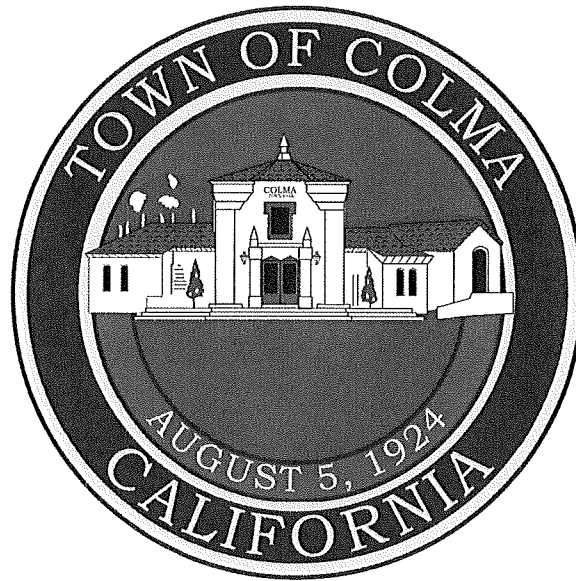


# **Town of Colma ADA Self Evaluation & Transition Plan**

**November 10, 2010**



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### Appendix

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# **TOWN OF COLMA ADA TRANSITION PLAN**

## **1. INTRODUCTION**

### **1.1 Executive Summary**

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.

This ADA Self Evaluation and Transition Plan are being prepared in partial fulfillment of the requirements set forth in Title II of the Americans with Disabilities Act (ADA). The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This report will assist the Town of Colma, its City Council and staff in identifying policy, programmatic, and physical barriers to accessibility and in developing barrier removal solutions that will facilitate the opportunity of access to all individuals.

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA was enacted on July 26, 1990. The ADA extended civil rights legislation to people with disabilities and is companion to the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. The Town of Colma has undertaken a comprehensive evaluation of its policies, programs, and facilities to determine the extent to which individuals with disabilities may be restricted in their access to Town services and activities

In 2002 and 2004 the Town of Colma conducted an ADA Self Evaluation and a draft ADA Self Evaluation and Transition plan was developed in 2008. After a comprehensive review was performed, we discovered that additional work needed to be done to complete the document. In 2009 staff re-evaluated the Town's physical and architectural barriers, as well as program, and developed the following ADA Self Evaluation and Transition Plan.

This document describes the process developed to complete the self-evaluation of Colma's activities, provides policy and program recommendations and presents a Transition Plan for the modification of facilities, public right-of-way and programs to ensure accessibility.

This document also guides the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self Evaluation and Transition Plan is significant in that it establishes the Town's ongoing commitment to the development and maintenance of policies, programs and facilities to include all of its citizenry.

## **1.2 Legislative Mandate**

The development of a Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act, which has become known as the "civil rights act" of persons with disabilities, states that:

"No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504)"

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act ADA on July 26, 1990. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of title V of the Rehabilitation Act. This legislative mandate, therefore, prohibits the Town, either directly or through contractual arrangements, from:

- Denying persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Denying persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered, even if the City offers permissibly separate or different activities.
- Making selections that have the effect of excluding or discriminating against persons with disabilities when determining the location of facilities.

## **1.3 Title II Requirements**

The Town of Colma is obligated to observe all requirements of Title I, which prohibits discrimination by employers against qualified individuals with disabilities in all aspects of employment (refer to Chapter 3 of Town of Colma Personnel Policies); Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the Town and its programs, services, or facilities; and all requirements specified in the ADA Accessibility Guidelines (ADAAG) that apply to the facilities and other physical holdings (e.g. street, sidewalks, and pedestrian right-of ways).

Title II has the broadest impact on the Town. A self-evaluation is required and intended to examine programs, activities, and services, identify problems or physical barriers that may limit accessibility by the disabled and describe potential compliance solutions.

Included in Title II are administrative requirements for all government entities employing fifty people or more. These administrative requirements are:



- Designation of a person who is responsible for overseeing Title II compliance;
- Development of an ADA complaint procedure;
- Completion of a self-evaluation; and
- Development of a Transition Plan if the self-evaluation identifies any structural modifications necessary for compliance. The Transition Plan must be retained for three years.

#### **1.4 State of California Accessibility Requirements**

The California Code of Regulations, Title 24, Part 2 mandates that all publicly funded buildings, structures and related facilities shall be accessible to and usable by persons with disabilities. These regulations, which are often referred to as Title 24, pertain to Colma's public buildings, parks and facilities that were constructed using State, Town, or municipal funds or that are owned, leased, rented, contracted, or sublet by the Town. Title 24 regulations and standards were also incorporated in the evaluation of architectural barriers as part of the Transition Plan Update. Where there is a conflict among Title 24 and ADA standards, the provision providing the greatest level of protection for individuals with disabilities shall govern.

#### **1.5 ADA Self-Evaluation and Transition Plan Development Requirements and Process**

The self-evaluation is the Town's assessment of its current policies, practices and procedures. The self-evaluation identifies and makes recommendations to correct those policies and practices that are inconsistent with Title II requirements. As part of the self-evaluation the Town should:

- Identify all of the Town's programs, activities and services; and
- Review all of the policies, practices and procedures that govern the administration of the Town's programs, activities, and services.

The ADA sets forth specific requirements for preparation of an acceptable ADA Transition Plan. At a minimum, the elements of the plan should include:

A list of physical barriers in the Town's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;

- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II; and
- The name of the individual responsible for the Transition Plan implementation.

## **1.6 Discrimination and Accessibility**

There are two kinds of accessibility: Program accessibility and physical accessibility.

Absence of discrimination requires that both types of accessibility be provided. Programmatic accessibility includes physical accessibility, but also entails all of the policies, practices and procedures that permit people with disabilities to participate in programs and to access important information. Physical accessibility requires that a facility be barrier free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility may be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of aides to beneficiaries and provisions of services at alternate sites.

## **1.7 Undue Burden**

The Town does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. This determination can only be made by the ADA Coordinator, department head, or designee and must be accompanied by a statement citing the reasons for reaching that conclusion.

The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the Town must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

## **1.8 Self-Evaluation Process**

### **1.8.1 Facilities and Sidewalks Survey**

The Town conducted a complete survey of architectural barriers in its buildings, facilities, sidewalks/streets, and parks during the draft development process in June 2008. Only those areas open to the public were surveyed. Since the Police Department was erected within the past five years, compliance with the California Code of Regulations Title 24 was integrated into the construction plan. The surveys provide the Town with an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs. The following locations were investigated for ADA compliance in June 2008:

- Town Hall
- Town Hall Annex (Public Works and Planning)
- Sterling Park Recreation Center
- Colma Community Center and Historical Museum

- Streets/Sidewalks throughout the Town

The survey process was accomplished by Staff equipped with measuring devices, facility plan sets in some cases, and ADA checklists for reference. The surveys identified physical barriers in Town buildings, facilities, and sidewalks/streets based on Americans with Disabilities Act Access Guidelines (ADAAG) and C.C.R. Title 24 standards.

The elements and their related features addressed in the facility survey include:

Parking Area	Sign
Curb Ramp	Door
Walk	Corridor or Aisle
Exterior Ramp	Building Level
Exterior Stairway	Interior Stairway
Site Furnishings	Interior Ramp
Game and Sports Area	Multiple User Restroom
Play Equipment Area	Single User Restroom
Viewing Area	Room
Drinking Fountain	Eating or Dining Area
Telephone	Picnic Area
Hazard	

### **1.8.2 Evaluation of Policies, Procedures, and Programs**

In 2004 a self evaluation was conducted, and in 2009 the Town began a re-evaluation of its policies, programs and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A survey of department staff provided information on the nature of the program, forms and methods used to advertise each program's services and activities, a profile of current participants, the types of equipment and materials used, testing and entrance requirements, the level of staff training and any special modifications provided.

The self-evaluation of the Town's services, programs, and activities required and involved the participation of every Town department. The Town conducted meetings with each department and distributed a program questionnaire to each employee (Appendix A – Program Survey) to complete. The survey included the review of the following information:

- Program or service description, including its activities, rules and regulations governing the program.
- Program or service eligibility requirements
- Characterization of program or service participants, along with a description of any participation requirements and any adaptations made to assist persons with disabilities.
- List of facilities where program or service takes place.
- Summary of program providers' training and experience working with people with disabilities.
- Summary of ADA compliance requirements for concessionaires, special recreation operators and other permittees or special events.
- Summary of transportation procedures and methods used to accommodate persons with disabilities.
- Summary of communication procedures in the area of audio/visual presentations, telephone communication, participant notification, and documents/publications, including any modifications or equipment used to accommodate people with disabilities.
- Description of emergency evacuation procedures designed to accommodate people with disabilities.
- Methods used to ensure that any automated electronic equipment used in a program or service is accessible to all participants.
- Methods used to ensure that all public meetings relating to a program or service are designed to accommodate persons with disabilities.

## **1.9 Definitions**

The following terms shall have the meaning ascribed to them in this Section, which are consistent with the provisions of existing federal and state law, including the regulations promulgated there under. Except to the extent expressly stated to the contrary, any term not expressly defined in this section or elsewhere in this Transition Plan that has an expressly defined meaning in either the ADA or the regulations promulgated there under ("Regulations") shall have the meaning ascribed to it by the ADA or the Regulations, in that order of preference. All other terms shall be interpreted according to their plain and ordinary meaning.

"ADA" means and refers to the Americans with Disabilities Act as contained at 42 U.S.C. §12101 et seq.

"ADAAG" means and refers to the Americans with Disabilities Act Access Guidelines, codified at Appendix A to 28 Code of Federal Regulations Part 36 and at Appendix A

to 49 Code of Federal Regulations part 37. "ADAAG Standards" means and refers to physical conditions that meet the new construction and/or alterations standards set forth in the ADAAG guidelines. Note: The Town of Colma subscribes to ADAAG and not the Uniform Federal Accessibility Standards ("UFAS").

"Auxiliary aids and services" includes, qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments; qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments; and acquisition or modification of equipment or devices; and other similar services and actions.

"Compliance Period" means and refers to the period of time for which this Transition Plan will be in effect. The Transition Plan shall become effective upon Final Approval and remain in effect for up to 30 years. The Town may dissolve the Transition Plan at any time upon a showing that it provides Program Access to Pedestrian Rights of Way or upon a showing that it has met or exceeded the monetary obligations specified in this Transition Plan. Alternatively, the Transition Plan will remain in effect until it dissolves automatically 30 years after Final Approval.

