

RESOLUTION NO.: R19-0401

INTRODUCED BY: COUNCIL MEMBER(s) Groeteke

1           **A RESOLUTION ADOPTING A TRANSITION PLAN FOR JEFFERSON**  
2   **COUNTY, MISSOURI AS REQUIRED BY THE FEDERAL REGULATIONS**  
3   **THAT IMPLEMENT TITLE II OF THE AMERICANS WITH DISABILITIES**  
4   **ACT OF 1990.**

5           **WHEREAS**, the United States Congress passed the Americans with Disabilities  
6   Act (hereinafter "ADA") on July 26, 1990; and

7           **WHEREAS**, the ADA extended protections against discrimination beyond those  
8   imposed by the Rehabilitation Act of 1973; and

9           **WHEREAS**, Title II of the ADA applies to State and Local Governments and  
10   protects individuals with disabilities from discrimination; and

11          **WHEREAS**, the ADA requires State and Local Governments to comply  
12   regardless of Federal Financial Assistance; and

13          **WHEREAS**, pursuant to the ADA, services, programs, and activities provided by  
14   public entities must be made accessible to individuals with disabilities; and

15          **WHEREAS**, the United States Department of Justice has promulgated  
16   regulations to implement Title II of the ADA; and

17          **WHEREAS**, those regulations appear in the Code of Federal Regulations at 28  
18   CFR 35; and

**FILED**

APR 12 2019

**KEN WALLER**  
COUNTY CLERK, JEFFERSON COUNTY, MO

1       **WHEREAS**, 28 CFR 35.105 requires public entities to evaluate their current  
2 services, policies, and practices, and the effects thereof, that do not or may not meet the  
3 requirements of the Federal Regulations implementing the ADA; and

4       **WHEREAS**, 28 CFR 35.150 requires public entities to, in the event that  
5 structural changes to facilities will be undertaken to achieve ADA program accessibility,  
6 develop a transition plan setting forth the steps necessary to complete such changes; and

7       **WHEREAS**, Jefferson County, Missouri engaged the firm of CASCO + R5  
8 (hereinafter "CASCO") to aid the County in its self-evaluation and its preparation of an  
9 ADA Transition Plan; and

10       **WHEREAS**, following the engagement of CASCO a collective effort was made  
11 to undertake the self-evaluation required by the provisions of 28 CFR 35.105 and to  
12 prepare an ADA Transition Plan pursuant to the requirements of 28 CFR 35.150; and

13       **WHEREAS**, pursuant to 28 CFR 35.105 during the self-evaluation process public  
14 entities are required to provide an opportunity to interested persons, including individuals  
15 with disabilities, to participate in the process by submitting comments; and

16       **WHEREAS**, to comply with this requirement, the County held a public meeting  
17 on July 17, 2018 where all interested persons could make comment; and

18       **WHEREAS**, following the meeting and the self-evaluation process, CASCO did  
19 prepare for the County a proposed ADA Transition Plan; and

20       **WHEREAS**, on October 22, 2018, representatives of CASCO appeared at a  
21 meeting of the Jefferson County Council and spoke, in open session, about the proposed  
22 ADA Transition Plan; and

1       **WHEREAS**, the Jefferson County, County Council considered a resolution to  
2       accept the ADA Transition Plan on December 10, 2018; and

3       **WHEREAS**, at said meeting, certain Councilmembers expressed the desire that  
4       the Disabilities Resource Association offer input on the ADA Transition Plan and no  
5       further action was taken by the County Council with respect to the Plan; and

6       **WHEREAS**, subsequent to the December 10, 2018 meeting, an ADA specialist  
7       with the Disability Resource Association reviewed the ADA Transition Plan and offered  
8       comments; and

9       **WHEREAS**, those comments were considered by the County and CASCO and  
10      resulted in changes to the Barrier Removal Schedule contained in the plan; and

11      **WHEREAS**, an updated copy of the proposed ADA Transition Plan,  
12      incorporating the new language in the Barrier Removal Schedule, is attached hereto as  
13      Exhibit A; and

14      **WHEREAS**, the Jefferson County, County Council has reviewed Exhibit A, and  
15      desires to adopt the Plan for the County.

