



MONTGOMERY COUNTY
T E N N E S S E E

Americans with Disabilities Act

Self Evaluation & Transition Plan

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TABLE OF CONTENTS

ACKNOWLEDGEMENTS	III
EXECUTIVE SUMMARY	1
FUNDING	1
SUMMARY OF SELF EVALUATION FINDINGS	2
INTRODUCTION	3
INTRODUCTION.....	3
LEGISLATIVE MANDATE	3
UNDUE BURDEN	5
TITLE II REQUIREMENTS & RESPONSIBILITIES.....	5
TRANSITION PLAN	5
ADA COORDINATOR	6
PUBLIC PARTICIPATION	7
ASSURANCES.....	7
STANDARDS, SPECIFICATIONS, AND DESIGN DETAILS.....	7
NOTICE AND GRIEVANCE PROCEDURE	7
POLICIES, PROGRAMS, AND PROCEDURES	8
GENERAL EFFECTIVE COMMUNICATION PROVISIONS.....	8
NEW CONSTRUCTION, ALTERATIONS, AND PHYSICAL CHANGES TO FACILITIES	9
PARKS AND OUTDOOR SPACES	9
RIGHT-OF-WAY IMPROVEMENTS.....	10
CITIZEN BARRIER REMOVAL REQUEST	10
MISCELLANEOUS PROVISIONS.....	10
SELF EVALUATION.....	11
SELF EVALUATION	11
BARRIER REMOVAL STRATEGIES.....	11
PRIORITIZATION.....	12
IMPLEMENTATION SCHEDULE	13
RECENT / CURRENT PROJECTS	14
COST ANALYSIS	14
ESTIMATED PROJECT COSTS BY FACILITY	15
RIGHT-OF-WAY ESTIMATED CONSTRUCTION COSTS BY TYPE	17
TRANSITION PLAN MANAGEMENT	17
MONITORING AND UPDATES.....	17
COORDINATION WITH FACILITY MAINTENANCE AND CAPITAL PROJECTS.....	17
ADA TOOL KIT	18
INTRODUCTION.....	18

FEDERAL ACCESSIBILITY STANDARDS AND REGULATIONS	18
RESOURCES FOR PROVIDING ACCESSIBLE PROGRAMS & FACILITIES	22
TECHNICAL RESOURCES	23
APPENDIX A: GLOSSARY OF TERMS.....	31
APPENDIX B: PUBLIC NOTICE	35
APPENDIX C: GRIEVANCE PROCEDURE.....	36
APPENDIX D: GRIEVANCE FORM	37
APPENDIX E: BLANK SELF EVALUATION CHECKLISTS	39
APPENDIX F: COMPLETED SELF EVALUATION CHECKLISTS.....	40
APPENDIX G: SELF EVALUATION COST SUMMARY	41
APPENDIX H: SELF EVALUATION OF SIDEWALKS AND CURB RAMPS	42

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EXECUTIVE SUMMARY

The federal statute known as the Americans with Disabilities Act (ADA), enacted July 26, 1990, provides comprehensive civil rights protection to persons with disabilities in the areas of employment, state and local government services, and access to public accommodations, transportation, and telecommunications. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Per the 2015 American Community Survey, the prevalence of disability in Montgomery County was 13.8% for persons of all ages. Title II of the ADA has the broadest impact on the Montgomery County Government with Title II requiring that all public entities with 50 or more employees perform a self evaluation, prepare a transition plan, make the transition plan available for three years (working document until all barriers are remediated), publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure. Title II of the ADA requires state and local government programs, services, and activities to be accessible and usable by individuals with disabilities.

An ADA Transition Plan is a document prepared to identify existing structural barriers impeding access to programs by people with disabilities, and describes any physical changes required to make programs accessible. This particular ADA Transition Plan is primarily focused on the facilities within Montgomery County's inventory, although other transition elements, including sidewalks and curb ramps are also addressed. Montgomery County considers this ADA Transition Plan as a step in the process to provide an accessible community. Montgomery County strives to ensure that all residents and visitors are able to access its services, programs, and activities, and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the county will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most affect the ability of persons with disabilities to access facilities or programs. Where access cannot be attained, an alternate means to offer the same opportunities to persons with disabilities will be provided.

Funding

In the current year's budget, the County Commission has approved \$20,000.00 to begin remediation as required based on the findings of the self evaluation. According to the Capital Improvements Plan schedule, the request to the commission will grow each year of the five-year plan. The majority of the funding for ADA remediations will be funded in the yearly capital projects request through a variety of funding avenues each year, which could include bond proceeds, tax rate funds, or grant funds.

In order to save County taxpayer funds and lessen the financial impact on the potential bond issue total each year, Montgomery County plans to request approval to hire additional employees in the Montgomery County Facilities and Maintenance Department to complete many of the required items. Items found to require skilled labor or lengthy timelines are expected to be contracted to an outside company.

Summary of Self Evaluation Findings

Facility	Total Deficiencies	Cost Estimate Total
EMS Facilities	120	\$124,800.00
Courts Center	70	\$129,850.00
Historic Courthouse	55	\$98,200.00
Public Safety Facilities	94	\$112,050.00
Parks Facilities	264	\$665,105.00
Veterans Plaza Complex	239	\$258,850.00
Animal Control	21	\$6,200.00
Highway Department	12	\$38,650.00
Sidewalks/Right-of-Way	2,466	\$3,428,632.00
Total		\$4,862,337.00

Table 1 - Summary of Self Evaluation Based on 2018 Construction Cost Estimates

Areas of these facilities evaluated generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees, such as restrooms, meeting spaces, reception areas, and hallways. Typical employee common-use areas evaluated included break rooms, employee restrooms, locker rooms, conference rooms, etc. Spaces dedicated as employee work areas are exempt from the self evaluation process, but that does not obviate the need of the county to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

In March of 2019, Montgomery County entered into an agreement with Austin Peay State University’s GIS Center to undertake a sidewalk assessment project excluding the City of Clarksville city limits. Since a comprehensive list of sidewalks within the County does not exist, the APSU GIS Center conducted a study of the area using aerial photography, Google Street View, and subdivision plan review. From this assessment we found that one of Montgomery County’s most prevalent sidewalk issues is the presence of non-compliant driveway intersections with the sidewalks. Specific information regarding the study of compliance of County-owned sidewalks and curb ramps can be located in Appendix H.

In addition to evaluating county facilities, each department was evaluated. The focus of this review was to determine how much public interaction each department faces, if the department leaders feel as though their department is compliant with the ADA, and gaining information of possibly conflicting policies regarding the ADA and nondiscrimination. A space was also included for those leaders to provide specific suggestions or thoughts regarding how county programs can be made more accessible to persons with disabilities or what trainings they feel would be especially helpful.

INTRODUCTION

Introduction

The Americans with Disabilities Act (ADA, as amended) is a civil rights law that mandates equal opportunity for individuals with disabilities. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. The ADA prohibits discrimination in access to jobs (Title I), government services and public transportation (Title II), public accommodations (Title III), and telecommunications (Title IV). Montgomery County has undertaken a comprehensive evaluation of its programs and facilities to determine the extent to which individuals with disabilities may be restricted in access to County services, activities, and facilities.

Montgomery County is dedicated to ensure that no qualified person with a disability be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by the County based on a disability. County employees are expected to be aware of and respectful of various types of disabilities individuals may have. Montgomery County has developed its ADA Self Evaluation and Transition Plan to ensure Montgomery County’s compliance with the ADA and identification of modifications for activities, facilities, public rights-of-way, and programs to ensure accessibility compliance.

Montgomery County, Tennessee has a land area of 539 square miles and is located approximately 30 minutes northwest of Nashville at the Tennessee-Kentucky state line (Figure 1). We are one of the most historic, yet progressive counties in the region and home to the fifth largest County in the state. The estimated population per the 2017 Census was 200,182. Montgomery County is classified as a “public entity” pursuant to Title II of the ADA. The county is also required to comply with Title I, which requires state and local government entities to practice nondiscrimination in all parts of the employment process.

