

**Metropolitan Government
of
Nashville and Davidson County**

Recommendations

of the

ADA Task Force

July 30, 1999

**Recommendations of The ADA Task Force in Response
to Executive Order No. 99-04
July 30, 1999**

TABLE OF CONTENTS

CHAPTER	PAGE
Introduction	3
Executive Order No. 99-04	5
1. Steps Metro Has Taken to Comply with ADA	9
2. ADA Transition Plan for the Metropolitan Government	19
3. Recommended Policies and Procedures	30
4. Other Recommendations	33
List of Exhibits	35

INTRODUCTION

INTRODUCTION

Executive Order No. 99-04, signed by Mayor Philip Bredesen on April 9, 1999, created the ADA Task Force for the Metropolitan Government. This Task Force, comprised of Metropolitan Government personnel, was determined to be the most thorough and expeditious way to gather and review documentation of self-evaluations, transition plans and progress reports compiled by the various agencies of the Metropolitan Government. This information is gathered to determine the degree of compliance with the Americans with Disabilities Act (ADA) and to determine whether further action by the Metropolitan Government is necessary to achieve compliance.

In addition, the Executive Order named the members of the Task Force, the Chair of the Task Force, and the specific duties of the Task Force which are defined as:

1. Determine the steps that the Metropolitan Government has taken to comply with the ADA.
2. Review the transition plans and compile one comprehensive transition plan for submission to the Mayor's Office.
3. Recommend to the Mayor any additional steps that should be taken to insure that the Metropolitan Government maintains compliance with the ADA.

The Task Force is to make a final report to the Mayor of its findings and recommendations on or before July 31, 1999.

In response to the requirements of the Executive Order, the Task Force is pleased to present this report of our findings and recommendations. The structure of the report is directly aligned with the duties of the Task Force found in the Executive Order:

- Chapter 1: Steps Metro Has Taken To Comply With ADA
- Chapter 2: Recommended Transition Plan
- Chapter 3: Recommended Policies and Procedures
- Chapter 4: Other Recommendations

The reader will find that much work has been done by the Metropolitan Government to move toward compliance with ADA. It is also evident that much work is yet to be done to make certain that all facilities, services, programs and activities provided by the Metropolitan Government are fully accessible to persons with disabilities.

**EXECUTIVE ORDER
NO. 99-04**

EXECUTIVE ORDER NO. 99-04

SUBJECT: Verification and monitoring of ADA compliance.

WHEREAS, Title II of the Americans with Disabilities Act (ADA) required cities to complete a self-evaluation by January 1993 which includes the following elements:

(a) Identify each of its services, programs and activities and determine if any of their buildings, other facilities and streets constitute or contain barriers to participation by disabled persons.

(b) Review their services, policies and practices in order to identify modifications needed to enable full participation by disabled persons.

(c) Review and identify ways to increase the effectiveness of communications with the disabled.

(d) Review procedures for evacuating facilities in emergencies and identify where visual and audible warning signals should be installed.

(e) Provide opportunities for public participation, including disabled persons, in the evaluation process and keep a list of the persons consulted; and,

WHEREAS, by July 1992 cities were to develop transition plans for bringing all barriers identified in the self-evaluation into compliance with the requirements of the ADA by January 26, 1995; and

WHEREAS, the transition plans were to include a separate schedule for installation of curb ramps on sidewalks at pedestrian crossings; and

WHEREAS, cities were to generate status reports to document the progress toward achieving compliance for each of its programs, services, activities and facilities; and

WHEREAS, accessibility, once achieved, must be maintained, and new construction and alteration of publicly-owned facilities must be monitored for compliance with the ADA; and

WHEREAS, documentation of the Metropolitan Government's progress toward elimination of barriers has not been centralized and it is therefore difficult to report the degree of compliance with the ADA that has been achieved; and

WHEREAS, there is a need to gather and review documentation of self-evaluations, transition plans and progress reports compiled by the various agencies of the Metropolitan Government in order to determine the degree of compliance with the ADA and whether further action is necessary to achieve compliance; and

WHEREAS, a task force composed of Metropolitan Government personnel is the most thorough and expeditious way to accomplish the tasks of review and recommendation.

NOW, THEREFORE, I, Philip Bredesen, Mayor of The Metropolitan Government of Nashville and Davidson County, by virtue of the power and authority vested in me, do hereby direct and order the following:

Creation of Task Force. There is hereby created a task force to be known as the ADA Task Force.

Composition of Task Force. The ADA Task Force shall consist of the following persons:

Sam McPherson, Director, Department of General Services
Randall Dunn, Acting Director, Department of Public Works
Gayle Ray, Sheriff of Metropolitan Davidson County
Jeff Browning, Executive Director, Metropolitan Planning Commission
Donna Nicely, Director, Metropolitan Public Library
Jim Fyke, Director, Parks and Recreation
Bob Babbit, Executive Director, Metropolitan Transport Authority
Joe Edgens, Planning and Construction, Metropolitan Board of Education
Larry Stephenson, Court Administrator, State Trial Courts
Susan Brumfield, ADA Coordinator Metropolitan Department of Human Resources
Jackie Page, Disability Information Director, Metropolitan Social Services
Trisha Griggs, member of the Mayor's Advisory Committee for Disability
Matt Foster, Office of the Mayor

The Task Force shall be chaired by Marlin Keel, Capital Projects Director.

Duties of Task Force. The ADA Task Force shall:

1. Determine the steps that the Metropolitan Government has taken to comply with the ADA.
2. Review the transition plans and compile one comprehensive transition plan for submission to the Mayor's Office.
3. Recommend to the Mayor any additional steps that should be taken to insure that the Metropolitan Government maintains compliance with the ADA.

Report. The ADA Task Force shall make a final report to the Mayor of its findings and recommendations not later than July 31, 1999.

Effective Date. This Executive Order shall become effective on ___ April 1999.

ORDERED THIS 9th DAY OF APRIL 1999.