16      **THE JEFFERSON COUNTY MISSOURI COUNCIL RESOLVES:**

17      Section 1.     The County Council hereby adopts the ADA Transition Plan that is  
18      attached hereto as Exhibit A and which is incorporated herein via reference.

19      Section 2.     This Resolution shall be in full force and effect from and after its  
20      date of approval. If any part of this Resolution is found to be invalid for any reason, such  
21      invalidity shall not affect the remainder of this Resolution.

**THE MEMBERS OF THE JEFFERSON COUNTY, MISSOURI, COUNCIL  
VOTED ON THE ABOVE RESOLUTION AS FOLLOWS:**

Council Member District 1, Brian Haskins

Yes

Council Member District 2, Renee Reuter

Yes

Council Member District 3, Phil Hendrickson

Yes

Council Member District 4, Charles Groeteke

Yes

Council Member District 5, Tracey Perry

Yes

Council Member District 6, Daniel Stallman

Yes

Council Member District 7, James Terry

Yes

**THIS RESOLUTION, AS INTRODUCED AND CONSIDERED BY THE  
JEFFERSON COUNTY, MISSOURI, COUNCIL ON THIS 8<sup>th</sup> DAY OF APRIL  
2019, WAS:**

✓

**DULY ADOPTED AND ORDERED**

**\_\_\_\_ FAILED**

  
Charles Groeteke, County Council Chair

  
Pat Schlette, Council Executive Assistant

Reading Date: 04-08-2019

JEFFERSON COUNTY, MISSOURI

# ADA TRANSITION PLAN

TITLE II

Date: 10-15-2018





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## 1.0 INTRODUCTION AND OVERVIEW

This **Self-Evaluation and Transition Plan** establishes Jefferson County's commitment to provide equal access for all individuals including those with disabilities. With the development of this plan, the County and its consultants have evaluated the County's facilities, sites, and right-of-ways to determine the access barriers, if any, for individuals with disabilities. This plan, as adopted by the Council, shall be used to assist and guide future planning, barrier removals, and accessibility improvements throughout the County in the coming years. It is anticipated that this transition plan will also assist the County in developing new or modified standards through programs and services.

With the County's commitment to provide accessibility to the public, this transition plan specifically focuses on public access areas within County facilities and pedestrian access to these County operated facilities. This plan also includes public right-of-way areas that have been determined as pedestrian routes.

This Transition Plan shall be considered a living document that is intended to be updated on a regular basis as projects for barrier removal progress into barrier removal and as new facilities or offices are modified or constructed for the County.

Accompanying this Transition Plan in the appendix are site evaluations on each County operated facility and right-of-way. These site evaluations are the initial steps taken to determine the barriers in place. From these evaluations, priorities are set based on ADA guidelines and estimated costs were generated to remove these barriers, identified as Potential Project Costs for Barrier Removal.

This collective effort has been made to fulfill the requirements of Title II of the Americans with Disabilities Act (ADA). The Self-Evaluation and the Transition Plan are required components of the federally mandated ADA Title II. ADA, Title II, requires government agencies to provide equal access to programs and services offered by the County. The development of this Transition Plan is a requirement with federal regulations, as outlined in section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

Under Title II of the ADA, Jefferson County is required to:

- Designate a responsible employee for the coordination of ADA compliance
- Provide public notice of ADA requirements
- Conduct a self-evaluation review of facilities, programs, and services
- Develop a transition plan when accessibility deficiencies are identified in the self-evaluation.

This report and the documents referenced establish the ADA Self-Evaluation and Transition Plan for Jefferson County.





## 2.0 ADA TRANSITION PLAN REQUIREMENTS

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All public entities that are subject to Title II of the Americans with Disabilities Act (ADA) of 1990 are required to complete a self-evaluation and transition plan. The Transition plan must meet the following requirements (minimum requirements):

- Identify and determine the physical barriers or obstacles of the public entity that limit accessibility to services, programs, and activities.
- Provide a detailed description/method for removing the barriers at the public facility or public access point.
- Identify a schedule to take the necessary steps towards compliance. Given the complexity and costs associated with removing barriers, improvements longer than one year out are anticipated. This plan will provide the steps necessary to make these changes via priority designation.

One of the tasks of this Evaluation and Transition Plan was to identify which facilities operated and/or owned by Jefferson County were open to the public. While a survey was conducted at all facilities, this Transition Plan will only focus on facilities that provide public services and programs.

