

CITY OF NORTH CHICAGO

ADA TRANSITION PLAN



ADOPTED : APRIL 18, 2011

I. ADA Administrative Requirements

The Americans with Disabilities Act was adopted on 1990. Detailed information can be found in the United States code of Federal Regulations, Title 28, Section 35.150(d). Administrative requirements are set forth in section II-8.0000. Generally, the requirements of the Act are :

- A. Development of a Grievance Procedure
- B. Designation of an individual to oversee compliance
- C. Development of a Transition Plan (that addresses structural changes necessary to achieve program accessibility)
- D. Development of a Self-Evaluation Program

A public entity with 50 or more employees is subject to these requirements.

This document will address each of the four items above.

II. History of ADA in the City of North Chicago

The City of North Chicago, located on the north shore of Lake Michigan, in Lake County, Illinois just south of the County seat of the City of Waukegan was incorporated in 1909. The 2000 census provides a population of 35,918 which includes Naval Station Great Lakes residents. 3,793 residents were considered handicapped as of the 2000 census.

While the City counts the Naval Base in their population statistics, the City is not responsible for the implementation of the American with Disabilities Act on any Federal land. This not only includes the Naval Base itself but also the housing developments, schools, businesses that occupy Federal land as well as the James Lovell Veterans Medical Center. No data is available to distinguish how many residents who do not live on Federal land are handicapped.

Since 1992, the City has been ensuring that facilities within the City are ADA accessible. This includes public buildings like City Hall, the Public Library, the Police Station, and the Fire Station. It also includes the public walkways throughout the rights-of-way of the City roadways. The City reviews new business within the City and ensures their buildings and parking lots are ADA accessible as well; however, the City is ultimately not responsible for ensuring all ADA regulations are met and maintained on any private property or public area owned by other entities such as the Park District or Train Stations.

As City roadways become resurfaced, the sidewalk depressions at intersections were consistently upgraded to ensure they were ADA compliant. As the regulations and guidelines for detectable warnings have greatly changed throughout the years, there are many different types of detectable warning areas throughout the City. Not all meet current standards, and this

document will address how the City intends to meet current standards as possible. The City is not responsible for accessibility on County or State owned roadways.



As City maintained parking lots become resurfaced or restriped, the City also intends to update striping and signage to meet current ADA standards. While the parking lots do meet ADA standards from previous years, updates will ultimately be planned and made to meet current standards that exist.

Many City buildings were built prior to 1990 and therefore do not meet current ADA standards. Some improvements are simple and fairly inexpensive and will be shown to be addressed sooner than later. Other improvements may not even be possible due to the existing characteristics of the building. All of these items will be addressed within this transition plan.

III. PURPOSE

The purpose of this document is to meet the standards set forth in the United States code of Federal Regulations, Title 28, Section 35.150(d). This document will outline existing conditions, proposed upgrades, and potential timelines to ensure the City of North Chicago is compliant with existing Federal Regulations. It is the City of North Chicago's desire to provide equal access and opportunity for individuals with disabilities, as well as those with a history of having impairment in the past in the areas of public accommodation, employment, and the receipt of services from private entities and the receipt of services from state and local government, transportation, and telecommunications.

IV. CONSIDERATIONS OF THE ADA

The American with Disabilities Act is divided into four sections. These sections will be addressed throughout this document :

1. Employment (Title I) : Title I of the ADA requires that employers with 15 or more employees must not discriminate against qualified individuals with disabilities in all areas of the employment process. These employers must provide reasonable accommodations that protect the rights of these individuals in all areas of the employment process. Possible examples of reasonable accommodations may include, but are not limited to : job restructuring, alteration of work stations, and modification of equipment.
2. State and local government (Title II) : This provision states that State and local government entities cannot deny services to persons with disabilities and cannot deny

participation in programs or activities that are available to the general public. In addition, public transportation such as rail or bus services must also be accessible.