A handwritten signature in black ink, appearing to read "Philip Bredezen". The signature is stylized with a large, circular initial "P" and a long, sweeping underline.

Philip Bredezen
Mayor

CHAPTER 1

**STEPS METRO HAS TAKEN TO
COMPLY WITH ADA**

STEPS METRO HAS TAKEN TO COMPLY WITH ADA

In 1973, the Rehabilitation Act was passed. This Act contained Section 504 and stated that any entity receiving federal funding had to be accessible to handicapped. At the time that the Act was put into place, there were no regulations that were included in the legislation. In 1977, regulations were written, but as a result of resistance by many states, it was some time until these regulations were passed.

June 20, 1974 Metropolitan Government of Nashville and Davidson County;
Executive Order No. 49; Beverly Briley, Mayor
(Exhibit B)

Executive Order No. 49 adopted the Affirmative Action Plan. While this did not include disabilities as a concern, it was the model for subsequent Orders by Mayors Fulton and Boner which added disabled persons as a protected class.

October 16, 1975 Metropolitan Government of Nashville and Davidson County;
Executive Order No. 03; Richard Fulton, Mayor
(Exhibit C)

Summary: This Executive Order was written as a policy of the Metropolitan Government of Nashville-Davidson Count stating that all persons shall have equal employment opportunities, regardless of race, religion, sex, age, or national origin. Furthermore, it was written that all present employees would be entitled to and given training, compensation, promotion, and all other attributes of employment without regard to race, religion, sex, age, or national origin.

The ordinance was written to define the responsibility of an Equal Employment Opportunity Officer that would be appointed by the Mayor, and located in the Personnel Department. This ordinance also established the Equal Employment Opportunity Advisory Committee, that was to consist of seven (7) members, as follows; The Metropolitan Mayor, or his designee; the EEO Officer; the Director of Personnel; the Director of Human Relations; a minority community representative; and two selected Department Heads, who may either be reappointed or rotated annually.

Record keeping was to be carried out at several levels: first, in each department by the EEO Coordinator, second, Metro-wide through monthly printouts of employment statistics, received and monitored by the EEO Officer, third, Metro-wide by the Personnel Department, including data regarding applicants, referrals, terminations, new hires, promotions, and training programs.

The ordinance continued to outline details in regard to types of programs that were to be implemented, the actual implementation of the plan, a grievance procedure, and objectives and timetables. Each department was encouraged to achieve the objectives of this ordinance by December 31, 1977.

October 1, 1976 Metropolitan Government of Nashville and Davidson County;
Administrative Order No. 16; Richard Fulton, Mayor
(Exhibit D)

Subject: Implementation of a coordinated van transportation system for the elderly, handicapped and indigent

Summary: This Administrative Order was written to provide effective special transportation services to the elderly, the indigent and the handicapped, and to provide this service at the least possible cost to the taxpayers of Davidson County, and several departments, agencies, commissions and authorities that were providing or planning to provide, such special services independently of one another and the Office of the Mayor appointed a special committee to study the problems and potentials of integrating all of the existing services into one coordinated system.

Continued History: In 1976, Mayor Richard Fulton established the Mayor's Advisory Committee for People with Disabilities as a free standing entity funded by a CETA grant and housed in the Mayor's office.

June 28, 1977 Metropolitan Government of Nashville and Davidson County;
Memorandum of Agreement; Richard Fulton, Mayor
(Exhibit E)

Subject: Memorandum of Agreement between the Metropolitan Government of Nashville and Davidson County, Acting by and through The Mayor's Office-Manpower Division and the Office for the Handicapped, Special Project and Activity Title VI.

Summary: This Memorandum of Agreement was entered into between the Metropolitan Government of Nashville and Davidson County, acting by the through the Office of the Mayor-Manpower Division, which was hereafter referred to as "Office for the Handicapped Persons". Manpower signed a Grant Application under the Comprehensive Employment and training Act of 1973, in order to obtain a block grant to carry out a Comprehensive Manpower Program.

Manpower and the Office for the Handicapped agreed by assurances, certifications, and otherwise that the Comprehensive Employment and Training Act Program would be administered and carried out in accordance with the Act, the rules and regulations prescribed thereunder, and other Federal Laws.

At the time that this Agreement was entered into there was a Work Statement agreed upon that made the Office for the Handicapped responsible for progress reports and detailed Statements of Cost for reimbursement on a monthly basis. The Agreement further detailed the financial information concerning funds that were to be made available for the CETA Fiscal Year.

September 15, 1978 Metropolitan Government of Nashville and Davidson County;
Executive Order No. 26; Richard Fulton, Mayor
(Exhibit F)

Subject: Implementation of Affirmative Action Plan

Summary: Pursuant to Section 5.03 of the Metropolitan Charter, implementation through this Executive Order of the Affirmative Action Plan for the Metropolitan Government of Nashville and Davidson County, Tennessee, with amendments required to correctly identify placement of the office in METRA. This Executive Order amends and replaces Executive Order 03, dated October 16, 1975.

September 26, 1979 Metropolitan Government of Nashville and Davidson County;
Executive Order No. 39; Richard Fulton, Mayor
(Exhibit G)

Subject: Reestablishment of the Affirmative Action Plan of the Metropolitan Government of Nashville and Davidson County

Summary: Under Section 5.03 of the Metropolitan Charter, implementation of this Executive Order directed that the services of the Veterans Service Office would be coordinated with the Affirmative Action Section of the Department of Personnel and that the Director of Personnel and the Administrator of the Veterans Service Office would cooperate to the fullest extent possible to carry out the objectives set out in the Affirmative Action Plan dealing with veterans. The administrator of the Veterans Service Office would coordinate the services of that office with the Affirmative Action Section of the Department of Personnel and assist the Affirmative Action Section of the Department of Personnel in carrying out its delegation under the Affirmative Action Plan of the Metropolitan Government.

