



FULTON COUNTY

ADA TRANSITION PLAN

January 1, 2019



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Introduction

The County's new ADA Title II Transition Plan update fulfills the requirements set forth in Title II of the Americans with Disabilities Act (ADA) as amended. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. In this regard the present plan details actions taken and/or that will take by Fulton County Government to identify policy, program, and physical barriers to accessibility, as well as develop/implement barrier removal solutions to facilitate opportunities to access for all individuals.

Fulton County has demonstrated a longstanding commitment to providing accessible services to the community. Pedestrian improvements, building renovations, and the delivery of services have been accomplished with consideration of the needs of people with disabilities. This commitment was initially exemplified by the creation in 1992 of the County's Commission on Disability Affairs, CODA (an advisory committee to the Fulton County Board of Commissioners comprised of allies of persons with disabilities and, Fulton County residents); the former Office of Disability Affairs (now the Disability Affairs Program within the Office of Diversity and Civil Rights Compliance) that seeks to ensure County compliance with disability-related statutes, regulations and/or policies, as well as accessibility for person with disabilities to programs, services and facilities serving the public; and establishment of the County's original ADA Transition Plan.

One of the purposes of the County's original Transition Plan was to identify physical barriers that might limit access to County programs and services to persons with disabilities. Many of the identified barriers were associated with facilities that had exterior site features (such as accessible parking, ramps, path of travel) as well as interior program features (such as accessible restrooms, program areas, and other usable features).

The present Transition Plan update is intended to provide a framework for the continuous improvement of County facilities for people with disabilities. Further, this is a living document, regularly updated as barriers are removed and new facilities come under ownership or control of the County. Finally, the needs of the community of persons with disabilities were taken into consideration for the removal of barriers and are incorporated into the Transition Plan's work, creating greater access.

Acknowledgements and Stakeholders

Many individuals were involved with the development of the County's new ADA Transition Plan. The active participation of County staff from each of the Departments indicates the level of engagement that has characterized the development of the Plan.

Fulton County Project Leadership

Dr. Ann F. Harris, Director, Office of Diversity and Civil Rights Compliance (DCRC)

Nadine Oka, ADA Administrator, Office of Diversity and Civil Rights Compliance (DCRC)

Ellis Kirby, Deputy Chief Operating Officer (Infrastructure), former Director, Department of Real Estate and Asset Management (DREAM)

Patrice Perkins-Hooker, County Attorney

Department of Real Estate and Asset Management Staff

Office of Diversity and Civil Rights Compliance Staff

Office of the County Attorney Staff

Community Members, Volunteers, and Stakeholders

Mike Galifianakis, State ADA Coordinator, Georgia State Financing and Investment Commission

Steven R. Jones, Senior ADA Architect, Georgia State Financing and Investment Commission

Fulton County Commission on Disability Affairs (CODA):

Yvette Pollard, Chair (appointed by Commissioner Marvin Arrington Jr.)

Robert Smith (appointed by Commissioner Marvin Arrington Jr.)

Vanessa Meadows (At-Large – elected by CODA)

Myrna Clayton (At-Large – elected by CODA)

Dr. Rometta Powell (appointed by Commissioner Bob Ellis)

Irvin Cox (appointed by Commissioner Natalie Hall)

Vernitia Shannon (appointed by Commissioner Emma Darnell)

Judith Henson (appointed by Commissioner Emma Darnell)

Community Service Partners (CSP) and Others:

Auditory-Verbal Center, Inc.
Center for the Visually Impaired
disABILITY LINK
enAble of Georgia, Inc.
First Step Staffing, Inc.
Friends of Disabled Adults and Children, Too! Inc.
Georgia Radio Reading Service, Inc.
Hillside, Inc.
Lekotek of Georgia, Inc.
North Metro Miracle League, Inc.
The Lionheart School, Inc.
Triumph in Life, Inc.

Consultants

Irene Bowen, ADA One, LLC
Eric Contreras, ADAAG Consulting Services, LLC

***Department Disability Compliance Liaisons (DCLs, as of December 2018)**

Fulton County Department representatives identified by Directors as being:

- First level Point of Contact (POC) for public inquiries re: accessibility to programs and services by persons with disabilities
- Knowledgeable about specific department operations
- Possessing knowledge of Program Access under the ADA
- Accessible to the Director and County ADA Administrator

*Note: Updated list of Non-Discrimination Compliance Liaisons is forthcoming for 2019.

See Appendix 7-1 for current Fulton County DCL Listing

1.0 Introduction to Policy and Framework



1.0 Introduction to Policy and Framework

A Transition Plan is a document that outlines how jurisdictions transition toward compliance with the Americans with Disabilities Act as amended. The Transition Plan identifies barriers for persons with disabilities and a schedule to remove those barriers over time. The present document summarizes actions taken by the County through the implementation of a multi-phase, multi-year ADA Self-Evaluation and Transition Plan project. The document also includes a discussion regarding: how requests for modifications are made; how complaints can be filed; as well as the results of facility evaluations for county-owned physical structures, where services and programs for the public are provided.

This chapter outlines the requirements for completing a Transition Plan under the Americans with Disabilities Act (ADA) as amended and is organized into the following topical areas: 1.1 Document Organization, 1.2 Legal Requirements, 1.2A Legislative History, 1.2B ADA Transition Plan Requirements and Process, 1.2C Accessibility and Discrimination, and 1.2D Fulton County Non-discrimination/ADA Policies and Complaint Procedure.

1.1 Document Organization

The present document is organized into Chapters containing the following:

Chapter 1: Introduction to Policy and Framework

Chapter 1 provides an overview of the legal requirements under the Americans with Disabilities Act through a review of its legislative history. The chapter also provides a comprehensive summary of the Fulton County's ADA policies.

Chapter 2: Self-Evaluation and Transition Plan Process

Chapter 2 provides a description of the multi-year, multi-phased process used for evaluating ADA Program Accessibility of County programs and facilities as well as development of the Transition Plan update, including the engagement of County staff and community stakeholders.

Chapter 3: Transition Plan Methodology

Chapter 3 provides a discussion of the process used by the County for developing the barrier removal timeline based on the findings of the facility evaluations.

Chapter 4: ADA Transition Plan

Chapter 4 provides a description of the County's timeline for addressing the barriers identified in the facility evaluations.

Chapter 5: Glossary

Chapter 5 provides a list of definitions of commonly used terms found in an ADA Self Evaluation and Transition Plan.

Chapter 6: Resources

Chapter 6 includes additional support documentation used in the development for the Transition Plan.

Chapter 7: Appendices

Chapter 7 includes support documentation referenced in the Transition Plan.

1.2 Legal Requirements

The Americans with Disabilities Act is a comprehensive civil rights law for persons with disabilities. The Applicable Regulation governing the establishment of an ADA Transition Plan is 28 CFR. § 35.150, Existing Facilities (d) TRANSITION PLAN which provides for the following:

- All public entities that employ 50 or more persons shall develop, a (ADA) Transition Plan setting forth the steps necessary to complete changes undertaken to achieve program accessibility.
- The Transition Plan shall provide an opportunity to interested persons, including individuals with disabilities, to participate in the development of the Transition Plan by submitting comments.
- A copy of the Transition Plan shall be made available for public inspection.
- If the public entity has a responsibility or authority over streets, roads, or walkways, its Transition Plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, places of public accommodate, and employers, followed by walkways serving other areas.

The Transition Plan must, at a minimum—

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to achieve compliance with § 35.105, 35.150(d); and,
- If the time period of the Transition Plan is longer than one year, identify steps that will be taken during each year of the transition plan period (interim measures);
- Estimated cost of each modification;
- Status column to record completion date; and
- Indicate the official responsible for implementation of the plan.

Fulton County established its first Transition Plan in April, 1992. The original transition plan document centered its work on the identification and remediation of physical barriers in County facilities. The present document represents a significant enhancement to the County's previous work related to the identification of barriers for persons with disabilities as well as the County's efforts to comply with Title II of the ADA.

A. Legislative History

Congress passed the original Americans with Disabilities Act (ADA) on July 26, 1990. This Civil Rights legislation was a critical milestone for creating more inclusion and access for persons with disabilities. Title II of the ADA covers programs, activities and services of public entities, and civic life. The Department of Justice's Title II regulation adopted the general prohibitions of discrimination established under Section 504 of the Rehabilitation Act of 1973 and incorporated specific prohibitions of discrimination for the ADA.

In 2010, the Americans with Disabilities Act regulations were revised requiring all Title II entities (State and Local Governments) to review and/or conduct, as needed, a new ADA Self-Assessment and Transition Plan of their programs and facilities serving the public, for barriers impacting access for persons with disabilities.

Specifically, the County may not, either directly or through contractual arrangements, do any of the following:

Deny persons with disabilities equal opportunity to participate as members of advisory boards and commissions;

Deny persons with disabilities equal opportunity to participate in services, programs, or activities; and

Make selections that have the effect of excluding or discriminating against persons with disabilities when determining the location of facilities.

Title II of the ADA as amended provides that Fulton County and other public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the their programs, activities, and services. The present document details how the County completed a new ADA self-evaluation of its programs serving the public as well as an assessment of all County-owned Facilities where services to the public were being rendered. Finally, it contains the new Transition Plan to guide remediation of identified barriers for persons with disabilities.

B. ADA Self Evaluation/Transition Plan Requirements and Process

The purpose of an ADA Self-Evaluation is to assess current policies, practices, and facilities for members of the public - to determine if there are barriers for persons with disabilities. When barriers to the physical environment cannot be modified, an entity should consider program accessibility of its policies, practices and service delivery to ensure access for persons with disabilities as part of its Title II responsibilities. During Phases I and II of its recent Self-Evaluation project, the County:

Identified the County's programs, activities, and services serving the public; and reviewed the policies, practices, and procedures that govern the administration of those

programs, activities, and services

Phase III of the County's multi-year project was to assess the physical environment (county-owned facilities) to determine if physical barriers existed for persons with disabilities, impeding their access to services, programs and facilities. The task for the County was to identify which County-owned locations primarily served the public, survey those facilities and identify any barriers that existed for persons with disabilities.

The Transition Plan (Phase IV) described in Chapter 4 is the result of a detailed evaluation of all Fulton County facilities where programs, activities, and services are available to the public.

C. Accessibility and Discrimination

Demonstrating the absence of discrimination requires two types of accessibility are provided under Title II of the ADA, Program Accessibility and Accessibility of the physical environment.

Program accessibility includes physical accessibility, but also requires that when the physical environment cannot be altered - policies, practices, and procedures permit people with disabilities to participate in programs as well as have access to important information. 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. Additionally, program accessibility also includes modifications to existing policies and practices in order to allow persons with disabilities opportunities for program participation, eligibility, testing/evaluation, including the provision of auxiliary aids and services, as well as effective communication.

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 or program. Programs offered by the County and to the public must be accessible.

The County may achieve (physical) accessibility by:

- Incorporating accessibility standards into all design, renovation and/or new construction-work

- Making modifications to an existing facility for the removal of barriers;

- Adding signage or way-finding to direct persons with disabilities to a more accessible route or accessible elements of the County

When choosing a method of providing program access, the County will give priority to the one that results in the most integrated setting appropriate to encourage interaction among

all users, including individuals with disabilities. In compliance with the requirements of the ADA, the County must provide equality of opportunity.