Equal Opportunity is the underlying principle of the ADA. While the law does not require equal treatment, the law does require modifications in policies or the way policies are implemented. Integral to this Transition Plan is the County's evaluation of the programs, activities, and services offered to the public. Accessibility is offered through program accessibility and physical accessibility. To eliminate discrimination, both program and physical accessibilities must be provided.

Program Accessibility allows individuals to participate in programs and services available while physical accessibility requires the facilities in which these programs are offered to be barrier-free. The programs offered to the public by Jefferson County are required to be accessible. To be accessible, the County must provide physical access, provisions for transportation, auxiliary aids, advertisement, orientation, policies, communication and access to the information, etc...

To achieve program accessibility, the County may provide one or all of the below options:

- Structural modifications for barrier free access – altering an existing facility
- Relocation of activities/facilities at alternate locations
- Acquisition or redesign of equipment
- Assignment of Aides

The selected method of accessibility should be based on a result that provides total integration for all potential users, which shall include those with disabilities. Such action by the County must be taken to avoid any alteration that may create a hazardous condition or one that may create financial burden on the County. This determination shall be made by the ADA Coordinator and accompanied with a statement justifying the determined conclusion. Such conclusion shall be based on the review of all resources available for each program, facility, and site. Should barrier removal be difficult to carry out, the county will need to consider different options for providing access to the facilities, program, or site.

Jefferson County is only responsible for the facilities (owned and leased) within the county boundaries of Jefferson. Cities and towns within Jefferson County are responsible for maintaining, developing, and applying the self-evaluation and transition process for the areas within their town and city boundaries.







## 3.0 ADA TRANSITION PLAN PROCESS

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The development process for implementing the ADA Self-Evaluation and Transition Plan involved meetings with the ADA Compliance Committee, made up of a team of the Department of Public Works staff members, site evaluations and surveys of existing county facilities (owned and leased), review of public right of ways and site access, all of which included identification of physical barriers. In addition, a public hearing was held on July 17, 2018 with public advertisement and website notification. CASCO + R|5 as consultants for Jefferson County, conducted the public hearing and presented the self-evaluation and transition plan process.

During the spring of 2018, CASCO + R|5 conducted on-site surveying of all Jefferson County owned and leased facilities to determine access barriers present. The result of the survey process, identified further in this report, were prioritized in coordination with ADA standards to determine priorities for the removal of barriers. These results are provided as an exhibit to this report. In addition to evaluating facilities, CASCO + R|5 also evaluated existing public right-of-ways and site access areas. Barriers were identified and this information is also available as an exhibit to this report.

To achieve accessibility, the County must have the ability to modify the Transition Plan from time-to-time. Input from the community, compliance committee, and review of the County's budget will determine barrier removal over the next fiscal year and following years. It is the intent of this transition plan and the supporting exhibits to this document, that the County will successfully remove barriers and adjust programs and activities over the coming years.

The County has limited funding available for each fiscal year allocated for capital improvement projects. County staff may be able to provide continuous improvements through general maintenance activity such as providing upgraded plumbing fixtures as routine maintenance, updating signage, etc...

## 4.0 HISTORY OF ADA

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The Americans with Disabilities act was passed in 1990 (July 26), following the first introduction by Congress in 1988. Title II of the ADA applies to State and Local government and protects individuals with disabilities from discrimination. Services, programs, and activities provided by public entities must be made accessible to individuals with disabilities. The 1990 ADA extends the protection on discrimination from the established Rehabilitation Act of 1973 (section 504). Section 504 banned discrimination by those entities utilizing federal funding. ADA requires State and Local governments to comply regardless of Federal financial assistance. The ADA also established a definition for disability: *"A physical or mental impairment that substantially limits one or more of the major life activities of such individual"*.

## 5.0 COUNTY ADA POLICY

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Jefferson County is committed to providing and maintaining an accessible environment at its facilities and pedestrian areas. Jefferson County is committed to providing all individuals access to facilities, pedestrian areas, programs, and information associated with the County's administration and services, programs, and County sponsored activities. The County website shall be accessible so that visitors, staff, and citizens with disabilities have equal access to the information provided to individuals without disabilities. The Americans with Disabilities Act prohibits discrimination against qualified individuals with disabilities in public facilities. Jefferson County will provide reasonable accommodations when necessary. These accommodations and adjustments must be made in a timely manner and on an individualized basis.