September 26, 1979

Metropolitan Government of Nashville and Davidson County;
Executive Order No. 40; Richard Fulton, Mayor
(Exhibit H)

Subject: Placement of the Affirmative Action Plan Under the Department of Personnel

Summary: Pursuant to Section 5.03 of the Metropolitan Charter, implementation through Executive Order the Affirmative Action Plan for the Metropolitan Government of Nashville and Davidson County, Tennessee, as amended to place the Affirmative Action Plan under the responsibility of the Department of Personnel. This Executive Order amends and replaces executive Order No. 26, dated September 15, 1978.

Continued History: On October 1, 1979, the Mayor's Office for Handicapped Persons became a part of the Personnel Department, and was thereafter called the Office for Handicapped Persons. The Mayor's Advisory Committee for Handicapped Persons, the volunteer arm of the Office, also moved its community awareness activities to the Department.

March 15, 1984

Metropolitan Government of Nashville and Davidson County;
Administrative Order No. 91; Richard Fulton, Mayor
(Exhibit I)

Subject: Appointment of Advisory Review Committee for Selecting a Consultant for a Curb-Space Management Study

Summary: This Advisory Review Committee was appointed to recommend a Consultant for a Curb-Space Management Study. The purpose of the Curb-Space Management Program was to optimize the various relation to land uses and activities each curb face serves.

1984

Public Notice: Revenue Sharing Handicapped Regulations

Added attention to the Revenue Sharing Act led to a statewide emphasis on compliance with Section 504 of the Civil Rights Act. Section 504 was the precursor to the ADA. A Coordinator was designated and this fact was indicated on notices sent to departments for posting. All departments completed self-evaluations and transition plans similar to those used for the ADA and these surveys are available in the office of the ADA Coordinator for the Metropolitan Government.

April 24, 1987

Metropolitan Government of Nashville and Davidson County;
Executive Order No. 76; Richard Fulton, Mayor
(Exhibit K)

Subject: Equal Employment Opportunity Program

Summary: Executive Order No. 76 reaffirmed that it is the policy of the Metropolitan Government to provide equal employment opportunity to all persons regardless of race, color, national origin, sex, religion, age or handicap. This policy will govern all aspects of personnel management, including recruitment, hiring, promotion and advancement.

March 13, 1987

Metropolitan Government of Nashville and Davidson County;
Administrative Order No. 112; Richard Fulton, Mayor
(Exhibit L)

Subject: Creating and Appointing a Task Force to study the Current System of Services for Disable Citizens

Summary: A task force was created to study the current system of services for disabled citizens within the jurisdiction of the Metropolitan Government and to define the Metropolitan Government's responsibilities within that system, including planning, funding, provision of services and coordination. The Task Force was to issue a written report of its findings no later than four (4) months from the effective date of this Administrative order.

The members of the Task force included:

- Director of Office for Handicapped Persons
- Director of Metropolitan Social Services (or designee)
- Director of Metropolitan Development and Housing Agency (or designee)
- Metropolitan Director of Schools (or designee)
- Chairman of the Budget and Finance Committee (or designee)
- Chair of the Mayor's Advisory Committee for Handicapped Persons
- Vice-chair of the Consortium on Handicapped Issues
- Representative, United Way of Nashville and Middle Tennessee
- Representative of the Religious Community
- Representative, Office of the Mayor

Continued History: In July of 1988, the Office for Handicapped Persons and the Mayor's Advisory Committee for Handicapped Persons was one of three programs that was consolidated into Social Services. The other two were a Transportation for the Elderly program under the Metro Action Commission and the Information and Referral Service for the elderly in the Mayor's Office. At that time, these three programs were under one division and had the ability to interact and coordinate delivery of services.

May 28, 1991

Metropolitan Government of Nashville and Davidson County;
Executive Order No. 91-03; Bill Boner, Mayor
(Exhibit M)

Subject: To Establish a Policy for Providing Appropriate Accommodations for Persons with Disabilities in Accordance with the Americans with Disabilities Act of 1990

Summary: The Americans with Disabilities Act of 1990 was designed to prevent discrimination against persons with disabilities in the areas of employment, public services and accommodations, and services operated by private persons. This legislation is embraced by the Metropolitan Government and will be used to further enhance the full integration of persons with disabilities into the mainstream of the Nashville community.

This Executive Order went on to instruct that all Metropolitan departments, boards, agencies and commissions were to thoroughly familiarize themselves with the Policies to Provide Appropriate Accommodation for Persons with Disabilities. The implementation of these policies was to ensure that applicants, employees and service recipients with disabilities would have their needs met effectively and that all government services and meetings would be accessible to persons with disabilities. Most importantly, people with disabilities would have a substantial opportunity to become greater resources, providing both financial and intangible contributions to our city.

This Executive Order included written policies for the Metropolitan Government that included; Definition of Terms, Purpose, Policy, Covered Entities, Employment Practices, Public Services/Physical Accessibility, and Transportation.

Note: The Office for Handicapped Persons and Mayor's Advisory Committee for Handicapped Persons were heavily involved in this process.

November 4, 1991

Metropolitan Government of Nashville and Davidson County;
Executive Order No. 91-09; Philip Bredesen, Mayor
(Exhibit N)

Summary: This Executive Order was written to reaffirm certain previous Executive Orders that had been issued by prior Administration. This order included Executive Order No. 91-03, Establishment of a policy for providing appropriate accommodations for persons with disabilities in accordance with the Americans With Disabilities Act of 1990.

February 5, 1992

Metropolitan Government of Nashville and Davidson County
Philip Bredeesen, Mayor
(Exhibit O)

Subject: Memo from Susan Brumfield, ADA Coordinator, to ADA Coordinators and Interested Parties

Summary: This Memo was attached to copies of additional ADA Regulations. Ms. Brumfield was disseminating information to the Departments for their review, as each department was responsible for applicable sections. This document discussed the proposed rule and issues so that if there were questions, these questions could be addressed at an open forum before the final regulations were written. The second part of this document gave the proposed additions to the ADAAG manual which included specific measurements and diagrams for facilities.