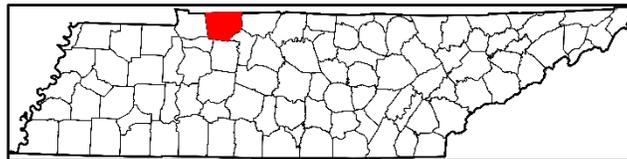


Figure 1 - Montgomery County Location Map

Montgomery County currently has 45 public facilities, approximately 60 miles of sidewalk, and 285 curb ramps that were evaluated for this Transition Plan. Appendices E, F, G, and H of this document provide a detailed look into the self evaluation process and results for each of these facilities.

Legislative Mandate

The Americans with Disabilities Act is companion legislation to two previous federal statutes and regulations: the Architectural Barriers Act of 1968 and Section 504 of the Rehabilitation Act of 1973.

The Architectural Barriers Act of 1968 is a Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a Federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. The development of a Transition Plan is a requirement of the Rehabilitation Act of 1973.

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. 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.

1. Title I of ADA prohibits discrimination on the basis of a disability for employment.
2. Title II of ADA prohibits discrimination by all public entities in access to all programs and services offered by the entity.
3. Title III of ADA requires any place of public accommodation be accessible to persons with disabilities.
4. Title IV of ADA requires telecommunication companies to ensure functionally equivalent services for consumers with disabilities.
5. Title V of ADA covers several technical provisions.

Montgomery County is required to observe all requirements of Title I of the ADA in its employment practices; Title II in its policies, programs, and services; any parts of Title IV and V that apply to Montgomery County, its programs, services, or facilities; and all requirements for accessibility set forth in the ADA Accessibility Guidelines (ADAAG).

Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V or the Rehabilitation Act. Title II of ADA extended this coverage of Section 504 of the Rehabilitation Act of 1973 to all state and local government entities, regardless of whether they receive federal funding or not. Specifically, the County may not, either directly or through contractual agreements, do any of the following:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny 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 County offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

When addressing accessibility needs and requirements, it is important to note that ADA and Title II do not supersede or preempt state or local laws that may offer equivalent or greater protections.

Undue Burden

It is important to note that the ADA requires all county programs, but not all county buildings, to be accessible. The ADA does not require Montgomery County to undertake any action that would result in a fundamental alteration in the intent of its program or activity, would create a hazardous condition, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. This determination can only be made by the ADA Coordinator and local government officials and must be accompanied by a statement citing the reasons for reaching the conclusion. The determination that an undue burden would result must be based on an evaluation of all resources available for use in the program or project. If an alteration is judged to be unduly burdensome, the County must fully consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program, service, or activity.

TITLE II REQUIREMENTS & RESPONSIBILITIES

Montgomery County 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 County 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.

Transition Plan

Included in Title II are administrative requirements for all government entities employing more than fifty (50) people. One of those requirements includes the development of a transition plan if the self evaluation process identifies any structural modifications necessary for compliance. This document will guide planning and implementation of necessary program and facility modifications over the next several years in accordance with ADA and the ADA Accessibility Guidelines (ADAAG). The ADA Self Evaluation and Transition Plan is significant in that it establishes the County's ongoing commitment to the development and maintenance of policies, programs, and facilities that include all of its citizenry.

In order to be effective, the Transition Plan needs to be utilized in the yearly planning of projects and funding decisions, and will need to be periodically reviewed for compliance and validity. It should be noted that the suggested remedies noted within this document are subject to further investigation and should not be binding. It is important that the deficiencies be addressed in such a manner that the end result is compliance. The Transition Plan should be viewed as a "living document" and updated regularly to reflect changes in real world conditions and to address any possible new areas of noncompliance. Changes to site conditions can create new access problems that were not evident when the plan was drafted. Regular updates to the plan will also result in monitoring compliance and the effectiveness of priorities set in the Plan itself. Over time, as County programs and facilities are

expanded and/or altered by needs of the citizens, this will be expanded upon to ensure accessibility to programs and facilities within the County.

Items listed in this document are to be used as a starting point for planning. Identified departments will be tasked with making corrections to deficiencies. The County has many resources available to interpret these regulations and it is expected that they will be utilized. The County desires to make the most effective repair as efficiently as possible. The timeframes outlined in this document are not final and are subject to adjustment based on funding availability and the complexity of the project. It should also be noted that there are undoubtedly more options to meeting compliance than those presented. Further investigation might reveal a more practical solution to the problem. Again, thoughtful utilization of resources, internal and external to the County, will be most valuable.

ADA Coordinator

The designation of an ADA Coordinator applies to all state or local government entities with fifty or more employees. The County must designate at least one responsible employee to coordinate ADA compliance. The benefits of having an ADA Coordinator are that:

- It makes it easier for members of the public to identify someone to help them with questions and concerns about disability discrimination,
- It provides a single source of information so questions by the County staff and from outside the County can be answered quickly and consistently, and
- It provides an individual who can focus on and who can be instrumental in moving compliance plans forward.

The name and contact information for the responsible person must be publicly advertised. Montgomery County has publicly posted this information in county-owned municipal buildings. The person who is appointed to this position must be familiar with the County's operation, trained in the requirements of the ADA and other laws pertaining to discrimination, and be able to deal effectively with local governments, advocacy groups, and the public. It is assumed that the coordinator is given sufficient time free of other responsibilities to carry out the Coordinator's functions. As of the publication of this document, Montgomery County's ADA Coordinator has been identified as:

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Public Participation

Montgomery County recognizes that the opportunity for the disabled community and other interested parties to participate in developing the Transition Plan is an integral part of the process. Montgomery County held an initial public meeting in May 2017 to lay the foundation for the creation of this plan. In addition, there was a public meeting held for the purpose of review and comment on this document on September 17, 2019 followed by a 30 day comment period. During this comment period, the draft version of the ADA Transition Plan was available to view in an online PDF format at <https://mcgtn.org/engineer/ada-compliance>, or in a paper format at the Montgomery County Mayor's Office (1 Millennium Plaza, Suite 201), and at the Clarksville-Montgomery County Public Library (350 Pageant Lane, Suite 501). Paper comment cards were made available at the public meeting that were able to be turned back in that night, mailed, or scanned and emailed to Amanda Bush. Comments were also available to be completed through email to Amanda Bush at agbush@mcgtn.net. No public comments were received during the defined draft review comment period. Ongoing public input will be achieved by direct communication with the ADA Coordinator through various means of communication including but not limited to face-to-face interactions, telephone, email, or postal mail.

Assurances

In order to receive federal funding, Montgomery County must guarantee non-discrimination and ensure new projects will be ADA compliant. Presently, Montgomery County includes a non-discrimination statement on all contracts. The document requires Montgomery County to comply with federal statutes, policies, and procedures. The document states no person on the grounds of race, color, national origin, sex, age, and handicap/disability may be excluded from federally funded programs. ADA compliance must also be met on all federally funded projects conducted by sub-recipients.

Standards, Specifications, and Design Details

The Architectural and Transportation Barrier Compliance Board (alternatively called the Access Board) has developed accessibility guidelines for pedestrian facilities in the public right-of-way. The Federal Highway Administration has recognized these as its currently recommended best practices. Montgomery County incorporates these accessibility guidelines into their own system of standards, specifications, and design details with modifications to meet local conditions. Development of design standards and design details within the County allows for consistency in the application of ADA requirements for new facilities.

Notice and Grievance Procedure

Montgomery County will adopt the attached Notice (Appendix B); distribute it to all department heads; post the Notice on its Internet Page; and post copies in evident locations in its public buildings. It will refresh the posted copies, and update the contact information contained on the Notice, as necessary. Copies will also be provided to any person upon request.

Under the Americans with Disabilities Act, users of Montgomery County facilities and services have the right to file a grievance if they believe that Montgomery County has not provided reasonable accommodation. Montgomery County will adopt the attached ADA Grievance Procedure (Appendix C), distribute it to all department heads, and post copies of it in evident locations in each of its public buildings. It will refresh the posted copies, and update the contact information contained on it, as necessary. Copies will also be provided to any person upon request. Under the Grievance Procedures, a formal complaint must be filed within 60 days of the alleged occurrence.