It is the responsibility of an individual to identify themselves as an individual with a disability when seeking an accommodation. It is also the responsibility of the individual to identify their disability and demonstrate how the disability limits their ability to participate in programs or services offered by the County.

## 6.0 PLANNING PROCESS

For compliance with the legal mandate for a Self-Evaluation and Transition Plan, Jefferson County is required to complete inventories of both physical barriers at County facilities and program barriers to County provided services (this transition plan does not specifically address program barriers). This plan identifies a list of physical barriers and establishes a schedule for removing barriers from existing facilities within the County.

The Evaluation of the Public Rights-of-Way pedestrian areas and the development of a schedule for removing these barriers completes the Self-Evaluation and Transition Plan. This section outlines the process and parties involved in producing the Self-Evaluation and Transition Plan including public outreach, the County's involvement, and staff/coordinator training.

### 6.1 PUBLIC OUTREACH

A public meeting was held on July 17, 2018 at the Annex Building in Hillsboro, Jefferson County, MO. The public meeting, advertised and notification provided via County website, was conducted to present the self-evaluation and transition plan process to public attendees. The meeting included an opportunity for attendees to voice concerns and ask questions regarding the process.

### 6.2 STAFF/ COORDINATOR TRAINING

ADA does require that the County provide a designated employee to coordinate the efforts of ADA compliance. The County must also adopt a grievance procedure for the resolution of complaints/concerns by any person with a disability who has or is denied services or programs from the County.

Jefferson County has designated the Human Resources Manager as the County's ADA Coordinator. A formal grievance procedure is available for review, attached to this report.

### 6.3 COUNTY STAFF INVOLVEMENT

The effort to complete this County evaluation of County owned and leased facilities and public right-of-ways was a partnership between CASCO + R5 and County employees. The County provided a steering committee of employees who regularly attended progress meetings and this committee of employees assisted with guiding the overall project.

### 6.4 REQUEST FOR ACCOMMODATION

The County will provide information to citizens, participants, employees, applicants and other parties regarding the rights and protections of Title II.

Request for accommodations through instructions or documents and materials in alternate formats may be provided in a letter, website posting, newspaper, or email to announce, promote a new or existing upcoming County program or activity. If the County does not provide this information to the public, contact shall be made to the County's ADA Coordinator to make a request for accommodation. A request for accommodation shall be made at least confirming with the county in advance of the public meeting or activity.

Requests for accommodations should include the following information:

1. Requesting person's name, contact information including address, email, telephone.
2. Location of the program, activity, or County provided service.
3. Description of the program, activity, or County provided service where accommodation is requested.
4. Briefly describe why the accommodation is needed.
5. Request for any alternate formats of materials such as braille, audio recording, etc...

The County has established a response time to provide a response to the request for accommodations. The County will make all necessary efforts to respond to the request prior to the program , activity, or event held by or on behalf of the County. If the response from the County does not adequately address or resolve the request, the requestor shall be entitled to file a formal grievance with the County. The County shall maintain requests for accommodations for a minimum of three years.

## 6.5 GRIEVANCE PROCESS

A formal grievance procedure has been established to assist individuals with a means to file a complaint with Jefferson County. The process is for individuals that allege discrimination has occurred on the basis of disability in services, activities, facilities, and programs provided by the County. The following is the grievance process:

The County wishes to provide prompt resolution of complaints that allege a service or facility of the County is not in compliance with Title II of the Americans with Disabilities Act of 1990. ADA provides a comprehensive civil rights protection in local government services, programs, and telecommunications to individuals with disabilities.

1. A complaint shall be filed with the ADA Coordinator within 30 days of the alleged violation. Extensions may be granted by the ADA Coordinator as needed.
2. The complaint shall be submitted in writing and contain the following information:
  - a. Name (person filing complaint).
  - b. Address (person filing complaint).
  - c. Description of the discriminatory action – provide adequate information that includes the nature and date of the alleged violation.
  - d. Sign the complaint (person filing complaint or authorized representative).
3. The ADA Coordinator, as appointed by the County Council, shall be designated to oversee the grievance process.