3. Private entities that provide public services (Title III) : All new construction must be accessible for individuals with disabilities. All barriers to goods and services must be removed if doing so is readily achievable. Places of public accommodation include such places as hotels, restaurants, grocery stores, retail stores, and transportation facilities.
4. Telecommunications (Title IV) : Title IV mandates the operation of an Interstate Relay Service and closed captioning system for all federally funded public service announcements.



V. RESPONSIBILITY OF THE CITY OF NORTH CHICAGO

The City of North Chicago has various responsibilities with respect to Title II. A public entity such as the City must provide reasonable modifications to its policies and procedures to avoid discriminating against individuals with disabilities; however, if the City is able to demonstrate that such accommodation would fundamentally alter the nature of the program or service, the City is not required to provide the modification.

The City of North Chicago must also consider Title I with respect to employment, Title III with respect to ensuring new construction follows the ADA regulations, and Title IV with respect to telecommunications.

The City may claim “Undue Hardship” to keep from meeting the requirements. This is defined as ‘An action requiring significant difficulty or expense’ when considering the nature and cost of

a reasonable accommodation or modification request in relationship to size, resources, and the overall structure of the public entity. Undue Hardship is determined on a case by case basis.

TITLE I – REASONABLE ACCOMODATIONS

Public entities are required to make reasonable modifications to policies or practices in order to avoid discrimination toward persons with disabilities. A modification is not required if it fundamentally alters the nature of the program or activity. The Equal Employment Opportunity Commission (EEOC) defines reasonable accommodation as :

- a. Modifications or adjustments to a job application process that enables a qualified applicant with a disability to be considered for a position that the qualified applicant desires
- b. Modifications or adjustments to the work environment, or to the manner of circumstances under which the position held or desired is customarily performed, that enable the qualified individual with a disability to perform the essential functions of the position
- c. Modifications or adjustments that enable the covered entity's employee with a disability to enjoy benefits and privileges of employment as are enjoyed by its employees that do not have disabilities

Examples of possible reasonable accommodations are :

- Making existing facilities accessible
- Job restructuring
- Modified work schedules
- Providing qualified readers or interpreters
- Reassignment of vacant positions

In some cases, the above may not be considered a reasonable accommodation. Each one is considered on a case by case basis.

An individual with a disability may request a change due to a medical condition, but this request does not necessarily mean that the employer is required to provide this accommodation. The employer needs to determine if the individual's medical condition meets the ADA definition of "Disability", a requirement for the individual to be entitled to reasonable accommodation.

Requests for reasonable accommodation may first be handled verbally between the employee and his/her immediate supervisor. If the request can be easily provided, the supervisor may grant that request. The supervisor must write a memo for the employee file stating the date of granted request and the nature of the accommodation.

In the event that the supervisor cannot easily provide accommodation, the employee must make a written request to the Human Resources Director. The Director shall properly document the request in the employee file. If the request is not satisfactory to the employee, the employee may follow the grievance procedure.

VI. GRIEVANCE PROCEDURE

The City of North Chicago hereby establishes within this Transition Plan a grievance procedure providing for the prompt and equitable resolution of any complaints alleging actions prohibited by the U.S. Department of Justice regulating Title II of the Americans with Disabilities Act. This procedure is available to all individuals utilizing the service and facilities of the City of North Chicago.

All complaints regarding access or alleged discrimination are to be submitted in writing to the City Human Resources Department. The complaint shall include a detailed description of the alleged discriminatory action which explains the nature and date of the alleged violation. The complaint must be signed by the complainant or by someone authorized to do so on his or her behalf. If someone other than the complainant signs the complaint, a Notary is also required. This notarization cannot be provided by an employee of the City of North Chicago to prevent a conflict of interest. No grievances are accepted for alleged violations that occurred more than one hundred and eighty (180) days from the time of complaint. For any violations that occurred prior to one hundred and eighty (180) days, the complaint is considered void. Once a complaint is filed, the designated person from the Human Resources Department will set up a meeting with the complainant to discuss the issue and attempt to resolve the grievance. The meeting will be scheduled within fifteen (15) working days of the issuance of grievance. Once a meeting has occurred, the designated HR person will provide a written response to the complainant within ten (10) working days.



