



ADA Self Evaluation and Transition Plan

Introduction

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunities for individuals with disabilities. The ADA prohibits discrimination against such individuals and requires equal access to jobs, public accommodations, government services, public transportation and telecommunications. The City of Terrell Hills is aware of its responsibilities to the disabled community. As part of these responsibilities the City of Terrell Hills has begun the process of evaluating the needs of the disabled community within Terrell Hills and are evaluating the barriers to City services and facilities. This evaluation is an ongoing process. The City of Terrell Hills is working to maximize the removal of barriers to the largest portion of the community, as possible, with the available resources. The City of Terrell Hills has initiated a comprehensive self-evaluation of its policies, programs and facilities to determine the extent to which individuals with disabilities may be restricted in their access to City services, activities and facilities. This document will guide the planning and implementation of necessary program and facility modifications over the next several years.

The development of a Transition Plan is a requirement of the Federal Regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Act, which has become known as the “civil rights act” of persons with disabilities, states:

No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (Section 504)

After the enactment of the Rehabilitation Act of 1973, Congress passed the Americans with Disabilities Act on July 26, 1990. The Department of Justice’s Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of the Rehabilitation Act. This legislative mandate, therefore, prohibits the City from, either directly or indirectly through contractual arrangements:

- Denying persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- Selecting facility locations that have the effect of excluding or discriminating against persons with disabilities.

The City of Terrell Hills is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs and services; any parts of Titles IV and V that apply to the City and its programs, services or facilities; and all requirements specified in the Americans with Disabilities Act Access Guidelines of 2004 (ADAAG) that apply to facilities and other physical holdings. Included in

Title II are administrative requirements for all government entities employing more than fifty (50) people. These administrative requirements are:

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

Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Terrell Hills will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

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

Effective Communication: The City of Terrell Hills will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Terrell Hills programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Terrell Hills, should contact the office of Kristyn Schones ADA Coordinator, 5100 N New Braunfels, San Antonio, Tx 78209, (210)824-7401, kschones@terrell-hills.com as soon as possible but no later than 48 hours before the scheduled event.

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

Complaints that a program, service, or activity of the City of Terrell Hills is not accessible to persons with disabilities should be directed to Kristyn Schones ADA Coordinator, 5100 N New Braunfels, San Antonio, Tx 78209, (210)824-7401, kschones@terrell-hills.com.

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

Grievance Policy

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, or programs by the City of Terrell Hills. The City of Terrell Hills' HR Policy governs employment-related complaints of disability discrimination.

Complaints may be submitted in writing by printing, completing and mailing the ADA Grievance Form to:

Kristyn Schones
ADA Coordinator
5100 N. New Braunfels,
San Antonio, Texas 78209

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted as soon as possible but no later than sixty (60) calendar days after an alleged violation.

Within fifteen (15) calendar days after receipt of a complaint, the ADA Coordinator or designee will acknowledge receipt of the complaint and may, at their discretion, meet with the complainant to discuss an alleged violation and possible resolutions.

Within thirty (30) calendar days after receipt of a complaint, the ADA Coordinator or designee will respond in writing or, if requested, in an alternative format accessible to the complainant, such as large print or audio tape. The response will explain the position of the City of Terrell Hills and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or designee does not satisfactorily resolve the issue, the complainant may file an appeal within fifteen (15) calendar days after receipt of the response.

The appeal should be in writing and addressed to:

William Foley
City Manager
5100 N. New Braunfels
San Antonio, TX 78209

Within fifteen (15) calendar days after receipt of the appeal, the City Manager or designee, will acknowledge receipt of the appeal and may, at his discretion, meet with the complainant to discuss the complaint and possible resolutions.

Within thirty (30) calendar days after receipt of the appeal, the City Manager or designee will respond in writing, or if requested, in an alternative format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or designee, appeals to the City Manager or designee, and responses from these offices will be retained by the City of Terrell Hills for a period of at least three years.