"Compliant Curb Ramp" means and refers to a curb ramp that is constructed to comply with state and/or federal law (whichever provides the higher access standard) in place at the time of construction. In the case of a location where it is Structurally Impracticable or Technically Infeasible to build a fully compliant curb ramp, or where construction of a fully compliant curb ramp would constitute a Fundamental Alteration of a service, program, or activity of the City or an Undue Burden on the City, a curb ramp that complies with access standards, or was constructed to the standards existing at the time of construction, or to the maximum extent feasible, will constitute a Compliant Curb Ramp as long as the requirements set forth in this Transition Plan for justifying the reasons for the City to avoid full compliance are met.

"Curb Ramp" is used interchangeably with "curb cut."

"Detectable Warnings" for example can mean truncated domes which provide a tactile surface at the transition between the curb and the street or other hazardous vehicular crossings, assisting pedestrians with Vision Disabilities in determining when they enter the street.

"Disability" means, with respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or being regarded as having such impairment.

"Discrimination on the Basis of Disability" means to, limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability; limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability; participate in a contract that could subject a qualified citizen with a disability to discrimination; use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability; deny equal benefits because of a disability; fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual

unless it can be shown that the accommodation would impose an undue burden on the Town's operations; use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

"Fundamental Alteration" means and refers to an action that, if taken by the Town, would result in a fundamental alteration in the nature of the service, program or activity. If the Town claims that any action otherwise required by this Transition Plan would constitute a Fundamental Alteration, the Town shall have to demonstrate that such an alteration would result and the decision that an action would constitute a Fundamental Alteration must be made by the ADA Coordinator and City Manager, or his or her designee, after considering all funds available for such work and must be accompanied by a written statement of the reasons for reaching that conclusion.

"Mobility Disability" means and refers, with respect to an individual, to any physical or mental impairment or condition that substantially limits an individual's ability to move his or her body or a portion of his or her body and includes, but is not limited to, orthopedic and neuromotor disabilities and any other impairment or condition that limits an individual's ability to walk, maneuver around objects, ascend or descend steps or slopes and operate controls. An individual with a Mobility Disability may use a wheelchair or motorized scooter for mobility, or may be Semi-Ambulatory.

"Pedestrian Rights-of-Way" (PROW) means and refers to all sidewalks over which the Town of Colma has responsibility or authority as well as all curb ramps and crosswalks serving such sidewalks and any other pathways used by pedestrians along public rights of way, including pedestrian pathways through public parking lots.

"Physical or mental impairments" may include, but are not limited to vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs. The following conditions are not physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

"Record of Impairment" means a history of having an impairment that substantially limits the performance of a major life activity or the diagnoses, correctly or incorrectly, of such impairment.

"Regarded as Having a Disability" means being treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

"Statutory Defenses" means and refers to the Town's right to assert under this Transition Plan that removal of any barrier or installation of a compliant curb ramp is not required because such barrier removal or curb ramp installation would be technically infeasible,

or structurally impracticable, or that it would constitute an undue burden or fundamental alteration.

“Structurally Impracticable” means and refers to circumstances in which the unique characteristics of terrain prevent the incorporation of accessibility features. If it is structurally impracticable to provide full access at any location along pedestrian rights of way, the Town shall comply with access requirements to the extent that it is not structurally impracticable to do so. (See ADAAG § 4.1.1(5)(a)).

“Substantial Limitations of Major Life Activities” means a physical or mental impairment that (a) renders a person unable to perform a major life activity or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people. Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. In determining whether a physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered: The nature and severity of the impairment; The duration or expected duration of the impairment; and the permanent or long-term impact (or expected impact) of or resulting from the impairment.

“Technically Infeasible” means, with respect to an alteration of a building, facility or Pedestrian Right of Way, that it has little likelihood of being accomplished because existing physical or site constraints or a lack of public right of way prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility. (See ADAAG § 4.1.6(1)(j)).

“Third-Party Entity” means an entity other than the Town of Colma that controls certain barriers or elements of barriers in a Pedestrian Rights of Way. Transit agencies and local utilities are examples of Third Party Entities.

“Title 24” means and refers to the regulations set forth at Title 24 of the California Code of Regulations also, known as the Building Codes.

“Undue Burden” means and refers to an action that, if taken by the Town of Colma, would result in an undue financial and administrative burden. In order to demonstrate that removal of a barrier would constitute an undue burden, the decision must be made by the ADA Coordinator and City Engineer, or his or her designee, after considering all resources available from various funding available for removal of sidewalk barriers and must be accompanied by a written statement of said reasons for reaching that conclusion. In preparing such a statement, the Town may consider the usability of the existing facilities.

“Qualified Individual with a Disability” means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the Town.

## **2. EVALUATION OF CITYWIDE PROGRAMS, ACTIVITIES AND SERVICES**

### **2.1 ADA Coordinator**

#### **2.1.1 Findings**

ADA and Title II regulations require the Town identify an ADA Coordinator. The City Manager has designated Brian Dossey, Director of Recreation Services, to be the Town's ADA Coordinator. His contact information is:

Brian Dossey, Director of Recreation Services  
Town of Colma  
1520 Hillside Boulevard  
Colma, CA 94014  
[brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov)  
650-985-5690 (phone)  
650-997-3796 (fax)

#### **2.1.2 Recommendation**

None.

### **2.2 ADA Accommodation and Grievance**

#### **2.2.1 Finding**

ADA and Title II regulations require the Town complaint procedure. In 2010 City Council adopted procedures for requesting Reasonable Accommodation and for resolving ADA Grievance Procedure. A copy of the Reasonable Accommodations and Grievance Procedure Forms as well as the regulations is attached as Appendices B, C and H.

#### **2.2.2 Recommendation**

None.

### **2.3 Customer Service**

#### **2.3.1 Findings**

(a) In person interaction with the public is one of the primary functions of any Town department. The Town as a whole does not have understood, established procedures for determining reasonable modifications to achieve program accessibility.

(b) No department charges an additional fee to persons with disabilities for modifying programs. In fact persons with disabilities receive a discount for participating in Recreation Department programs.

(c) Some Town departments have utilized some sort of communication modification such as paper and pencil and listening device. A TDD/TTY is not available at Town



facilities except for the Police Department for 911 emergencies. Most staff is unaware and has not been trained on the 711 California Relay System.

(d) The City Council has adopted a procedure for making reasonable modifications to provide program accessibility. The procedure provides that:

(1) Requests for reasonable modification in programs or services should be made to the department responsible for the program or service.

(2) The department offering the program or service should meet with the individual with a disability to identify which aspects of the program limit participation and what modifications can be made.

(3) The department offering the program or service should consult with the affected program or service staff to determine the reasonable modification. The department offering the program or service may also consult the Town's ADA Coordinator or other resources providing services or information regarding persons with disabilities as appropriate.

(4) The department offering the program or service should document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation should be filed with the Town ADA Coordinator.

(5) Individuals with disability who are not satisfied with the results of this process may appeal the decision in accordance with the Town's Grievance Procedure (See Appendix H).

### **2.3.2 Recommendations**

(a) Make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service at Town transaction counters. For example staff can read documents to those who are visually impaired.

(b) Provide standard equipment at Town Hall to facilitate basic communications access. Equipment may include paper and pencil, a copy machine to enlarge print, and access to TDD or TTY and training about the California Relay System for the deaf or 711.

(c) Identify and provide training for staff using a relay service that can be used for telephone communications and/or use an alternative method of communication such as e-mail.

(d) Allow the use of service animals to assist persons in accessing Town programs and facilities. Since service animals are not always dogs, staff should be made aware of the definition of a service animal.

(e) Assign a staff member to be a greeter at public meetings and events. Identify the staff member as a resource for persons with disabilities who may require assistance.

(f) For departments that use outside contracted employees to provide services to the public, a procedure (during contract negotiations) should be set up to ensure that their work is in compliance with Title II of the ADA.

## **2.4 Notice of ADA Requirements**

### **2.4.1 Findings**

ADA and Title II regulations require the Town to inform the public of the rights and protections provided by the ADA. Public notifications should be updated to reflect the recommended Town of Colma ADA Public Notice. Currently our noticing refers to our City Council Agenda and City Council meeting requirement.

### **2.4.2 Recommendations**

(a) Approve the Town of Colma ADA Public Notice (Appendix D – ADA Public Notice). This notice should appear on all Town of Colma information boards including the kiosks in front of Town Hall, Sterling Park and Clark and E Street.

(b) Include the following notice regarding the Town's commitment to providing accessible services in all Town publications that provide general information about or registration information for Town services, program or activities. The notice should also be produced and placed in all Town departments in a location that will maximize public exposure.

"In accordance with the Americans with Disabilities Act and California Law, it is the policy of the Town of Colma to offer its programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact the ADA Coordinator at (650) 985-5690, at least two business days in advance of the hearing. Advance notification within this guideline will enable the Town to make reasonable arrangements to ensure accessibility. E-mail: [brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov)."

(c) Indicate that the Town has a TTY/TTD device in printed Town directories and include the following statement:

"This publication can be made available upon request in alternative formats, such as Braille, large print, audiotape, or computer disk. Requests can be made by calling (650) 985-5690 (voice) or e-mail [brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov). Please allow two business days for your request to be processed."

(d) Non-discrimination language should appear on web versions of meeting agendas.

## **2.5 Printed Information**

### **2.5.1 Description**

In order to meet the ADA's communication standards, Town departments must be able to provide information in alternative formats such as using easy-to-understand language, Braille, large print format, audiotape, or computer disk.

### **2.5.2 Findings**

(a) Most Town departments produce printed information that is available to the public.

(b) Some Town departments distribute information about obtaining printed information in alternate formats, other departments do not. Some departments will produce printed information in alternate format upon request.

(c) All registration forms, permits and waivers are available in written form. No documents are regularly produced in large print, Braille and on audio tape.

### **2.5.3 Recommendations**

(a) Provide written instructions to each department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner.

(b) Include the following notice on all materials printed by the Town that are made available to the public:

"This publication can be made available upon request in alternative formats, such as Braille, large print, audiotape, or computer disk. Requests can be made by calling (650) 985-5690 (voice) or e-mail [brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov). Please allow two business days for your request to be processed."

(c) Identify and have available a list of interpreters, readers, etc to be used to accommodate requests for these services.

(d) Handle all requests for other alternative formats on an individual basis.