Policies, Programs, and Procedures

Montgomery County conducted an evaluation of its departments to determine current levels of public service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A questionnaire administered to department staff provided information on the nature of their program(s) along with questioning if they, as a department, felt as though their department is in compliance with the requirements set forth in the ADA. Public concerns and recommendations have been received and have been noted and researched regarding accessibility issues along with information provided in correspondences with County staff. The information found and received has revealed the County's existing policies, programs, and procedures may occasionally present barriers to accessibility for people with disabilities. It is the intent of the County to address the following county-wide programmatic accessibility barriers in the following areas:

- Customer service,
- Outreach and printed information
- Montgomery County website,
- Training
- Facility information and signage,
- Communication devices
- Effective Communication
- Disability Etiquette

Additionally, when a policy, program, or procedure creates an accessibility barrier unique to a department or a certain program, the County's ADA Coordinator can coordinate with that Department to address the matter in the most reasonable and accommodating manner.

General Effective Communication Provisions

According to Section 35.160(a) of the ADA, "a public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others." This means that Montgomery County is required to provide equally effective communication to individuals with disabilities. Equally effective communication can be provided by offering alternative formats, auxiliary aid(s), and/or services upon request. For example,

interpreters are hired as requested for those with hearing impairments, and text materials accessible by screen readers are made available to users when requested.

New Construction, Alterations, and Physical Changes to Facilities

The County will ensure that all buildings and facilities constructed by or on behalf of the County, and any alterations made to County facilities, are constructed in full compliance with the requirements of 28 C.F.R. § 3

- From September 15, 2010, to March 15, 2012, State and local governments (public entities) have the option of choosing to follow the 1991 Standards, the UFAS, or the 2010 Standards when making architectural changes to provide program access. The elevator exception in the 1991 Standards may not be used.
- On or after March 15, 2012, public entities must comply with the 2010 Standards in making architectural changes to achieve program accessibility and for all new construction and alterations.

The County will make modifications to physical features of County owned buildings and facilities found to be non-compliant during the self evaluation process. This survey was completed by using the 1991 and 2010 ADA standards. The effective date of Title II of the ADA is January 26, 1992. Facilities built prior to this date were required to be modified in a timely manner to provide accessibility. Facilities constructed or modified after this date are required to be in full compliance with the 1991 ADA regulations. However, any new construction or modifications commencing on or after March 15, 2012 will have to meet the requirements of the 2010 ADA Standards.

The County currently requires accessibility to be addressed when a building permit is issued for a structure. Montgomery County's Building and Codes Department has adopted as its building code the 2012 International Building Code and consequently adopts, by reference, the ICC/ANSI A117.1 Accessible and Usable Buildings and Facility Code. This building code is the basis for determining when a proposed project will be required to meet the current accessibility standards. The Building and Codes Department is responsible for plan review and inspection of facilities constructed under the building permit system.

Parks and Outdoor Spaces

The County will continue to be proactive in assessing the accessibility of our outdoor spaces. Outdoor spaces will include, but may not be limited to, parks and trails owned by the County. Policies, practices and procedures offered by Montgomery County's Parks and Recreation Department must be accessible. Accessibility includes advertisement, eligibility, participation, physical access, policies, and communication. Previously there have been few requirements pertaining to specific features of the types of facilities. Existing regulations did not address specific elements. Compliance had to be inferred by applying pertinent sections of the Standards to specific elements (stair and handrail requirements, for example). The 2010 ADA Standards now address many of these types of facilities in a more specific

manner. Combined with guidance produced by the Access Board and Federal Highway Administration (FHWA), outdoor spaces will become more accessible as the regulations and guidance are used to guide replacement of older features located within these facilities as well as designing new features as parks and trails are expanded.

Right-Of-Way Improvements

The County will continue to be proactive in ensuring Right-of-Way pedestrian areas remain in compliance with regulations. In discussions with the Montgomery County Highway Department it has been determined that Montgomery County has approximately 60 miles of sidewalks within the County, but the Montgomery County Highway Department does not currently maintain any of these sidewalks or curb-cuts as the majority have been installed by property developers and maintained by the homeowners' association in that area. Montgomery County contracted with Austin Peay State University's GIS Center to complete an assessment of the sidewalks, curb ramps, and push-button intersections within Montgomery County. Many Montgomery County facilities are located within City of Clarksville limits, thus the County cannot determine or direct any access barrier remediation actions that would fall under the responsibility of the City of Clarksville. The County will continue to monitor any new pedestrian right-of-way locations that may be installed in the future to ensure compliance.

Citizen Barrier Removal Request

When confronted with a barrier to access (i.e. no existing curb ramps, curb ramp in disrepair, etc.), Montgomery County citizens will have the opportunity to submit a barrier removal request to the County to be reviewed.

Miscellaneous Provisions

A questionnaire administered to department heads revealed that approximately 1/3 of county departments are unsure if their respective departments are fully compliant with the ADA. Based upon the need shown with this gathered data, Montgomery County will within twelve (12) months of the approval of this document, develop or procure a training program on the requirements of the ADA and appropriate ways of serving persons with disabilities. The County will use the ADA technical assistance materials developed by the Department of Justice in developing or procuring the ADA training program. The County will plan to deliver its training program to all County employees.

SELF EVALUATION

Self Evaluation

In order to perform the required self evaluation for Montgomery County's many facilities, in regards to adherence to the Americans with Disabilities Act; in depth research was conducted to develop a usable self evaluation form that could be modified across facilities to ensure any potential compliance issues could be determined.

The self evaluation consisted of visiting the public spaces of Montgomery County owned facilities. Each facility was observed, tested, and measured by a licensed architect to assess compliance with the applicable ADA Standards using appropriate tools including a digital level, door pressure gauge, tape measure and others as needed.

Barrier Removal Strategies

There are numerous scheduling strategies that can be utilized to identify the best use of County resources to remove a physical accessibility barrier. The County will use the following guidelines to categorize the removal actions.

A. Maintenance Project – An accessibility barrier not requiring a design solution that can be removed by the County's facility and maintenance staff or with limited assistance from a licensed contractor.

Examples of these items include:

- Adjust door closers
- Paint indicator stripes on stair nosing, interior applications.
- Relocate or install signage
- Replace door hardware
- Relocate toilet room accessories

B. Barrier Removal Project – Accessibility barrier removal projects that the County plans to address in the Capital Improvements Plan that will require a design solution and be performed by a licensed contractor. These projects can generally be completed in a short time frame upon funding by the County.

Examples of these items include:

- Relocate plumbing fixtures and associated systems
- Modify or install stair and ramps, associated handrails
- Modify built-in casework and countertops

C. Current Planning/Construction Projects – An accessibility barrier is already scheduled to be removed under a current or pending construction project.

D. Long Term Planning Project – Projects requiring long-term planning and significant funding from the County.

Prioritization

In creating priorities, it should be the county's intent to evaluate all areas of potential deficiency and to make structural changes where necessary and when equal accommodation cannot be made in another manner. The assignment of priorities is intended to facilitate public review and to address specific concerns of the local disabled community. It must be emphasized that it is the county's intention that all individuals with all types of disabilities be reasonably accommodated to provide access to all programs offered at all facilities. The following priorities have been provided by the ADAAG for accessibility of each publicly accessible area for each public building, other County facility, or park.

- Priority 1 – Accessible approach and entrance:
 - An accessible approach route from site arrival points and an accessible entrance should be provided for everyone, including those with disabilities. Priority 1 buildings and facilities are required to comply with the standards for accessible approach and entrance regarding all County programs, services, and activities. There should be an accessible route from site arrival points to include parking, passenger loading zones, and public sidewalks that do not require the use of stairs.
- Priority 2 – Access to goods and services:
 - The layout of the building should allow people with disabilities to obtain goods and services and to participate in activities without assistance. The accessible entrance should provide direct access to the main floor, lobby and elevator. All public spaces should have at least one access route.
- Priority 3 – Access to public toilet rooms:
 - When toilet rooms are open to the public, they should be accessible to people with disabilities. If toilet rooms are available to the public, at least one toilet room should be accessible, with either one for each sex, or one family restroom. There should be signs at inaccessible toilet rooms that give directions to accessible toilet rooms. If not all toilet rooms are accessible, there should be a sign at the accessible toilet room with the International Symbol of Accessibility.
- Priority 4 – Access to additional amenities:
 - Access to additional amenities such as water fountains, public telephones and fire alarm systems should be provided.

In addition to the priorities listed above, the County has assessed the use of each facility and has ranked each facility from most utilized by the public to least utilized based upon the estimated daily number of users, unique facility in that programs are unable to be moved, and long term planning status where a facility is scheduled for upgrades or improvements in the Capital Improvements Plan that will include accessibility. The facilities have been ranked in 4 Tiers with Tier 1 having the highest utilization score.