Written complaints shall be submitted to City of North Chicago, 1850 Lewis Avenue, North Chicago, Illinois 60064, Attention : Human Resources Director. A record of complaints and the actions taken will be maintained on file until such time records are allowed to be destroyed as designated by the State of Illinois.

If the response of the Human Resources Department is not acceptable to the complainant, he or she may request that the grievance be forwarded to the next available Monday that a closed executive session of the Human Resources/Public Relations Committee can be held. The executive session must be held within thirty (30) days of the request. The chair person of the committee must issue a written decision to the complainant and Human Resource Department within thirty (30) days of the executive session.



Any decision by the Human Resources/Public Relations Committee may be appealed to the City Council within thirty (30) days of the date of the written decision. The City Council must then schedule a vote of final decision within thirty (30) days of the appeal request. The appeal request must be made to the Mayor of North Chicago at City of North Chicago, 1850 Lewis Avenue, North Chicago, Illinois 60064.

A record of the grievance process must be taken by the City Clerk or his or her designee at each level of Committee and Council hearings.

The individual's rights to prompt and equitable resolution shall not impair his/her pursuit of other remedies such as filing of a complaint with the U.S. Department of Justice or any other appropriate Federal agency. The filing of a lawsuit in a state or federal court can occur at any time. The use of this grievance procedure is not a prerequisite to the pursuit of other remedies.

VII. INDIVIDUAL DESIGNATION

The City has designated the City Engineer to be responsible for the creation, implementation, and maintenance of this Transition Plan. This individual has added the ADA responsibilities along with existing Engineering duties. The City Engineer will coordinate and consult with the Mayor's Office, HR Department, Building Department, Police Department, Fire Department, and Library Director to ensure appropriate modifications are made as possible without undue hardship. The City, not the City Engineer, is ultimately responsible for modifications and implementation of the plan.

VIII. TRANSITION PLAN

A public entity that employs fifty (50) or more persons must develop a transition plan that describes existing conditions and structural changes that are needed at a facility to make a program, service, or activity accessible to people with disabilities. The transition plan will address the following items :

- a. Physical obstacles that limit the accessibility of the public entity's programs, services, or activities to individuals with disabilities.
- b. Schedule for providing accessibility to public buildings and walkways.
- c. Description of methods used to make facilities accessible.
- d. Prioritize implementation of structural changes

The summaries listed below address the items above with respect to existing conditions, needed improvements, as well as potential implementation costs. A proposed schedule follows all the facility descriptions.

CITY HALL

The North Chicago City Hall is located at 1850 Lewis Avenue. City Hall provides services for payments (Finance Department), permitting and inspections (Building Department), programs (Economic Development Department), public information (Clerk's Office), design information (Engineering Department), and public meetings (City Council Chambers). City Hall also contains the IT department, HR department, and Mayor's office.

- A. **Building Entrance** – The east entrance to City Hall is not ADA accessible as there are stairs outside of the building and within the building which lead to the main area of City Hall as well as the Police Department. There is signage outside directing visitors to the west side of the building. The west entrance is accessible to handicapped visitors.
 - a. The entrance is appropriately sloped.
 - b. The entrance does not have a detectable warning; therefore, one is needed.
 - c. The entrance does have a push button system for a handicapped person.
- B. **Building Parking** – Employee and public parking exists on the west side of the building. There are xx number of spaces. Xx general public parking exists on the east side of the building off of Lewis Avenue. As no ramps exist on the east side of the building, a sign was installed to direct handicapped persons to the rear of the building. They need to enter back into their vehicle and drive around to the west side and parking in the handicap spaces provided.