D. Fulton County Non-discrimination/ADA Policies and Complaint Procedure

On July 26, 1990, The Americans with Disability Act (ADA) was passed to prohibit discrimination and ensure equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation. It was amended in 2010. Title II of the ADA prohibits local governments from excluding persons with disabilities from participation or denying persons with disabilities the benefits of the County's services, programs, or activities.

In 2011, the Disability Affairs Program announced and initiated its multi-phase, multi-year new ADA Self- Evaluation and Transition Plan (SETP) Project and requested all County entities to designate a Disability Compliance Liaison (DCL), who was charged with working with the ADA Administrator to: complete departmental completion the SETP Project; resolve issues related to increasing access and removing barriers for persons with disabilities; assist with (public) reasonable modification requests; and resolve ADA complaints under Title II.

On March 6, 2013, the Board of Commissioners approved the establishment of Fulton County's Program Access Policy for Persons with Disabilities (600-72) with accompanying Standard Operating Procedures. This policy reaffirms the County's commitment to ensure that people with disabilities have an equal opportunity to access its programs, services and facilities in a similar manner, as people without disabilities. The policy also provided for a Grievance and Complaint procedure. *(See Appendix 6-2)*

Non Discrimination policies may be accessed through the County's website. In addition to providing access to the County's non-discrimination policies, the DCRC web page provides links for reasonable modification requests, instructions regarding how to file ADA complaints, ADA Administrator's contact information, access to the Self-Evaluation reports and the Transition Plan, as well as other related resources. The aforementioned information can be found on the DCRC Disability Affairs Program web page at <http://www.fultoncountyga.gov/dcrc-disability-affairs-home>

Complaints reporting that a County program, service, or activity is not accessible to persons with disabilities should be directed to the Office of Diversity and Civil Rights Compliance (DCRC) within 180 days of the alleged violation. Individuals interested in filing a complaint should use the ADA Grievance and Complaint Form to file the complaint or provide the necessary information to DCRC.

For more information, please read the Request for Reasonable Modifications Form, and ADA Grievance/Complaint, found at <http://www.fultoncountyga.gov/dcrc-how-request-reason-modify> or interested individuals may contact Nadine Oka, ADA Administrator at 404-612-7390. Information and forms are available in alternative formats upon request.

2.0 Multi-Phase ADA Self Evaluation and Transition Plan Process



2.0 Multi-Phase ADA Self-Evaluation and Transition Plan Process

As previously stated, revised regulations for the Americans with Disabilities Act were promulgated in 2010. Some of the amendments resulted in regulation changes which required all Title II entities (State and Local Governments) to review and/or conduct, as needed, a new ADA Self-Evaluation and Transition Plan for remediation of their programs as well as facilities serving the public for barriers to accessibility for persons with disabilities. To fully comply with the legal mandate for a Self-Evaluation and Transition Plan, the Office of Diversity and Civil Rights Compliance (DCRC), in 2011, developed and began implementation of a multi-year, multi-phased Self Evaluation and Transition Plan (SETP) Project to address its legal responsibilities.

As a point of information for the reader, the scope of work for this project included a review of two major areas of County operations including:

- A. County Protocols including Policies and Practices (e.g. governing how services or programs are delivered) and People (e.g. regarding how knowledgeable or equipped employees are to provide services to persons with disabilities); as well as
- B. County Facilities (e.g. to determine how accessible are the locations where County services or programs are being delivered to the public)

In addition, there were 3 critical activities that were undertaken in order to successfully complete the overall project which included: 1) Assessment (e.g. identifying impediments/barriers to full access); 2) Transition Plan Creation (e.g. identifying required barrier removal and establishing a schedule to guide remediation work, including cost estimates); and 3) Remediation (e.g. timely implementing and monitoring of the remediation schedule).

2.1 Summary of Project Timelines and Achievements

A brief synopsis of accomplishments of this initiative follows:

- 2011-2012 Phase 1 – Completion of ADA program access self-evaluation assessment surveys for 163 County Programs across 37 departments. Due to the unique nature of their programs, 2 County programs were not surveyed as part of this activity which included the Atlanta-Fulton County Emergency Management Agency (AFCEMA)-Emergency Evacuation and Preparedness for persons with disabilities; Information Technology-Fulton County Website and were identified for assessment at a later date as funding was identified;
- 2012-2015 Phase 2 – Identification of 928 barriers impeding access of persons with disabilities to surveyed County programs; Remediation was completed for 98% of the identified barriers;
- 2015-2017 Phase 3 - Completion of ADA assessments of County facilities where public programs and services are delivered (including 3.2 million square feet across 53 locations).The detailed-assessment identified approximately 7,600 barriers for remediation.
- 2018 Phase 4 – Completion of a draft new County ADA Transition Plan for submission by December 31, 2018 to stakeholders (County Attorney, Chief Operating Officer, Deputy Chief Operating Officer-Infrastructure and Department of Real Estate and Asset Management) for review and comment. The Transition Plan prioritizes remediation projects into short term (1 to 5 years), mid-term (5 to 10 years) and long term (10 to 15 years) categories to guide remediation work until completion.
- 2019 Initiate Transition Plan 15 year schedule for barrier removal and remediation work

Additionally, this chapter outlines the process and stakeholders involved in completing the Self-Evaluation and Transition Plan Project including the program and physical barrier evaluation tools used; methods of public outreach employed; Department involvement and related staff training.

2.2 Planning Process

Due to the scope of the services provided by the County, the County elected to complete the requirements of the ADA Self-Evaluation and Transition Plan in phases. Critical steps included: preliminary program reviews; program access survey distribution; program access corrective actions development and implementation; assessment of County-owned facilities leading to the remediation of barriers and subsequently the development of a new ADA Transition Plan. A description of the activities undertaken and the timeline used in the multi-phased approach appears below:

A. SELF EVALUATION OF COUNTY PROGRAMS

PHASE 1:

Department Preliminary Program Overview (PPO) Questionnaire:

During 2011-2012, the County evaluated 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 in the next phase of this work.

The County hired a consultant firm, ADA One LLC to assist in the development and deployment of an ADA program access survey instrument and to assist the DCRC in providing related training. An initial survey was sent to Department program managers to obtain information on the nature of the programs, forms and methods used to advertise the 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. *(See Appendix 6-3)* Preliminary information was received from 166 programs.

ADA Program Access Survey

With results from the PPO questionnaire, ADA One developed a comprehensive program access self-evaluation survey covering the following areas:

- Infrastructure, Eligibility and Participation
- Communications
- Accessibility and Maintenance of Features
- Equipment / Furniture
- Outside Entities
- Transportation
- Emergency Procedures (Communications)

The final online survey was sent to Department Disability Compliance Liaisons (DCLs) who were identified by their Department Directors to coordinate completion of the ADA survey questionnaires activities, with program staff. *(See Appendix 6-4)* Questionnaires were deployed to all programs with the exception of the following: Information Technology-County Website Program and Atlanta Fulton County Emergency Management Agency (AFCEMA)-Emergency Preparedness Program. It was decided that

due to the unique nature of these programs, program specific ADA assessments would have to be undertaken at a later time.

Completed questionnaires were submitted to the consultant, who conducted an analysis of department response data, summarized report results and provided the results for each County Department as well as for the County as a whole to DCRC. The Phase I Final Report identified barriers across County programs as highly successful, generally successful, or needs significant improvement. The report also suggested next steps. In November 2012, the completed report was presented by DCRC's consultant to County leadership. *(See Appendix 7-5 Consultant Report: Full Access Ahead)*

PHASE 2

Corrective Action Planning and Implementation

From 2012 through 2015, DCRC worked with and provided guidance to County Department staff in the development of 928 program access corrective actions to remediate the barriers identified through administration of the ADA Self-Evaluation Survey. At the close of this phase of the project, 98% of the corrective actions had been implemented. A summary report of remediation activities and accomplishments was completed and presented by DCRC's consultant to County leadership in February 2017. *(See Appendix 7-6 Consultant Report: Forging Ahead).*

B. FACILITY EVALUATIONS

PHASE 3

From 2015 through 2017, the County completed site assessments of County-owned facilities, in order to identify facility barriers, as well as, provide recommendations for alterations that would ensure compliance for Program Access with State and Federal accessibility standards. The scope of the assessment work included County facilities where public programs and services were being delivered (approximately 3.2 million square feet across 53 locations). The assessment identified approximately 7,600 barriers for remediation.

As a result of the County-wide assessment of barriers and, relative to the *2010 ADA Standards for Accessible Design* Scoping and Technical Requirements, the County's overall distribution of barriers identified, were as follows:

Fulton County Government; ADA Title II Transition Plan Update

ADA Codes:	Description:	Percent Overall:
§36.303	New Construction/Alterations; policy	1%
§200-232.2.1	Scoping Requirements; signage, line of sight, seating capacity	2%
§300-309.4	Building Blocks; ground surface, ramps, knee/toe clearance	24%
§400-4409.4.7.3	Accessible Routes; curb ramps, ramps, maneuvering clearance	29%
§500-508	General Site/Building Elements; parking handrails	9%
§600-611.3	Plumbing Elements; toilets, dispensers, grab bars	9%
§700-705.2	Communications; signage	11%
§800-811.3	Special Rooms/Spaces; ceramics, fitness, quiet room	7%
§900-904.5.2	Built-In Elements; reception counters, tables, benches	7%

A complete list of the facilities evaluated for this Transition Plan is located in Chapter 4. To facilitate discussion and reporting purposes, the DCRC grouped evaluated County-owned facilities in the following program clusters:

- Justice Tower Complex/Cluster;
- Government Center Complex/Cluster;
- Animal Services (Atlanta Fulton County Emergency Management Agency)
- Arts and Culture
- Health Services
- Libraries
- Senior Services
- Miscellaneous County Facilities

To complete the facility assessments, the DCRC contracted with a firm specializing in ADA Facility Assessment work, ADAAG Consulting Services (ACS), Eric Contreras, Project Manager. The facility evaluations were conducted referencing the following applicable codes; §Section 504 of the Rehabilitations Act (504), Uniform Federal Accessibility Standards (UFAS), the (2010) Americans with Disabilities Act (ADA), and 2010 ADA Standards for Design and Construction, the Architectural Barriers Act (ABA) and the Georgia Accessibility Code (GAC). Barrier conditions commonly found through the

assessment in County facilities and programs included but were not limited to: parking, signage, path of travel, buildings, restrooms, and elevators. Consultant findings from the facility evaluations were provided to DCRC consistent to the stated Scope of Work included facility location, specific barrier, relevant ADA code, remediation recommendation, estimated remediation cost and suggested prioritization for removal. The consultant suggested an A through D prioritization schedule for remediation removal as follows:

Category A – Projects involving life safety remediation

Category B – Projects involving program access remediation

Category C – Projects involving barrier removal remediation work

Category D – Projects involving “Best Practices” in field for ADA remediation

Category A and B barriers were scheduled as “short term” remediation projects (anticipated completion 1 to 5 years). Category C barriers were scheduled as “mid-term” remediation projects with less urgency (anticipated completion no greater than 10 years). Category D barriers were scheduled as “long term” remediation projects requiring the least urgency (anticipated completion no greater than 15 years). A secondary description field was provided by the consultant focused on whether they believed remediation efforts could be completed by internal maintenance staff, a sub-contractor or, would require an architectural/engineering firm for more extensive work.

The resulting detailed consultant facility reports included a list of barriers; relevant Federal ADA codes applicable to identified barriers; barrier remediation suggestions, suggested remediation schedule and cost estimate (per industry standards) to remove barriers.