(e) Provide program, facility, permits and reservation information in a variety of formats upon request (for example, in large print format for persons with visual disabilities or in simple language for persons with cognitive disabilities). Provide programmatic changes e.g. staff assistance, upon request to assist in filling out forms or when alternative formats are unavailable or not feasible.

(f) Provide an accessible permit, reservation, or registration system in a variety of formats. For example, provide Telephone Device for the Deaf (TDD) service for applications, reservations and general queries.

(g) Produce meeting agendas and other public information distributed at meetings in alternative formats when requested.

## **2.6 Town of Colma Website**

### **2.6.1 Description**

(a) As the population turns to the internet as their primary source of information regarding services, products, programs and facilities, the Town's website ([www.colma.ca.gov](http://www.colma.ca.gov)) takes on increased importance as a communication tool.

(b) Providing public access to the Town's publications on-line is an effective means of reaching persons with disabilities. New accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible.

### **2.6.2 Finding**

As of January 2010, the Town of Colma website meets Section 508 requirements. The website is maintained by the Human Resources Manager and all documents posted by staff meet Section 508 requirements.

### **2.6.3 Recommendations**

(a) Continue to maintain the current level of access on the website.

(b) Include the Town's policy on non-discrimination on the basis of disability on the website.

(c) List on the website that the Town has a TTY/TTD device on the contacts page and include the following statement:

"The Town of Colma offers Text Telephone (TTY) or Telecommunications Device for the Deaf (TDD) services for persons with speech or hearing impairments. Colma staff is also trained in the California Relay System for the deaf or 711."

(d) Include the Town's statement regarding accessible locations and the availability of auxiliary aides upon request on the website.

(e) Create a page/area identifying the ADA Coordinator and grievance procedures, including complaint forms.

(f) Ensure that staff members who are posting materials on the website are properly trained and are aware of the ADA requirements.

## **2.7 Training and Staffing**

### **2.7.1 Findings**

(a) In general, staff is not fully aware of the everyday accessibility problems encountered by persons with disabilities. Some have limited experience working with individuals with disabilities. Many staff members may not be aware of the different types of reasonable modifications that would make their services accessible. Most staff is familiar with the evacuation procedures and meeting points due to the evacuation plans posted in all facilities and annual testing.

(b) One of the needs most frequently identified by Town staff is training. Different types of training are necessary depending on the type of work and the amount of public contact involved with a specific position. Standard Town-wide accessibility guidelines, procedures and training need to be developed for:

- (1) Standardized, appropriate language for written material;
- (2) How to acquire or use assistive devices; and
- (3) Basic tools needed for accommodating persons with disabilities.

### **2.7.2 Recommendations**

(a) Provide training to staff members who have contact with the public in regards to providing modifications and using assistive devices to make their programs accessible. Ensure that customer service training that is provided to Town employees includes training with respect to communicating with and providing modifications for persons with a variety of disabilities.

(b) Develop a comprehensive disability access training program. Educate all staff in their responsibilities under the ADA. The Town's ADA Coordinator is responsible for ensuring that staff members receive training. Reference materials that address special modifications should be included in the training.

(c) Develop standard guidelines for written materials. These guidelines should include language that appropriately describes the Town's policy on inclusion and non-inclusion, and staff should receive training using the guidelines effectively.

(d) Provide staff with on-going awareness and sensitivity training. Resources such as Interacting with Persons with Disabilities may be helpful. ([www.fcc.gov/cgb/dro/504/disability\\_primer\\_4.html](http://www.fcc.gov/cgb/dro/504/disability_primer_4.html)). Include persons with disabilities as trainers.

(e) Depending on operational needs, consider offering training to employees who wish to learn American Sign Language (ASL) and develop interpreting skills. The training should emphasize basic communication skills and is viewed as a substitute for employing qualified ASL interpreters when requested.

(f) Widely disseminate information regarding the availability and location of Town Telephone Communication Devices for the Deaf (TDD) and train staff members in the use of TDD equipment or other means of communicating over the telephone with a person with a hearing disability.

(g) In order to facilitate access to Town programs by all citizens, the Town will assemble a toolkit of resources and information designed to assist staff in communicating with and providing public service to individuals with a variety of disabilities. The Town will periodically review the components of the toolkit, as new technologies become available, in order to ensure that the best types of technology are being used to improve accessibility to Town services and programs. (See Appendix E – ADA Staff Tool Kit)

(h) Train maintenance staff with respect to accessibility compliance and building codes to achieve accessibility.

## **2.8 Public Meetings**

### **2.8.1 Findings**

(a) Public meetings are held in multiple facilities throughout Town.

(b) Generally, public meetings are held in locations that are accessible to persons with mobility impairments. Town Hall has accessibility issues that are detailed in the Facilities Survey and Transition Plan. Staff indicated that they would like training on how to respond to requests for other modifications. Assistive listening devices are available during meetings.

### **2.8.2 Recommendations**

(a) Schedule public meetings in accessible locations whenever possible or make reasonable accommodations. An accessible location includes, but is not limited to accessible restrooms, wheelchair access, accessible parking, and accessible route, temperature control, and the ability to provide access to fresh air for persons with chemical sensitivities.

(b) Make information available to Town staff on the types of modification requests that may be made by persons with different types of disabilities. Provide information about auxiliary aides such as different types of listening systems, sign language interpreters, readers and descriptive services.

(c) Display a notice on meeting agendas indicating the availability of accessibility modifications.

(d) Provide agendas in alternative formats when requested.

(e) Provide flexibility in the time limit on speaking for individuals with communication difficulties.

(f) Publicize the availability of American Sign Language (ASL) interpreters in all meeting announcements. Include the following notice in all meeting publicity.

"Translators, American Sign Language interpreters, and assistive listening devices for individuals with hearing disabilities will be available upon request. Please make your request two business days prior to the meeting. If you require other modifications not listed above, please contact the ADA Coordinator at (650) 985-5690 or at [brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov)."

(g) Maintain a list of on-call American Sign Language interpreters to assist individuals with hearing impairments.

## **2.9 Telephones and Communication Devices**

### **2.9.1 Findings**

The Police Department has a TDD/TTY for the 911 emergency call service only. The Town does not have a TDD/TTY device for regular calls for service.

### **2.9.2 Recommendations**

(a) An amplification device, such as a telephone (TDD/TTY) should be installed at a central location such as Town Hall.

(b) Train staff in the use of TDD/TTY's and Town staff in the use of 711 California Relay System.

## **2.10 Purchasing Accessible/Adaptive Equipment**

Adaptive aids are devices, controls, appliances or items that make it possible for persons with disabilities to improve their abilities to function independently and participate in programs, services and activities offered by the Town.

### **2.10.1 Findings**

(a) Town Hall and the Colma Community Center have adaptive aids for the hearing impaired during meetings.

(b) Most staff members are unaware of resources for purchasing equipment or supplies that would make programs more accessible to persons with disabilities.

### **2.10.2 Recommendations**

(a) Establish a "Resources Toolkit" of adaptive aids and human resources that should be available for use by individuals participating in Town programs. Provide information about the availability of specific equipment and/or individuals who are available to provide special services (e.g., ASL translation) in public information materials such as brochures and the Town's website.

(b) Select items that are easily adjustable or can be modified to accommodate a variety of physical and ergonomic needs when purchasing items such as furniture, site furnishings and office systems.

## **2.11 Maintenance of Accessible Programs and On-going Accessibility Improvements**

### **2.11.1 Findings**

(a) Although many of the Town's public programs are accessible to persons with disabilities, some are not. In some instances the Town works with outside agencies/businesses that assist persons with disabilities.

(b) In addition, opportunities for further improvement of Town services and facilities will continue to arise as advances are made in technology and the provision of programs for persons with disabilities. If the Town acquires new facilities and develops new programs, it will be necessary to review each for access and compliance.

### **2.11.2 Recommendations**

(a) Ensure that individuals with disabilities are not excluded from regular programs or are required to accept special services or benefits. Involve individuals with disabilities in regular programs to the maximum extent possible.

(b) Maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities.

(c) Modify policies, practices or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program or create a hazardous condition.

(d) Ensure that when specific requirements that exclude or limit the participation of persons with disabilities are necessary for the safe operation of programs, those requirements are based on real risks, not on speculation, stereotypes or generalizations.

(e) Evaluate each request for modification on an individual basis, and when possible, the individual and the Town should determine an appropriate modification for the individual.

## **2.12 Emergency Evacuation Procedures**

All Town Departments require established emergency evacuation procedures to safely evacuate persons with disabilities who may need assistance in an emergency.

### **2.12.1 Findings**

Town Departments have an emergency evacuation procedure that is described in the Employee Emergency Action program in the Towns' Illness & Injury Prevention Plan which was adopted in March 2009. Emergency evacuation drills are completed at all facilities annually by members of the Safety Committee.



### **2.12.2 Recommendations**

(a) Review existing procedures dealing with emergencies to ensure that persons with disabilities can be alerted during an emergency. When requested provide all evacuation policies and procedures in alternative formats. Possibly explore the use of other technologies such as audible exit signs for orientation and direction.

(b) Provide training for Police Department to enable them to communicate in American Sign Language (ASL).

### **3. EVALUATION OF DEPARTMENTAL PROGRAMS, ACTIVITIES, AND SERVICES**

#### **3.1 Scope**

The following departments completed the ADA Programs, Services, and Activities survey:

- City Manager/City Clerk
- Police Department
- Public Works Department
- Planning Department
- Recreation Services

Each specific report includes a description of programs and services, contact information, the locations of operations, practices that facilitate the participation of persons with disabilities in programs and activities, and action steps.

#### **3.2 City Manager/City Clerk**

##### **3.2.1 Description of Programs and Services**

The City Manager/City Clerk contains the central administrative services for the Town. The City Manager also serves as the City Clerk. Department functions include general managerial oversight of departments and Capital Improvement Program (CIP) projects as well as traditional City Clerk functions such as records management, City Council support, and elections.

(a) The Department consists of the following divisions:

- Administration
- Human Resources
- Finance, with General Services and Debt Services

The Administration Division provides support to residents, members of the City Council and staff. Division functions include front office reception and general administrative support; City Council agenda and packet preparation; Council meeting minutes; records management; and elections.

The Human Resources Division is responsible for employee recruitment, selection, classification, compensation and benefits administration. The Division includes programs such as the annual employee recognition event, citywide training, safety committee and contracts for professional consulting services including labor negotiations and employment legal services.

The Finance Division is responsible for paying the Town's bills, maintaining and reconciling accounts, payroll, responding to vendor and employee inquiries within 24 hours, and maintaining current files.