A complaint form can be obtained by calling the ADA Coordinator at 636-797-5071 or from the county's website [www.jeffcomo.org](http://www.jeffcomo.org). Complaints should be addressed to the County's ADA Coordinator, 729 Maple Street, Hillsboro, MO 63050.

Any person with disabilities that wishes to request accommodations to participate in a County sponsored meeting, program, service, or program may contact the ADA Coordinator. The request for accommodation should occur within one week of the scheduled program, activity, meeting, or service. Accommodation requests may be made to the ADA Coordinator at 636-797-5071. Mailing address: 729 Maple Street, Hillsboro, MO 63050.

The process the County will take upon receiving a grievance is as follows:

1. An investigation shall follow upon receipt of the grievance. The ADA Coordinator shall conduct the investigation in a thorough manner offering all interested parties and any others in association with the grievance the opportunity to submit relevant information and evidence of the complaint.
2. The County ADA Coordinator shall provide a written determination regarding the validity of the grievance request and the resolution of the investigation, if necessary. The County shall make necessary effort to provide the written determination within 30 days of the grievance request submittal. The nature of the grievance may require an extension from the County in which the ADA Coordinator will provide such extension notice within 30 days of the grievance request submittal, extending the period for another 30 days.
3. The ADA Coordinator shall file all grievances and resolutions for a period no less than 3 years after the grievance process is officially closed.
4. Should the resolution/determination not be satisfactory to the person responsible for the grievance request, an appeal request may be made for reconsideration. Any such request should be made in writing within 30 days of the determination and submitted to Jefferson County. Such requests shall be reviewed by the ADA Compliance Committee, a committee comprised of appointed county staff, on behalf of the ADA Coordinator. Requests shall be submitted to 729 Maple Street, Hillsboro, MO 63050.
5. The ADA Compliance Committee shall follow the same guidelines established in item 2 above, providing a written determination as to the viability of the complaint along with a written resolution. Such determination shall be made within 30 days from the date received.
6. Any grievance filer with Jefferson County is not precluded from pursuing other remedies outside of this grievance process with the County.







## 7.0 FACILITIES LIST

### GENERAL REVENUE BUILDINGS

Administration Building	729 Maple Street
Annex Building	725 Maple Street
<i>Facilities Building</i>	<i>739A Maple Street</i>
Courthouse	300 Main Street
Justice Center	400 First Street
County Jail	510 First Street
Juvenile Detention	9501 Goldfinch Lane
<i>Emergency Management Operations Center (EMOC)</i>	<i>1409 Herculaneum Industrial Drive</i>
Animal Control	7105 Shelter Road
Civic Center	2800 Community Lane
<i>Fleet – New West Campus</i>	<i>5275E State Highway B</i>
<i>Parks – West Campus</i>	<i>5275 State Highway B</i>
Parks – Concession Stand	4900 Byrnesville Road

### LEASED BUILDINGS

Public Defenders Office	116 Main Street
Sheriff – North Zone	34 Dillon Plaza
<i>New Day Juvenile Day Treatment Center</i>	<i>5 Merchant Drive</i>
<i>Economic Development Corporation (EDC)</i>	<i>5217 State Highway B</i>
Third Street Annex	301 Third Street
<i>Sheriff – East Zone</i>	<i>955 Windsor Harbor</i>
<i>Sheriff – South Zone</i>	<i>1000 Viking Drive</i>

### ROADS & BRIDGE BUILDINGS

<i>Maintenance Shed – East</i>	<i>2960 Lee Pyle</i>
<i>Maintenance Shed – West</i>	<i>5275C State Highway B</i>
<i>Maintenance Shed – North</i>	<i>6460 State Road MM</i>
<i>Highway Fleet Facility</i>	<i>5275D State Highway B</i>
<i>Sign Shop</i>	<i>5275B State Highway B</i>