C. DRAFTING THE TRANSITION PLAN

PHASE 4

DCRC collaborated with staff in DREAM and Strategy and Performance Management to centralize its consultant findings for the identified barriers, provided in an Excel format, with ADA-related facility work orders in DREAM’s MAXIMO application and into the Strategy and Performance’s project management application, ACHIEVEIT.

Using these applications, DCRC will be able to generate facility reports to monitor ADA – remediation efforts including, progress on proposed remediation, actual cost

expenditures, barrier location, applicable ADA codes, proposed removal date, and the identification of a barrier removal category.

D. UNIQUE PROGRAM ASSESSMENTS

As previously mentioned, due to the unique nature of their operations and responsibilities, two County programs were not included in the 2011 self-evaluation assessment including Information Technology's (IT) County Website Program and the Atlanta Fulton County Emergency Management Agency's (AFCEMA) Emergency Preparedness Program. The current status of program access evaluation activities for these programs is provided below:

Information Technology-County Website Program

Regarding the status of the County website, the IT Department reported that it has engaged consultant services from Rightpoint, Inc. The scope of work (includes, but is not limited to) was focused on the need for a consistent "Look and Feel" across all County web pages as well as to meet ADA guidelines as set forth in the technical assistance document "Accessibility of State and Local Government Websites to People with Disabilities" www.ada.gov/websites2.htm. That work is ongoing as of the writing of this report.

Atlanta Fulton County Emergency Management Agency (AFCEMA)

Concerning the status of the AFCEMA program assessment, this item is still outstanding. However, DCRC has requested funds, in its FY 2019 budget submission, to obtain consultant services that can provide specific expertise in completing an ADA program access assessment of the County's emergency preparedness and management program. The request is still pending at the writing of this document.

2.3 Public Engagement:

Community involvement and input are priorities to the County and this project. As described throughout Section 2.0, the community has been involved in the SETP Project. Furthermore, public review of a jurisdiction's Transition Plan is required. As 28 CFR 35.150(d) (1) the Federal Statute states under the heading Transition Plan:

“In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.”

Public Comment Summary

During Phase II of the multi-phase self-evaluation assessment, the County shared with members of the public its intent to conduct a *new* ADA Self Evaluation and Transition Plan project. As part of the initial assessment, the public (including organizations and advocacy agencies) was provided with a brief survey document, to articulate how they perceived Fulton County's ability to provide services and modifications for individuals with disabilities and to ask for input regarding how programs, services and activities could be made more accessible for individuals with disabilities. Surveys were available for completion online and via hard copy. The top 5 responses/comments received from the public (highest to lowest number of comments) were as follows:

1. Greater transportation services for seniors and people with disabilities
2. Increase accessible parking and parking for seniors
3. Improve sidewalks/streets and curb ramps
4. Greater accessibility to buildings
5. More accessible seating at events and/or seating for long (wait) lines

More detailed information regarding this survey appears in the Fulton County: Full Access Ahead, Consultant's Report to the Board of Commissioners Self-Evaluation and Transition Plan of Fulton County, Georgia Under the Americans with Disabilities Act (*See Appendix 7-5*).

Website

[See Section 2.2 D. Unique Programming.]

For all other information or resources related to Persons with Disabilities, including the County's Policies and Standard Operating Procedures for Program Access, (ADA) Complaints or applicable forms, go to -
www.fultoncountyga.gov/dcrc-disability-affairs-home

2.4 Department Review & Participation

Department partners have been involved at every step of the way in the execution of this project. Each Department dedicated staff time and resources to implementing this plan and has reviewed and commented on the select results. This document is a stronger plan moving forward based on the engagement and participation of Department staff committed to improving access for persons with disabilities.

2.5 Staff Training

As part of preparation for implementation of the ADA Self Evaluation and Transition Plan Project, ADA One LLC and DCRC's Disability Affairs Program held a number of ADA Title II trainings for select county staff.

The consultant and DCRC's Disability Affairs Program led training sessions and annual briefing updates for Disability Compliance Liaisons beginning in 2011. The intention of these sessions was to familiarize staff with the requirements of standards, guidelines, and regulations governing accessibility for persons with disabilities; provide instructions and timeframes for the completion of assessment activities and corrective actions; review department assessment results; and provide periodic updates on the overall status of the project.

In November 2012, Irene Bowen, principal of ADA One, presented the first project report, "Full Access Ahead" to the County Manager and Department Directors, detailing self-evaluation results and recommended next steps. Subsequent presentations were provided to Disability Compliance Liaisons. The subject report identified 928 program barriers in need of remediation. In May 2013, DCRC provided training to Disability Compliance Liaisons regarding the process used to develop and submit corrective actions as indicated by department self-evaluation reports. In March 2015, Bowen returned to present a second report, "Forging Ahead" on the corrective actions successfully implemented to correct deficiencies previously identified.



A notable accomplishment in this area is DCRC’s creation and deployment of a 4-part online training for public facing staff called the ***Program Access Learning Management System (PALMS)***. In response to the Program Access Survey, barriers indicating the need for comprehensive training for County staff, DCRC began development of an online training solution in 2013. PALMS was designed to address four key objectives including the following:

1. Determine core topics and training approach to increase employee knowledge of their responsibilities as well as to enhance development of skill sets related to provision of “accessible” customer service delivery to persons with disabilities
2. Ensure 5,000 employees had easy access to training in an efficient and effective manner
3. Determine and successfully implement a training deployment strategy
4. Determine and implement a training assessment measurement strategy

DCRC successfully deployed PALMS in 2015 winning an Achievement Award from the National Association of Counties (NACo). Since its deployment, many jurisdictions across the United States have inquired about gaining access to this training tool. Ongoing training continues to be provided to staff across the County (*See Appendix 7-7 Select ADA Training for more information*).

3.0 Transition Plan Methodology

Advancing Access

Increasing access to County Programs, Services, Activities and Facilities required a phased implementation strategy.



3.0 Transition Plan Methodology

The process of developing the transition plan includes the identification of barriers, the evaluation to prioritize remediation of that type of barrier, and proposed schedule to remove the barrier. Fulton County anticipates remediation of the identified barriers will be accomplished in a timely manner and has established a 15 year timeline for barrier removal, even though it is possible that completion of the remediation projects will not require this length of time.

3.1 Facility Evaluation Process

At the time of the facilities evaluation the County's facility assessment consultant, ADAAG Consulting LLC used the relevant portions of the 2010 Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities including both Title II regulations at 28 CFR §35.151; and the 2004 ADAAG at 36 CFR part §1191, appendices B and D. Other applicable code references utilized for this assessment were §504, UFAS, ABA, GAC standards applicable to each architectural barrier. When one of the codes was more stringent than another, the more rigorous of the codes was applied.

3.2 Fulton County's Prioritization Process

The following categorization protocol is referenced in the ADA under 28 CFR Part 35, §35.150 and §35.150 under Subpart D - Program Accessibility. The term "priority" is used within 28 CFR Part 35, but is referred to as "category" within this Transition Plan document and its appendices. A principle consideration of the protocol is to ensure that basic access is

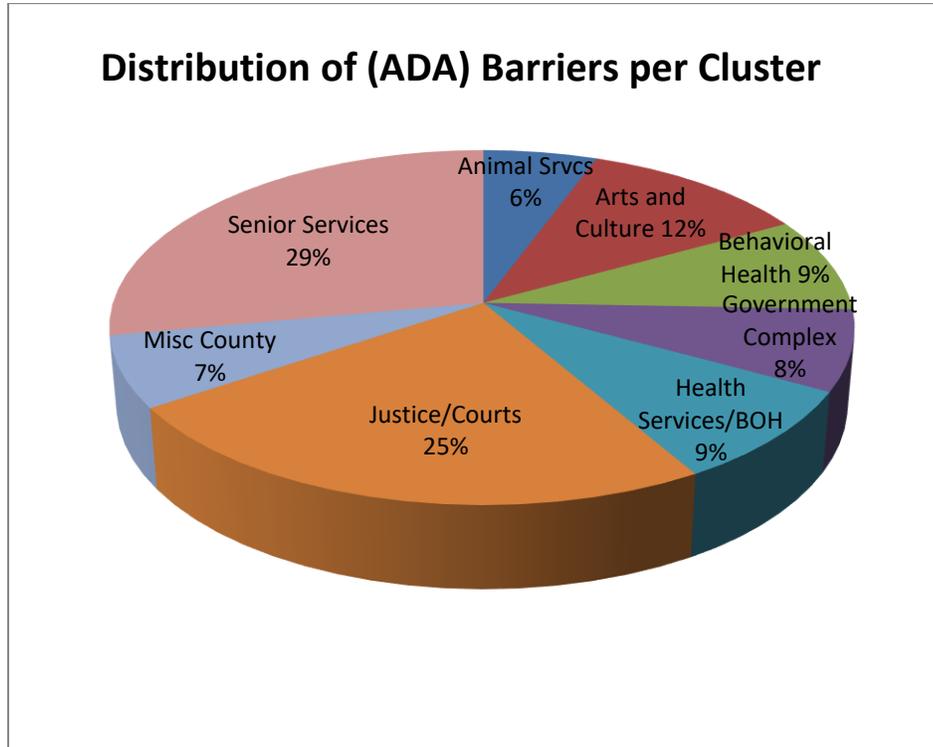
provided to activities/amenities and that alternatives to architectural modifications are allowed when appropriate.

Further, the (ADA) Title II Technical Assistance Manual states “when choosing a method of providing program access, a public entity must give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities.” Such projects that will require major construction may be deferred to later years to coordinate with ongoing major maintenance and capital projects.

Recognizing that the County has limited funds and cannot immediately make all buildings and facilities fully accessible, the County’s consultant in conjunction with County stakeholders, considered the following criteria to prioritize facilities for removal of architectural barriers:

Category	Description	Term	Years
A	Life Safety	Short	1-5 Years
B	Program Access	Short	1-5 Years
C	Barrier Removal	Mid	6-10 Years
D	Best Practices	Long	11-15 Years

Fulton County is committed to accomplish barrier removal work as indicated in the Transition Plan and where funding permits, completion of remediation work as scheduled - or earlier.



3.3 County Facility Program Cluster Descriptions

Each County Facility Cluster includes department programs and services that are unique to its category. Brief summaries of the clusters and transition plan schedule follow in the next section.

Justice Tower Complex (and other Justice-related programs)

The Justice Tower Complex serves as the central location for County courts and justice-related departments and, offers the largest inventory of public-facing programs. It assumes 3 main facilities, as well as four additional facilities representing the County's Justice Cluster including:

1. Justice Center Tower (JCT): 185 Central Avenue, Atlanta GA. 30303
2. Lewis Slaton Courthouse (LSC): 136 Pryor Street, Atlanta, GA. 30303
3. Judge Charles Carnes Building (JCB): 160 Pryor Street, Atlanta, GA. 30303
4. Judge Romae T. Powell Juvenile Justice: 395 Pryor Street, Atlanta, GA. 30312
5. Medical Examiner's Office: 430 Pryor Street, Atlanta, GA. 30312
6. Jail 1 (Main): 901 Rice Street, Atlanta, GA. 30318
7. Jail 2: 781 Marietta Blvd. Atlanta, GA. 30318

Government Center Complex

The Government Center Complex serves as the central location for County operations and some public facing departments. It consists of the following locations:

1. Government Center Assembly Building: 141 Pryor Street, Atlanta, GA. 30303
2. Government Center Tower: 141 Pryor Street, Atlanta, GA. 30303
3. Government Center Midrise: 141 Pryor Street, Atlanta, GA. 30303
4. Government Center Public Safety Building: 130 Peachtree, Atlanta, GA. 30303

All other cluster or program areas are noted below in alphabetical order with detailed information to follow.