- a. Two handicap spaces exist in the west parking lot which meets the minimum amount required. The slopes of the spaces are acceptable and within the 2.0% maximum standard.
 - b. The signage requires updating to the current Illinois standard showing a \$250 fine.
 - c. The striping needs updated to provide one 8 foot space and one 8 foot diagonal striped space.
- C. **Council Chambers** – This is the area used for public meetings. It is accessible to handicapped persons. There are currently no available devices or methods to assist a deaf or blind person with experiencing the meetings.
- D. **Restrooms** – There are two sets of restrooms within City Hall. One men’s and women’s restrooms are located in the main hallway of City hall and are for public use. One other set of men’s and women’s restrooms exist in a back hallway and are typically for employee use.
 - a. All four restrooms are handicap accessible and meet ADA standards. No improvements are needed.
- E. **Clerk’s Office** – The clerk’s office is ADA accessible. The clerk’s office currently has no method to translate resolutions and ordinances for the disabled.
- F. **Payment Center** – The payment center is where citizens pay water bills, complete real estate transactions, pay traffic tickets, and other financial business like license fees. Part of their counter is ADA accessible.
- G. **Building/Economic Development Department** – Visitors come to this department to pick up permit and application forms for various services or programs. The counter does not follow ADA guidelines; however, the access to the department is, and employees could conduct business without issue with disabled visitors.
- H. **HR Department** – The offices of the Human Resources Department are ADA accessible. It is the responsibility of this department to establish policies with respect to employees and employment. Currently, there is no specific policy on disabled employees or those wishing to seek employment. This transition plan recommends the department examine existing policies to determine whether they exclude or limit the participation of individuals with disabilities. It also recommends that the employment policies are reviewed to ensure they are consistent with the Equal Employment Opportunity Commission. Lastly, the HR department should ensure that staff are properly trained with respect to disabled co-workers and visitors and that the drug policies do not deny participation to disabled persons.
- I. **Public Information** – The City provides a number of documents and information through a variety of media. The City provides brochures about programs and services in the City Hall media rack. The City provides a newsletter periodically during the year. The City

provides updates via e-mail (commonly called e-updates) as well as electronic postings on their website and facebook page. All of these pieces of information are only available in written formats. No policy is in place to assist the disabled with the ability to obtain and read these documents.



POLICE DEPARTMENT



The North Chicago Police Department can be accessed from City hall or by a separate entrance on the north side of the building. The entrance from City Hall provides access to employees. The north entrance provides access to employees and the public. Police Department employees as well as the public use the parking lot located on the north side of the Police Department.

The police department also has an annex at the building commonly known as “Grant Place” which exists at Grant Place and Sheridan Road.

A. City Hall Police Station

- a. **Parking Area** –The police visitor and employee parking exist to the north of the police station and contains 40 parking spaces. 20 spaces are used for parking police vehicles and 20 are used for employees and visitors. 1 handicap space is provided. Signage and striping should be updated to current standards.
- b. **Public Entrance** – The entrance, located on the north side of the building, is accessible but should be retrofitted with a detectable warning.
- c. **Restrooms** – The restrooms are for employee use only and meet code.

B. Police Station Annex (Grant Place)

- a. **Parking Area** - The parking area consists of 4 parking spaces with one being striped for handicap parking. This meets code.
- b. **Public Entrance** – The entrance is located on the north side of the building. It contains a ramp for accessibility.
- c. **Restrooms** – The restrooms are for employee use only and meet code.

C. Dispatch

- a. Parking Area, Public Entrance and Restrooms are shared with the Police Department
- b. Dispatch has a Telecommunications Typewriting Device (TTY) that meets code.

*Note that all grievance procedures fall under the Police Pension Board, not the City Human Resources Department.



FIRE DEPARTMENT



The North Chicago Fire Department (referred below as Fire Station No. 1) is located at the south side of City Hall. A public entrance exists at the south side of the building along with a visitor and employee parking area. Another employee parking area exists on the west side of the fire station. There is also a connection between City hall and the Fire Station which is accessible through the Council Chambers.

The Fire Department also has Fire Station No. 2 located on Buckley Road, west of Route 41. This second station is for employees only. It contains an entrance on the northeast side as well as a small parking area.

A. Fire Station No. 1

- a. **Parking Area** – There are 11 parking spaces for employees and 4 parking spaces for visitors. None of the spaces are signed or striped for handicap accessibility. Slopes from the parking areas to the main entrance exceed 2.0% and would not meet ADA guidelines. There is no economic way to provide handicap parking at this location. If a visitor wants to meet with the Fire Department, the meeting could be set at the adjacent City Hall which has accessibility.
- b. **Public Entrance** – The entrance exists on the south side of the building and is not ADA accessible and could not be modified without expensive modifications.
- c. **Restrooms** – The restrooms are not properly outfitted, but some minor retrofit could be completed such as the addition of grab bars.
- d. **Office rooms** – Most rooms are not accessible. Only the day room is accessible.