In some instances, it may be advantageous to construct all improvements at a single site at once rather than only correcting the Priority 1 barriers and coming back at a later date to correct Priorities 2, 3, and 4. Some Facilities which are heavily used may have a lower Tier ranking due to low amount of deficiencies noted during the self evaluation survey.

Tier 1	Tier 2	Tier 3	Tier 4
Courts Center	Historic Courthouse	Workhouse	EMS Stations*
Public Safety Complex*	Cumberland Heights-Bartee Center	South Guthrie Community Center	Spur Line Trailhead
Jail	Rotary Park	RichEllen Park	Facilities
Library	On-Site Health*	Woodlawn Park	Memorial Park
Veterans Service Office*	Veterans Plaza Parking & Walks	Civic Hall	Highway Department Building
County Clerk	Building and Codes	Civitan Park	
Health Department	DHS	Election Commission	
WIC	DCS	Archives	
	Property Units	Training Room	
	Animal Control	Purchasing	

Table 2 - Facility Tier Ranking
 * Facility with currently ongoing Project

Implementation Schedule

The proposed implementation schedule outlined in Table 3 is arranged by tier type for facilities evaluated as part of this project. This 20-year plan will serve as the implementation schedule for the Transition Plan.

Facility Tier	Schedule (years)	Correction Cost Estimate
Tier 1	1 - 5 Years	\$ 291,550.00
Tier 2	6 - 10 Years	\$ 428,255.00
Tier 3	11 - 15 Years	\$ 528,700.00
Tier 4	16 - 20 Years	\$ 185,200.00

Table 3 - Estimated Implementation Schedule

Sidewalk & Curb Ramp corrections will be scheduled separately by the County Highway Department. Montgomery County does reserve the right to modify the priorities based on funding levels and changes in county programs, activities, and services to have flexibility in accommodating community requests, and complaints.

Recent / Current Projects

The County has recently completed or is currently working on several projects that have removed barriers or provided new facilities that have improved accessibility to County programs & services.

2017-2018 Rotary Park Parking & Infrastructure Improvements – This project provided accessible walkways and parking spaces to allow access to the playground, pavilions, and toilets facilities at various location throughout the park.

2018-2019 EMS Administration & Logistics Facility – The relocation to a new facility provided accessible parking spaces, routes, and entrances to the EMS staff offices, training room, and the county morgue. The transaction window where the public pays bills is now compliant. The building has multiple accessible restrooms public usage.

2018-2019 Civitan Park Phase II – Phase II of Civitan Park added three little league fields with compliant access routes and spectator bleachers, a fully accessible “ADA Ballfield” that is specifically designed for players using wheelchairs, accessible restrooms, accessible concession windows, an accessible pavilion with restrooms, and a compliant walking trail.

2019-2020 Veterans Service Organization – The Veterans Service Organization is being relocated from their current location to a new location within the Veterans Plaza complex. When completed, the new office will provide an accessible waiting area and reception counter, an accessible route to offices for public interaction with staff, and accessible public toilets.

2019-2020 Public Safety Complex 2nd Floor Magistrate & Warrants Renovations – When completed, the renovated magistrate and warrants areas will have multiple accessible transaction windows.

2019-2020 On-Site Employee Health Clinic – The Clarksville-Montgomery County School System is in the design phase of a renovation project that will expand the current On-Site Health Clinic into the existing Veterans Service Organization space once it is vacated. It is anticipated that the renovation will address several of the accessibility issues noted in the self evaluation.

2019-2021 EMS Station 20 – This facility renovation project is in the design phase. This project will renovate the entire station and in the process, accessibility barriers will be removed.

Cost Analysis

The goal of the Transition Plan is to provide an outline for future projects to ultimately bring County-owned facilities into compliance with the ADA. The Transition Plan does not provide the design solutions for each item not currently in compliance. Many items identified within this plan require final design solutions.

The estimated costs included in this plan are listed for rough budgeting purposes. Although they are accurate enough to determine the county-wide magnitude, the cost estimates are not precise enough to insure specific facility upgrades. The costs do not include cost escalation. Also excluded are design

services, hazardous materials testing and abatement, and topographic surveys that may be required to complete the work.

Accordingly, it is anticipated that a more detailed estimate will be completed in conjunction with correction design solutions to create capital funding requests for the facility upgrades planned in a specific year.

Estimated Project Costs by Facility

Facility Name	Deficiency Correction Cost Estimate
EMS Headquarters *	New 2018 - Not Surveyed
EMS Station 20	\$ 19,475.00
EMS Station 21	\$ 5,050.00
EMS Station 22	\$ 18,600.00
EMS Station 23	\$ 500.00
EMS Station 24	\$ 18,250.00
EMS Station 25 **	City of Clarksville Building
EMS Station 26	\$ 16,750.00
EMS Station 27	\$ 11,000.00
EMS Station 28	\$ 13,150.00
EMS Station 29	\$ 22,025.00
EMS Station 30 *	New 2015 - Not Surveyed
EMS Station 31 *	New 2017 - Not Surveyed
Historic Courthouse	\$ 98,200.00
Courts Center	\$ 129,850.00
Civitan Park	\$ 244,350.00
RichEllen Park	\$ 45,050.00
Rotary Park	\$ 79,150.00
South Guthrie	\$ 72,400.00
Spur Line Trail	\$ 9,650.00
Woodlawn Park	\$ 136,850.00
Cumberland Heights	\$ 77,655.00
Downtown Commons	New 2018 - Not Surveyed
Veterans Plaza Parking & Routes	\$ 136,400.00
Archives	\$ 450.00
Building & Codes	\$ 5,650.00
Civic Hall	\$ 9,300.00
County Clerk	\$ 5,000.00
Department of Children's Services*** - State of TN	\$ 850.00
Department of Human Services*** - State of TN	\$ 5,800.00

Election Commission	\$ 2,900.00
Facilities & Maintenance	\$ 1,100.00
Health Department	\$ 24,950.00
Information Technology	New 2017 - Not Surveyed
Mid Cumberland HRA ***	N/A - No Public Spaces to Survey
Oasis Café	\$ 500.00
On-Site Health Clinic**** - CMCSS	\$ 9,550.00
Property Assessor	\$ 550.00
Property Units Corridor & Restrooms	\$ 7,050.00
Public Library	\$ 3,150.00
Purchasing	\$ 300.00
Register of Deeds	\$ 350.00
Training Room	\$ 5,850.00
Trustee	\$ 350.00
Veterans Services	\$ 12,050.00
Veterans Memorial Park	\$ 11,300.00
WIC Clinic	\$ 15,450.00
Highway Department	\$ 38,650.00
Animal Control	\$ 6,200.00
Public Safety Complex	\$ 12,000.00
New Jail	\$ 89,100.00
Workhouse	\$ 10,950.00
Preliminary Deficiency Correction Cost Estimate	\$ 1,433,705.00
Construction Contingency 15%	\$ 215,056.00
Soft Costs 20%	\$286,741.00
Total Estimated Cost	\$ 1,935,502.00

Table 4 - Estimated Costs per Facility
** New Facility constructed to 2010 Standards - Not Surveyed*
*** Facility not owned by Montgomery County*
**** Interior renovations completed by Tennant*
***** Facility with no public spaces - Not Surveyed*

Based on the non-compliant features, the total costs for facilities corrections are listed in Table 4. The costs were calculated by using the following information:

- Costs were derived using a combination of current 2018 construction industry indexes and adjusted historical cost data.
- Costs are based on similar corrections at a given location being bid as a single project.
- Costs are not adjusted for projects self-performed by Montgomery County.

Right-of-Way Estimated Construction Costs by Type

Montgomery County sidewalk and curb ramp accessibility survey, data collection, and cost estimates were conducted under a consultant agreement with the Austin Peay State University GIS Center.

Type	Deficiency Correction Cost Estimate
Sidewalks	\$ 2,393,534.00
Curb Ramps	\$ 1,035,048.00
Preliminary Deficiency Correction Cost Estimate	\$ 3,428,632.00
1.5 cost multiplier	\$ 1,714,316.00
Total Estimated Cost	\$ 5,142,948.00

Table 5 - Estimated Costs per Right-of-Way Type

Based on the non-compliant features, the total costs for right-of-way corrections are listed in Table 5. The costs were calculated by using the following information:

- Costs for obstructions were not calculated.
- Base costs were derived from 2018 TN TDOT Price Information.
- Cost multiplier is for obstructions, contingency, soft costs, complexity and inflation.
- Costs for replacement include removal and replacement.
- All costs are calculated based on total replacement.