The Self-Evaluation

The City began a re-evaluation of its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. The first task involved in preparing an ADA Transition Plan is conducting an inventory of existing physical barriers in the city's facilities and listing all the barriers that limit accessibility. This is often referred to as the self-evaluation process. The FHWA and TxDot listed deficiencies likely to be found in an inventory of facilities are:

SELF-EVALUATION CHECKLIST	
ISSUE	POSSIBLE BARRIERS
Sidewalk and Pathway Clear Width	Narrow, Below Guidelines
Sidewalk and Pathway Cross Slope	Steepness, Irregularity, Variability, Warping
Landings Along Sidewalks and Pathways	Less Than 4 feet by 4 feet
Sidewalk and Pathway Grade	Steepness, Angle Points
Materials and Finishes	Deterioration of Surfaces, Deterioration of Markings, Appropriateness of material (ex. Cobblestones)
Gratings	Grating Type, Grate Opening Orientation
Discontinuities	Missing Sections, Gaps, Drops, Steps
Detectable Warning System	Missing, Inappropriate Materials, Inadequate Size, Wrong Location
Obstructions	Signs, Mail Boxes, Fire Hydrants, Benches, Telephones, Traffic Signal Poles, Traffic Signal Controller Boxes, Newspaper Boxes, Drainage Structures, Tree Grates, Pole Mounted Objects, Standing Water, Snow or Ice
Traffic Signal Systems	Lack of Provision for the Visually Impaired such as APS, Inadequate Time Allowed, Inoperable Buttons, Inaccessible Buttons
Curb Ramp	Missing, Doesn't Fall within Marked Crosswalk, Doesn't Conform to Guidelines
Curb Ramp Flares	Missing Where Required, Too Steep

The City of Terrell Hills does not have public transportation, walking pathways, trails, or traffic control devices. City Hall, Crestwood Park and the five green spaces are the only public facilities within the city limits. All sidewalks surrounding City Hall meets the ADA standards. There is one small section of sidewalk at the intersection of Elizabeth and N. New Braunfels, the city engineer has approved it as compliant.

City Hall

The City Hall building and parking lot was rebuilt in 2011, an ADA inspection was performed upon completion of the new facility. Staff are working to locate the official documentation of the passed ADA Inspection Report. Once the inspection report is located, a copy will be provided in this transition plan.

City Staff found no physical barriers.

Crestwood Park

Crestwood Park was remodeled in 2023 and all new features have been installed up to ADA standards. The water fountain, “take a book leave a book” library, benches, trash cans and grills are all accessible and meet height requirements. It is recommended that an outdoor picnic table with an expanded top be installed. The one physical barrier found was entrance to the swings. It is suggested that a ramp be installed. It was confirmed that the mulch used in the swing area is Engineered Wood Fiber (EWF) that meets the ASTM F1951 Standard. Annual inspections of the EWF will be conducted to make sure it is properly graded and filled.