(b) Contact Information

Town of Colma  
Town Hall  
1198 El Camino Real  
Colma, CA 94014  
Telephone number: 650-997-8300  
Fax number: 650-997-8308

(c) Programs

- Budget
- Agenda's & Noticing
- Recruitment
- Accounts Receivable and Accounts Payable
- Payroll
- CIP
- Records Management

**3.2.2 Customer Service**

**3.2.2.1 Findings**

(a) The City Manager's Department has no policies or practices that could have direct or indirect effect of excluding or limiting the participation of individuals with disabilities.

(b) The Administration and Human Resources Division require forms to be filled out.

(c) The City Manager's Department has a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

(d) For Town employees and employment applicants, the Human Resources Division has developed and formalized a process to ensure compliance with the ADA legislative changes relating to qualified workers with permanent disabilities. Guidelines have been established which identify trigger mechanisms and a process for engaging in interactive discussions on reasonable accommodation, modified duty, and alternative work options that would enable the ill/injured employee to perform their essential job duties with or without

reasonable accommodation. (See Town of Colma Administrative Code 3.02 relating to Personnel Policies)

(e) The Humans Resources Division has established a process for responding to requests for modification. Reasonable accommodation requests are submitted to the Human Resources Manager, who then facilitates an interactive process and, if possible, oversees that the necessary modifications to the program are made to allow that individual to participate.

(f) The Finance Department does not have programs for the public.

(g) There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements imposed on other program participants.

### **3.2.2.2 Recommendations**

(a) The Administration and Human Resources Division will provide alternative methods of completing written forms (i.e. job application) for people with disabilities that prevent them from filing out or signing forms.

(b) The Human Resources Division will develop a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

(c) The Department Head, and appropriate management staff will begin working with the Town's ADA Coordinator, Human Resources Division and City Attorneys office to review and respond to requests. Requests are infrequent and responses will be indexed. Depending on the nature of the request, written correspondence will be generated and retained according to the Town's Records Retention Schedule.

### **3.2.3 Notice Requirements**

#### **3.2.3.1 Findings**

(a) A notice of non-discrimination based on disability is included in all public agendas.

(b) A notice of non-discrimination based on disability is included in all job announcements. Job announcements are placed on the job hotline, internet including the Town website, newspapers, and LiveWire. Recruitment brochures are sent to various job placement agencies, local high schools and colleges as well as other northern California municipal agencies.

(c) A notice of non-discrimination based on disability is not included in the Town's Budget.

(d) The Town has not posted its ADA policy statement informing all persons have a right to participate in public meetings regardless of disability.

(e) Should persons contact the Town offices, or their agent contact the offices, they are directed either to the ADA Coordinator or the City Clerk, who will work to resolve the barriers faced by the disabled individual for their public participation.

(f) The public is advised that the City Manager's Department is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(g) The City Manager's Department does not include a notice in public meeting agendas regarding the accessibility of meeting locations and the availability of modifications provided for people with disabilities.

(h) The City Manager's Department does not include a notice in public meeting agendas for procedures for filing a disability discrimination complaint.

(i) The Human Resources Division informs that all persons have a right to participate in the job application process regardless of disability by posting and distributing job announcements, which also includes information about the availability of modification provided for people with disabilities.

(j) The public is advised that the Human Resources Division is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(k) The Human Resources Division does not publicize information about the right of people with disabilities to participate in resolving complaint or violation.

### **3.2.3.2 Recommendations**

(a) A notice of non-discrimination based on disability will be included in the Town's Budget.

(b) The Town will post the ADA policy statement informing all persons have a right to participate in public meetings regardless of disability. Also the following statement will be printed on all public meeting agendas.

#### **"ADA Notice and Hearing Impaired Provisions**

"The City Council Chamber is equipped with aids to help the hearing impaired. The aides work in conjunction with the Chamber's sound system. You may request these aids from the Administrative Staff for public use before the City Council meetings."

"In accordance with the Americans with Disabilities Act and California Law, it is the policy of the Town of Colma to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or material in an appropriate alternative format; or if you require any other

accommodation, please contact the ADA Coordinator at (650) 985-5690, at least two business days in advance of the meeting. Advance notification within this guideline will enable the Town to make reasonable arrangements to ensure accessibility. E-mail: [brian.dossey@colma.ca.gov](mailto:brian.dossey@colma.ca.gov)."

(c) The ADA Coordinator will provide City Manager's Department with a document which provides staff with alternative outside services for various disabilities, and develop a "who to call" reference manual of outside service providers (interpreters, etc), and a list of the most frequently used practical solutions as a central resource.

(d) The City Manager's Department will include a notice in public meeting agendas regarding the accessibility of meeting locations and the availability of modifications provided for people with disabilities.

(e) The City Manager's Department will include a notice in public meeting agendas for procedures for filing a disability discrimination complaint.

(f) The Human Resources Division will publicize information about the right of people with disabilities to participate in resolving complaint or violation.

### **3.2.4 Printed Information**

#### **3.2.4.1 Findings**

(a) The City Manager's Department provides publications in alternative media or accessible format as follows:

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Agendas	X	X		X	X	X	X
Meeting Packets	X			X	X	X	X
City Council reports	X			X	X	X	X
Job Applications	X			X	X	X	X
Job Descriptions	X			X	X	X	X
MOU's	X			X	X	X	X
Policies and Codes	X			X	X	X	X

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Budget	X			X	X	X	X
Misc Documents	X			X	X	X	X

(b) A staff person is available to assist individuals in reading documents.

(c) A staff person is available to assist individuals in filling out job applications.

(d) The Human Resources Division provides documents and publications in simple, easy-to-understand language for individuals with learning disabilities.

(e) The Finance Division provides documents (budget) in simple, easy-to-understand language for individuals with learning disabilities.

(f) The Administration Division is not always able provide documents and publications (i.e. policies and codes) in simple, easy-to-understand language for individuals with learning disabilities. City Manager's Department staff is prepared to produce these documents in simple language when requested.

(g) The City Manager's Department does not include any pictures or images in its publications of individuals with disabilities.

#### **3.2.4.2 Recommendation**

(a) The City Manager's Department will make an effort to include pictures or images in its publications of individuals with disabilities.

### **3.2.5 Website**

#### **3.2.5.1 Findings**

(a) The Town of Colma's website does not include a link to information about accessibility.

(b) The Town of Colma's website is maintained by the Human Resources Division.

(c) The Human Resources Division does not include information on the Town's website about accessibility of facilities where programs or services are offered.

#### **3.2.5.2 Recommendations**

(a) The Town of Colma's website will have a link to accessibility.

(b) The Human Resources Division along with the ADA Coordinator will ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities and facilities. Information regarding the location of accessible entrances, programs, sites, TDD numbers, and other access features can be provided on the Town of Colma website, [www.colma.ca.gov](http://www.colma.ca.gov).

See Section 2.6, Findings and Recommended Actions – Citywide Programs, Activities and Services.

### **3.2.6 Communications Devices**

#### **3.2.6.1 Findings**

(a) The City Manager's Department staff is not familiar with the California Relay System or trained in the use of TDD/TTY equipment with persons with hearing disabilities.

#### **3.2.6.2 Recommendation**

(a) The City Manager's Department staff will receive training in the use of TDD/TTY equipment and the California Relay System for persons with hearing disabilities.

### **3.2.7 Training and Staffing**

#### **3.2.7.1 Findings**

(a) City Manager's Department staff is aware that it may be necessary to modify policies and practices to enable people with disabilities to participate in and benefit from a program.

(b) The Human Resources Division is trained regarding their obligations and policies that enable people with disabilities to participate in programs and activities.

(c) The City Manager's Department staff has had some experience working with people with disabilities or altering programs and services to accommodate people with disabilities.

#### **3.2.7.2 Recommendation**

(a) The City Manager's Department will receive training regarding working with people with disabilities and/or altering programs and services to accommodate people with disabilities.

### **3.2.8 Program Eligibility Requirements and Admission**

#### **3.2.8.1 Findings**

(a) There are circumstances in which the participation of a person with a type of impairment would be restricted or excluded in programs offered by the Administration and



Human Resources Division. These exclusions or restrictions are necessary to the operation of the programs and to public health and safety.

(b) There are no known circumstances in which the participation of a person with a disability in the Finance Division programs would be restricted or excluded.

(c) Individuals are required to complete a written form in order to participate in Human Resources programs. Human Resources staff is prepared to assist people who are unable to fill out the form.

(d) Job applications contain a notice that the Human Resources Division does not discriminate against people with disabilities.

(e) Applicants inform the Human Resources Division of any a special needs they may have to complete and application and/or participate in the application/interview process. The Human Resources division will attempt to make accommodation to the requests.

#### **3.2.8.2 Recommendation**

(a) None.

### **3.2.9 Public Meetings**

#### **3.2.9.1 Findings**

(a) The Finance and Human Resources Divisions do not hold public meetings.

(b) Meetings and other public events sponsored by the City Manager's Department are required to be held in accessible locations.

(c) Assistive listening devices are available for all City Council meetings.

(d) Auxiliary aids and services such as sign language interpreters will be made available at public meetings, interviews, conferences upon request of two business days.

#### **3.2.9.2 Recommendation**

Ensure all facilities where public meetings are held are ADA compliant.

### **3.2.10 Tours and Trips**

#### **3.2.10.1 Findings**

The City Manager's Department does not provide tours.

#### **3.2.10.2 Recommendation**

None.

### **3.2.11 Transportation Services**

#### **3.2.11.1 Findings**

The City Manager's Department does not provide transportation services.

#### **3.2.11.2 Recommendation**

None.

### **3.2.12 Use of Consultants**

#### **3.2.12.1 Findings**

The City Manager's Department ensures outside contractors are notified of their responsibilities for providing services in a nondiscriminatory manner.

#### **3.2.12.2 Recommendation**

Include the Town's policy regarding accessibility for individuals with disabilities in all contracts. For example all contracts should have language associated with "Compliance to Civil Rights" and "Compliance with laws" section.

### **3.2.13 Emergency Evacuation Procedures**

#### **3.2.13.1 Findings**

The City Manager's Department has an emergency evacuation procedure that is described in the Employee Emergency Action program in the Towns Illness & Injury Prevention Plan which was adopted in March 2009. Emergency evacuation drills are completed at all facilities annually by members of the Safety Committee.

#### **3.2.13.2 Recommendation**

None.