Arts and Culture

Animal Services (Atlanta Fulton County Emergency Management Agency)

Health Services – Behavioral Health
Department of Public Health

Senior Services

Miscellaneous County Facilities -Career Center/Work Source
North Fulton Service Center
Sandy Springs Recycling Center
South Fulton Service Center

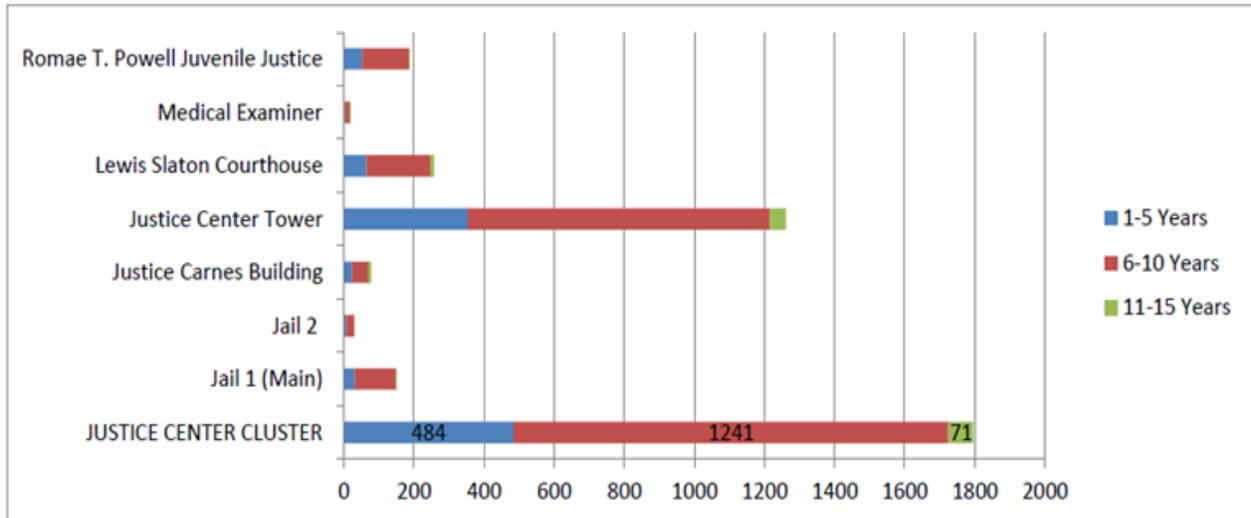
***Libraries:** Atlanta Fulton Public Library System
(Not assessed during all other site assessments due to the County’s ongoing Library Building Program, however current ADA-status is included in this section)

4.0 Facility Barrier Removal Schedule by Facility Program Cluster

4.0 Facility Barrier Removal Schedule by Cluster

JUSTICE CENTER COMPLEX/CLUSTER

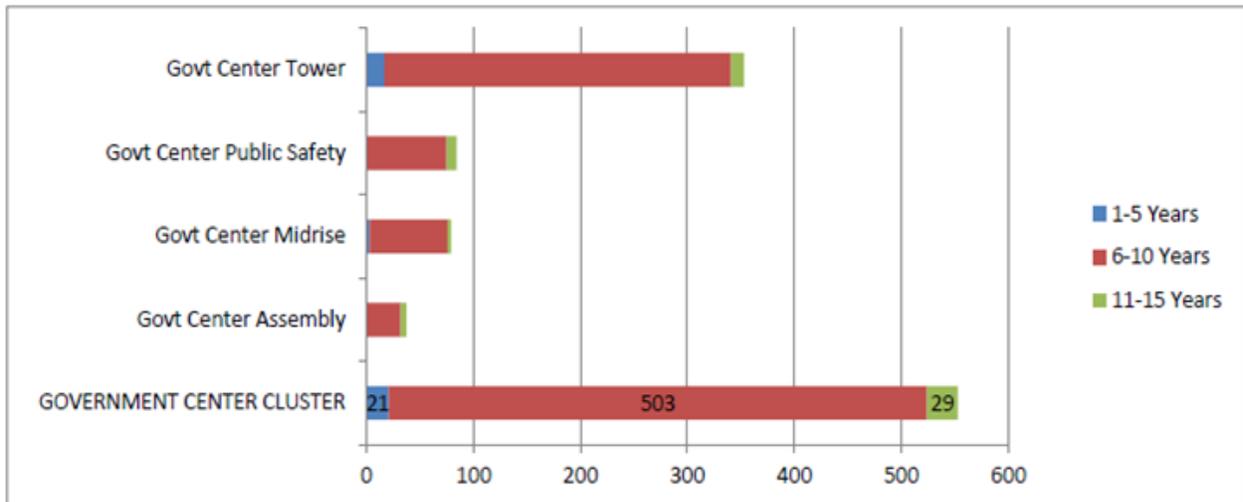
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
JUSTICE CENTER CLUSTER	484	1241	71
Jail 1 (Main- Rice St.)	31	117	3
Jail 2 (Marietta St.)	7	23	0
Justice Carnes Building	23	47	7
Justice Center Tower	354	860	47
Lewis Slaton Courthouse	65	181	12
Medical Examiner	4	13	2
Romae T. Powell Juvenile Justice	53	133	2



For additional detail see: Appendix 7-8

GOVERNMENT CENTER COMPLEX/CLUSTER

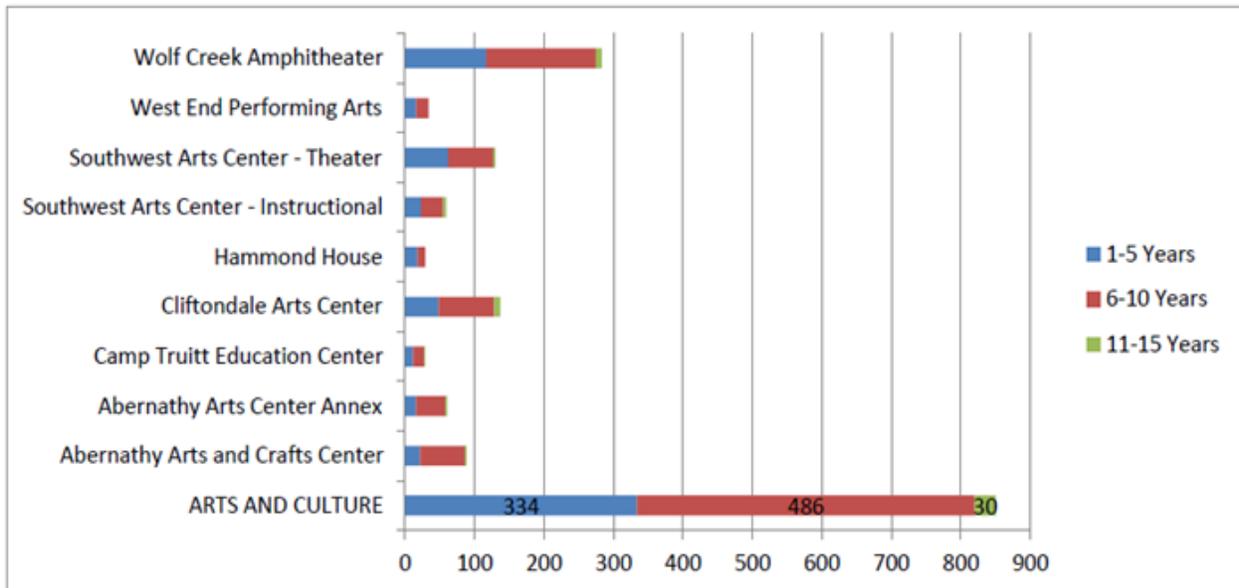
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
GOVERNMENT CENTER CLUSTER	484	1241	71
Govt. Center Assembly	1	31	5
Govt. Center Midrise	3	73	3
Govt. Center Public Safety		75	9
Govt. Center Tower	17	324	12



For additional detail, see Appendix 7-9

ARTS AND CULTURE

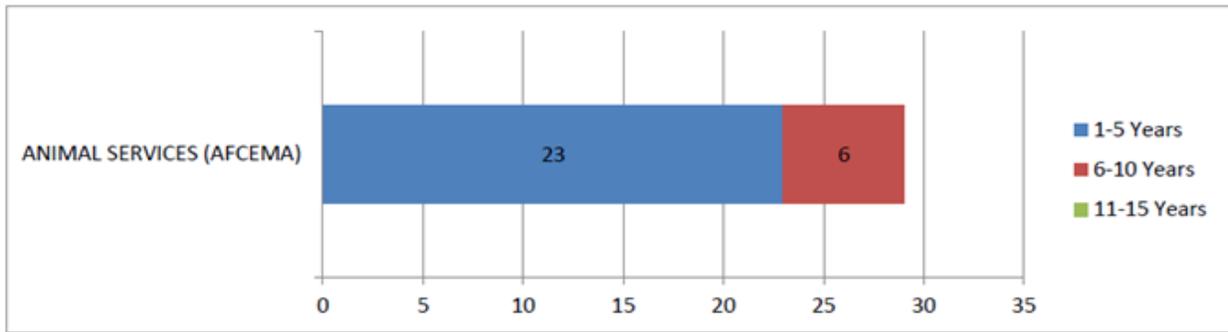
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
ARTS AND CULTURE	334	486	30
Abernathy Arts and Crafts Center	22	64	2
Abernathy Arts Center Annex	16	42	3
Camp Truitt Education Center	12	16	1
Cliftondale Arts Center	48	80	9
Hammond House	18	11	0
Southwest Arts Center – Instructional	23	32	4
Southwest Arts Center – Theater	62	65	3
West End Performing Arts	16	18	0
Wolf Creek Amphitheater	117	158	8



For additional detail, see Appendix 7-10

ANIMAL SERVICES (Atlanta Fulton County Emergency Management Agency)

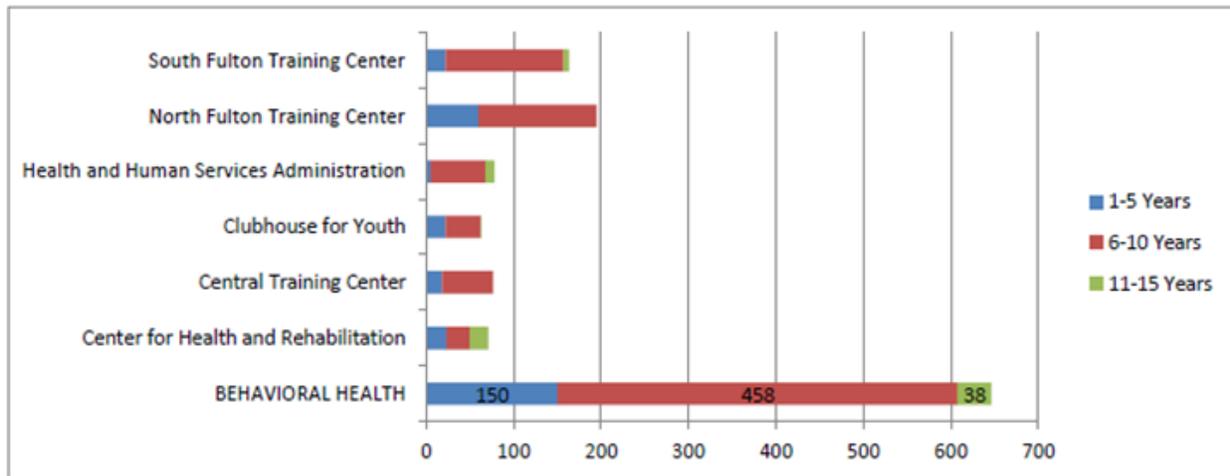
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
ANIMAL SERVICES (AFCEMA)	23	6	0
Animal Services (AFCEMA)	23	6	0