1994 - 1995

Metropolitan Government of Nashville and Davidson County;
Philip Bredeesen, Mayor
(Exhibit Q)

The Department of Personnel designed a new Diversity training program which includes disability awareness. This program has been facilitated for approximately 4000 employees.

Continued History/January 1995-June 1995: While there has not been a written directive found as to why there was an ADA Compliance Survey completed by the Departments, there is written record, to be found in the office of the ADA Coordinator, that does list all Departments and their status as it relates to compliance under the ADA. Completed by the Departments were Self-Evaluation forms and Transition Plans. Information that was gathered included the status of all Facilities, Services, Programs and Activities provided by the Government.

1995

Metropolitan Government of Nashville and Davidson County;
ADA Status Report
(Exhibit P)

Summary: While this document is not dated, it would appear to be a Summary of actions taken by the Metropolitan Government of Nashville and Davidson County as it relates to the Americans With Disabilities Act of 1990. The following information is to be found; An employee of the Personnel Department was appointed as ADA Coordinator dealing with Title I (Employment) and Title II (Programs and Services). This position was to be a coordinator only, supplying departments with information as needed.

A formal complaint procedure was written, approved and distributed for problems with programs and services. Employment problems were already covered under a separate discrimination complaint procedure.

Information sessions were held during 1992, explaining the ADA and Metro's obligations under the Act.

ADA Coordinators for programs and services were appointed for all departments. They were given information about the ADA and instructed to complete self-evaluations and transitions plans. These self-evaluations and transitions plans are currently located in the office of the ADA Coordinator.

Civil Service rules and policies were reviewed and amended as necessary, as were forms and documents. ADA concerns as it related to physical requirement in job descriptions and reasonable accommodation for testing was being monitored continually.

The ADA Coordinator assisted the departments at their request. There were particular areas of concerns included in this document, ranging from the need for further studies of regulations and guidelines to facilities, services, communications, and training. At the time this Summary was completed, there was also concern about the need for funding, the need for a full time ADA Coordinator, and the need for that Coordinator to have some degree of authority that was supported by the administration.

Continued History: In light of the adoption of the Americans with Disabilities Act, the term "handicap" was dropped for the word "disability" for activities and functions of Metropolitan Government, including the before mentioned Office and Committee.

April 9, 1999

Metropolitan Government of Nashville and Davidson County;
Executive Order No. 99-04; Philip Bredesen, Mayor
[Included in This Report]

Subject: Verification and monitoring ADA Compliance

Summary: This Executive Order relays the information that Title II of the Americans with Disabilities Act required cities to complete a self-evaluation by January 1993. Elements that were to be included in the evaluation, were facilities, services, programs and activities provided by the Metropolitan Government. Additionally, cities were to complete transition plans that would outline how they would bring all barriers up to compliance.

Transition plans were to include a separate schedule for installation of curb ramps on sidewalks at pedestrian crossings, and,

Cities were to generate status reports to document the progress toward achieving compliance for each of its programs, services, activities and facilities, and whereas,

Accessibility was to be maintained and new construction and alteration of public owned facilities must be monitored for compliance with the ADA, and,

Documentation of the Metropolitan Government's progress toward elimination of barriers had not been centralized and because of this there was a difficulty in reporting what degree of compliance with the ADA had been achieved.

As a result, it was found that there was a need to gather and review documentation of self-evaluations, transition plans and progress reports that were to be compiled by the various agencies of the Metropolitan Government in order to determine the degree of compliance with the ADA and whether or not further action would be necessary to achieve compliance.

This Executive Order addressed the fact that a task force composed of Metropolitan Government personnel would be the most thorough and expeditious way to accomplish the tasks of review and recommendations. The Order further defined the creation of the Task Force, the composition of the Task Force, the duties of the Task Force and established a deadline that all findings and recommendations be reported to the Mayor.

All self-evaluations and transition plans that were completed as a result of this Executive Order are in the possession of the Mayor's Office at this time.

CHAPTER 2

**ADA TRANSITION PLAN
FOR THE
METROPOLITAN GOVERNMENT**

ADA TRANSITION PLAN FOR THE METROPOLITAN GOVERNMENT

INTRODUCTION

The Americans with Disabilities Act of 1990 (ADA) guarantees civil rights protection to people with disabilities. Discrimination against people with disabilities in employment, public entities, public accommodations, and telecommunications is prohibited. Title II of the ADA specifically prohibits discrimination on the basis of disability in local government services, programs, or activities.

OVERVIEW

This transition plan is designed to bring the Metropolitan Government of Nashville-Davidson County into compliance with ADA Title II requirements. The plan is divided into two (2) transitional phases, allowing for systematic progression into Title II compliance. In order to expedite the transition process, self-evaluations were conducted by all Metro departments at an earlier date.

TRANSITION PHASE ONE (Years One & Two)

Transition Phase One includes Metro-wide, short-term projects which can be accomplished relatively quickly and affordably with widespread benefit to the public. In addition, individual need requests (i.e., complaints brought to a department's attention by members of the public) will automatically fall into the *Transition Phase One* category. *Transition Phase One* projects will largely comprise non-structural improvements, but will also include some that are structural. Since these improvements must be addressed by all Metro departments, it is recommended that each department develop its own transition plan to determine which improvements unique to the department are needed. These transition plans should include a facilities inventory, a timeline for project completion, and a cost estimate for each project. An earlier review of each department's ADA self-evaluation indicated a few general objectives, as enumerated below.

Phase One Objectives

- 1) Determination of those structural and non-structural improvement needs which can be accomplished relatively quickly and affordably with widespread benefit to the public;
- 2) Implementation of *Transition Phase One* short-term, structural and non-structural improvements.

Phase One Improvements—A Sampling

Signage. Recommend the posting of Braille and/or large-print signage outside main entrances, stairways, elevators, offices, conference rooms, emergency exits, and in main lobbies (directories).