TRANSITION PLAN MANAGEMENT

Monitoring and Updates

Montgomery County’s Transition Plan is a living document that will require routine updates. The first update will be scheduled to occur one year from the plan’s formal adoption and on a 4 year cycle thereafter. If new regulations are adopted or new information is available, Transition Plan documents may be altered at that time. The Transition Plan schedule may be altered at the discretion of Montgomery County based on changes in guidance from the United States Access Board, Federal Policy, and State of Tennessee Policy.

Coordination with Facility Maintenance and Capital Projects

For the ADA Transition Plan to be successful, it will be imperative to coordinate necessary modifications with annual Facility Maintenance and Capital Project budgets. Current, as well as future, programs and projects can be addressed in conjunction with ADA modifications in mind to decrease expenses and increase the benefit to the public. While the Transition Plan offers a schedule for modifications and lists priorities, Montgomery County will review and adjust the plan to reflect projects fitting into the Capital Improvements Plan. If a project affects those priorities scheduled in the Transition Plan, it will then be necessary to re-prioritize facilities for improvement.

ADA TOOL KIT

Introduction

In order to facilitate access to all county programs and departments, the county will maintain program accessibility guidelines, standards, and resources. This information is available to all employees and volunteers. The county will add to these guidelines when necessary to address its needs and include information and technological devices that help staff and volunteers communicate with individuals with a variety of disabilities. The county will periodically review the components of this section, as new technologies are developed in order to ensure that the best types of modifications are included. This section also contains the accessibility standards of care that govern new construction and alterations to facilities.

If you need any additional assistance, please contact:

Ms. Amanda Bush, ADA Coordinator

Phone: (931) 553-5113

Email: agbush@mcgtn.net

Federal Accessibility Standards and Regulations

U.S. Department of Justice

The U.S. DOJ provides many free ADA materials. Printed materials may be ordered by calling the ADA Information Line at (800) 514-0301 (Voice) or (800) 514-0383 (TDD). Publications are available in standard print as well as large print, audiotape, Braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the DOJ website (www.ada.gov/).

Unless noted, the ADA publications have not been updated to reflect the recent revisions to the ADA regulations that took effect on March 15, 2012.

- ADA Regulation for Title II: This publication describes Title II of the ADA (http://www.ada.gov/regs2010/ADAregs2010.htm#titleII_final_2010), Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under Section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth Standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.

- Title II Technical Assistance Manual (1993) and Supplements: This manual (www.ada.gov/taman2.html) explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance.
- Accessibility of State and Local Government Websites to People with Disabilities. This is a publication providing guidance (www.ada.gov/websites2.htm) on making state and local government websites accessible.

U.S. Access Board

The full texts of Federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded from the Access Board's website (www.access-board.gov/the-board/laws). In addition to regular print, publications are available in large print, disk, audiocassette, and Braille. Multiple copies of publications can be ordered by sending a request to pubs@access-board.gov. In addition to the guidelines, guidance material is also available to assist staff in understanding and implementing Federal accessibility guidelines.

The following publications are currently available from the U.S. Access Board.

Guidelines and Standards for Facilities

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The county should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

- ADA Standards for Accessible Design (ADASAD): This document (www.ada.gov/2010ADAstandards_index.htm) contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA, including special provisions where applicable for elements designed specifically for children ages 12 and under. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by Titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the DOJ and the DOT, under the ADA.
- Accessibility Guidelines for Play Areas: The Access Board has developed accessibility guidelines for newly constructed and altered play areas. This bulletin is designed to assist in using the play area accessibility guidelines and provides information regarding where the play area guidelines apply, what a play component is considered to be, how many play components must be an accessible route, and the requirements for accessible routes within play areas. (<https://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides/play-areas>).
- Accessibility Guidelines for Recreation Facilities: The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility

guidelines are a supplement to ADASAD. They cover the following facilities and elements: amusement rides, boating facilities, fishing piers and platforms, miniature golf courses, golf courses, exercise equipment, bowling lanes, shooting facilities, swimming pools, wading pools, and spas. These summaries were updated following issuance of ADASAD (www.access-board.gov/guidelines-and-standards/recreation-facilities/guides).

- Accessibility Guidelines for Outdoor Developed Areas: The Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas was established in June 1997. The accessibility guidelines proposed by the Committee include consideration of the latest information, design, and construction practices in existence. Proposed Section 16 of ADAAG requires all areas of newly designed or newly constructed and altered portions of existing trails connecting to designated trailheads or accessible trails to comply with this section. This proposed section also provides design guidelines for all newly constructed and altered camping facilities, picnic areas, and beach access routes. It is recognized that compliance with this section will not always result in facilities that will be accessible to all persons with disabilities. These guidelines recognize that often the natural environment will prevent full compliance with certain technical provisions, which are outlined in this publication (<https://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/final-guidelines-for-outdoor-developed-areas>).

Guidance Material and Advisory Reports for Facilities

The following publications provide additional information on specific aspects of the above guidelines and standards for facilities. Employees are encouraged to refer to these publications to obtain more detailed and up-to-date information when evaluating and implementing accessibility improvements to facilities. Note that several websites have been reconfigured and some outdated information removed. Some web addresses or hyperlinks may not be functional and not all information contained in the documents references current standards.

- Using ADAAG Technical Bulletin: This bulletin was developed to serve the specific needs of architects and other design professionals who must apply the ADAAG to new construction and alterations projects covered by Titles II and III of the ADA. It is also intended to clarify accessibility regulations generally, including those that apply to existing facilities covered by the ADA.
- Detectable Warnings Update (March 2014): Currently, the Access Board is in the process of developing guidelines on public rights-of-way that, once finalized, will supplement the new ADASAD and be the enforceable standard for ROW facilities. This update was expected in 2013 but as of publication of this SETP is still pending. While ADASAD covers various features common to public streets and sidewalks, such as curb ramps and crosswalks, further guidance is necessary to address conditions unique to public ROW. Constraints posed by space limitations at sidewalks, roadway design practices, slope, and terrain raise valid questions on how and to what extent access can be achieved. Guidance on providing access for blind pedestrians at street

crossings is also considered essential. This bulletin outlines the requirements of detectable warnings, a distinctive surface pattern of domes detectable by cane or underfoot, which are used to alert people with vision impairments of their approach to streets and hazardous drop-offs. Note that detectable warnings are required in very few locations outside of the public ROW and are often installed in parking lots and similar site conditions where they are not required and should not be placed. Overuse of detectable warnings can lead to confusion for persons with vision loss and can create unsafe conditions for persons using mobility devices.

(<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research/detectable-warnings-update>)

- Assistive Listening Systems Technical Bulletins: Assistive listening systems are devices designed to help people with hearing loss improve their auditory access in difficult and large-area listening situations. Typically, these devices are used in such venues as movie houses, theaters, auditoriums, convention centers, and stadiums, where they are piggybacked on a public-address system. They may also be used in smaller listening locations like courtrooms, museums, classrooms, and community centers. This web site provides information about the types of systems that are currently available and tips on choosing the appropriate systems for different types of applications (<https://www.nidcd.nih.gov/health/assistive-devices-people-hearing-voice-speech-or-language-disorders>).

Guidance Material for Communication

- Standards for Electronic and Information Technology: The Access Board is issuing final accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 requires the Access Board to publish standards setting forth a definition of electronic and information technology and the technical and functional performance criteria necessary for such technology to comply with section 508. (<https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards/guide-to-the-section-508-standards>). Section 508 also requires that individuals with disabilities, who are members of the public seeking information or services from a Federal agency, have access to and use of information and data that is comparable to that provided to the public who are not individuals with disabilities, unless an undue burden would be imposed on the agency. (www.section508.gov/)
- Bulletin on the Telecommunications Act Accessibility Guidelines: As technology continues to improve our means of telecommunication, it can pose challenges to accessibility on one hand, while on the other hold the key to innovative access solutions. Section 255 of the Telecommunications Act requires telecommunications products and services to be accessible to people with disabilities. This is required to the extent access is "readily achievable," meaning easily accomplishable, without much difficulty or expense. Telecommunications products covered include: wired and wireless telecommunication devices, such as telephones (including pay phones and cellular phones), pagers, and fax machines; other products that have a telecommunication service capability, such as computers with modems, and equipment that

carriers use to provide services, such as a phone company's switching equipment. (<https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-telecommunications-act-guidelines>).