B. Fire Station No. 2

- a. **Parking Area** – There are 15 parking spaces for employees and/or visitors. No handicap spaces exist; however, one could be striped and signed.
- b. **Public Entrance** – The entrance is on the north side of the building and is not currently accessible, but with minimal improvements could be made accessible. Detectable warnings could be installed. The entrance itself could not be modified without large expense.
- c. **Restrooms** – The restrooms are not properly outfitted, but some minor retrofit could be completed such as the addition of grab bars.

With Fire Station No. 2 more accessible than Fire Station No. 1, disabled employees could potentially temporarily work out of Fire Station No. 2 if they needed disabled access.

No passenger loading zones exist at either fire station.

Drinking Fountains exist at both fire stations but both are located higher than the ADA maximum.

No regular telephones at either station are TTY outfitted.

*Note that all grievance procedures fall under the Fire Pension Board, not the City Human Resources Department.



LIBRARY



The North Chicago Public Library is located at 2100 Argonne Drive just west of City Hall. The library has a parking lot for visitors and employees. The main entrance exists on the east side of the building for both employees and visitors. The library is used for typical uses such as general reading and research, meetings, and administration.

- A. **Parking Area** – The parking lot contains 38 regular parking spaces and 2 handicap spaces which meets code. The signage should be updated to include the \$250 fine signs. A passenger loading and drop off zone exists at the front door which is accessible.
- B. **Public Entrance** – The main entrance located on the east side of the building is handicap accessible. A push button exists for disabled patrons. A proper detectable warning should be added.
- C. **Restrooms** – There is one men's and one women's restroom. They remain locked at all times and a key is available for use at the circulation desk. They restrooms are both ADA accessible with respect to size and amenities. The drinking fountains are also available and are accessible.
- D. **Office areas** – All office areas are of sufficient size to be ADA accessible if necessary. Furniture can be easily moved. The staff lounge also has moveable furniture to accommodate a disabled person. All phones are moveable if necessary. No telephones are TTY capable.
- E. **Meeting Rooms** – All rooms are accessible with moveable furniture. The typewriters are also in accessible areas.
- F. **Emergency Procedures** – The Circulation Clerk makes announcements on the PA system in the event of an emergency. Security, who generally monitor the library, will walk around to inform library patrons of the need for evacuation.
- G. **Administrative** – The library does not currently provide training but intends to provide training for staff members from the municipality, State library and library system concerning non-discrimination of disabled persons. Copies of policies or manuals will be posted in the employee break room. If a complaint is issued, the Library Director is

responsible and will address the issue within 2-3 business days. The complaint process is available at the Circulation Desk.



CITY YARD



The North Chicago City Yard is located at 1421 Renken Avenue. The City Yard is where the Street Department is located. City Street vehicles and materials used in maintenance of streets are located here. The City Yard building has a public entrance on the southwest side of the building. There is a public parking area as well as an employee parking area.

- A. **Parking Area** – The westernmost parking area consists of 5 parking spaces and the northernmost parking area consists of 20 parking spaces. None of the parking spaces are designated for handicap persons. 1 would be required per code. It is recommended that one space be striped and signed. The slopes closest to the main entrance are within the 2.0% allowable.
- B. **Public Entrance** – The main entrance for employees and visitors exists on the south side of the building. It is not currently accessible but has the potential to be reconstructed with a ramp and detectable warning.
- C. **Restrooms** – There are two restrooms, both of which are not ADA compliant. It is recommended that the restrooms be retrofitted as possible to meet current codes.
- D. **Work Areas** – The city yard office areas can be rearranged to accommodate a disabled employee if necessary.