For additional detail, see Appendix 7-11

HEALTH SERVICES; Behavioral Health

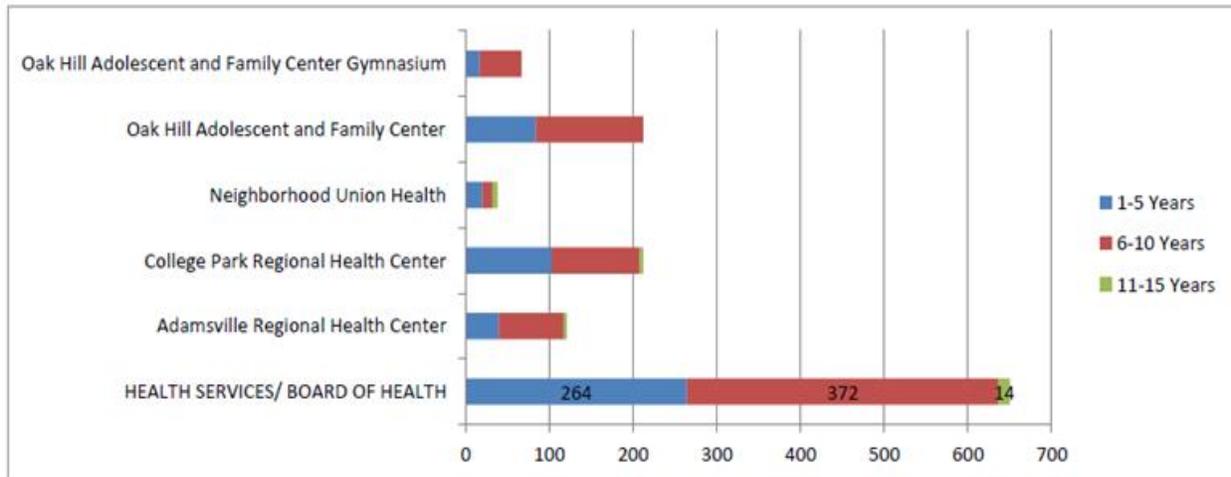
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
BEHAVIORAL HEALTH	150	458	38
Center for Health and Rehabilitation	23	27	21
Central Training Center	18	58	0
Clubhouse for Youth	22	40	1
Health and Human Services Administration	5	63	10
North Fulton Training Center	60	135	0
South Fulton Training Center	22	135	6



For additional detail, see Appendix 7-12

HEALTH SERVICES: Board of Health

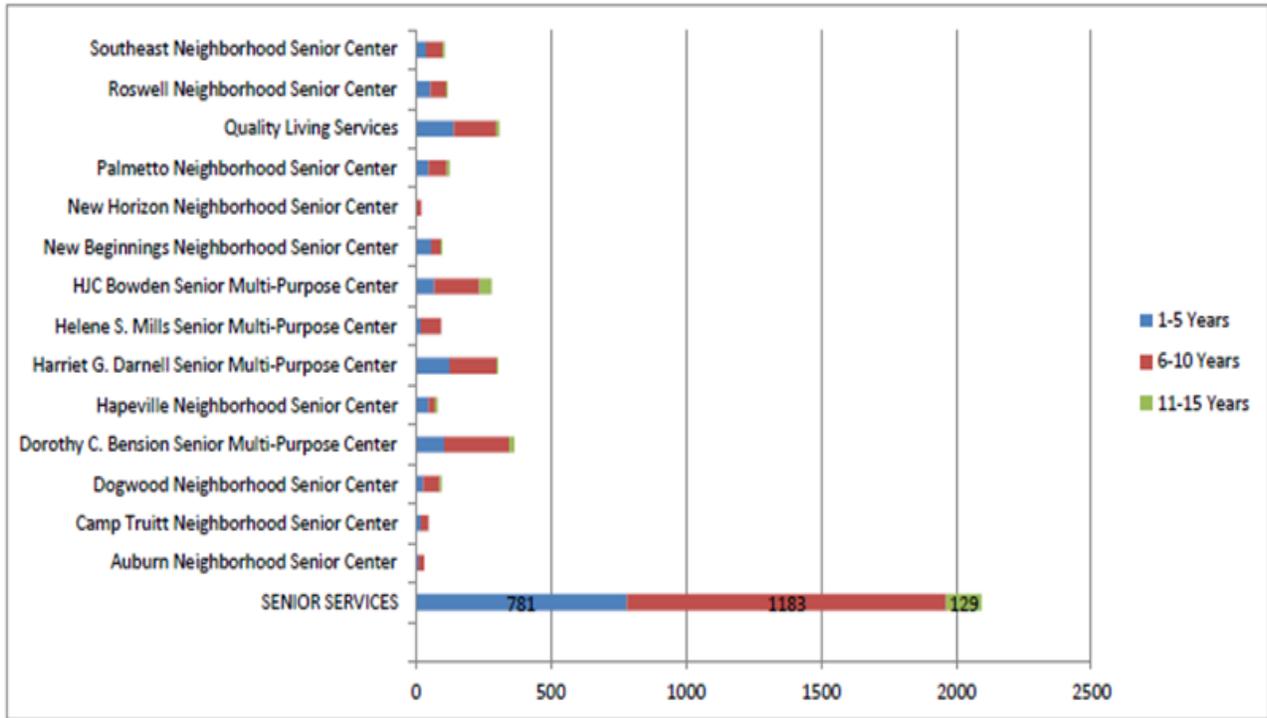
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
HEALTH SERVICES; BOARD OF HEALTH	264	372	14
Adamsville Regional Health Center	40	77	4
College Park Regional Health Center	103	105	4
Neighborhood Union Health	20	12	6
Oak Hill Adolescent and Family Center	84	128	0
Oak Hill Adolescent and Family Center Gymnasium	17	50	0



For additional detail, see Appendix 7-13

SENIOR SERVICES

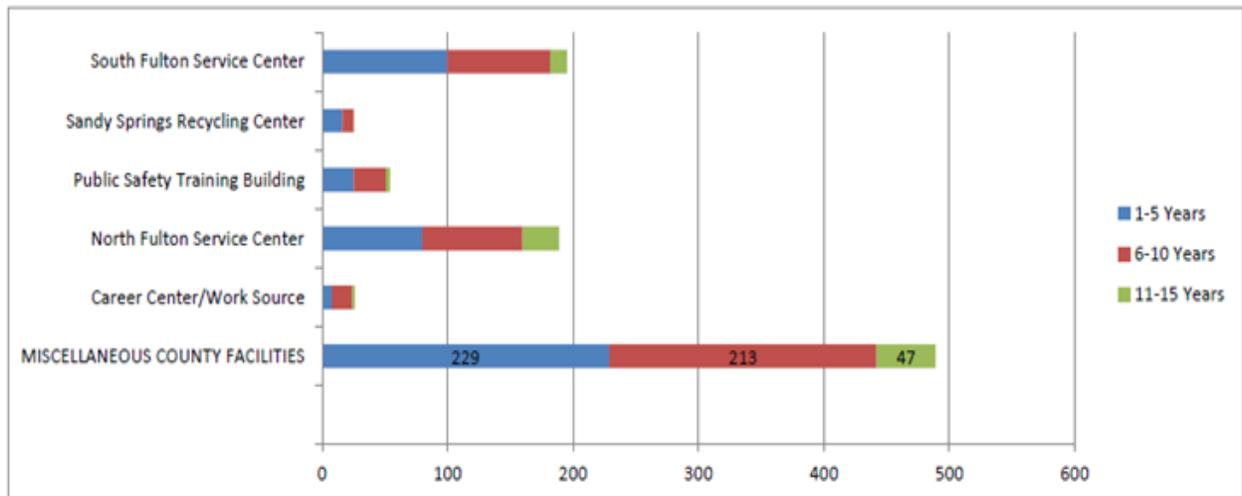
	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
SENIOR SERVICES	781	1183	129
Auburn Neighborhood Senior Center	13	19	0
Camp Truitt Neighborhood Senior Center	20	29	0
Dogwood Neighborhood Senior Center	28	63	6
Dorothy C. Benson Senior Multi-Purpose Center	106	240	20
Hapeville Neighborhood Senior Center	48	23	11
Harriet G. Darnell Senior Multi-Purpose Center	127	174	5
Helene S. Mills Senior Multi-Purpose Center	20	74	0
HJC Bowden Senior Multi-Purpose Center	70	166	47
New Beginnings Neighborhood Senior Center	59	34	6
New Horizon Neighborhood Senior Center	5	16	0
Palmetto Neighborhood Senior Center	49	69	9
Quality Living Services	142	156	11
Roswell Neighborhood Senior Center	55	58	6
Southeast Neighborhood Senior Center	39	62	8



For additional detail, see Appendix 7-14

MISCELLANEOUS COUNTY FACILITIES

	SHORT TERM	MID TERM	LONG TERM
	(A) Life Safety (B) Program Access	(C) Barrier Removal	(D) Best Practices
	1-5 years	6-10 years	11-15 years
MISCELLANEOUS COUNTY FACILITIES	229	213	47
Career Center/Work Source	8	16	2
North Fulton Service Center	80	80	29
Public Safety Training Center	25	26	3
Sandy Springs Recycling Center	16	9	0
South Fulton Service Center	100	82	13



For additional detail, see Appendix 7-15



LIBRARIES; Atlanta Fulton Public Library System

The summary reports for the Atlanta Fulton Public Library System will be provided in a different format from all other Transition Plan areas due to the County’s undertaking of Newly Constructed Libraries (Phase I) and Major Renovation (Phase II) of the County’s Library Building Program. All new construction and major renovation Capital Improvement Library Projects were designed and built consistent with all applicable federal, state, and local building codes, including but not limited to §Section 504 of the Rehabilitations Act (504), the (2010) Americans with Disabilities Act (ADA), and 2010 ADA Standards for Design and Construction, the Architectural Barriers Act (ABA) and the Georgia Accessibility Code (GAC). Additionally, all Libraries were constructed with LEED Silver-Certification as the final goal.

The County’s ADA Administrator was an active participant in each phase of the planning, design and construction of the Library Building Program. All libraries newly constructed or, undergoing major renovation followed a similar process leading up to the opening day including the following steps: 1) Planning 2) Opportunity for Public Comment 3) Design 4) Closing and Vacate (for Phase II) 5) Construction 6) Opening.