Federal guidelines and standards are subject to periodic revision based on research findings and guidance from advisory committees. The county should have a regular practice of reviewing research materials posted to the U.S. Access Board's website and updating local guidelines and practices as new standards are adopted or existing standards are revised.

Resources for Providing Accessible Programs & Facilities

- ADA Document Portal: This website (<https://adata.org/ada-document-portal>) provides links to more than 7,400 documents on a wide range of ADA topics. The ADA Document Portal is supported by the 10 ADA & IT Technical Assistance Centers.
- The U.S. Department of Labor, Office of Disability Employment Policy: www.dol.gov/odep/. The Office of Disability Employment Policy (ODEP) is the only non-regulatory federal agency that promotes policies and coordinates with employers and all levels of government to increase workplace success for people with disabilities.
- National Center on Accessibility (NCA): The Center (<http://ncaonline.org>) is a cooperative effort between the National Park Service (NPS) and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. Initiated in 2005, this longitudinal study is primarily the result of questions that the National Center on Accessibility has, for many years and continues to receive from organizations, agencies and individuals who desire to make their trails accessible; are interested in an unobtrusive surface that blends and is friendly to the environment; and provides a quality trail experience for people with and without disabilities.
- National Center on Health, Physical Activity, and Disability: The Center (www.ncpad.org) provides information and resources on physical activity to help people with disabilities find ways to become more active and healthy. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps, and health and leisure services.
- National Park Service: NPS has many programs that address the issue of providing accessible recreation services to people with disabilities. These include Wilderness Accessibility for People with Disabilities (www.nps.gov/publications/1992/December1992#8-1a) and Director's Order #42-Accessibility, which establishes the purpose and role of the NPS Accessibility Program (www.nps.gov/accessibility.htm), lists applicable laws, standards, and authorities, implementation strategies, roles, and responsibilities. It also addresses NPS policies and provides links to additional information sources.
- Tennessee Department of Environment and Conservation, Recreation Educational Services Division: RES (<https://www.tn.gov/environment/program-areas/res-recreation-educational-services/res-greenways-trails.html>) has produced a Greenways and Trails Program, ADA

Accessibility Guidelines document the issues pedestrian trail projects face and the planning and design components that must be incorporated to ensure facilities are accessible to and usable by people with disabilities.

Technical Resources

The county will utilize the many disability-related resources available through the internet.

Assistive Technology Vendors and Service Providers

- American Sign Language Interpreters: A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a 24-hour basis to handle emergency procedures. The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, unique circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. Resources and contacts for qualified sign language interpreters and information for the deaf and hard of hearing are at the following locations:
 - Bridges
935 Edgehill Avenue
Nashville, TN 37203
(615) 248-8828
 - Registry of Interpreters for the Deaf – www.rid.org/, including the Tennessee Chapter (<http://www.tennrid.org/>).
- Assistive Technology: Systems and devices amplify sound for persons with hearing disabilities should be available for public meetings and conferences. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals.
- Telecommunications Devices Access Programs (TDAP): The Telecommunications Devices Access Program (TDAP) is established by Chapter 417 of the Public Acts of 1999. In accordance with the Act, the program is designed to distribute appropriate telecommunications devices so that persons who have a disability may effectively use basic telephone service. The Tennessee Public Utility Commission was given the responsibility and authority to implement and manage this program. Devices are issued on a first-come, first-served basis. However, there are certain qualifiers that might enable individuals to receive devices on a priority basis. (<https://www.tn.gov/tpuc/telecommunications-devices-access-programs-tdap.html>)
- Tennessee Relay Services (TNRS): As a service to Tennessee's deaf, deaf-blind, hard-of-hearing, and hearing and speech-impaired community, the Tennessee Relay Service (TNRS) provides free, statewide assisted telephone service to those with speech, hearing, and visual impairments. (www.tn.gov/tpuc/relay-center-services.html).

- Technology Access Center (TAC): The Technology Access Center has offered services for middle Tennesseans with disabilities and functional limitations since 1989. The Center is operated by the nonprofit corporation, Access Services of Middle Tennessee. The mission of the corporation's board and staff members is to promote the independence and participation of individuals of all ages with disabilities in school, work, play and everyday activities through their use of assistive technology. (<http://tacnashville.org/>)
- Closed Caption Machine - To the extent practical, county divisions should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- Enlarging Printed Materials - A copy machine capable of enlarging printed materials should be available for each site where programs or transaction counter services are provided to the public.
- Optical Readers - Equipment that can translate printed information into an audio format should be available to Departments.
- TDD - To the extent necessary, county Divisions should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies.
- TDI – TDI's (formerly known as Telecommunications for the Deaf and Hard of Hearing, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened, or deaf blind. TDI's online resources (<https://tdiforaccess.org/>) include information about telecommunications access such a TTY, pagers, telephony, VoIP, and more.

Guide to Disabilities and Disability Etiquette

A summary guide to disabilities and disability etiquette has been included below. The guide will allow staff members to become familiar with a variety of types of disabilities and help them to be more sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

The National Organization on Disability reports that more than 59 million Americans have a disability. This section is for anyone — with or without a disability — who wants to interact more effectively with people who are disabled.

The ADA was conceived with the goal of integrating people with disabilities into all aspects of American life, particularly the workplace and the marketplace. Sensitivity toward people with disabilities is not only in the spirit of the ADA, it makes good business sense. It can help the county expand its services to citizens, better serve its customers and improve relationships with its employees.

When supervisors and co-workers use disability etiquette, employees with disabilities feel more comfortable and work more productively. Practicing disability etiquette is an easy way to make all people feel more comfortable and welcomed in their environment.

There is no reason to feel awkward when dealing with a person who has a disability. This section provides some basic tips for county staff to follow. If a county employee is ever unsure how to best serve a person with a disability, just ask them.

- Ask Before You Help – Just because someone has a disability, don't assume he/she needs your help. If the setting is accessible, people with disabilities can usually get around fine without assistance. Adults with disabilities want to be treated as independent people. Offer assistance only if the person appears to need it. If they do want help, ask what type of help they would like before you offer any assistance. What you think they may need may not be what they really need.
- Do Not Touch! – Some people with disabilities depend on their arms for balance. Grabbing them – even if you mean well – could knock them off balance and create an injury. This is especially true of a person using a cane, crutches, or walker. When someone is in a wheelchair, never pat their head or touch their wheelchair (or scooter) without permission. This equipment is part of their personal space and touching it is considered rude.
- Engage Your Mind Before Engaging Your Mouth – Always speak directly to the person with the disability NOT to their companion, aide, or sign language interpreter. Making small talk with a person who has a disability is great; just talk to him/her like you would anyone else. Respect his/her privacy and don't ask questions about their disability unless they invite the discussion. If you are with a child who asks, don't make the situation awkward for everyone; let the person with the disability respond directly to the child. They are used to children's questions.
- Make No Assumptions – People with disabilities are the best judge of what they can or cannot do. Do not make any decisions for them about participating in any activity or what they may or may not be able to do. Simply respond to their questions and let them make their own decisions. Depending on the situation, it may be a violation of the ADA to exclude someone because of a wrong decision on what they're capable of doing.
- Respond Graciously to Requests – When people who have a disability ask for an accommodation at a county-owned property, it is not a complaint. It shows they feel comfortable enough in your establishment to ask for what they need. If they get a positive response, they will enjoy their transaction and feel comfortable to come back again and again. Unless they are asking for something outlandish, provide what is asked for. If they request something unreasonable, contact your ADA Coordinator for a direction toward a resolution.
- Terminology – PUT THE PERSON FIRST! Always say “person with a disability” rather than “disabled person”. This recognizes that they are a person first, not a disability first. If someone has a specific disability, it would be a “person who is blind”, a “person who is deaf”, or a “person with dwarfism”. Each person may have their own preferred terminology, and if you're not sure what to use, just ask them. Most, however, will recognize the effort when you just refer to them as “people”.
 - Avoid outdated, politically incorrect terms like “handicapped” or “crippled”. Be aware that many people with disabilities dislike jargon and euphemistic terms like “physically

challenged” and “differently abled”. Say “wheelchair user” instead of “confined to a wheelchair” or “wheelchair bound”. The wheelchair is what enables the person to get around, but they are neither confined by it nor bound to it. The wheelchair is liberating, not confining.