Estimated cost of one main lobby directory.	\$150
Estimated cost of other signage (exits, stairwells, elevators, lavatories, offices).	\$75

Communications. Recommend the incorporation of Metro-wide contracts for TTD, telephone relay, and interpreting services. Also recommend Metro-wide publication of large-print, Braille, and/or audio-taped informational brochures and directories for general Metro public services.

Estimated cost of ASL Interpreting services (hourly rate) through League of the Hearing-Impaired.	\$25/hour
Estimated per department cost of installing a TTD/TTY telephone system.	\$600
Estimated per department cost of printing government services documents in alternative format (large print).	\$300
Estimated cost of converting documents into Braille through National Braille Press (from Internet).	\$1/page

(Note: No documents are currently in Braille. Civil Service and Benefit Board on tape, Internet, and Government Access Channel 3.)

Door Levers. Recommend Metro-wide replacement of non-ADA compliant door levers, in cases where doorways do not need to be enlarged.

Estimated cost of hardware purchase and installation.	\$100
---	-------

Employee Training. Recommend the training of Metro Government employees in diversity awareness and in assisting persons with disabilities.

Estimated cost of 4 hours' training for 3 employees per department (training to include items such as: using telephone relay system, using TTD/TTY, reading documents/maps, diversity awareness, etc).	\$225
--	-------

TRANSITION PHASE TWO (Years Three – Six)

Transition Phase Two includes those Metro-wide and department-specific improvements which rank highest on overall accessibility needs, but are more costly and require a greater investment of time. These improvements are at the core of the transition process, comprising mainly structural changes. These improvements also must be addressed by all Metro departments through their individual transition plans. A few *Transition Phase Two* general objectives are enumerated below.

Transition Phase Two Objectives—General

- 1) Determination of the order in which long-term structural and non-structural improvements are to be accomplished. This order may need to be reorganized on an occasional basis. Most Metro-wide, non-structural improvements will have been incorporated by this time.
- 2) Concurrent implementation of department and Metro-wide structural improvements.
- 3) Final transition plan summation to be reported to assure that structural and non-structural needs have been fulfilled, and that these improvements are in compliance with ADA Title II requirements.

Phase Two Improvements—A Sampling

Parking. Recommend the placement of handicapped parking stalls as close as possible to all Metro building main entrances. Although standard parking is not provided for all Metro buildings at this time, accommodations for handicapped parking is recommended.

Estimated cost of paint striping and signage for one parking space.	\$200
---	-------

Ramps and Curb-Cuts. Recommend the installation of ramps and curb-cuts along walkways between parking facilities, bus routes, and main entrances.

Estimated cost of installing two ramps/curb-cuts per facility.	\$900
--	-------

Accessible Main Entrances. Recommend reconstruction of main entrances to accommodate persons with disabilities. Recommend construction of ramps as needed along walkways to main entrances.

Estimated cost of sidewalk and ramp construction between handicapped parking spaces and main entrance.	\$12,000
--	----------

Estimated cost of widening a door in a non-historical building.	\$1,000
---	---------

Elevators. Recommend installation of ADA-compliant elevators where currently they are too small, or where only access to public areas is via stairs. Where feasible, recommend adaptation of current elevators instead of total replacement (lowering of buttons, installation of audible signals, posting of Braille-marked indicators).

Estimated cost of retrofitting or installing of elevators.	\$120,000
--	-----------

Lavatories. Near main entrances, recommend installation of wheelchair-accessible doorways, stalls, towel and soap dispensers, and full length mirrors. If necessary, in specific cases, construction of a locking, unisex lavatory is recommended.

Estimated cost of constructing one unisex lavatory.	\$7,000
---	---------

Pools. Recommend installation of hydraulic lifts in selected public swimming pools.

Estimated cost of installing hydraulic lift in swimming pool.	\$8,000
---	---------

Drinking Fountains. Recommend the installation of drinking fountains on selected floors, as needed.

Estimated cost of retrofitting or installing of one drinking fountain.	\$300
--	-------

Miscellaneous Costs

Some departments have estimated their own costs, which have been placed under "Miscellaneous Costs" in the following spreadsheet.

**ADA Transition Plan
Fiscal Years 2001 - 2007 (Corresponding to Capital Improvement Budget)**

Structural and Non-Structural Improvement Costs by Year

Buildings	Years 1-2	Years 3-6	Total Cost
General Government Buildings			
Courthouse (There are structural issues in this building which cannot be reasonably resolved.)	\$36,750	\$365,900	\$402,650
222 Building	\$47,350	\$37,800	\$85,150
Ben West Building	\$17,350	\$1,500	\$18,850
Howard Office Building	\$29,050	\$510,000	\$539,050
Lindsley Hall	\$4,600	\$143,500	\$148,100
Clifford Allen Building	\$4,475	\$12,500	\$16,975
Stahlman Building (General)	\$127,325	\$708,700	\$836,025
Stahlman Building (Government Access Channel--In addition to a \$100,000-a-year needed operating budget)	\$0	\$0	\$200,000
Washington Square Building (Leased; Renovated in 1993)	\$2,225	\$400	\$2,625
Cummins Station (Leased)	\$6,150	\$19,900	\$26,050
Soil & Water Conservation Old Fire Hall	\$2,375	\$7,700	\$10,075
Union Street Building (Leased Space)	\$3,850	\$34,400	\$38,250
Subtotal	\$281,500	\$1,842,900	\$2,124,400
Parks & Recreation			
Administration Building (This building is not ADA-compliant, as it is not structurally feasible. Activities are moved to another building, as needed.)	\$2,225	\$157,700	\$159,925
Parks with Community Centers (22 Facilities)	\$11,850	\$340,300	\$352,150
Centennial Arts Activity Center (Renovated; In Compliance)	\$1,600	\$7,600	\$9,200
Warner Park Nature Center	\$11,500	\$29,300	\$40,800
Parthenon	\$4,000	\$0	\$4,000
Sailboat Marina bathrooms, ramps from parking to facility & then to dock	\$1,300	\$200	\$13,500
Sportsplex	\$1,225	\$0	\$1,225
Pearl Cohn High School	\$0	\$32,200	\$32,200
Golf Course Pro Shops (2 Main Facilities)	\$400	\$40,400	\$40,800
Two Rivers Mansion	\$2,625	\$39,900	\$42,525
Subtotal	\$36,725	\$42,600	\$69,325