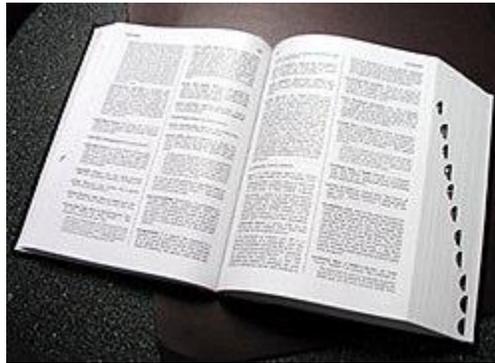
Phase I Libraries – New Construction

	Library Name	Date Opened
1.	Wolf Creek Library	September 8, 2014
2.	Palmetto Library	December, 15, 2014
3.	East Roswell Library	February 20, 2015
4.	Northwest Atlanta Library	July 9, 2015
5.	Milton Library	July 16, 2015
6.	Alpharetta Library	July 30, 2018
7.	Metropolitan Library	October 1, 2015
8.	Southeast Library	June 30, 2016
9.	Auburn Avenue Research Library	August 4, 2016
10.	South Fulton Library	September 22, 2016

Phase II Libraries - Major Renovation Program

GROUP	LIBRARY	CONSTRUCTION PHASE (At the time of this report)				
		(Pre) DESIGN	CLOSED	DEMO	CONSTRUCTION	OPENING
Group1	Dogwood	✓	✓			
Group1	Kirkwood	✓	✓			
Group1	Roswell	✓	✓			
Group1	Sandy Springs	✓	✓	✓		
Group1	Southwest	✓	✓	✓		
Group1	Washington Park	✓	✓			
Group1	West End	✓	✓			
Group 2	Buckhead Library	✓				
Group 2	Mechanicsville	✓				
Group 2	Northeast-Spruill	✓				
Group 2	Northside	✓				
Group 2	Ocee	✓				
Group 3	Adams Park Library	✓				
Group 3	Adamsville-Collier Heights	✓				
Group 3	Cleveland Avenue	✓				
Group 3	College Park	✓				
Group 3	East Atlanta	✓				
Group 3	Ponce de Leon	✓				
Group 4	East Point	✓	✓			
Group 4	Fairburn	✓	✓			
	Central	✓	✓			
	Hapeville	✓	✓			
Leased	MLK	Not started				
Leased	Peachtree	Not started				

5.0 Glossary



5.0 DEFINITIONS FOR IMPLEMENTING FULTON COUNTY PROGRAM ACCESS POLICY FOR PERSONS WITH DISABILITIES

Summary

For the purpose of this Transition Plan, the terms, policy and procedures contained, herein, have the following meaning ascribed to them:

Section 504 of the Rehabilitation Act of 1973

Broader than any disability law that came before it, Section 504 of the Rehabilitation Act made it illegal for the federal government, federal contractors, and any entity *receiving federal financial assistance* to discriminate on the basis of disability.

Americans with Disabilities Act (ADA) of 1990

The ADA is a wide-ranging civil rights law that prohibits discrimination based on disability. It affords similar protections against discrimination to Americans with disabilities as the Civil Rights Act of 1964, which made discrimination based on race, religion, sex, national origin, and other characteristics illegal. It guarantees equal opportunity for individuals with disabilities in,

- Title I Employment
- Title II State and local government services - “public entities” (state and local governments) and the programs, services, and activities they deliver and transportation
- Title III Public Accommodations
- Title IV Telecommunications
- Title V Miscellaneous

While the ADA has five separate titles, Title II is the section specifically applicable to “public entities” (state and local governments) and the programs, services, and activities they deliver. The Department of Justice (“DOJ” or the “Department”), through its Civil Rights Division, is the key agency responsible for enforcing Title II and for coordinating other federal agencies’ enforcement activities under Title II.

Title II of the ADA

The cornerstone of Title II of the ADA is this: no qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities *provided by state and local governments* because of a disability.

Title III of the ADA

Under Title III, no individual may be discriminated against on the basis of disability with regards to the full and equal enjoyment of the goods, services, facilities, or accommodations of any place of *public accommodation* by any person who owns, leases (or leases to), or operates a place of *public accommodation*.

"Public accommodations" include most places of lodging (such as inns and hotels), recreation, transportation, education, and dining, along with stores, care providers, and places of public displays, among other things.

ADA Amendments Act (ADAAA)

The ADA Amendments Act of 2008 (the Amendments Act) was signed into law by President George W. Bush on September 25, 2008, with a statutory effective date of January 1, 2009. Pursuant to the Amendments Act, the definition of disability under the ADA, 42 U.S.C. 12101, *et seq.*, shall be construed in favor of *broad coverage* to the maximum extent permitted by the terms of the ADA as amended, and the determination of whether an individual has a disability should not demand extensive analysis. Page 3 of 25 2/21/13

The) ADA Standards for Accessible Design (the ADA Standards)

The ADA Standards for Accessible Design, or the "ADA Standards," refer to the requirements necessary to make a building or other facility architecturally (physically) accessible to people with disabilities.

ADA/SEP Liaisons

Individuals designated by Appointing Authorities who have the primary responsibility for coordinating and ensuring department activities related to the accurate and timely completion of ADA self-evaluation surveys and physical site inspections.

Auxiliary Aids and Services

Devices, services and other methods used to ensure effective communication with people with disabilities. They may include sign language and oral interpreters, note-takers, assistive listening devices, captioning, TTYs, readers, Braille materials and large-print materials.

Persons with disabilities should have the opportunity to request an auxiliary aid, and you should give 'primary consideration' to the aid requested. Primary consideration means that the aid requested should be supplied unless: (1) you can show that there is an equally effective way to communicate; or (2) the aid requested would fundamentally alter the nature of the program, service, or activity.

NOTE: For additional information consult the Access Guidelines for Providing Effective Communication to Persons with Disabilities.

CART (Communication Access Real-time Translation or Computer-Assisted Real Time Captioning)

A word-by-word transcription of spoken English, onto a laptop or computer via certified reporter (transcriber) using real-time software and a steno machine. CART is similar to captioning but displayed on a laptop or screen simultaneously with the spoken work and can be used in such settings as meetings or performances.

Corrective Action Plan for Program Access

A written department plan which details specific actions that must be completed in order to meet requirements of this policy as it relates to programs, services and activities provided by Fulton County. This plan also includes timelines for completion.

Denial

A public accommodation is required to provide auxiliary aids and services that are necessary to ensure equal access to the goods, services, facilities, privileges, or accommodations that it offers, unless an undue burden or a fundamental alteration would result.

Direct Threat

Direct threat means a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices or procedures or, by the provision of auxiliary aids or services as provided.

Disability

The ADA defines disability as a mental or physical impairment that substantially limits one or more major life activities. ADA protection extends not only to individuals who currently have a disability, but to those with a record of a mental or physical impairment that substantially limits one or more major life activities, or who are perceived or regarded as having a mental or physical impairment that substantially limits one or more major life activities.

Disability Compliance Liaisons

Individuals designated by Department Directors who have primary responsibility for assisting the DCRC in the implementation of this policy within their respective organizations.

NOTE: For additional information consult the Access Guidelines Regarding County Department Implementation Responsibilities

Effective Communication

Under Title II of the ADA, all state and local governments are required to take steps to ensure that their communications with people with disabilities are as effective as communications with others. This requirement is referred to as “effective communication” and it is required except where a state or local government can show that providing effective communication would fundamentally alter the nature of the service or program in question or would result in an undue financial and administrative burden.

Facility

Facility means all or any portion of buildings, structures, sites, complexes, equipment, rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real or personal property, including the site where the building, property, structure, or equipment is located.

Fundamental Alteration

A *fundamental alteration* is a change to such a degree that the original program, service, or activity is no longer the same. For example, a Communications Shift Operations Manager in the Communications Division of Emergency Services 911 works in a 24 hour, 7 day a week operation and performs shift work as required, including holidays and weekends. If the incumbent requests a modification to his/her schedule such that the employee is only able to work from 9:00am to 5:30pm Monday through Friday, the request would require a fundamental alteration to the Emergency Services 911 program, since the Communications Division operates 24 hours a day, 7 days a week. The County would not be required to provide such a fundamental alteration to the Department program.

Impairment

A *physical* impairment is a physiological disorder or condition, cosmetic disfigurement or anatomical loss impacting one or more body systems. Examples of body systems include neurological, musculoskeletal (the system of muscles and bones), respiratory, cardiovascular, digestive, lymphatic and endocrine.

A *mental* impairment is a mental or psychological disorder. Examples include mental retardation, emotional or mental illness, and organic brain syndrome.

Integrated Setting

One of the main goals of the ADA is to provide people with disabilities the opportunity to participate in the mainstream of American society. Commonly known as the "integration mandate," public entities must make their programs, services, and activities accessible to qualified people with disabilities in the most integrated way appropriate to their needs. Separate or special activities are permitted under Title II of the ADA to ensure that people with disabilities receive an equal opportunity to benefit from your government's programs, services, or activities. However, even if a separate program is offered to people with disabilities or people with one kind of disability, a public entity cannot deny a person with a disability access to the regular program. Under the ADA, people with disabilities get to decide which program they want to participate in, even if the public entity does not think the individual will benefit from the regular program.

Major Life Activity

A major life activity is an activity that is central to daily life. According to the Department's regulations, major life activities include walking, seeing, hearing, breathing, caring for oneself, sitting, standing, lifting, learning, thinking, working, and performing manual tasks that are central to daily life. This is not a complete list.

An impairment "substantially limits" a major life activity if the person cannot perform a major life activity the way an average person in the general population can, or is significantly restricted in the condition, manner or duration of doing so. An impairment is "substantially limiting" under the ADA if the limitation is "severe," "significant," "considerable," or "to a large

degree." The ADA protects people with serious, long-term conditions. It does not protect people with minor, short-term conditions.

Other Power-Driven Mobility Device (OPDMD)

Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines – whether or not designed primarily for use by individuals with mobility disabilities – that is used by individuals with mobility disabilities for the purpose of locomotion, including but not limited to, devices such as Segways and golf carts.

Programs, Services, and Activities

Public entities may provide a wide range of programs, services, and activities. Police, fire, corrections, and courts are *services* offered by public entities. Administrative duties such as tax assessment or tax collection are services.

A “program” is defined as an activity or series of activities through which a department offers services, advantages, opportunities, or benefits to the public or specific groups who are eligible for the services.

Public Entity

Public entity means –

- 1) Any state or local government;
- 2) Any department, agency, special purpose district, or other instrumentality of a State or States or local government; and
- 3) The National Railroad Passenger Corporation and any commuter authority as defined in section 103(8) of the Rail Passenger Service Act.

Qualified Person with a Disability

A “qualified individual with a disability” is someone who meets the essential eligibility requirements for a program, service or activity **with or without** (1) reasonable modifications to rules, policies, or procedures; (2) removal of physical and communication barriers; and (3) providing auxiliary aids or services for effective communications.

- *Essential eligibility requirements* can include minimum age limits or height requirements (such as the age at which a person can first legally drive a car or height requirements to ride a particular roller coaster at a county fair). Because there are so many different situations, it is hard to define this term other than by examples. In some cases, the only essential eligibility requirement may be the desire to participate in the program, service, or activity.

Reasonable Modification

Public entities must reasonably modify their rules, policies, and procedures to avoid discriminating against people with disabilities. Requiring a driver’s license as proof of identity is a policy that would be discriminatory since there are individuals whose disability makes it impossible for them to obtain a driver’s license. In that case it would be a reasonable modification to accept another type of government-issued I.D. card as proof of identification.

Self-Evaluation

A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications.