- With any disability, avoid negative, disempowering words like “victim” or “sufferer”. Say “person with AIDS” instead of “AIDS victim” or person who “suffers from AIDS”.
- It’s okay to use idiomatic expressions when talking to people with disabilities. For example, saying “It was good to see you” and “See you later” to a person who is blind is completely acceptable. They will use the same terminology and it’s inappropriate to respond with questions like, “How are you going to see me later?”
- An individual in a wheelchair may say, “Let’s go for a walk” and it’s okay for you to say it too. The situation will only become awkward if you make it so.
- Many people who are Deaf communicate with sign language and consider themselves to be members of a cultural and linguistic minority group. They refer to themselves as Deaf (with a capital D) and may be offended by the term “hearing impaired.” Others may not object to the term, but in general it is safest to refer to people who have hearing loss but communicate through a spoken language as “people with hearing loss” and those who have a profound hearing loss as “people who are Deaf”.

Community Groups, Organizations, Associations, and Commissions

There are a large number of groups nationally, regionally, and within each state that provide specialized services, information, and advocacy for persons with all disabilities. A number of advocacy groups are listed below, the list is not intended to be complete by any means:

- Ability Resources: Ability Resources Inc. (<http://www.abilityresources.org/>) was founded in 1976. Their mission is to assist people with disabilities in attaining and maintaining their personal independence. One way this can be achieved is in the creation of an environment in which people with disabilities can exercise their rights to control and direct their own lives.
- ADA National Network: The ADA National Network (<https://adata.org/>) provides information, guidance and training on the Americans with Disabilities Act (ADA), tailored to meet the needs of business, government and individuals at local, regional and national levels. The ADA National Network consists of ten Regional ADA National Network Centers located throughout the United States that provide local assistance to ensure that the ADA is implemented wherever possible.
- American Council of the Blind: ACB (<https://www.acb.org/>) is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. ACB is located at 1703 N Bearuregard Street, Suite 420, Alexandria, VA 22311. You can reach them by phone at (800) 424-8666 or by e-mail at info@acb.org.

- American Association of People with Disabilities: The American Association of People with Disabilities (www.aapd.com/) is the largest non-profit, non-partisan, cross-disability organization in the United States.
- National Association of the Deaf: NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website (www.nad.org).
- National Federation of the Blind: NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provided online resources (www.nfb.org) for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed circuit TV (CCTVs). There is also a Tennessee state chapter (<http://www.nfbtn.org/>).
- National Organization on Disability: The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation related resources (www.nod.org).
- Paralyzed Veterans of America: PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website (<http://www.pva.org/>) provides information on useful sports publications and a list of contacts.
- United Spinal Association: United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender, or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website (www.unitedspinal.org).
- World Institute on Disability: WID is an international public policy center dedicated to carrying out research on disability issues and overcoming obstacles to independent living. WID maintains an on-line information and resource directory on technology, research, universal design, and the ADA. (www.wid.org/resources).
- Tennessee Department of Human Services – provides information on a wide variety of disability services (<https://www.tn.gov/humanservices/disability-services.html>). Information is provided for:
 - Vocational Rehabilitation
 - Blind & Visually Impaired Services
 - Deaf, Deaf-Blind, and Hard of Hearing Services
 - Tennessee Rehabilitation Center
 - Community Tennessee Rehabilitation Centers
 - Disability Determination Services

- Tennessee Technology Access Program
 - Councils and Committees
 - Tennessee Business Enterprises
 - Vocational Rehabilitation (VR) Office Locations
- Tennessee Commission on Aging and Disability: The Tennessee Commission on Aging and Disability was created by the Tennessee General Assembly in 1963. The Commission is the designated state agency on aging and is mandated to provide leadership relative to aging issues on behalf of older persons in the state. Our mission is to bring together and leverage programs, resources, and organizations to protect and ensure the quality of life and independence of older Tennesseans and adults with disabilities. (www.tn.gov/aging.html).
 - Tennessee Association of the Deaf: The Tennessee Association of the Deaf (TAD) is a state association affiliated with the National Association of the Deaf and the local chapters across Tennessee. It serves as an advocate for more than 500,000 deaf and hard of hearing people living in Tennessee. The TAD is a non-profit state association operating independently of federal, state, and local. Membership includes deaf, hard of hearing, and hearing people. The mission of TAD is to promote the general welfare of deaf, hard of hearing, and hearing people by advocating accessible services and programs across Tennessee. The paramount significance of this mission is that it will enable all individuals to achieve full participation into the mainstream of life and community (www.deaftenn1897.org/).
 - Southeast ADA Center: The Southeast ADA Center a leader in providing information, training, and guidance on the ADA and disability access tailored to the needs of business, government, and individuals at local, state, and regional levels. They also conduct research to reduce and eliminate barriers to employment and economic self-sufficiency and to increase the civic and social participation of Americans with disabilities. (<http://www.adasoutheast.org/>)
 - Tennessee Disability Pathfinder: Tennessee Disability Pathfinder provides free information, resources, support, and referrals to Tennesseans with disabilities and their families. Through three major program components, they provide information and resources to individuals of all ages, all types of disabilities, and language spoken. (<https://vkc.mc.vanderbilt.edu/vkc/pathfinder/>)
 - Disability Rights Tennessee: Disability Rights Tennessee (DRT) was founded in 1978 and recently the agency was known as Disability Law & Advocacy Center of Tennessee. Today, DRT is Tennessee's Protection & Advocacy System and has served—at no cost—more than 40,000 clients with disabilities. Their mission is to protect the rights of Tennesseans with disabilities. DRT provides services to people with disabilities across the state with numerous issues, including employment discrimination, safety in schools, abuse and neglect, and access to community resources and services. (<https://www.disabilityrightstn.org/>)
 - Tennessee Disability Coalition: The Tennessee Disability Coalition is an alliance of organizations and individuals joined to promote the full and equal participation of people with

disabilities in all aspects of life. The Coalition and its member organizations represent Tennesseans of every age, economic background, political persuasion and disability. Some are disability-specific groups, like the Autism Society of Middle Tennessee, while others are cross-disability and may focus on specific issues, such as independent living, employment, or assistive technology. Each is committed to collaboration toward improving the lives of all Tennesseans who are touched by a disability. <https://www.tndisability.org/>

- Statewide Independent Living Council of Tennessee (SILC): Their mission has been to promote independent living philosophies in Tennessee and support its practices and values. As such, the SILC TN educates the community and public leaders about the IL philosophy, provides training and support to the Independent Living community, and, per new language of the Workforce Innovation and Opportunity Act (WIOA), facilitates funding opportunities for expanding the practice of IL in Tennessee. (<http://www.silctn.org/>)
- The Arc Tennessee: The Arc Tennessee is a grassroots, non-profit, statewide advocacy organization for people with intellectual and developmental disabilities and their families. (www.thearctn.org/)
- Tennessee Council of the Blind (TCB): The Tennessee Council of the Blind (TCB) is a 501(c)(3) not-for-profit membership organization whose members are concerned about the dignity and well-being of blind people and a proud affiliate of the American Council of the Blind. Their members include persons who are blind, losing vision, or are parents of a child who is blind or visually impaired or fully sighted. (www.tennesseecounciloftheblind.org/)
- Support and Training for Exceptional Parents (STEP): Their mission is to improve the lives of families of children with disabilities by guiding them through challenges they face accessing education and community programs. STEP provides services that promote working together with school staff to resolve issues often faced by children with disabilities at school, such as harassment, bullying, low expectations, and social isolation. (www.tnstep.org/)
- Deaf Link: Provides accessible hazard alert system (AHAS), video remote interpreting (VRI), pre-recorded interpreting (PRI), and Shelter Link (an internet-based interpreting service for sheltering and mass care agencies) to provide the highest standard of inclusion for persons who are Deaf, Blind, Hard-of Hearing and Deaf-Blind. (www.deaflink.com/)

Potential Funding Opportunities

Grants may be available from a wide variety of sources from state and federal agencies to private agencies and non-profits. A number of potential programs are available. The following is not intended to be complete by any means and not all grants are funded at all times. The Tennessee Department of Environment & Conservation offers a number of grants for parks and recreation facilities. Recreation Educational Services is responsible for administering federal and state recreational grant programs to local and state governments. The Division manages the Local Parks and Recreation Fund (LPRF), the Recreational Trails Program (RTP), and the Tennessee Recreation Initiative Program (TRIP), and the Land and Water Conservation Fund (LWCF). Refer to their website for a matrix of grant programs. (<https://www.tn.gov/environment/about-tdec/grants/grants-recreation-grants-home.html>) Likewise, the Tennessee Department of Transportation administers several grant programs for transportation-related projects (<https://www.tn.gov/tdot/government/g/gr/tdot-grant-information.html>).