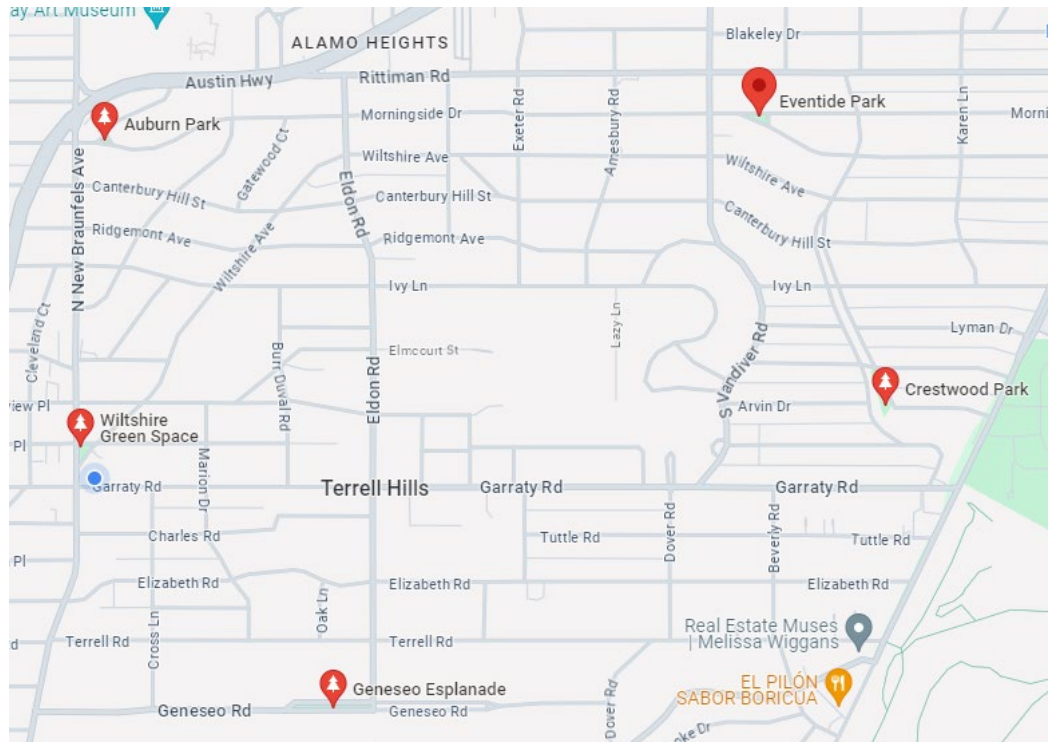




Green Spaces

The city of Terrell Hills has a total of five greenspaces, four of which include public benches. The Wiltshire Green Space does not have a bench. All benches are ADA compliant, but they are located above curb height and there are no curb cuts or ramps for entrance. It is suggested that each location get a curb cut and ramp installed that includes tactile paving.

Note: ADA bench compliance state the of the bench seat surface shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the finish floor or ground.



Geneseo Esplanade

There are two separate green spaces in the Esplanade. Each space will need a curb cut with an entrance ramp installed. This location hosts the Annual 4th of July Parade and Block Party. It is suggested that two ramps on each green space be installed so it will allow event activities to become more accessible.



Auburn Park

In addition to the curb cut and ramp entrance, it is suggested that the pavers be removed and replaced with a cement path from entrance to the bench.



Eventide Park

This location has a gravel pathway, and it is suggested that the city put in a curb cut and ramp at each end of the pathway.



Edsel Parkway

This location is not an official city green space, but St. Davids Episcopal Church and School put two benches on location. Entrance to the benches with a curb cut and ramp is recommended.