### **3.2.14 Special Events and Private Events on Public Properties**

#### **3.2.14.1 Findings**

(a) The Administration and Human Resources Division ensures that programs held on private and public property meet the obligations to facilitate the participation of individuals with disabilities. For example ribbon cuttings, honor ceremonies, Mayor/Chamber walks, etc.

(b) The Human Resources Division organizes workshops for employees and members of the public; examples include the Heart Healthy and Weight Management workshops. The Human Resources Division ensures that all these events are held in accessible locations.

- (c) The Finance Division does not host special events.

#### **3.2.14.2 Recommendation**

The Human Resources Division will make sure all printed information regarding the workshops will have all the necessary ADA accessibility language.

### **3.2.15 Maintenance of Accessible Programs and Ongoing Accessibility Improvements**

#### **3.2.15.1 Findings**

(a) The Administration and Finance Division does not consult with outside organizations that assist people with disabilities.

(b) The Human Resources Division consults with several organizations that assist people with disabilities. For example California Department of Rehabilitation, San Mateo County Human Services Agency, Community Gatepath, CalOpps, etc.

#### **3.2.15.2 Recommendation**

None.

### **3.2.16 Automated Electronic Equipment**

#### **3.2.16.1 Findings**

(a) The Finance and Human Resources Division does not allow access to automated electronic equipment.

(b) The Administration Division have modifications for the hearing impaired and make staff available to provide assistance for accessing City Council meeting agenda packets upon request.

#### **3.2.16.2 Recommendation**

None.

### **3.2.17 Auxiliary Aides**

#### **3.2.17.1 Findings**

The City Manager's Department provides the following auxiliary aids and services:

- Writing instrument, paper and clipboard
- Aids for the hearing impaired
- Moveable light sources

### **3.2.17.2 Recommendation**

When appropriate and upon request of two business days, the City Manager's Department will provide or make available additional auxiliary aids that would allow a person with disabilities to participate in programs.

## **3.3 Police Department**

### **3.3.1 Police Department Divisions**

(a) The Police Department includes the following Divisions

- Police Administration
- Police Patrol
- Police Communications
- Police Grants

Police Administration provides the planning, direction and oversight control of the Department.

Police Patrol provides front-line uniform response to calls for police services. Police Patrol addresses neighborhood quality-of-life issues and responds to all security-related service needs of the community including: threats to life and property, enforcement of traffic laws and investigation of crimes against persons and property.

Police Communications handles the clerical and record-keeping duties of the Department and citizen-initiated calls for service.

The Police Grants program was initiated in late FY 2001-02 to comply with state requirements to separately account for certain annual state-provided funds, which initially included technology grants and the Supplemental Law Enforcement Services Fund (SLESF) for front-line personnel services. This program funds a Community Service Officer (CSO), and the purchase of two police canines and related materials and training costs.

(b) Contact Information

Police Department  
1199 El Camino Real  
Colma, CA 94014  
Telephone number: 650-997-8321  
Fax number 650-997-8330

(c) Programs

- Livescan Services
- House Checks

- Community Outreach
- Community Service
- Booking & Holding
- Interviewing
- Exercise (Physical Fitness)
- DUI Checks
- Gang Task Force
- SWAT
- Motorcycle Officer
- Holiday Outreach

### **3.3.2 Customer Service**

#### **3.3.2.1 Findings**

(a) The Police Department has no policies or practices that could have direct or indirect effect of excluding or limiting the participation of individuals with disabilities.

(b) The Police Department does not have a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

(c) The Police Department requires forms to be filled out.

(d) There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements imposed on other program participants.

#### **3.3.2.2 Recommendations**

(a) The Police Department will develop a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

(b) The Police Department will provide alternative methods of completing written forms for people with disabilities that prevent them from filling out or signing forms.

### **3.3.3 Notice Requirements**

#### **3.3.3.1 Findings**

(a) The Police Department does not have a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(b) The Police Department does not advertise the accessibility of facilities and their special procedures used for individuals with disabilities.

(c) The Police Department has not publicized information about the information about the right of people with disabilities to participate in resolving a complaint or violation.

#### **3.3.3.2 Recommendations**

(a) The Police Department will develop a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(b) The Police Department will ensure that people with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individual with disabilities.

(c) The Police Department will publicize information about how and with whom to file a disability discrimination complaint using the Town of Colma's website.

### **3.3.4 Printed Information**

#### **3.3.4.1 Findings**

(a) The Police Department provides publications in alternative media or accessible format as follows:

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Police Reports	X	X		X	X	X	X
Pamphlets				X	X	X	X
Misc. Documents	X			X	X	X	X

(b) A staff person is available to assist individuals in reading documents.

(c) The Police Department provides documents and publications in simple, easy-to-understand language for individuals with learning disabilities.

(d) The Police Department does not include any pictures or images in its publications of individuals with disabilities.

#### **3.3.4.2 Recommendation**

The Police Department will make an effort to include pictures or images in its publications of individuals with disabilities.

### **3.3.5 Website**

#### **3.3.5.1 Findings**

(a) The Town of Colma's website does not include a link to accessibility.

(b) The Town of Colma's website is maintained by the Human Resources Division.

(c) The Police Department does not include information on the Town's website about accessibility of facilities where programs or services are offered.

#### **3.3.5.2 Recommendations**

(a) The Town of Colma's website will have a link to information about accessibility.

(b) The Police Department along with the ADA Coordinator will ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities and facilities. Information regarding the location of accessible entrances, programs, sites, TDD numbers, and other access features can be provided on the Town of Colma website, [www.colma.ca.gov](http://www.colma.ca.gov).

See Section 2.6, Findings and Recommended Actions – Citywide Programs, Activities and Services.

### **3.3.6 Communications Devices**

#### **3.3.6.1 Findings**

(a) The Police Communications Division personnel are trained in the use of the California Relay System and TDD/TTY equipment with persons with hearing disabilities.

(b) The Police Administration and Patrol Division staff is not familiar with the California Relay System or trained in the use of TDD/TTY equipment with persons with hearing disabilities.

### **3.3.6.2 Recommendation**

The Police Administration and Patrol Division staff will receive training in the use of TDD/TTY equipment and the California Relay System for persons with hearing disabilities.

### **3.3.7 Training and Staffing**

#### **3.3.7.1 Findings**

(a) Police Department staff is aware that it may be necessary to modify policies and practices to enable people with disabilities to participate in and benefit from a program.

(b) Some Police Department staff members are trained regarding obligations and policies that enable people with disabilities to participate in programs and activities.

(c) The Police Department staff has some experience working with people with disabilities or altering programs and services to accommodate people with disabilities.

#### **3.3.7.2 Recommendations**

(a) Police Department staff will be trained regarding their obligations and policies that enable people with disabilities to participate in programs and activities.

(b) The Police Department will train staff regarding working with people with disabilities and/or altering programs and services to accommodate people with disabilities.

### **3.3.8 Program Eligibility Requirements and Admission**

#### **3.3.8.1 Findings**

There are no known circumstances in which the participation of a person with a type of impairment would be restricted or excluded in programs offered by the Police Department.

#### **3.3.8.2 Recommendation**

None.

### **3.3.9 Public Meetings**

#### **3.3.9.1 Findings**

(a) All Police Department Public Meetings are held in accessible locations. (Tow Hearings at Emergency Operation Center)

(b) Sign language interpreters, listening devices and other auxiliary aids will be made available upon request at public meetings.



### **3.3.9.2 Recommendation**

None.

### **3.3.10 Tours and Trips**

#### **3.3.10.1 Findings**

The Police Department offers a ride-a-long program upon request. Accommodations will be considered on a case by case basis, however it is not possible to alter the equipment in the patrol vehicles or make accommodations where officer safety may be compromised

#### **3.3.10.2 Recommendation**

(a) None.

### **3.3.11 Transportation Services**

#### **3.3.11.1 Findings**

(a) The Police Department does not provide transportation services to the public.

(b) The Police Department has special procedures through mutual aid agreements to make transportation to facilities accessible to persons with disabilities.

#### **3.3.11.2 Recommendation**

None.

### **3.3.12 Use of Consultants**

#### **3.3.12.1 Findings**

The Police Department ensures outside contractors are notified of their responsibilities for providing services in a nondiscriminatory manner.

#### **3.3.12.2 Recommendation**

Include the Town's policy regarding accessibility for individuals with disabilities to all contracts. For example all contracts should have language associated with "Compliance to Civil Rights" and "Compliance with laws" section.

### **3.3.13 Emergency Evacuation Procedures**

#### **3.3.13.1 Findings**

(a) The Police Department has established emergency evacuation procedures through the Board of Corrections in regards to assisting people with disabilities.

#### **3.3.13.2 Recommendation**

None.

### **3.3.14 Special Events and Private Events on Public Properties**

#### **3.3.14.1 Findings**

The Police Department hosts two special events each year - Holiday Outreach at the Metro Center and the Halloween Event on Clark Street. The Police Department ensures that the facility is accessible and all materials are available in alternative formats for those with disabilities.

#### **3.3.14.2 Recommendation**

None.

### **3.3.15 Maintenance of Accessible Programs and Ongoing Accessibility Improvements**

#### **3.3.15.1 Findings**

(a) The Police Department does not have ongoing relationships/partnerships with groups that assist people with disabilities.

(b) The Police Department does not consult with outside organizations that assist people with disabilities.

#### **3.3.15.2 Recommendation**

None.

### **3.3.16 Automated Electronic Equipment**

#### **3.3.16.1 Findings**

The Police Department does not allow access to automated electronic equipment.

#### **3.3.16.2 Recommendation**

None.

### **3.3.17 Auxiliary Aides**

#### **3.3.17.1 Findings**

The Police Department provides the following auxiliary aids and services:

- Writing instrument, paper and clipboard

- Aids for the hearing impaired
- Moveable light sources

### **3.3.17.2 Recommendation**

When appropriate and when requested, the Police Department will provide or make available additional auxiliary aids that would allow a person with disabilities to participate in programs.

## **3.4 Public Works Department**

### **3.4.1 Description of Programs and Services**

(a) The Public Works Department includes the following Divisions:

- Administration
- Engineering
- Building
- Public Works Maintenance

The Administration, Engineering and Building Division are staffed by contract employees, manage the Five-Year Capital Improvement Program (CIP), and provide general engineering, consulting and building inspection services to the Town. The Division manages the Town's Storm Water National Pollutant Discharge Elimination System (NPDES) Permitting Program requirements, annual sewer fees, annual waste management reporting and sanitary sewer overflow reporting requirements, the Town's traffic speed surveys, roadway infrastructure and related projects for state and local grants. Engineering assists the Public Works Maintenance Division and the Police, Recreation and Planning Departments in all aspects of Town infrastructure. The Division processes building, grading and encroachment permits for new construction as well as providing plan review and inspection services. These activities are partially fees supported.