Appendix A: Glossary of Terms

Access Board: An independent Federal agency devoted to accessibility for people with disabilities. The Access Board developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines.

Accessible: Describes a facility in the public right-of-way that provides ADA compliant access for people with disabilities.

Accessible Pedestrian Signal (APS): A device that communicates information about the WALK phase in audible and vibrotactile formats.

Alteration: A change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use.

Americans with Disabilities Act (ADA): Federal civil rights legislation passed in 1990 and effective July 1992 (42 USC 12131). The ADA prohibits discrimination and ensures equal opportunity for persons with disabilities.

ADAAG: An acronym for the 2010 ADA Standards for Accessible Design (formerly called “ADA Accessibility Guidelines”). These standards contain scoping and technical requirements for accessibility to buildings and facility sites.

Auxiliary Aids and Services: Includes a wide range of services and devices that promote effective communication or allows access to goods or services. Examples may include qualified interpreters, note takers, telephone handset amplifiers, telecommunication devices for deaf persons (TDDs), audio recordings, Braille materials, communication boards, and many others.

Complaint: A written statement, alleging violation of the ADA, which contains the complainant’s name and address and describes the county’s alleged discriminatory action in sufficient detail to inform them of the nature and date of the alleged violation. It shall be signed by the complainant or by someone authorized to do so on his or her behalf. Complaints filed on behalf of classes or third parties shall describe or identify (by name, if possible) the alleged victims of discrimination.

Cross Slope: The grade that is perpendicular to the direction of pedestrian travel.

Curb Ramp: A ramp that cuts through or is built up to the curb.

Detectable Warning: Surface consisting of truncated domes aligned in a square or radial grid pattern, and built in or applied to a walking surface.

Disability: Defines a person who has a physical or mental impairment that substantially limits one or more of the major life activities of such individual: a record of such an impairment: or being regarded as having such an impairment.

Element: An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

Essential Job Functions: The fundamental job duties of the employment position that the individual with a disability holds or desires. The term “essential functions” does not include marginal functions of the position.

Existing Facility: Refers to buildings that were constructed before the ADA went into effect. A public building constructed before the effective date of Title II does not have to be fully accessible unless the removal of barriers, including structural ones, is readily achievable.

Facility: All or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

Impairment: A physical or mental impairment means any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genito-urinary, hemic and lymphatic, skin, and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Major Life Activity: A term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working. These are examples only. Other activities such as sitting, standing, lifting, or reading are also major life activities.

Operable Part: A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element.

Pedestrian Access Route (PAR): A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

Pedestrian Circulation Path: A prepared exterior or interior surface provided for pedestrian travel in public right-of-way.

PROWAG: An acronym for the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (formerly called “Public Rights-of-Way Accessibility Guidelines”). These guidelines, first issued in 2005 by the U. S. Access Board, have not yet been adopted by the U.S. Access Board but are recommended by the Federal Highway Administration as a best practice when working in the public right-of-way. This guidance addresses design practices related to pedestrian access to walkways and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.

Public Entity: Entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as Amtrak. It does not include the Federal government.

Public Right-of-Way: Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

Qualified Historic Facility: A facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate state or local law.

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

Readily Achievable: Is easily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include nature and cost of the action, overall financial resources and the effect on expenses and resources, legitimate safety requirements, impact on the operation of a site, and, if applicable, overall financial resources, size, and type of operation of any parent corporation or entity.

Reasonable Accommodation: Under Title I, a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. Reasonable accommodation is a key nondiscrimination requirement of the ADA.

Running Slope: The grade that is parallel to the direction of pedestrian travel.

Safe Harbor: Elements of existing facilities that already comply with either the 1991 ADA Standards or UFAS are not required to comply with the 2010 ADA Standards unless they were altered on or after March 15, 2012 and elements comprising a path of travel to an altered primary function area are not required to comply with the 2010 ADA Standard merely as the result of an alteration to a primary function area, provided those elements comply with the 1991 ADA Standard or UFAS.

Service Animal: Any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition.

Undue Burden: The ADA does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with this subpart would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action required to comply with this subpart would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such

burdens but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by the public entity.

Vertical Surface Discontinuities: Vertical differences in level between two adjacent surfaces.



Appendix B: Public Notice

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

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

Employment: Montgomery County 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: Montgomery County will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Montgomery County's 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: Montgomery County 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 Montgomery County offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of Montgomery County, should contact the office of Mrs. Amanda Bush, 1 Millennium Plaza, Suite 401, Clarksville, TN 37040, (931)553-5113, as soon as possible but no less than five (5) business days before the scheduled event.

The ADA does not require Montgomery County 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 Montgomery County is not accessible to persons with disabilities should be directed to Mrs. Amanda Bush, Montgomery County ADA Coordinator, 1 Millennium Plaza, Suite 401, Clarksville, TN 37040, (931)553-5113.

Montgomery County 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.

Appendix C: Grievance Procedure

Montgomery County, TN Grievance Procedure under The Americans with Disabilities Act

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, programs, or benefits by Montgomery County. The County's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. 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 by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Amanda Bush

ADA Coordinator

1 Millennium Plaza, Suite 401

Clarksville, TN 37040

(931) 553-5113

TTY 1 (800) 848-0298

agbush@mcgtn.net

7:30am – 4:30pm Monday through Friday

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of Montgomery County and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the County Mayor or his designee.

Within 15 calendar days after receipt of the appeal, the County Mayor or his designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the County Mayor or his designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or appointed designee, appeals to the County Mayor or his designee, and responses from these two offices will be retained by the Montgomery County for at least three years.

Appendix D: Grievance Form
Montgomery County, Tennessee
Americans with Disabilities Act (ADA)
Grievance Form

Instructions

This is a printable form. Please fill out this form completely either electronically and printing or printing and handwriting using black ink. Sign it and send it to:

Montgomery County ADA Coordinator
1 Millennium Plaza, Suite 401
Clarksville, TN 37040
Via email agbush@mcgtn.net
931.553.5113

Complainant Information

Name

Address

City

State

Zip Code

Email Address (optional)

Telephone (Daytime)

Telephone (Alternate):

Person Alleging ADA Violation (to be completed if other than complainant)

Name

Address

City

State

Zip Code

Email Address (optional)

Telephone (Daytime)

Telephone (Alternate):

Information on Alleged Violation

Date Alleged Violation Occurred

Description of Alleged Violation

Requested Remedy

Appendix D: Grievance Form

Have efforts been made to resolve this complaint through the Department in which the alleged discrimination occurred? (please check one): Yes No

Complete the following if you answered “Yes” to the previous questions

Department

Contact Person

City

State

Zip Code

Telephone

Date Filed

Additional space for answers or comments:

If you need assistance completing this form, please contact the Montgomery County ADA Coordinator listed above.

Signature:

Date:

**Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan**

Appendix E: Blank Self Evaluation Checklists



**MONTGOMERY
COUNTY**
T E N N E S S E E



PREPARED BY:
Doug Jones, Architect
Montgomery County
1 Millennium Plaza, Suite 401
Clarksville, TN 37040

Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan

Appendix F: Self Evaluation Results



MONTGOMERY
COUNTY
T E N N E S S E E



PREPARED BY:
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Clarksville, TN 37040

**Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan**

Appendix G: Self Evaluation Cost Summary



**MONTGOMERY
COUNTY**
T E N N E S S E E



PREPARED BY:
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Clarksville, TN 37040

**Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan**

Appendix H: Self Evaluation of Sidewalks and Curb Ramps



**MONTGOMERY
COUNTY**
T E N N E S S E E



PREPARED BY:



601 N Second Street, Clarksville, TN 37044