Structural and Non-Structural Improvement Costs by Year

Buildings	Years 1-2	Years 3-6	Total Cost
General Public Facilities			
Nashville Arena (Towel dispensers need lowered)	\$1,625	\$0	\$1,925
Convention Center	\$1,525	\$1,000	\$2,525
Cumberland Science Museum	\$2,725	\$0	\$2,725
Farmer's Market	\$1,225	\$1,500	\$2,725
Municipal Auditorium	\$3,200	\$153,600	\$156,800
Tennessee State Fairgrounds (Have hired a consultant to complete transition plan; Will be in compliance within 3 years; Self-generating budget.)	\$0	\$0	\$0
Nashville International Airport (Fully compliant; Not Metro budget)	\$0	\$0	\$0
Subtotal	\$10,300	\$156,100	\$166,700
Public Service Facilities			
Public Works Facilities (8 total)	\$6,025	\$40,000	\$46,025
Juvenile Justice Center (Crosswalk issue)	\$26,025	\$0	\$38,025
Criminal Justice Center (Sheriff & Police)	\$9,525	\$80,400	\$89,925
Police Central Sector Building	\$1,000	\$0	\$1,000
Police West Sector Building	\$1,000	\$0	\$1,000
Police East Sector Building	\$1,000	\$0	\$1,000
Police South Sector Building (New building; Fully compliant)	\$100	\$0	\$100
Police 911 Room (Ramp needed)	\$325	\$0	\$5,325
Sheriff's Administration Facility	\$3,325	\$140,400	\$143,725
Sheriff's Day Reporting Center	\$4,925	\$9,000	\$13,925
Sheriff's Hill Detention Center (Entire visitation room needs to be renovated)	\$1,750	\$15,200	\$36,950
Sheriff's Training Center	\$2,600	\$600	\$3,200
Sheriff's Correctional Work Center	\$975	\$0	\$975
Fire Department (45 facilities)	\$0	\$0	\$110,000
Social Services Richland Village (Needs one cottage converted into Co-ed)	\$6,000	\$19,000	\$30,000
Water Services Whitson Building	\$6,775	\$140,600	\$147,375
Water Services Customer Service Building	\$3,225	\$20,700	\$23,925
NES Main Customer Service Building (Need electric bill in Braille)	\$6,225	\$300,000	\$306,225

Structural and Non-Structural Improvement Costs by Year

Buildings	Years 1-2	Years 3-6	Total Cost
Metro Action Commission (9 facilities)	\$19,000	\$212,700	\$231,700
MTA Nestor Street Building	\$6,875	\$2,600	\$9,475
NCAC ("Metra;" Leased; Federally-funded; Fully compliant)	\$0	\$0	\$0
Libraries (Completed separate transition plan)	\$0	\$0	\$96,200
Schools (Completed separate transition plan ; For 60 facilities)	\$0	\$0	\$4,050,000
MDHA (Completed separate transition plan)	\$0	\$0	\$3,130,718
Subtotal	\$106,675	\$598,200	\$8,516,793
Health-Related Facilities			
Metro General Hospital (Fully compliant)	\$0	\$0	\$0
Bordeaux Hospital (Fully compliant)	\$0	\$0	\$0
MHD Lentz Center	\$16,475	\$120,000	\$136,475
MHD East Nashville Center	\$8,825	\$7,000	\$15,825
MHD Downtown Clinic	\$6,425	\$0	\$6,425
MHD Woodbine Clinic	\$6,425	\$0	\$6,425
MHD South Nashville Center	\$6,425	\$8,250	\$14,675
MHD Animal Control Center	\$6,425	\$0	\$6,425
	\$0	\$0	\$0
TE Simpkins Forensic Science Center (They are moving to a new facility.)	\$2,325	\$9,000	\$11,325
Subtotal	\$53,325	\$144,250	\$197,575
Grand Total	\$488,525	\$3,771,450	\$11,901,193

