunteer or interns with disabilities at your site (if known)?
- Don't Know
 - No
 - No
 - No
25. Have you provided training or information to your staff regarding the requirements of the Americans with Disabilities Act? If yes, describe.
- Don't Know
 - No
 - No
 - No
26. Do you have any volunteers or interns?
- No
 - Yes
 - Yes
 - Yes
27. If you have volunteers or interns, have they received training on providing services or activities for individuals with disabilities?
- (no response)
 - No
 - No
 - Don't Know
28. Would you like additional training regarding the Americans with Disabilities Act?
- Yes
 - Yes
 - Yes
 - Yes
29. Does your site offer any exemplary programs or services for individuals with disabilities? If yes, describe.
- Don't Know
 - No
 - No
 - Don't Know
30. Have you received any awards or special recognitions regarding programs or services for individuals with disabilities? If yes, describe.
- Don't Know

- Don't Know
- No
- No

31. Do you have any construction or remodeling projects currently underway or planned for the next 5 years? If yes, describe.

- Yes
- Don't Know
- Yes
- Don't Know

32. Do you already have an Accessibility Survey or report for your site or the sites for which you are responsible? If yes, please attach to the survey.

- Don't Know
- Don't Know
- No
- Don't Know

33. Other Comments

- (no comments)
- None
- (no comments)
- None

Implementing Compliance Recommendations

The City of Menifee has demonstrated an ongoing commitment to provide equal access to its programs, services and activities to maintain and enhance compliance with the requirements of the Americans with Disabilities Act. This commitment is evident throughout the organizational structure and is demonstrated by its outreach efforts and involvement of the community. The City continues to embrace a concept of full and equal access for all of the people it serves.

As further evidence of its efforts for compliance with the Americans with Disabilities Act and related accessibility legislation, the City of Menifee has continued to prioritize and develop funding projections for implementation of the ADA Self-evaluation and barrier removal/transition plan.

Implementation of the recommendations in the Self-evaluation will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

Appendix - Public Notices, Postings and Surveys

Public Notice and Posting
City of Menifee

The City of Menifee, in keeping with its ongoing efforts to serve all members of the community, is updating its Americans with Disabilities Act (ADA) transition plan and self-evaluation. The accessibility plan provides a comprehensive plan for access for individuals with disabilities to City buildings, sidewalks, programs, services, activities and events.

The City of Menifee is seeking input from agencies, organizations and individuals with disabilities. As an agency, organization or individual, the value of stakeholder guidance will help to address and prioritize current and future needs. Individuals who would like to provide input are invited to complete a survey, call or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested individuals who wish to participate in the evaluation.

Your comments and opinions are important to us and will provide valuable information regarding how the City of Menifee can better serve individuals with disabilities. Surveys can be mailed to you or are available at:

City Hall
City of Menifee
29714 Haun Road
Menifee, CA 92586

Please contact Sarah Manwaring, ADA Coordinator, if you have questions or comments or would like to request a survey in an alternate format.

(951) 672-6777
smanwaring@cityofmenifee.us

Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator. The City of Menifee complies with the Americans with Disabilities Act of 1990, Public Law 101-336, which prohibits discrimination on the basis of disability.

PUBLIC NOTICE

Americans with Disabilities Act (ADA)

The City of Menifee is committed to achieving full compliance with the Americans with Disabilities Act.

City of Menifee **DOES NOT**:

- Deny the benefits of City programs, services and activities to qualified individuals with a disability on the basis of a disability.
- Discriminate on the basis of disability in access to or provision of programs, services, activities of the City, or application for employment or employment to qualified individuals with disabilities.
- Provide separate, unequal or different programs, services or activities, unless the separate or different programs are necessary to ensure that the benefits and services are equally effective.

The City of Menifee operates its programs so that, when viewed in their entirety, they are readily accessible to or usable by individuals with disabilities.

In accordance with Section 35.106 of the Americans with Disabilities Act, all participants, applicants, organizations and interested individuals are advised and noticed that the ADA Coordinator for the City is:

Sarah Manwaring
City Hall
City of Menifee
29714 Haun Road
Menifee, CA 92586
(951) 672-6777
smanwaring@cityofmenifee.us



CITY OF MENIFEE

ADA PUBLIC NOTICE



In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (“ADA”) and Section 504 of the Rehabilitation Act (504), the City of Menifee will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

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

Effective Communication: The City of Menifee will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Menifee’ programs, services, and activities.

Modifications to Policies and Procedures: The City of Menifee will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City of Menifee offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Menifee, should contact the office of the program, service or activity coordinator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Menifee to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Menifee is not accessible to persons with disabilities should be directed to:

Sarah Manwaring, ADA/Section 504 Coordinator

City of Menifee

29714 Haun Road

Menifee, CA 92586

smanwaring@cityofmenifee.us

Phone: (951) 672-6777

TTY: 711

The City of Menifee will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

City of Menifee
Survey for Program and Facility Users



Survey for Menifee Program and Facility Users

The city is seeing input from agencies, organizations and individuals with disabilities to help the City enhance accessibility to its facilities, programs, services and events.

First Name (Optional)

Last Name (Optional)

Date (Optional)

Address (Optional)

Phone (Optional)

E-mail address (Optional)

Name of City of Menifee Facility or type of Program or Service for which you are providing input.

1. What is your relationship to the City of Menifee? (check all that apply)

- Resident
- Visitor
- Contractor
- Employee
- Participant of a Program, Service or Activity
- Other

If other please describe

2. Check all programs, service or activities in which you participate at the facility.

- Classes
- Recreation
- Meetings
- Sporting Events
- Seminars
- Work (Volunteer)
- Work (Employee)
- Other

If other please describe

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

- Yes
- No

If yes, who would you contact?

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

- Yes
- No
- Not Applicable
- Don't Know

5. If an accommodation was requested, was your accommodation made by the City?

- Yes
- No
- Not Applicable
- Don't Know

If yes, what accommodations were made? If no, were you given a reason why it was not provided?

6. Have you experienced any exterior barriers nonaccessible areas, or nonaccessible programs?
(Examples: no accessible parking spaces, difficulty reaching an accessible entrance, steep ramps, uneven sidewalks, need for assistive listening device, large print, etc.)

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

7. Have you attended any special events in the City?

- Yes
- No

If yes, did you encounter any barriers to accessibility?

8. Is accessible seating provided for individuals with disabilities at meetings, classes, programs, etc. held at the facility?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

9. Are you aware of any programs, service or activities that are not accessible to individuals with disabilities?

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

10. Are you aware of any areas or elements of the facility that are not accessible to individuals with disabilities?

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

11. Is information provided regarding accommodations, auxiliary aids (such as assistive listening systems, interpreters, alternate formats, specialized equipment, or assisted services, etc.?)

- Yes
- No
- Not Applicable
- Don't Know

Please describe.

12. Is there adequate directional and informational signage provided at the facility?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

13. If you have requested auxiliary aids, an interpreter or specialized equipment, was your request accommodated?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

14. Has the attitude of the staff of the City of Menifee towards you or someone you know with a disability been generally helpful, supportive, positive and proactive in solving accessibility issues?

- Yes
- No
- Not Applicable
- Don't Know

Please describe.

15. Other comments:

16. What do you feel is the highest priority for accessibility in the city of Menifee Accessibility Plan?