The Public Works Maintenance Division is responsible for the up-keep and maintenance of public streets, sidewalks, traffic signals, street lights and public facilities. The Division also manages the landscape maintenance and sanitary sewer maintenance contracts, and provides roadway weed and litter control and graffiti abatement.

(b) Contact Information

Town Hall Annex  
1188 El Camino Real  
Colma, CA 94014  
Telephone number: 650-757-8888  
Fax number: 650-757-8890

Corp Yard  
601 F Street  
Colma, CA 94014  
Telephone number: 650-757-6272

(c) Programs

- Building Maintenance
- Street Cleaning
- Building Permits
- Building Inspections
- Capital Improvement Projects
- Landscaping
- Roadway Repairs
- Sanitary Sewer Maintenance

### **3.4.2 Customer Service**

#### **3.4.2.1 Findings**

(a) The Public Works Department may have policies or practices that could have direct or indirect effect of excluding or limiting the participation of individuals with disabilities.

(b) The Public Works Department does not have a process for determining whether a policy or practice modification would fundamentally alter the nature of the program.

(c) The Public Works Department requires forms to be filled out.

(d) The Public Works Department does not have a process for responding to requests for modification.

#### **3.4.2.2 Recommendations**

(a) The Public Works Department will develop a process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered.

(b) The Public Works Department will provide alternative methods of completing written forms for people with disabilities that prevent them from filling out or signing forms.

(c) The Public Works Department will develop a process where upon receipt of a request for modification or assistance, the request will be evaluated by the Department Head and ADA Coordinator to determine the feasibility of providing the modification or accommodation. Examples of a process would include:

(1) If an individual reports a raised sidewalk impeding wheelchair travel to Public Works Department, a Maintenance Technician will investigate and, if warranted, grind down the concrete or ramp the offset with asphalt.

(2) If someone calls the Public Works Department inquiring about curb ramps, building access or disabled parking, the call would be directed to the ADA Coordinator.

(3) If an individual with a visual impairment calls the Public Works Department and requests an audible pedestrian signal (chirping sound) the request would be forwarded to the Engineering Division to investigate and determine if the request can and should be accommodated.

(4) There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements except those imposed on other program participants.

### **3.4.3 Notice Requirements**

#### **3.4.3.1 Findings**

(a) The Public Works Department does not have a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(b) The Public Works Department does not advertise the accessibility of facilities and their special procedures used for individuals with disabilities.

(c) The Public Works Department has not publicized information about the right of people with disabilities to participate in resolving a complaint or violation.

#### **3.4.3.2 Recommendations**

(a) The Public Works Department will develop a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

(b) The Public Works Department will ensure that people with disabilities can obtain information about the location of accessible entrances, program sites, and other access features and special procedures for individual with disabilities.

(c) The Public Works Department will publicize information about how and with whom to file a disability discrimination complaint using the Town of Colma's website.

### **3.4.4 Printed Information**

#### **3.4.4.1 Findings**

(a) The Public Works Department provides publications in alternative media or accessible format as follows:

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Permits	X			X	X	X	X
RFP's	X			X	X	X	X
Building Spec's	X			X	X	X	X
Plans	X			X	X	X	X
Policies and Codes	X			X	X	X	X
Budget	X			X	X	X	X
Misc Documents	X			X	X	X	X

(b) A staff person is available to assist individuals in reading or to explain documents.

(c) The Public Works Department provides documents and publications in simple, easy-to-understand language for individuals with learning disabilities.

(d) The Public Works Department does not include any pictures or images in its publications of individuals with disabilities.

#### **3.4.4.2 Recommendation**

None.

### **3.4.5 Website**

#### **3.4.5.1 Findings**

(a) The Town of Colma's website is maintained by the Human Resources Division.

(b) The Public Works Department does not include information on the Town's website about accessibility of facilities where programs or services are offered.

#### **3.4.5.2 Recommendation**

The Public Works Department along with the ADA Coordinator will ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities and facilities. Information regarding the location of accessible entrances, programs, sites, TDD numbers, and other access features can be provided on the Town of Colma website, [www.colma.ca.gov](http://www.colma.ca.gov).

See Section 2.6, Findings and Recommended Actions – Citywide Programs, Activities and Services.

### **3.4.6 Communications Devices**

#### **3.4.6.1 Findings**

The Public Works Department does not have TDD/TTY equipment and is not familiar with the 711 California relay system.

#### **3.4.6.2 Recommendation**

The Public Works Department staff will receive training in the use of TDD/TTY equipment and the California Relay System for persons with hearing disabilities.

### **3.4.7 Training and Staffing**

#### **3.4.7.1 Findings**

(a) Public Works Department staff is aware that it may be necessary to modify policies and practices to enable people with disabilities to participate in and benefit from a program.

(b) The Public Works Department staff has some experience working with people with disabilities or altering programs and services to accommodate people with disabilities.

(c) Building Division staff work with the disabled community to complete code compliant regulations.

#### **3.4.7.2 Recommendation**

The Public Works Department will train staff regarding working with people with disabilities and/or altering programs and services to accommodate people with disabilities.

### **3.4.8 Program Eligibility Requirements and Admission**

#### **3.4.8.1 Findings**

There are no circumstances in which the participation of a person with a disability in the Public Works Department would be restricted or excluded.

#### **3.4.8.2 Recommendation**

None.

### **3.4.9 Public Meetings**

#### **3.4.9.1 Findings**

(a) The Public Works Department requires that public meetings and special events are held in accessible locations.

(b) The Public Works Department will provide auxiliary aides (such as sign language interpreters) at all department programs, public meetings, and interviews upon request of two business days.

(c) Assistive listening devices will be made available at Public Works Facilities for public meetings.

#### **3.4.9.2 Recommendation**

None.

### **3.4.10 Tours and Trips**

#### **3.4.10.1 Findings**

The Public Works Department does not provide tours and trips.

#### **3.4.10.2 Recommendation**

None.

### **3.4.11 Transportation Services**

#### **3.4.11.1 Findings**

The Public Works Department does not provide transportation services.

#### **3.4.11.2 Recommendation**

None.



### **3.4.12 Use of Consultants**

#### **3.4.12.1 Findings**

The Public Works Department employs consultants. Outside consultants are notified of their responsibilities for providing services in a nondiscriminatory manner.

#### **3.4.12.2 Recommendation**

Include the Town's policy regarding accessibility for individuals with disabilities to all contracts. For example all contracts should have language associated with "Compliance to Civil Rights" and "Compliance with laws" section.

### **3.4.13 Emergency Evacuation Procedures**

#### **3.4.13.1 Findings**

The Public Works Department has an emergency evacuation procedure that is described in the Employee Emergency Action program in the Towns' Illness & Injury Prevention Plan which was adopted in March 2009. Emergency evacuation drills are completed at all facilities annually by members of the Safety Committee.

#### **3.4.13.2 Recommendation**

None.

### **3.4.14 Special Events and Private Events on Public Properties**

#### **3.4.14.1 Findings**

The Public Works Department does not host special or private events on public property.

#### **3.4.14.2 Recommendation**

None.

### **3.4.15 Maintenance of Accessible Programs and Ongoing Accessibility Improvements**

#### **3.4.15.1 Findings**

(a) The Building Division has ongoing partnerships with a variety of groups that assist people with disabilities.

(b) The Building Division consults with outside organization

#### **3.4.15.2 Recommendation**

None.

### **3.4.16 Automated Electronic Equipment**

#### **3.4.16.1 Findings**

The Public Works Department does not make automated equipment available to the public.

#### **3.4.16.2 Recommendation**

None.

### **3.4.17 Auxiliary Aides**

#### **3.4.17.1 Findings**

Auxiliary Aids (such as tools, adjustable work tables, etc) are not available to assist persons with disabilities.

#### **3.4.17.2 Recommendation**

When appropriate and when requested, the Public Works Department will provide or make available auxiliary aids that would allow a person with disabilities to participate in programs.

## **3.5 Planning Department**

### **3.5.1 Description of Programs and Services**

#### **(a) Staffing**

Planning services for the Town are provided by contract and are partially supported by fees. There are four main activities in the Department: Administration, Code Enforcement, Current Planning and Advance Planning. The Planning staff is an important interface with Town residents and the business community, helping to ensure a positive working and living environment by encouraging economic development, enforcing codes, promoting property maintenance and recommending high-quality development projects for City Council approval.

#### **(b) Contact Information**

Town Hall Annex  
1190 El Camino Real  
Colma, CA 94014  
Telephone number: 650-985-2590  
Fax number: 650-985-2578

#### **(c) Programs**

- Permit Processing

- Business License Processing
- Economic Development

### **3.5.2 Customer Service**

#### **3.5.2.1 Findings**

(a) The Planning Department may have policies or practices that could have direct or indirect effect of excluding or limiting the participation of individuals with disabilities.

(b) The Planning Department requires forms to be filled out.

(c) The Planning Department does not have a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

(d) The Planning Department has established a process for responding to requests for modification. Reasonable accommodation requests are submitted to the Director of Planning, who oversees that the necessary modifications to the program are made to allow that individual to participate.

(e) The Planning Department has the following programs for the public.

- Process development applications
- Community meetings/Public engagements

(f) There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements that is not already imposed on other program participants.

#### **3.5.2.2 Recommendations**

(a) The Planning Department will provide alternative methods of completing written forms for people with disabilities that prevent them from filling out or signing forms.

(b) The Planning Department will develop a process for determining whether a policy or practice modification would fundamentally alter the nature of a program or services being offered.

### **3.5.3 Notice Requirements**

#### **3.5.3.1 Findings**

(a) A notice of non-discrimination based on disability is included in all public agendas and notices.

(b) The Planning Department has yet to include a notice in public meeting agendas regarding the accessibility of meeting locations and the availability of modifications provided for people with disabilities.

(c) The Planning Department has yet to include a notice in public meeting agendas for procedures for filing a disability discrimination complaint.

(d) The Planning Department does not publicize information about the right of people with disabilities to participate in resolving complaint or violation.

### **3.5.3.2 Recommendations**

(a) The Planning Department will include a notice in public meeting agendas regarding the accessibility of meeting locations and the availability of modifications provided for people with disabilities.