Service Animal

Service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. In determining whether reasonable modifications can be made to allow a service animal into a specific County facility, the following factors shall be considered:

1. The type, size, and weight of the service animal and whether the facility can accommodate these features;
2. Whether the handler has sufficient control of the service animal;
3. Whether the service animal is housebroken; and
4. Whether the service animal's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.
5. Whether the service animal is immunized against rabies and/or other diseases common to that type of animal and its vaccinations are current.
6. Whether the service animal is wearing a rabies vaccination tag (the handler may be asked to show the tag on the animal)
7. Whether the service animal, if it is a dog, is licensed which is compliant with State law requirements

A public entity may make two inquiries to determine whether an animal qualifies as a service animal. 1) a public entity may ask if the animal is required because of a disability and, 2) what work or task has the animal been trained to perform.

Telecommunications Relay Service (TRS) or TTY Calls

A service that enables people who use TTYs or other telecommunication devices (generally, people who are deaf or hard of hearing or have speech disabilities) to use telephone services by having a third party transmit and translate the call. Also called, RELAY OR RELAY SERVICE

TTY

TTY was the original acronym for Tele-Typewriter. Today these devices are sometimes called TDDs (telecommunication devices for the deaf). A TTY-type machine allows people with hearing or speech disabilities, to communicate over the phone using a keyboard and a viewing screen.

Video Remote Interpreting (VRI)

VRI is a means of using an interpreter (e.g. sign language), who is in a location separate from the participants in a communication. The interpreter appears via video on a computer screen or videophone through a computer or videophone connection.

6.0 Resources

6.0 Resources

In order to facilitate access to all Fulton County programs, services and facilities, the County utilizes these, and other, program accessibility guidelines, standards, and resources. This information is available to all employees and members of the public.

ADA Document Portal: (<http://www.adaportal.org/>).

ADA Checklist for Polling Places | <http://www.ada.gov/votingprt.pdf>
(2004) <http://www.ada.gov/votingchecklist.htm>

ADA Regulation for Title II: https://www.ada.gov/ada_title_II.htm

Communications & IT:

Section 508 Standards: <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards>

Fulton County Office of Diversity and Civil Rights Compliance/Disability Affairs Program

<http://www.fultoncountyga.gov/dcrc-disability-affairs-home>

Georgia State ADA Coordinator's Office:

<https://ada.georgia.gov/ada-and-state-government>

Title II Technical Assistance Manual | Supplement

(1993) <http://www.ada.gov/taman2.html>

U.S. Access Board Publications <http://www.access-board.gov/>

U.S. Department of Justice (800) 514-0301 (Voice) or (800) 514-0383 (TTY)]

<https://www.justice.gov/>

7.0 Appendices

7.0 Appendices

The development of the Transition Plan was based on the findings of the ADA program access survey of County programs, facility evaluations and meetings with County staff to establish the schedule for addressing barrier removal. After the draft Transition Plan has circulated for comment through the County stakeholders and leadership, the County will open the draft Transition Plan to the public for comment. The following appendices references the Fulton County adopted ADA related resolutions and policies; self-evaluation program survey materials and reports; and facility reports by program cluster; materials used for staff trainings, as well as, the public outreach materials with comments.

7.1 Departmental Disability Compliance Liaisons

7.2 Fulton County Adopted ADA Related Resolutions and Policies

- Fulton County Board of Commissioners Resolution (92-RC-147), Establishment of the Office of Disability Affairs (ODA) and the Commission on Disability Affairs (CODA)
- Title I-Employment Americans with Disabilities Act (ADA) & Reasonable Accommodation Policy and Procedure (100-16)
- Program Access Policy and Standard Operating procedures (600-72)
- Program Access Grievance and Complaint Procedure

7.3 Preliminary Program Overview (PPO) Surveys

7.4 ADA Program Access Survey

7.5 Consultant Report: Full Access Ahead

7.6 Consultant Report: Forging Ahead

7.7 Select ADA Training - A select list of ADA program access related trainings provided to County staff

***7.8 Detailed Facility Reports Justice Cluster**

***7.9 Detailed Facility Reports Government Center Cluster**

***7.10 Detailed Facility Reports Arts and Culture Data**

***7.11 Detailed Facility Reports AFCEMA/Animal Services Data**

***7.12 Detailed Facility Reports Health Services/Behavioral Health Data**

***7.13 Detailed Facility Reports Health Services/Board of Health Data**

***7.14 Detailed Facility Reports Senior Services Data**

***7.15 Detailed Facility Reports Miscellaneous Cluster**

[*Note: Resource for all *Detailed Facility Reports*: <http://www.fultoncountyga.gov/dcrc-self-eval-transit-plan>]

Disability Compliance Liaisons (DCLs)

Appendix 7-1

Animal Services	Matthew Kallmyer	Lara Hudson	404-613-2163
Arts & Culture	Dr. Lionel Thomas	Emmitt Stevenson	404-612-8190
Behavioral Health	LaTrina Foster	Charles Releford	404-613-1053
Board of Commissioners/ Clerk's Office	Jesse Harris	Felisa Cordy	404-612-8272
Child Attorney	Coy Johnson	Roberta Cooper	404-224-4712
Contract Compliance	Rholanda Stanberry	Rholanda Stanberry	404-612-6304
Cooperative Extension	Von Baker	Trina Chaney	404-332-2400
County Attorney	Patrise Perkins-Hooker	Wayne Alphonso	404-612-0254
County Manager	Richard "Dick" Anderson	Rosemary Shedrick	404-612-0249
Dept. of Housing & Community Development	Frankie Atwater	Karen Sessoms	404-612-9802
District Attorney	Paul Howard	Lynn Nelson Cierra Cavor	404-612-4981
Diversity and Civil Rights Compliance	Dr. Ann Harris	Nadine Oka	404-612-0425
Emergency Management	Matthew Kallmyer	Wanda Floyd	404-612-5660
Emergency Services 911	Joseph Barasoain	Latisha Schofield	404-612-7902
External Affairs; Communications, FGTV	Jessica Corbitt	James Reese	404-612-8303
Finance/Risk/Safety	Sharon Whitmore	Ericka Lee	404-612-7710
Health/Public Health	Dr. Kathleen Toomey	Jennifer Culler	404-612-0234
Information Technology		Ken Poinsette	404-612-0015
Internal Audit	Anthony Nicks	Queena Jenkins	404-612-1020
Juvenile Court	Omotayo Alli	LaWanda Onley	404-613-4616
Library System	Dr. Gabriel Morley	Linda Jordan	404-730-1908
Marshal	Antonio Johnson	Deloris Martin Dama Lee	404-612-4479 404-612-4430
Medical Examiner	Dr. Jan Gorniak	Paul Desamours Karleshia Bentley	404-613-4417 404-613-4502
Personnel	Kenneth Hermon	Telka Christian	404-613-0922
Police	Darryl Halbert	Kimberly Drayer	404-613-0754
Probate Court	Pinkie Toomer (Judge)	Sandra Dupree	404-612-4670
Public Defender	Vernon Pitts	TBD	404-612-5180
Public Works	David Clark	Anthony McGarity	404-612-9465
Purchasing	Felicia Strong-Whitaker	Rholanda Stanberry	404-612-6304
Real Estate Asset Mgmt.	Ellis Kirby	Joe Davis	404-612-0811
Registrations & Elections	Richard Barron	Mariska Bodison	404-612-7020
Select Fulton/Workforce	Al Nash	TBD	404-612-8101
Senior Services	Pamela Roshell	Tekeshia Burns	404-612-6005
Sheriff	Ted Jackson (Sheriff)	Curtis Clark	404-612-5158
Solicitor General	Keith Gammage	Terri Allison	404-612-4759
State Court	LeNora Ponzo	Tyrone Coley	404-612-8880
Superior Court	Yolanda Lewis	Diana Young	404-612-0437
Superior Court Clerk	Tina Robinson	Roland Lane	404-612-4535
Tax Assessor	Dwight Robinson	Darlene Davis	404-612-6437
Tax Commissioner	Dr. Arthur Ferdinand	Terry Noble	404-613-0116

Fulton County Adopted ADA-Related Resolutions and Policies

Appendix 7-2: Board of Commissioners Resolution

92-RC-147 HUMAN SERVICES - DISCUSSION ON UPDATE OF THE SENIOR CITIZENS MULTI-PURPOSE FACILITIES PLAN (CROSS REFERENCE: CAPITOL IMPROVEMENTS BUDGET FOR 1992 ITEM 92-FM-020, 2/26/92) (DISCUSSED WITH 92-RC-174)

This item was discussed with 92-RC-174.

92-RC-148 HUMAN SERVICES - DISCUSSION AND SUBMISSION OF FINAL REPORT FROM THE BLUE RIBBON PANEL FOR DISABILITY AFFAIRS AND REQUEST FOR APPROVAL OF RESOLUTION TO CREATE AN OFFICE FOR DISABILITY AFFAIRS IN THE HUMAN SERVICES DEPARTMENT (DISCUSSED)

Stephanie Davis, Chairperson for the Blue Ribbon Panel, on Disability Affairs presented a report and gave a brief synopsis of the findings. The Panel's findings and recommendations are with regard to several key themes on several specific areas: AIDS, County facilities and Code Enforcement Health Department, Library Services, Office of Disability Affairs and Parks and Recreation. Although there are many issues which effect the lives of those with disabilities, the report focuses primarily on areas within the purview of the Board of Commissioners. Unfortunately, County government not unlike other governmental bodies has had a long history of not being particularly sensitive in the area of access to buildings, facilities and programs. The study reveals gains made after exhaustive struggle. It appears that many officials have assumed that keeping abreast of the issues, moderating and enforcement were someone else's responsibility. With few notable exceptions, there has been no advocacy of issues affecting the disabled community and no central place to channel concerns. Ms. Davis urged the Board of Commissioners to move quickly to establish an Office on Disability Affairs manned by a full time professional, who can be a resource for the County, a monitor compliance efforts advocate for disabled citizens and employees, and serve as a clearinghouse for information in all areas of concerns to the disabled community. A commission or citizen advisory board should also be appointed to assist the Office of Disability Affairs in establishing priorities and for community outreach. These entities working together can assist the Board in implementing the recommendations made in the report.

Commissioner Boxill made the motion to receive the Final Report, establish the Office of Disability Affairs effective May 1, 1992 and to move forward with the recommendations of the Blue Ribbon Panel for Disability Affairs, as amended by Vice Chairman King

to create a Citizens Commission on Disability Affairs. The motion carried by a vote of 5-0-0. Chairman Lomax was not present.

Commissioner Boxill noted that she would prefer this Office of Disability Affairs be established in the Human Services Department. She believes it makes good organizational sense.

The County Manager was asked to recommend and inform the Board of Commissioners as to whether the Office of Disability Affairs should be located within an existing Fulton County Department or as separate office.

There being no further discussion. This matter concluded.

CLERK'S NOTE: A COPY OF THE REPORT FROM THE BLUE RIBBON PANEL FOR DISABILITY AFFAIRS IS ON FILE IN THE CLERK'S OFFICE.