### CROSSWALKS AND INTERSECTIONS

Dittmer Ridge @ Maple Grove School	Northern Crosswalk @ Dittmer School Road
Dittmer Ridge @ Maple Grove School	Southern Crosswalk @ Dittmer Ridge Road
Gravois (Schumacher)-Jefferson (Woodridge) Middle School	Western Crosswalk across Gravois Road
Gravois (Schumacher)-Jefferson (Woodridge) Middle School	Eastern Crosswalk across Gravois Road
Gravois (Northwest School)-Elementary School	
Gravois (Northwest School)-Junior High School	
Gravois (Northwest School)-Ball Fields	
Hardin @ Sunrise School	Northern Crosswalk
Hardin @ Sunrise School	Southern Crosswalk
High Ridge Blvd. @ Elementary School	Western Crosswalk @ High Ridge Blvd.
High Ridge Blvd. @ Elementary School	Eastern Crosswalk @ High Ridge Blvd.
High Ridge Blvd. @ St. Anthony's Church	
Seckman @ Jr. High and Elementary School/Arrow Ridge Subdivision	
Seckman @ Mastadon Park	
Windsor Harbor @ Elementary School	
Windsor Harbor @ Sheriff Station	

*\*\*italicized locations designate facilities that we understand are not visited by the general public or do not offer any services or classes to the general public. These facilities were surveyed but recommendations for modifications were not suggested. Title II addresses government facilities that offer services to the general public.*

## 8.0 FACILITY EVALUATION PROCESS

Surveys of each noted facility or crosswalk location were completed with teams equipped with basic tape measures and digital or laser measuring devices and digital cameras. Checklists that listed the various ADA requirements were used to record the field data as it was collected. By comparing the 2010 ADA requirements with the corresponding data collected physical barriers were identified. The collected data and corresponding photos were organized and entered into the electronic form of the checklist, noting the non-compliant conditions along with recommendations for remediation. This standard checklist is divided into levels of priority as noted in the 2010 ADA Standards.

### 8.1 PRIORITIZING BARRIER REMOVAL IN THE COUNTY

The ADA Title II Technical Assistance Manual indicates “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”.

With an understanding that the County has limited project funding and cannot make all buildings, facilities, and right-of-ways fully accessible, this report considers the following criteria (in order of priority) to facilities for removal of architectural barriers:

- Use by the public: A higher level of public use should be assigned a higher priority.
- Program requirements: Some programs may be unique to a specific building or facility and relocation to another facility would be difficult.
- Critical services provided: Buildings that provide services related to health, wellness, safety, and other essential County services, i.e. license and permitting, shall be assigned a higher priority.
- Complaints: Building and facilities with a history of citizen complaints that are connected to accessibility shall receive a higher priority.
- County Owned facilities: Facilities/buildings that are owned by the County may be assigned a higher priority over leased facilities. Leased facilities often are the responsibility of a landlord for improvements.

### 8.2 PRIORITIZING BARRIER REMOVAL AT THE FACILITY

The ADA Existing Facility Checklist provides a prioritization for barrier removal at each facility. The following priority shall be followed by the County:

- Priority 1: Accessible approach and entrance
- Priority 2: Access to goods and services
- Priority 3: Access to restrooms
- Priority 4: Any other measures necessary

The evaluation reports by facility in the appendix to this document provides the identification of barriers and the specific barrier removal actions necessary. The County will accomplish barrier removals in two ways:

- Policy and procedure modifications to remove programmatic barriers.
- Construction projects to remove architectural barriers.



## 9.0 ADA TRANSITION PLAN

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Title II of the ADA requires that public entities that have the responsibility for and authority over facilities, roads, pedestrian access points, sidewalks and other areas shall develop a Transition Plan to make the facilities meet the standards for Program Accessibility. In order to achieve program accessibility, the program, activity, and/or service shall be accessible in its entirety. Based on this, the Transition Plan makes accommodations for the prioritizing and scheduling of inaccessible facilities modified into facilities that are accessible to and usable for individuals with disabilities.

Each facility report within the appendix of this report includes a list of architectural barriers and barrier removal requirements, as required by Title II of the ADA. Not all barriers identified must be removed in order to provide program accessibility. Priority one is to remove the identified barriers limiting access to programs. Specific evaluation of programs provided by the County are not included in this plan but are considered when establishing public meetings, events, and programs.

For compliance with the requirements of Title II of the ADA, the County will update the appendix on a routine basis and maintain facilities that are required to provide access to individuals with disabilities.

### 9.1 BARRIER REMOVAL SCHEDULE

It is the County's intent to address and remove barriers to accessibility in public facilities (buildings and pedestrian areas) based upon complexity, uniqueness of the program, and cost of the removal. Barrier removal is subject to budgetary limitation and the time required to plan for such accommodations. Jefferson County will develop projects for future funding allocation and as funding becomes available, priority will be based on the information provided in section 8.1.