Building	Lobby Director \$150 ea	Other Signs \$75 ea	ASL Interpreter \$25/hr (annual)	TBD \$4000/yr	Funding in Alternative Format \$2000/yr	Current Recruitment in Budget \$100	Door Levers \$100 ea	Employee Training \$225/yr	Years 3-6							Total Costs		
									Parking \$200/yr	Curb-Curb & Ramp \$1000/yr	Main Entrance \$1000/yr	Altering Door Width \$1000 ea	Union Bath \$7000 ea	Elevator \$12000 ea	Pool Lift \$4000 ea		Lecturing Center \$100	Drinking Fountain \$200 ea
General Public Facilities																		
Nashville Arena (Tread dispensers need lowered)	\$150	\$750	\$100	\$0	\$300	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,975
Convention Center	\$300	\$100	\$100	\$0	\$300	\$100	\$500	\$225	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,325
Cumberland Science Museum	\$150	\$1,050	\$100	\$600	\$300	\$300	\$0	\$225	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,725
Farmer's Market	\$0	\$0	\$0	\$600	\$300	\$100	\$0	\$225	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,725
Municipal Auditorium	\$150	\$1,725	\$100	\$600	\$300	\$100	\$0	\$225	\$12,000	\$120,000	\$600	\$0	\$0	\$0	\$0	\$0	\$0	\$156,800
Emergency Stair Enclosure (Have needed completion to complete transition plan. Will be in compliance within 3 years. Self-generating budget)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Nashville International Airport (Fully compliant. Not Metro budget)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Public Service Facilities								\$10,200										\$10,200
Public Works Facilities (8 total)	\$1,200	\$1,200	\$800	\$600	\$300	\$100	\$1,600	\$225	\$600	\$35,000	\$0	\$0	\$1,200	\$1,200	\$1,200	\$0	\$0	\$46,025
Juvenile Justice Center (Crownwalk issues)	\$150	\$3,375	\$100	\$4,800	\$2,400	\$800	\$0	\$14,400	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$18,025
Criminal Justice Center (Sheriff & Police)	\$300	\$5,775	\$1,000	\$1,300	\$600	\$200	\$0	\$450	\$600	\$49,000	\$0	\$0	\$600	\$600	\$600	\$0	\$0	\$59,925
Police Central Sector Building	\$150	\$750	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Police West Sector Building	\$150	\$750	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Police East Sector Building	\$150	\$750	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Police South Sector Building (New building. Fully compliant)	\$0	\$0	\$100	\$600	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Police 911 Room (Ramp needed)	\$150	\$75	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,325
Sheriff's Administration Facility	\$150	\$750	\$100	\$600	\$300	\$300	\$1,000	\$225	\$0	\$120,000	\$0	\$0	\$0	\$3,000	\$0	\$0	\$0	\$147,725
Sheriff's Day Reporting Center	\$150	\$1,050	\$2,500	\$600	\$300	\$100	\$0	\$225	\$0	\$7,000	\$2,000	\$0	\$0	\$0	\$0	\$0	\$0	\$13,925
Sheriff's Jail Detention Center (Ensure ventilation room needs to be renovated)	\$300	\$750	\$100	\$600	\$0	\$0	\$0	\$0	\$0	\$14,000	\$0	\$0	\$600	\$600	\$70,000	\$0	\$0	\$76,950
Sheriff's Training Center	\$150	\$750	\$100	\$600	\$0	\$0	\$1,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,200
Sheriff's Conference Work Center	\$150	\$225	\$0	\$600	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$975
Fire Department (45 facilities)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$110,000
Social Services Richland Village (Needs one cottage converted into Co rd)	\$150	\$1,125	\$100	\$2,400	\$300	\$100	\$1,600	\$225	\$0	\$7,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$30,000
Waste Services Wilson Building	\$150	\$3,300	\$100	\$600	\$300	\$100	\$2,000	\$225	\$600	\$14,000	\$120,000	\$0	\$4,800	\$300	\$0	\$0	\$0	\$147,725
Waste Services Customer Service Building	\$150	\$975	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$7,000	\$12,000	\$0	\$100	\$100	\$0	\$0	\$0	\$23,925

Building	CARTS 1 2										CARTS 3 6										Total Cost
	Lobby \$150 ea	Other Sign \$75 ea	ASL Interpreter \$25/hr (annual)	TDD \$400/yr	Printing in Alternative Format \$200/yr	Concert Documents in Braille \$1/yr	Door Levers \$100 ea	Employee Training \$250/yr	Out-Cost \$100/yr	Misc. Expense \$1000/yr	Altering Draw W/As \$1000 ea	Unicef Bath \$7000 ea	Elevator \$120000 ea	Pool Lift \$3000 ea	Luminesc Counter \$300	Drinking Fountains \$300 ea	Miscellaneous Costs				
NES Main Customer Service Building (Fixed electric bill in facilities)	\$0	\$0	\$100	\$600	\$100	\$5,000	\$0	\$225	\$0	\$0	\$0	\$300,000	\$0	\$0	\$0	\$0	\$106,225				
Metro Action Commission (9 facilities)	\$1,350	\$10,425	subsidized	\$600	\$100	\$100	\$6,000	\$225	\$0	\$48,000	\$42,000	\$120,000	\$0	\$2,700	\$0	\$0	\$21,700				
MFA, Meigs Street Building	\$150	\$4,000	\$100	\$0	\$200	\$100	\$2,000	\$225	\$0	\$7,000	\$0	\$0	\$0	\$0	\$600	\$0	\$9,475				
NCAC ("Men's" Leased, Federally- funded, fully compliant)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0				
Colleges (Completed separate transition plan)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0				
Schools (Completed separate transition plan - For 60 facilities)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$19,200				
MDHA (Completed separate transition plan)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4,050,000				
Health-Related Facilities	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,130,718				
Metro General Hospital (Fully compliant)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,130,718				
Hoehn Hospital (Fully compliant)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$8,316,793				
MIDD Lenoir Center	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
MIDD East Nashville Center	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
MIDD Downtown Clinic	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
MIDD Woodbine Clinic	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
MIDD South Nashville Center	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
MIDD Annual Control Center	\$150	\$4,000	\$100	\$600	\$100	\$100	\$2,000	\$225	\$0	\$0	\$0	\$120,000	\$0	\$0	\$0	\$0	\$13,475				
TE Singsima Forensic Science Center (They are moving to a new facility)	\$150	\$450	\$100	\$600	\$100	\$100	\$400	\$225	\$0	\$0	\$7,000	\$0	\$0	\$0	\$0	\$0	\$11,375				
Sub-Total								\$488,525									\$1,900,193				

CHAPTER 3

**RECOMMENDED
POLICIES
AND
PROCEDURES**

RECOMMENDED POLICIES AND PROCEDURES

In reviewing the data that has been collected as a result of Executive Order 99-04, the following recommendations are made in regard to compliance issues under the Americans for Disabilities Act as it relates to the Metropolitan Government of Nashville and Davidson County, and the following are suggested policies and procedures;

Administrative Commitment It is suggested that there be a renewed commitment by the Administration for the Metropolitan Government to reach and maintain compliance under the ADA. In doing this, it should be considered that the Mayor issue an Administrative Order stating that the Metropolitan Government of Nashville and Davidson County realizes the importance of, and is committed to reaching and maintaining compliance under the law; and that because of this commitment, an employee of the Metropolitan Government will be designated as being the ADA Coordinator for the Metropolitan Government; and that this will be the sole responsibility of said employee. It is further recommended that said ADA Coordinator and staff be located in the office of the Mayor.