WATER DEPARTMENT



The North Chicago Water Treatment Plant is located at 35 Lakeview Drive. The plant can receive visitors but mostly just contains employees. A small parking area exists inside the gate for employee use. The main entrance exists on the west side of the building.

- A. **Parking Area** – The parking area consists of 5 parking spaces. No spaces are striped or signed for handicap accessibility. The slope of the pavement exceeds 2.0% and cannot be repaved to make an accessible area. It is recommended that a space be striped and signed at the grade level near the front entrance for handicap accessibility.
- B. **Public Entrance** – The entrance is located on the north side of the building and could be accessible. The entrance needs a detectable warning to meet current ADA standards.

- C. **Restrooms** – There are restrooms that exist for employee use only. The men’s restroom is handicap accessible; however, the women’s restroom is not. It is recommended that the women’s restroom become retrofitted to include a grab bar in the toilet stall area.
- D. **Work Areas** – The water plant was generally not designed for disabled employees. If an employee who works beyond the main office area becomes disabled, the HR department and Water Superintendent will work with the employee to establish an appropriate work station for them in the office until such time they can resume their original job within the plant.
- E. **Visitors** – For those visiting the plant, disabled employees may only tour the top floor of the plant which connects them to the main office and meeting room; however, manual assistance will be needed to move the disabled person down a short couple of stairs from the office area to the plant operation area.

The Water Distribution crew operates out of an office located at a building adjacent to the North Chicago Water Tower. This is a field office and is not ADA accessible with its parking or restroom. Field operations would not be possible by a disabled employee. They would need to be given some type of light office work at the plant or city hall.



PUBLIC SIDEWALKS



The City of North Chicago has been updating handicap ramps at intersection of roadways that are completed as part of the MFT Resurfacing Program since 2001 when the regulation of raised bumps became part of the standard for detectable warnings. As technology has improved, the City has transitioned from imprinted concrete to pre-fabricated panels. The City of North Chicago has chosen reddish concrete pigmentation or reddish panels as their detectable warning color. The City intends to continue this program, but has a long way to go to bring the entire public walkway system into ADA compliance. Not all pedestrian areas contain sidewalks; however, it is the policy of the City to have property owners who redevelop or develop a piece of property to install sidewalks in front of their residence.

The City also completes sidewalk replacement by using CDBG funds. Detectable warnings can be purchased with these funds. In FY2012, \$15,000 is being programmed towards sidewalks. There is not a specific amount designated toward detectable warnings. This money is also not guaranteed if the Federal government changes their funding programs.

Assuming that the MFT project generally takes care of 3 roadways each year that has a typical 20 detectable warnings and \$5000 is used from CDBG which will pay for 27 each year based on

the cost being \$30 per square foot which is \$180 for one 2'x3' detectable warning. This provides approximately 47 new detectable warnings per year.

There are approximately 815 locations for detectable warnings throughout the City. Approximately 100 are now compliant. Approximately 715 need replacement. This will take approximately 15 years to complete based on current funding levels.

MISCELLANEOUS NEEDED IMPROVEMENTS

Throughout all public buildings, it was noted that no departments have accommodations in place to provide the blind with meeting notices or agendas, newsletters, council minutes, or other periodicals. It is recommended that the Human Resource Department create a policy that shows that the City has partnered with a company who can translate written materials into Braille upon request. The Department needs to establish with the company how long it will take to complete a typical translation and have it ready for the citizen. This time period should then be published so that the disabled person knows how many hours or days in advance they must request the documentation.

The Human Resources Department shall also contact a company or person who can provide sign language interpretation for the deaf in the event a hearing impaired person attends any program, activity, or service provided by the City. The City would need to publish the hours or days in advance an interpreter would need to be requested to accommodate the disabled person.

It was also noted that no departments receive training for their staff, interns, or volunteers to understand how to interact with disabled employees, citizens, visitors, or volunteers. It is recommended that the Human Resource Department set up a training for all staff during FY2012.

Another item that was continually shown to be deficient was how to deal with the disabled during an emergency. Examples are ensuring that there are means of assuring people with hearing disabilities are made aware of an alarm, creation of an emergency evacuation procedure that addresses the needs of individuals with disabilities, and training for staff concerning emergency procedures. It is recommended that the Fire Department who acts as the local Emergency Manager address these issues in their Emergency Operations Plan.