(b) The Planning Department will include a notice in public meeting agendas for procedures for filing a disability discrimination complaint.

(c) The Planning Department will publicize information about the right of people with disabilities to participate in resolving complaint or violation.

### **3.5.4 Printed Information**

#### **3.5.4.1 Findings**

(a) The Planning Department provides publications in alternative media or accessible format as follows:

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Planning	X			X	X	X	X
Housing	X			X	X	X	X
Economic Development	X			X	X	X	X
Applications	X			X	X	X	X
Policy Documents	X			X	X	X	X
Permits	X			X	X	X	X

(b) The Planning Department provides documents in simple and easy to understand format.

(c) The Planning Department includes images of individuals with disabilities in its publications.

(d) The Planning Department has staff available to assist individuals in reading documents.

#### **3.5.4.2 Recommendation**

None.

### **3.5.5 Website**

#### **3.5.5.1 Findings**

(a) The Town of Colma's website is maintained by the Human Resources Division.

(b) The Planning Department does not include information on the Town's website about accessibility of facilities where programs or services are offered.

#### **3.5.5.2 Recommendation**

The Planning Department along with the ADA Coordinator will ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities and facilities. Information regarding the location of accessible entrances, programs, sites, TDD numbers, and other access features can be provided on the Town of Colma website, [www.colma.ca.gov](http://www.colma.ca.gov).

See Section 2.6, Findings and Recommended Actions – Citywide Programs, Activities and Services.

### **3.5.6 Communications Devices**

#### **3.5.6.1 Findings**

The Planning Department does not have TDD/TTY equipment and some staff is familiar with the 711 California relay system.

#### **3.5.6.2 Recommendation**

The Planning Department staff will receive training in the use of TDD/TTY equipment and the California Relay System for persons with hearing disabilities.

### **3.5.7 Training and Staffing**

#### **3.5.7.1 Findings**

(a) Planning Department staff is aware that it may be necessary to modify policies and practices to enable people with disabilities to participate in and benefit from a program.

(b) Some Planning Department staff is trained regarding their obligations and policies that enable people with disabilities to participate in programs and activities.

(c) The Planning Department staff has had some experience working with people with disabilities or altering programs and services to accommodate people with disabilities.

(d) Some Planning Department staff members are familiar with ASL and can communicate with those with hearing impairments in the case of an emergency.

#### **3.5.7.2 Recommendation**

The Planning Department will train staff regarding working with people with disabilities and/or altering programs and services to accommodate people with disabilities.

### **3.5.8 Program Eligibility Requirements and Admission**

#### **3.5.8.1 Findings**

(a) There are no circumstances in which the participation of a person with a disability in the Planning Department would be restricted or excluded.

(b) Clients are required to complete written forms in order to participate in some Department programs.

#### **3.5.8.2 Recommendation**

Planning Department staff will assist clients to complete written forms upon request.

### **3.5.9 Public Meetings**

#### **3.5.9.1 Findings**

(a) Planning Department public meetings are held in accessible locations.

(b) Sign language interpreters, listening devices or other auxiliary aids and services are available at public meetings.

#### **3.5.9.2 Recommendation**

(a) None.

### **3.5.10 Tours and Trips**

#### **3.5.10.1 Findings**

(a) The Planning Department provides tours and trips to the public on a limited and case by case basis.

(b) Planning staff ensures all tour and trip locations are fully accessible or that reasonable accommodations can be made for those with impairments or disabilities.

**3.5.10.2 Recommendation**

None.

**3.5.11 Transportation Services**

**3.5.11.1 Findings**

The Planning Department does not provide transportation services to the public.

**3.5.11.2 Recommendation**

None.

**3.5.12 Use of Consultants**

**3.5.12.1 Findings**

The Planning Department employs consultants. Outside consultants are notified of their responsibilities for providing services in a nondiscriminatory manner.

**3.5.12.2 Recommendation**

Include the Town's policy regarding accessibility for individuals with disabilities to all contracts. For example all contracts should have language associated with "Compliance to Civil Rights" and "Compliance with laws" section.

**3.5.13 Emergency Evacuation Procedures**

**3.5.13.1 Findings**

The Planning Department has an emergency evacuation procedure that is described in the Employee Emergency Action program in the Towns' Illness & Injury Prevention Plan which was adopted in March 2009. Emergency evacuation drills are completed at all facilities annually by members of the Safety Committee.

**3.5.13.2 Recommendation**

None.

**3.5.14 Special Events and Private Events on Public Properties**

**3.5.14.1 Findings**

Planning Department staff sometimes host community meetings. The meetings are always scheduled in accessible locations and staff provides reasonable accommodations upon request.

#### **3.5.14.2 Recommendation**

None.

### **3.5.15 Maintenance of Accessible Programs and Ongoing Accessibility Improvements**

#### **3.5.15.1 Findings**

(a) The Planning Department has ongoing partnerships with a variety of groups that assist people with disabilities.

(b) The Planning Department consults with outside organizations that assist people with disabilities, for example staff refers residents to the Housing Element for legal services.

#### **3.5.15.2 Recommendation**

None.

### **3.5.16 Automated Electronic Equipment**

#### **3.5.16.1 Findings**

The Planning Department does not make automated equipment available to the public.

#### **3.5.16.2 Recommendation**

None.

### **3.5.17 Auxiliary Aides**

#### **3.5.17.1 Findings**

The Planning Department provides the following auxiliary aids and services:

- Writing instrument, paper and clipboard
- Copy machine to enlarge documents
- Moveable light sources
- Variety of surfaces at different heights that may meet ADA requirements

#### **3.5.17.2 Recommendation**

When appropriate and when requested, the Planning Department will provide or make available additional auxiliary aids that would allow a person with disabilities to participate in programs.



### **3.6 Recreation Department**

#### **3.6.1 Description of Programs and Services**

##### **(a) Programs**

The Recreation Services Department provides programs, activities and events for Colma residents of all age groups ranging from infants to seniors at two park facilities: Colma Historical Park & Community Center and Sterling Park. Program elements include: Fitness, Enrichment, Special Events, Cultural Events, Sporting Events, Trips and Community Events. It is the goal of the Recreation Services Department to offer a balanced program ensuring all elements are offered to all age groups throughout the fiscal year.

##### **(b) Contact Information**

Colma Community Center  
1520 Hillside Boulevard  
Colma, CA 94014  
Telephone number: 650-985-5678  
Fax number: 650-997-3796

Sterling Park Recreation Center  
427 F Street  
Colma, CA 94014  
Telephone number: 650-991-3213  
Fax number: 650-991-3206

##### **(c) Programs**

###### **(1) After School Program**

The Recreation Services Department offers the KIDS' CLUB after-school program at the Sterling Park Recreation Center. This free drop-in program is offered September through June and offers programs to all Colma Youth ages 6 to 14 years, Monday through Friday, 3:00pm to 5:30pm throughout the school year. Recreation staff members lead participants in arts & crafts, athletics, board & team games, and provide help with homework.

###### **(2) Community Programs**

The Recreation Services Department offers the following Community Programs:

- (i) Family Field Day & BBQ
- (ii) Outdoor Movie Night
- (iii) Earth Day Celebration
- (iv) Health Fair

(v) E-Waste Day

(vi) Project Read

These programs are available to all residents and are held at the Colma Community Center, Sterling Park Recreation Center, and T.R. Pollicita Middle School.

(3) Day Camp Programs

The Recreation Services Department is offers winter, spring and summer Day Camp to youth ages 5-12 years old. The program provides a wide range of activities to keep children occupied during the school breaks. Children enjoy activities such as arts & crafts, outdoor games, indoor games, music, cooking projects, bowling, movies, and trips to local parks around the Bay Area.

(4) Enrichment Programs

The Recreation Services Department offers the following Enrichment Programs:

- (i) Yoga
- (ii) Tae Kwon Do
- (iii) Hula Dancing
- (iv) Ballroom Dancing
- (v) Fitness Classes
- (vi) Math Tutoring
- (vii) Golf Lessons
- (viii) Scrapbooking
- (ix) Ballet & Tap Dancing
- (x) Kids Carpentry
- (xi) Cooking Classes
- (xii) Driver's Education
- (xiii) Financial Services Workshops
- (xiv) First Aid & CPR Training
- (xv) Composting Workshop

These programs are available to all residents and are held at the Colma Community Center, Sterling Park Recreation Center, Cypress Golf Course, Serramonte Del Rey, Duo Dance Academy, Terrabay Recreation Center in South San Francisco, and the Colma Fire House.

#### (5) Facility Rentals

The Colma Community Center is a 5,500 square foot facility designed to host receptions, parties, reunions, and events accommodating up to 150 people. The Colma Community Center has a commercial kitchen, banquet room with adjoining outdoor decks, conference room, restrooms, lending library, audio visual equipment, and tables and chairs. The Colma Community Center can be rented by Town of Colma residents, Monday—Thursday, 9:00am—10:00pm and Friday—Sunday, 9:00am—11:00pm.

Sterling Park Recreation Center is a 1,200 square foot facility with restrooms, small kitchenette, TV/VCR, computers, book nook, and tables and chairs to accommodate a party of 50 for a sit down event. Sterling Park Recreation Center can be rented by Town of Colma residents on Saturdays and Sundays from 11:00am—6:00pm and Monday—Friday from 6:00pm—9:00pm

#### (6) General Recreation Programs

The Recreation Services Department offers the following General Recreation Programs:

- (i) Parents Night Out
- (ii) Ice Cream Arts and Crafts
- (iii) Mega Candyland
- (iv) Mega Chutes and Ladders
- (v) Guitar Hero Night

These programs are available to resident youth between the ages of 5 and 17 years old and are held at the Colma Community Center and Sterling Park Recreation Center.

#### (7) Senior Programs

The Recreation Services Department offers the following Senior Programs:

- (i) Senior Luncheons

Enrichment Workshops, such as Reverse Mortgage, Avoiding Cons and Scams, Identity Theft and Finishing Strong

- (ii) Senior Holiday Event

These programs are available to residents ages 55 and older and are held at the Colma Community Center.

(8) Special Events

The Recreation Services Department offers the following Special Events:

- (i) Town Picnic
- (ii) Youth and Teen Holiday Events
- (iii) Halloween Parade and Pumpkin Carving Party
- (iv) Murder Mystery Dinner
- (v) Eggstravaganza
- (vi) Teen Fright Night

These programs are available to all residents and are held at the Colma Community Center, Sterling Park Recreation Center and Marine World.