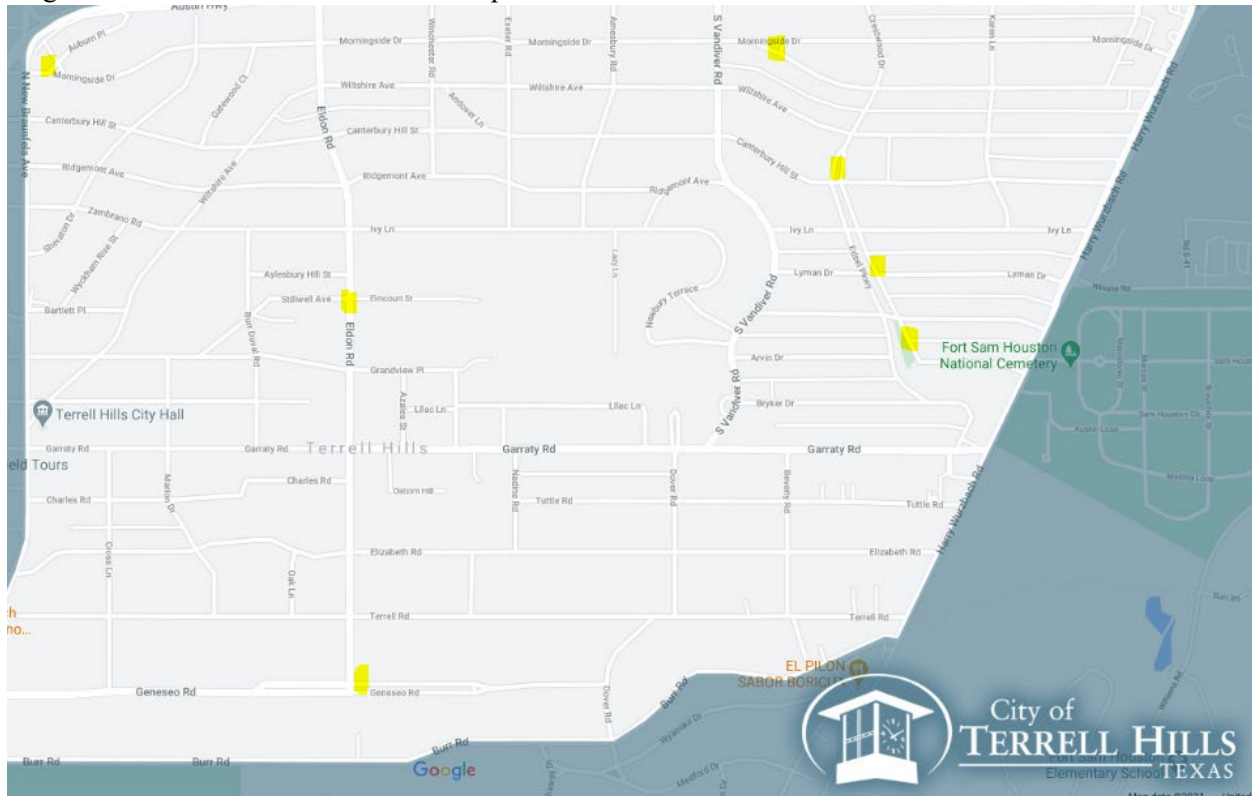
Physical Barrier Map



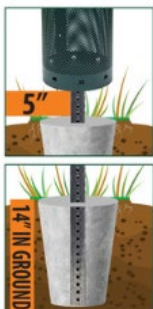
— = Proposed Ramp Location

Mutt Mitt Stations

The city has seven Mutt Mitt stations located around the city. All have been installed at the manufacturer's recommendation. To meet ADA height requirements the receptacles must be 48" or less in height. All stations were found to be compliant.



Installed dimensions:
75" h x 13" w x 15" d Weight: 32 lbs
Material: 100% Aluminum,
 Commercial Grade, Rustproof, Locking
 Powder-Coated, UV Protected,
 Screen Printed Front Panel Instructions.
 Galvanized, square, steel posts.



Website & App

In April 2024, the DOJ issued a new ruling. Cities with a population under 50,000 must have their website and mobile applications comply with the Web Content Accessibility Guidelines (WCAG) standards by April 26, 2027. The City of Terrell Hills website has not been built to be compliant with ADA (Section 508) and WCAG 2.0 A and AA levels. The My Terrell Hills App is compliant with all ADA requirements and has provided a copy of their Accessibility Conformance Report.

Events

The city annually hosts two public events. The 4th of July Parade & Block Party is hosted at the Geneseo Esplanade. National Night Out is hosted at Crestwood Park. All events provide ADA Port a Pottys. With the above-mentioned ramp updates, all event activities will be accessible for those with disabilities.

Meetings

As stated in the Terrell Hills ADA Compliance Notice:

The City of Terrell Hills will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Terrell Hills programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Transition Plan

Green Spaces

8- Curb cuts and ramps (with tactile paving): Auburn x1, Morningside x2, Edsel Pkwy x1, Geneseo Esplanade x4
 1-Curb cut, pathway and 8x6 cement pad at Auburn

Bids before engineered plans created

-Alamo Asphalt Company total bid: \$66,780
 -Fortress Construction total bid: \$32,400