## 10.0 DEFINITIONS

Some language utilized in this Self-Evaluation and Transition Plan have a definition specific to ADA and accessibility requirements. The following is a list of selected definitions found in the ADA. Refer to the Americans with Disabilities Act for further definition and explanation.

**COMPLAINT:** A claimed violation of the ADA.

**DISABILITY:** A physical or mental impairment that substantially limits one or more of the major life activities of such individual.

**DISCRIMINATION ON THE BASIS OF DISABILITY:** Limit a citizen in a way that may adversely affect opportunities or status because of the person's disability; Limit 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; 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 County's operations; and use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public

**PHYSICAL OR MENTAL IMPAIRMENTS:** Orthopedic, visual, speech, hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, and drug addiction and alcoholism.

**QUALIFIED INDIVIDUAL WITH A DISABILITY:** An individual with a disability who meets the eligibility requirements for the receipt of services or the participation in programs or activities provided by the County.

**REASONABLE PROGRAM MODIFICATIONS:** If the individual's disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable an individual to perform the essential functions of the program or activity. Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities.

Modification applies to: All decisions and to the application or registration process; All services provided in connection with the program or activity; and known disabilities only.

Modification is not required if it changes the essential nature of a program or activity of the person with a disability; It creates a hazardous situation; Adjustments or modifications requested are primarily for the personal benefit of the individual with a disability; or it poses an undue burden on the County.

## 11.0 RESOURCES

For access to all County programs, the County may utilize these program accessibility guidelines, standards, and resources. The County, to its best ability, will maintain and expand upon these guidelines as necessary to include information that can assist the volunteers and staff of the County. Jefferson County will periodically review the components of this section, as new information and resources become available.

U.S. Department of Justice: Provides free ADA material including the Americans with Disability Act (ADA) text. To obtain a hard copy of materials, contact ADA at their information line: 800-514-0301 (Voice) or 800-514-0383 (TTY). Publications are available in standard print as well as large print, audiotape, Braille, and computer disk for people with disabilities. Information may also be downloaded from the Department of Justice website at [www.ada.gov](http://www.ada.gov). Available information under ADA includes (but is not limited to):

- ADA regulations for Title II
- Title II Technical Assistance Manual

U.S. Access Board: Federal laws and regulations that provide guidelines for designing accessible facilities and programs. Copies of publications are available for download or may be ordered on the Access Board's website at [www.access-board.gov](http://www.access-board.gov). Publications are available in large print, disk, audiocassette, and Braille.

## 12.0 NEXT STEPS

With acceptance by the County Council this document and the attached exhibits will effectively serve as the Americans with Disabilities Act (ADA) Transition Plan for the County of Jefferson in the State of Missouri. The effort to conclude this report is in coordination with a self-evaluation conducted by CASCO + R|5 during the Spring of 2018. This self-evaluation was conducted on County owned and leased properties. Those facilities with public access are identified in the attached exhibit and have been prioritized by importance per ADA. As part of this process, public outreach has been conducted via public meeting on July 17, 2018.

The County will evaluate the project estimated costs and begin the process of assigning projects for future fiscal budgets. Primary focus initially will be to provide programs and locations that are accessible to individuals in need of assistance. Over the coming years, as fiscal funds can be dedicated, larger scale projects will be conducted in order to remove barriers that exist.











GRIEVANCE FORM: ALLEGATIONS OF VIOLATIONS  
OF THE AMERICANS WITH DISABILITIES ACT



**Instructions:** Please fill out this form completely. Sign and return as instructed on page 2.

Person filling out this form: \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Preferred method of contact:            Telephone \_\_\_\_\_    Email \_\_\_\_\_

If filled out on behalf of person other than person listed above provide the following:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Circumstances related to the facts of complaint:

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Details of complaint:

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(Please be as specific as possible, and include the names and contact information of anyone who might have knowledge of the facts regarding the complaint. To help us to address your concerns promptly, please stick to

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Signature of person completing form:

\_\_\_\_\_

Date: \_\_\_\_\_

The complaint should be submitted by the complainant and/or his/her designee as soon as possible, but no later than 60 calendar days after the alleged violation to:

**ADA Coordinator**  
Jefferson County  
Administration Center  
729 Maple Street  
Hillsboro, MO 63050