SCHEDULE OF IMPLEMENTATION – THE TRANSITION PHASE

The purpose of the transition plan is to show the deficiencies within the City, acknowledge that the City is aware of these deficiencies and show how via a timeline, the City can become in compliance with the ADA regulations without undue hardship. In some cases, implementation will not be possible, and these impossible structural changes will be listed at the end of this section after the schedule.

SUMMARY OF NEEDED IMPROVEMENTS

1. City Hall

- a. Addition of Detectable Warning at Building entrance
- b. Restriping of handicap parking spaces
- c. Resigning of handicap parking spaces
- d. Research and find availability of sign language interpreters and Braille devices for meetings in the council chambers
- e. Research and find availability of Braille devices for resolution, ordinance, and code reviews
- f. Establishment of employment policies with respect to disabled applicants.
- g. Review of policies to ensure disabled persons can take part in all municipal programs, services, and activities.
- h. Review of policies to ensure employment practices are consistent with the Equal Employment Opportunity Commission
- i. Provide a training program to current and future employees with respect to disabled employees and disabled visitors.
- j. Research and find availability of Braille interpretation for all City written publications.

2. Police Department

- a. Addition of Detectable Warning at Building entrance
- b. Restriping of handicap parking spaces
- c. Resigning of handicap parking spaces
- d. Review operability of the Dispatch TTY device.

3. Fire Department No. 1

- a. Addition of Detectable Warning at Building entrance
- b. Restriping of handicap parking spaces
- c. Resigning of handicap parking spaces
- d. Retrofitting of restrooms/water fountains
- e. Retrofitting of at least one office space or create policy for what to do in the case of a disabled employee.

4. Fire Department No. 2

- a. Addition of Detectable Warning at Building entrance

- b. Striping of handicap parking spaces
 - c. Signing of handicap parking spaces
 - d. Retrofitting of restrooms/water fountains
- 5. Fire Department – General
 - a. Amend Emergency Operation Plan to include a section on how to handle disabled employees or visitors during an emergency.
- 6. Library
 - a. Addition of Detectable Warning at Building entrance
 - b. Proper signing of handicap parking spaces
 - c. Provide training to staff concerning disabled persons
 - d. Research and find availability of library resources (books, periodicals, etc) for use by disabled persons
- 7. City yard
 - a. Addition of Detectable Warning at Building entrance
 - b. Striping of handicap parking spaces
 - c. Signing of handicap parking spaces
 - d. Retrofitting of restrooms/water fountains
- 8. Water Department
 - a. Addition of Detectable Warning at Building entrance
 - b. Striping of handicap parking spaces
 - c. Signing of handicap parking spaces
 - d. Retrofitting of restrooms/water fountains
- 9. Public Sidewalks
 - a. Retrofit public sidewalk system with all needed detectable warnings and proper sidewalk replacement for smooth surfaces.

SCHEDULE

<u>Fiscal Year</u>	<u>Department Responsible</u>	<u>Cost</u>	<u>Improvement to be completed</u>
2012	Building/Street	\$300	Item 1a.
	Building/Street	\$200	Item 1b. and 1c.
	Clerk	\$0	Item 1d.
	Clerk	\$0	Item 1e.
<u>Fiscal Year</u>	<u>Department Responsible</u>	<u>Cost</u>	<u>Improvement to be completed</u>

2012	HR	\$0	Item 1f., 1g., 1h., 1i., 1j.
	Police/Street	\$300	Item 2a.
	Police/Street	\$200	Item 2b. and 2c.
	Police	\$0	Item 2d.
	Fire/Building	\$xxxx	Item 3d.
	Fire	\$0	Item 3e.
	Fire/Street	\$300	Item 4a.
	Fire/Street	\$200	Item 4b. and 4c.
	Fire/Building	\$xxxx	Item 4d.
	Fire	\$0	Item 5a.
	Library/Street	\$300	Item 6a.
	Library/Street	\$100	Item 6b.
	Library	\$0	Item 6c. and 6d.
	Street	\$300	Item 7a.
	Street	\$200	Item 7b. and 7c.
	Street/Building	\$xxxx	Item 7d.
	Water/Street	\$300	Item 8a.
	Water/Building	\$xxxx	Item 8d.
2012	Street	\$5000 (annually)	Item 9a.
thru	Engineering(MFT)	\$5000 (annually)	Item 9a.
2027			