92-RC-149 LAND - REQUEST FOR APPROVAL OF LAND REPORT
(APPROVED)

John Stanford, County Manager, presented the following memorandum:

Fulton County Adopted ADA-Related Resolutions and Policies
Appendix 7-2b: Title I Employment & Reasonable Accommodations



PERSONNEL POLICY

**SUBJECT: AMERICANS WITH DISABILITIES ACT AND REASONABLE
ACCOMMODATION**

DATE: January 1, 2017

Number: 100-16

I. Statement of Policy

It is the policy of Fulton County to ensure the civil rights of all current and prospective employees irrespective of any mental or physical disability, and to fully comply with the Americans with Disabilities Act (ADA), as amended by the Americans with Disabilities Act Amendments Act of 2008, and Fulton County policies. Fulton County will not tolerate discrimination against any individual with a disability in any terms or conditions of employment, including, but not limited to:

- Recruitment, advertising and position application procedures.
- Hiring, promotion, awarding of tenure, demotion, transfer, layoff, termination, right of return from reduction in force, or rehiring.
- Rate of pay or any other compensation or change in compensation.
- Position assignment, position classification, organizational structure, position description, line of progression and seniority listing.
- Leaves of absence, sick leave or any other leave.
- Fringe benefits available by virtue of employment, whether or not administered by Fulton County.
- Selection and/or financial support for training, including apprenticeships, professional meetings, conferences and other related activities and selection for leaves of absence to pursue training.

These policies do not create a contract of employment. Employment for non-classified employees remains "at will".

100-16-1

II. Background and Applicability

The Americans with Disabilities Act (ADA), as amended, is a federal mandate requiring all public and private sector entities to provide equal access to employment opportunities, facilities, buildings, programs, goods, services and activities for individuals who have mental or physical disabilities. Signed into law in 1990, this federal mandate extends anti-discrimination and civil rights protections to persons with disabilities as defined by the Act.

This policy is designed to assist all Fulton County employees with ADA compliance; to provide full and equal access to employment and promotional opportunities; to assist qualified employees with disabilities whose job performance may be impacted by their disability; and to provide reasonable accommodation(s) which may enable qualified employees to perform the essential functions of their positions, unless the accommodation would result in undue hardship to Fulton County. This policy shall be administered by the Office of Diversity and Civil Rights Compliance ("DCRC").

III. Establishment and Implementation of Procedure

The County Manager, in consultation with the Chief Human Resources Officer and the County Attorney, is authorized to establish and modify, as needed, a procedure for implementing this policy.

These policies do not create a contract of employment. Employment for non-classified employees remains "at will".

Fulton County Adopted ADA-Related Resolutions and Policies
Appendix 7-2c: Program Access and Standard Operating Procedures (600-72)



POLICY AND PROCEDURE	
SUBJECT: Fulton County Program Access Policy for Persons with Disabilities	
DATE: March 6, 2013	NUMBER: 600-72

I. PURPOSE OF POLICY:

The purpose of this policy is to reaffirm Fulton County's commitment to ensuring that its physical facilities, programs, services and activities are accessible to all members of the public, including qualified individuals with disabilities, in compliance with Title II of the Americans with Disabilities Act as amended and Section 504 of the Rehabilitation Act of 1973. The County commits to making reasonable modifications to its policies, practices and procedures to ensure non-discrimination. This policy also establishes a procedure, in accordance with the requirements of the Americans with Disabilities Act, for individuals wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by Fulton County Government. (See: **Program Access Policy Standard Operating Procedures**).

II. APPLICABILITY

This policy shall apply to all Fulton County Departments, Divisions, Offices, Entities, Grantees and other organizations that provide services to the public on behalf of the County.

III. GRIEVANCE/COMPLAINT PROCEDURE

Any individual wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by a Fulton County Department, Division, Office Entity or Grantee, including supervisors, managers, employees, clients and/or agents, **must** file a written complaint with the Office of Equal Employment Opportunity and Disability Affairs (OEEODA) within 180 calendar days of the alleged violation. The OEEODA is located in Suite 5042, 141 Pryor Street SW, Atlanta, Georgia 30303. This procedure in no way excludes individuals from filing complaints with the United States Department of Justice.

IV. PROHIBITION AGAINST RETALIATION:

Fulton County Government strictly prohibits retaliation against: 1) any citizen who opposes any act or practice they perceive to violate this policy; and 2) any citizen who has filed a complaint, cooperated, assisted or participated (in any manner) in any investigation, proceeding or hearing related to a complaint filed pursuant to this policy. Any citizen who believes s/he has been subjected to retaliation should contact the OEEODA immediately.

V. DISCIPLINARY ACTION:

Fulton County employees found to have engaged in retaliation shall be subject to disciplinary action by the County Manager or Appointing Authority, in accordance with Article 13, PR 1800-2 of the Fulton County Personnel Regulations. Appeals of disciplinary actions by permanent classified employees shall be made to the Personnel Board or to the Grievance Review Committee. Officials appointed by the Board of Commissioners of Fulton County may seek redress for any disciplinary action before the Board.

Departmental Sponsor: Office of the County Manager

Policy Review Date: March 2016

References: Minutes of the Board of Commissioners, March 6, 2013

Departments Affected: All Departments and Offices of Appointed or Elected Officials

Fulton County Adopted ADA-Related Resolutions and Policies
Appendix 7-2d: Program Access Grievance and Complaint Procedures



POLICY AND PROCEDURE

SUBJECT: Fulton County Program Access Policy for Persons with Disabilities

DATE: March 6, 2013

NUMBER: 600-72

I. PURPOSE OF POLICY:

The purpose of this policy is to reaffirm Fulton County's commitment to ensuring that its physical facilities, programs, services and activities are accessible to all members of the public, including qualified individuals with disabilities, in compliance with Title II of the Americans with Disabilities Act as amended and Section 504 of the Rehabilitation Act of 1973. The County commits to making reasonable modifications to its policies, practices and procedures to ensure non-discrimination. This policy also establishes a procedure, in accordance with the requirements of the Americans with Disabilities Act, for individuals wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by Fulton County Government. (See: **Program Access Policy Standard Operating Procedures**).

II. APPLICABILITY

This policy shall apply to all Fulton County Departments, Divisions, Offices, Entities, Grantees and other organizations that provide services to the public on behalf of the County.

III. GRIEVANCE/COMPLAINT PROCEDURE

Any individual wishing to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by a Fulton County Department, Division, Office Entity or Grantee, including supervisors, managers, employees, clients and/or agents, **must** file a written complaint with the Office of Equal Employment Opportunity and Disability Affairs (OEEODA) within 180 calendar days of the alleged violation. The OEEODA is located in Suite 5042, 141 Pryor Street SW, Atlanta, Georgia 30303. This procedure in no way excludes individuals from filing complaints with the United States Department of Justice.

IV. PROHIBITION AGAINST RETALIATION:

Fulton County Government strictly prohibits retaliation against: 1) any citizen who opposes any act or practice they perceive to violate this policy; and 2) any citizen who has filed a complaint, cooperated, assisted or participated (in any manner) in any investigation, proceeding or hearing related to a complaint filed pursuant to this policy. Any citizen who believes s/he has been subjected to retaliation should contact the OEEODA immediately.

Preliminary Program Overview (PPO) Template
Appendix 7-3

FULTON COUNTY, GEORGIA

ADA SELF-EVALUATION: PRELIMINARY PROGRAM OVERVIEW

DEPARTMENT NAME	SEP/ADA LIAISON INFORMATION	(Leave blank)	
Department WEBSITE	SEP/ADA Liaison NAME		
PROGRAM NAME	TITLE		
PROGRAM ID NUMBER	EMAIL ADDRESS		
PROGRAM DESCRIPTION	PHONE NUMBER		
QUANTIFIABLE GOAL (Total actual number of external clients served or interactions with the public conducted during FY2011)	DATE FORM COMPLETED		
Program WEBSITE (if other than above or N/A)			
<p>INSTRUCTIONS: Please list the distinct core activity-types that your Department provides within the Program/area listed above. For each core activity-type, include a brief description and the location where the core activity is conducted or delivered from. Upon completion of this form, return to nadine.oka@fultoncountyga.gov. Please do not alter formatting or save/send as a pdf!</p>			
#	CORE ACTIVITY-TYPE	CORE ACTIVITY-TYPE DESCRIPTION	LOCATION where activity is conducted/delivered
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
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20			

ADA Program Access Survey Tool

Appendix 7-4

 Fulton County, Georgia ADA Self-Evaluation Programs and Activities	
Department:	
Program:	
Program ID Number:	
Cluster:	#N/A
Consolidation Notes:	
Date of Interview:	
Name and Title of Interviewee:	
Name and Title of Interviewer:	
Date of Submission of Survey:	
	Contact: Nadine Oka (404) 612-0425 nadine.oka@fultoncountyga.gov
ADA One, LLC, and LCM Architects, LLC 2/1/2012	

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FULTON COUNTY: FULL ACCESS AHEAD
Consultant's Report to the Board of Commissioners Self Evaluation and Transition Plan
Of Fulton County, Georgia Under the Americans with Disabilities Act
Appendix 7-5



FULTON COUNTY:
FULL ACCESS AHEAD

Consultant's Report to the Board of Commissioners
Self-Evaluation and Transition Plan of Fulton County, Georgia
Under the Americans with Disabilities Act



Irene Bowen, ADA One, LLC
August 2012

<http://www.fultoncountyga.gov/dcrc-self-eval-transit-plan/Phase1.rpt.pdf>

FULTON COUNTY: FORGING AHEAD
Consultant's Report to the County Manager
Phase II: County's Progress After 2012 self-Evaluation Plan Under the
Americans with Disabilities Act
Appendix 7-6



FULTON COUNTY:
FORGING AHEAD

Consultant's Report to the County Manager
Phase II: County's Progress After 2012 Self-Evaluation Plan
Under the Americans with Disabilities Act



ADA One, LLC February 25, 2017
Irene Bowen, Larry Goldberg, and Cara Gilad

http://www.fultoncountyga.gov/dcrc-self-eval-transit-plan/PhaseII_Final_rpt.pdf

SELECT ADA-RELATED TRAINING

Appendix 7-7

Fulton County Self Evaluation Plan, 2010

Program Access Corrective Action Plan Update, 2013

DCL Spring Compliance Briefing, 2015

Program Access Learning Management System (PALMS), 2015

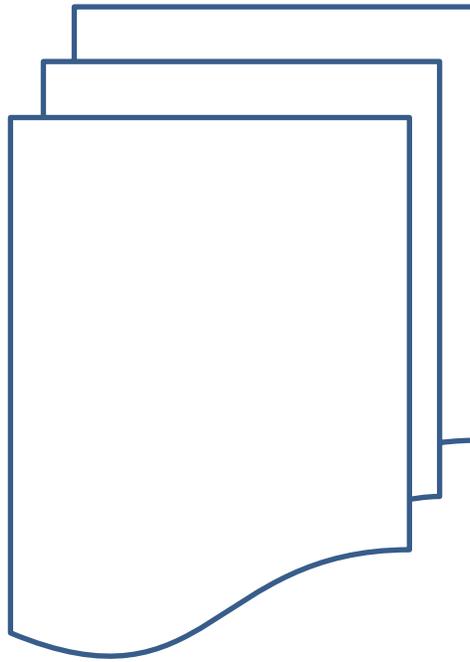
All People Can! 2016

Technical Assistance Training for Increased Accessibility: Maintenance, 2018



Detailed Facility Assessment Reports

Appendices 7-8 through 7-15



*Detailed (Digital) Assessment Reports are Available Upon Request

Special thanks to the Fulton County Board of Commissioners
for their continued support in making Fulton County Government,

Accessible for All!