ADA Coordinator It is suggested that there is an immediate need for the Government to strengthen the role of the ADA Coordinator. To date, the role of the Coordinator has been primarily to educate departmental coordinators and to assist in resolving problems. This position has not had the authority to insure that any action was taken or that the Government reach and maintain compliance under the law. Because of the impact of this law on the day to day operations of the Metropolitan Government, it is important that the Coordinator be given the authority to see that all Departments of the Metropolitan Government continue to carry out current transition plans and oversee the day to day operations of the Government as it relates to compliance under the ADA.

Departmental Coordinators As stated in regard to the role and authority of the ADA Coordinator for the Metropolitan Government, it is suggested that there be an employee of each department designated as the ADA Departmental Coordinator. The role of these employees should be clearly defined to include responsibility for designating resource personnel as needed, i.e., specific programs, services, or communications, the oversight of any educational programs being administered as it relates to the ADA, the maintenance of departmental records required by the ADA Coordinator for the Government, and responsibility for the oversight of departmental transition plans.

ADA Policy Statement and Procedures It is suggested that the ADA Coordinator for the Government work in conjunction with the Metropolitan Legal Department in drafting an ADA statement for all departments to cite and post in publications, at public meeting places, etc. The ADA Coordinator will also assist the Division of Purchasing in reviewing annual construction contracts, as well as any and all policies and procedures of departments involved in constructions projects. This should be done to maintain assurance that the Metropolitan Government operates in compliance with the law.

Furthermore, the ADA Coordinator will be responsible for investigating the need for policies and procedures, the review and the maintenance of any and all departmental policies and procedures that may relate to maintaining compliance for all facilities, services, programs, and activities under the ADA.

Informational Meetings It is suggested that the ADA Coordinator be responsible for conducting meetings with Appointing Authorities to explain the revised policies and procedures and other pertinent information resulting from the recommendations of this Task Force. Similar meetings should be held with Departmental Coordinators and Human Resource Managers. Further informational meetings will be the responsibility of Departmental Coordinators as it relates to employees working in their departments. A record of all such meetings as it relates to the ADA will be kept in the office of the ADA Coordinator of the Metropolitan Government.

Grievance Procedures As a priority, it is suggested that the current grievance procedure be reviewed (**Exhibit R**). It is recommended that if the administration considers the appointment of an ADA Commission (See Chapter 4) then this Commission will serve as an appeals body for any unresolved grievances. It will be the responsibility of the ADA Coordinator for the Metropolitan Government to communicate such changes to all Departmental Coordinators. It will be the responsibility of said Coordinator to develop a tracking system for complaints and resolutions or responses.

Communications It is suggested that the ADA Coordinator of the Metropolitan Government prepare and distribute informational posters and flyers to each Departmental Coordinator as it relates to the rights of the citizens of Davidson County under the ADA. These must be distributed and posted in every department and facility within each department. It is further suggested that the ADA Coordinator consider the need for an informational brochure that would include accessible locations, services provided and specific directions for requesting accommodations when needed by the citizens of Davison County.

Employee Training It is suggested that the ADA Coordinator for the Metropolitan Government work in conjunction with the Human Resource Department to develop and oversee the implementation of any training that is found to be necessary under the ADA. While training records will continue to be the responsibility of the Human Resource Department, copies of curriculum will be kept on file in the office of the ADA Coordinator.

CHAPTER 4

**OTHER
RECOMMENDATIONS**

OTHER RECOMMENDATIONS

Other recommendations by the Task Force include the following:

1. **The establishment of an ADA Commission.** The Commission should serve as an appeals body for complainants seeking additional relief from the Metropolitan Government response to their written complaint. The Commission should have a diverse membership, including persons with disabilities and members of the architecture/engineering profession. The Commission should be made up of no more than five persons, not including the Metro-wide ADA Coordinator who should serve as an ex-officio member.

The Commission should monitor the Metropolitan Government transition plan and update it, as needed. The Commission should monitor the implementation of each department transition plan by requiring the department heads to submit updated self-evaluation and transition plans annually. The Commission should also make recommendations, as needed, to department heads and the ADA Coordinator concerning improvements in ADA policies and procedures. The Commission, after reviewing the department updates, should submit an annual report to the Mayor, summarizing the tasks accomplished Metro-wide for that year. The annual report should also recommend any tasks, in addition to those already contained in the transition plan, which may need to be added to the transition plan for the following year. Copies of the annual departmental updates and the Commission's annual report should be located in the office of the Metro-wide ADA Coordinator.

2. **Adoption of the ADA Title II ADAAG (Americans With Disabilities Act Accessibility Guidelines) (Exhibit T)** for buildings and facilities as a part of the Metro building code.

LIST OF EXHIBITS

LIST OF EXHIBITS

The following Exhibits to this report are being kept on file in the Office of the ADA Coordinator for the Metropolitan Government.

EXHIBIT

A	Americans With Disability Act of 1990	
B	Executive Order No. 49	June 20, 1974
C	Executive Order No. 3	October 16, 1975
D	Administrative Order No. 16	October 1, 1976
E	Memorandum of Agreement	June 28, 1977
F	Executive Order No. 26	September 15, 1978
G	Executive Order No. 39	September 26, 1979
H	Executive Order No. 40	September 26, 1979
I	Administrative Order No. 91	March 15, 1984
J	Public Notice - Revenue Sharing Handicapped Regulations	1984
K	Executive Order No. 76	April 24, 1986
L	Administrative Order No. 112	March 13, 1987
M	Executive Order No. 91-03	May 28, 1991
N	Executive Order No. 91-09	October 31, 1991
O	Memorandum from Susan Brumfield	February 5, 1992
P	ADA Status Report	1995
Q	Training Materials	1994 - 1995
R	Draft Complaint Procedure	July, 1999
S	Draft of Revised Public Notice	July, 1999
T	ADA Title II ADAAG (Americans With Disabilities Act Accessibility Guidelines)	