ITEMS OF UNDUE HARDSHIP

These items are shown as needs but due to existing conditions and significant costs that would be required, these items cannot be upgraded to meet the ADA code :

1. Items 3a., 3b., and 3c. – The slopes of the pavement cannot be reworked without major economic and functional impact.
2. Items 8b. and 8c. – The slopes of the pavement cannot be reworked without major economic and functional impact.

IX. RESPONSIBILITY OF THE CITY WITH RESPECT TO TITLE III – PRIVATE ENTITIES

The City of North Chicago, when issuing a permit for new construction, has a responsibility to review the architectural and engineering plans to ensure that the design follows accessibility guidelines. The City is only responsible to notify the petitioner/permittee of the existence of the ADA guidelines as is NOT responsible for the private entity to follow all requirements during design and construction. The City will provide architectural and engineering reviews as a courtesy but is ultimately not responsible if the final design plans or construction is ADA deficient. The City is not responsible for a private entity's employment practices with respect to ADA. The City only review Building Code and Licensing requirements and does not police whether a private entity is remaining in compliance with ADA guidelines.

X. RESPONSIBILITY OF THE CITY WITH RESPECT TO TITLE IV – TELECOMMUNICATIONS

The City of North Chicago must ensure that it has the capabilities to properly communicate with disabled persons whether that be to complete City business at the Payment Center, listen to a City wide telephone message, contacting Police/Fire Dispatch, or simply crossing a street at a busy intersection. The self evaluation is used to ensure that all persons, handicap or not, can be communicated with equally.

XI. SELF EVALUATION

A public entity with fifty (50) or more employees must complete and retain a self evaluation every three (3) years. A self evaluation is a public entity's assessment of its current policies and practices. The evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Items in a self evaluation should include :

1. Identification of all public entity's programs, activities, and services
2. Review of all policies and practices that govern the administration of the public entity's programs, activities, and services

Typical areas that should be reviewed may include the following :

- A. Examination to determine what, if any, physical barriers exist to access to a program, activity, or service
- B. Examination of existing policies to determine whether any exclude or limit the participation of individuals with disabilities in its programs, activities, or services
- C. Examination of existing policies to ensure that the public entity is properly communicating with applicants, participants, and members of the public with disabilities in a manner that is as effective as its communications with others
- D. Examination of existing policies to ensure that provisions are included for individuals with visual impairments and those with hearing impairments as well as those with manual impairments. A method for securing services should be developed, including guidance on when and where these services can be provided.
- E. Examination of procedures used to evacuate individuals with disabilities during an emergency.
- F. Examination of a public entity's written and audio visual materials to ensure that individuals with disabilities are not portrayed in an offensive or demeaning manner.
- G. Examination of policies and procedures to ensure that individuals with mobility impairments are provided access to all public meetings
- H. Examination of employment policies to ensure they are consistent with the Equal Employment Opportunity Commission
- I. Examination of existing building and construction policies to ensure that the new construction or alteration conforms to Title II standards.
- J. Examination of policies to ensure that all employees are familiar with the policies and practices for the full participation of individuals with disabilities
- K. Examination of policies of drug usage. Denial of participation in a program, activity, or service based on drug usage is allowed just as long as it does not discriminate against former drug users

XII. PUBLIC NOTICE

A public entity with fifty (50) or more employees must complete and retain a copy of the transition plan for public inspection. The entity should provide a thirty (30) day comment period on the transition plan document prior to city council adoption.

Public notice may be provided any way the public entity deems necessary. These methods may include municipal website, newsletter, mailings, newspaper notice, or other methods. No specific method is required, only that public notice is provided.