Exhibit A. BMB Engineered Cost Estimate 8/26/24

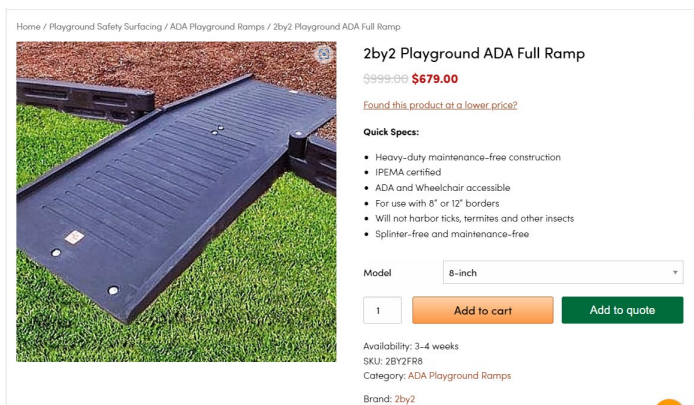
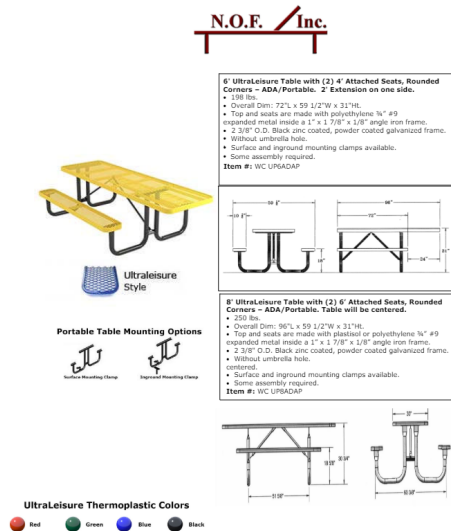
TABULATION OF EXPECTED CONSTRUCTION COSTS						
PRELIMINARY COST ESTIMATE						
TERRELL HILLS, TX						
ITEM	DESCRIPTION	UNIT	QTY	UNIT PRICE		EXTENSION
100.1	Mobilization	LS	1	\$	12%	\$ 3,998.10
101.1	Site Preparation	LS	1	\$	15%	\$ 4,997.63
103.1	Remove Concrete Curb	LF	95	\$	8.50	\$ 807.50
103.4	Remove Miscellaneous Concrete	SF	50	\$	7.00	\$ 350.00
200.1	Flexible Base 2" Compacted Depth	SY	160	\$	18.00	\$ 2,880.00
200.1	Flexible Base 4" Compacted Depth	SY	70	\$	22.00	\$ 1,540.00
500.101	Concrete Curb	LF	100	\$	22.00	\$ 2,200.00
502.1	Concrete Sidewalks	SY	70	\$	100.00	\$ 7,000.00
515.1	Topsoil (3" Depth)	CY	50	\$	45.00	\$ 2,250.00
516.1	Sodding	SY	575	\$	14.00	\$ 8,050.00
SP1	Remove Decomposed Granite Walking Surface	SF	460	\$	4.00	\$ 1,840.00
SP2	Decomposed Granite Walking Surface	SY	160	\$	40.00	\$ 6,400.00
SUBTOTAL =						\$ 42,313.23
CONTINGENCY (15%) =						\$ 6,346.98
TOTAL =						\$ 48,660.21

See Figure B. BMB Engineered ADA Green Space Plans submitted 8/16/2024

Crestwood Park

1- 6-8ft ADA extended top picnic table - \$1,100 - \$1,700.00

1- Entrance ramp to swing - \$489 - \$679.00, 3-4 week lead time – Full ramp installed 8/9/2024



Website

Katie Misch, the City of Grapevine ADA Coordinator – Civic Plus – requested pricing
accessiBe - \$490 per year for websites under 1,000 pages (COTH has less than 200, approx. 180)

- Takes 48 hours to install
- Checks for needed updates every 24 hours
- Translates to 16 different languages
- Users can choose an accessibility profile type from a listing of disabilities (vision impaired, seizure safe, blind, ADHD, cognitive, keyboard navigation, etc.), they can choose a standalone adjustment (color changes, font size, etc.) or they can use a combination of both.

USERWAY- \$49 monthly or \$490 per year for up to 100k page views a month. I have a demo scheduled to see all the features; it should be comparable to accessiBe.

FULLFUSION – this is our current website provider, they partner with accessiBe and can do the website overhaul for \$590. (\$100 for installation and customization, \$490 annually) – **Installed on 02/07/2025**

******This information is to be presented at the June 10, 2024, city council meeting as an agenda item. Staff will act based on the council's discussions and direction. Staff will update the transition plan. Notification will be sent out to the public via the My Terrell Hills App text and email notifications in addition to having the agenda item posted on the City of Terrell Hills' website and bulletin boards. The public may make their comments during the public meeting under the Citizen Comments agenda section.***

Conclusion

Services and programs offered by the City to the public must be accessible for all citizens through reasonable accommodations for those with disabilities. Accessibility applies to all aspects of a program or service, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids and transportation. The process of making City facilities and programs accessible to all individuals will be ongoing and the City will continue to review accessibility issues through resolution of access requests and by making reasonable modifications to programs.

The City has made progress towards improving accessibility as seen by the following actions:

- Designation of an ADA Coordinator
- Implementation of an ADA access request/grievance procedure
- Conducting a self-assessment to identify issues needing to be resolved
- Complying with federal and state requirements as facilities are modified or constructed
- Planning future improvements through the direction of the City Council

The City will also periodically evaluate the success of improving access to programs by the practices and procedures developed during the self-evaluation process. In addition to the existing access request process, feedback will be obtained from the community by publishing this document on the City's website and requesting comments. In addition, the City Council will solicit comments at a public hearing. Upon receiving public input, City staff will update the Transition Plan and make it available to the public.