(9) Sporting and Theatrical Events

Listed below is a sample of Sporting and Theatrical Events the Recreation Services Department offers:

- (i) San Francisco Giants Game
- (ii) Peter Pan – Theater Show
- (iii) Golden State Warriors Game

These programs are available to all residents and are held at Candlestick Park, AT&T Park, Orpheum Theater and Oracle Arena.

(10) Trips

Listed below is a sample of trips the Recreation Services Department offers:

- (i) De Young Museum
- (ii) Legion of Honor Museum
- (iii) Golden Gate Fields
- (iv) Walt Disney Museum
- (v) Sky High Sports
- (vi) Santa Cruz Beach Boardwalk

- (vii) Safari West
- (viii) Malibu Grand Prix
- (ix) Boomers
- (x) Great America

These programs are available to all residents and are held at various locations throughout the Bay Area.

### **3.6.2 Customer Service**

#### **3.6.2.1 Findings**

(a) The Recreation Services Department has no policies or practices that could have direct or indirect effect of excluding or limiting the participation of individuals with disabilities. Every effort is made to accommodate for special need whenever possible.

(b) Residents are required to complete written forms in order to apply for a Colma ID cards. Participants are required to complete written applications and registration forms in order to rent recreation facilities and to participate in recreation programs.

(c) The Recreation Services Department does not have a process for determining whether a policy or practice modification would fundamentally alter the nature of the program.

(d) There is no circumstance in which a person with a disability would be asked to pay a fee or meet any other requirements imposed on other program participants. In fact persons with disabilities are offered program discounts for participating.

#### **3.6.2.2 Recommendations**

(a) The Recreation Services Department will provide alternative methods of completing forms for people with disabilities who are unable to fill out or sign forms. Example: Recreation staff can fill out forms for persons with disabilities.

(b) The Recreation Services Department will develop a process for determining whether a policy or practice modification would fundamentally alter the nature of the program or service being offered.

### **3.6.3 Notice Requirements**

#### **3.6.3.1 Findings**

The Recreation Services Department does not have a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

### **3.6.3.2 Recommendation**

The Recreation Services Department will develop a policy of notifying the public that it is prepared to make reasonable modifications to programs or services to make them accessible to people with disabilities.

### **3.6.4 Printed Information**

#### **3.6.4.1 Findings**

Upon request the Recreation Services Department is prepared to provide the following documents and publications in alternative or an accessible format as follows:

Type of Information	Accessible PDF File	Audio Tape	Braille	Large Print	Web	Computer Disk	Readers
Recreation Guide	X			X	X	X	X
Colma I.D. Card Applications	X			X	X	X	X
Colma I.D. Card Information	X			X	X	X	X
Registration Forms	X			X	X	X	X
Facility Rental Applications	X			X	X	X	X
Fliers	X			X	X	X	X
Facility Rental Policies and Procedures	X			X	X	X	X
Day Camp Schedules	X			X	X	X	X

### **3.6.4.2 Recommendation**

The Recreation Services Department will locate services that can provide our printed documents in alternative formats such as audio tape, Braille, and readers so when requested the service can be provided.

### **3.6.5 Website**

#### **3.6.5.1 Findings**

(a) The Town of Colma's website is maintained by the Human Resources Division.

(b) The Recreation Guide, Colma I.D. card information, registration forms, and facility rental information are posted on the Town of Colma's website.

(c) The Recreation Services Department does not include information on its website about accessibility of facilities where programs or services are offered.

#### **3.6.5.2 Recommendation**

The Recreation Services Department will ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities, and facilities. Information regarding TDD/TTY numbers and 711 relay system, and other access features can be provided in the website.

See Section 2.6, Findings and Recommended Actions – Citywide Programs, Activities and Services.

### **3.6.6 Communications Devices**

#### **3.6.6.1 Findings**

The Recreation Services Department staff is not familiar with the California Relay System or trained in the use of TDD/TTY equipment with persons with hearing disabilities.

#### **3.6.6.2 Recommendation**

The Recreation Services Department staff will receive training in the use of TDD/TTY equipment and the California Relay System for persons with hearing disabilities.

### **3.6.7 Training and Staffing**

#### **3.6.7.1 Findings**

(a) Recreation Services Department staff members are advised at staff meetings that it might be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from programs and services.

(b) The Recreation Services Department staff has had very little to no experience working with people with disabilities or altering programs and services to accommodate people with disabilities.

#### **3.6.7.2 Recommendation**

The Recreation Services Department will train staff regarding working with people with disabilities and/or altering programs and services to accommodate people with disabilities.

### **3.6.8 Program Eligibility Requirements and Admission**

#### **3.6.8.1 Findings**

(a) There are no circumstances in which participation of a person with a disability in Special Events, Sporting and Theatrical Events, and Adult and Senior Enrichment programs would be restricted or excluded.

(b) There are circumstances in which the participation of a person with a type of impairment would be restricted or excluded in the After School program, Day Camp program, and youth General Recreation programs. These exclusions or restrictions are due to mandated staff/participant ratios and are necessary to the operation of the programs. Please see Appendix F – ADA for Childcare Providers.

(c) Clients are required to complete a written form in order to participate in Day Camp programs, Facility Rentals, General Recreation programs, and Afterschool programs.

(d) Recreation Services Department forms do not contain notices that the department does not discriminate against people with disabilities.

#### **3.6.8.2 Recommendations**

(a) Staff will provide alternative methods for persons with disabilities who are unable to fill out or sign forms.

(b) The Recreation Services Department will add notices to all forms stating that the department does not discriminate against people with disabilities.

### **3.6.9 Public Meetings**

#### **3.6.9.1 Findings**

(a) The Colma Community Center is ADA compliant and can host public meetings and special events.

(b) The Recreation Services Department will provide auxiliary aides (such as sign language interpreters) at all department programs, public meetings, and interviews upon request of two business days.



(c) Assistive listening devices are available at Recreation Facilities for public meetings.

#### **3.6.9.2 Recommendation**

None.

### **3.6.10 Tours and Trips**

#### **3.6.10.1 Findings**

(a) The Recreation Services Department provides Tours and Trips for all Adult & Senior outings, Youth & Teen outings as well as Family outings.

(b) Recreation staff ensures all tour and trip locations are fully accessible or that reasonable accommodations can be made for those with impairments or disabilities. Examples include the purchase of limited mobility/wheelchair seating for those at theater/sporting venues, ASL interpreter for the San Francisco Moving Movie Tour, and provide audio headphone tours for the visually impaired.

#### **3.6.10.2 Recommendation**

None.

### **3.6.11 Transportation Services**

#### **3.6.11.1 Findings**

(a) Transportation is often provided via contracted motor coach companies for Tours and Trips in our Adult, Senior, Youth and Teen programs. When requested staff hires an accessible vehicles for those clients with disabilities.

(b) Our Youth and Teen programs sometimes use public transportation for the Town's Trips and Tours. Sam Trans and Bay Area Rapid Transit are ADA compliant.

#### **3.6.11.2 Recommendation**

None.

### **3.6.12 Use of Consultants**

#### **3.6.12.1 Findings**

(a) The Recreation Services Department contracts with Outside Consultants (i.e. Contract Instructors) and notifies them of their responsibilities for providing services in a non-discriminatory manner. Instructor contracts include the Town's policy regarding accessibility for individuals with disabilities.

(b) Contract instructors and the programs they teach are sometimes monitored to ensure that they are meeting their responsibilities for providing services in a non-discriminatory manner.

**3.6.12.2 Recommendation**

None.

**3.6.13 Emergency Evacuation Procedures**

**3.6.13.1 Findings**

The Recreation Services Department has an emergency evacuation procedure that is described in the Employee Emergency Action program in the Towns' Illness & Injury Prevention Plan which was adopted in March 2009. Emergency evacuation drills are completed at all facilities annually by members of the Safety Committee.

**3.6.13.2 Recommendation**

None.

**3.6.14 Special Events and Private Events on Public Properties**

**3.6.14.1 Findings**

Recreation Services Department staff ensures that programs held on private or public property meet the obligations to facilitate the participation of individuals with disabilities. Examples include classes at Duo Dance Academy, events at T.R. Pollicita Middle School, and Town Picnic offsite at Saratoga Springs.

**3.6.14.2 Recommendation**

To strengthen the Town's commitment to ensuring that events that are held on public or private properties, use agreements or contracts will include the Town's policy regarding accessibility for individuals with disabilities. Also staff will fill out an Accessible Public Event Checklist – Appendix G, ensuring accessibility.

**3.6.15 Maintenance of Accessible Programs and Ongoing Accessibility Improvements**

**3.6.15.1 Findings**

The Recreation Services Department does not consult or work with any outside organizations that assist people with disabilities.

**3.6.15.2 Recommendation**

The Recreation Services Department will strive to keep programs up-to-date through increased community involvement and partnerships with organizations that offer services to persons with disabilities.

### **3.6.16 Automated Electronic Equipment**

#### **3.6.16.1 Findings**

The Recreation Services Department does not provide automated electronic equipment for public use.

#### **3.6.16.2 Recommendation**

None.

### **3.6.17 Auxiliary Aides**

#### **3.6.17.1 Findings**

The following auxiliary aides are available at the Recreation Services Department

- Adjustable tables
- Writing instruments and paper
- Movable light sources
- Hearing devices

#### **3.6.17.2 Recommendation**

When appropriate and when requested, the Recreation Services Department will provide or make available additional auxiliary aids that would allow a person with disabilities to participate in programs.

### **3.7 Schedule for Completing Recommended Actions for Programs, Activities and Services**

The recommended actions described in sections 2 & 3.1-3.6 of the ADA Self Evaluation and Transition Plan will be completed by fiscal year 2012-13. Each year the Safety Committee will review the recommended actions in sections 2 & 3.1-3.6 of the ADA Self Evaluation and Transition Plan and will schedule staff training, write policies and purchase supplies and equipment. Training, supplies and equipment will be purchased through the ABAG Risk Management grant program and operating budget.

### **3.8 Policy Document Review Introduction and Review**

The City Attorney's office reviewed the Town's Municipal Code and Administrative Code. Policies were reviewed to determine if the Town Municipal and Administrative Codes inadvertently discriminate against people with disabilities in accessing Town services. The Colma Municipal Code and Colma Administrative Code were amended at the February, March and September 2010 City Council meetings and now comply with Federal ADA and State Accessibility (Title 24) requirements. Please see Appendix H – Amended Town of Colma

Municipal and Administrative Codes including new sections pertaining to accessibility and reasonable accommodation.