A.   IMPLEMENTATION GUIDELINES

A great deal of information has been generated as a result of the Self-Evaluation and Transition Plan Update. Some of the resources that staff now has to work with include:

Facilities Related Work Products:

o   Transition Plan Barrier Removal Implementation Schedule: For the nine priority facilities that had a detailed accessibility evaluation, the minimum physical barriers that must be removed to provide program accessibility (priority "A" barriers) are reflected in the ADA Transition Plan Update document, refer to **Chapter 2.A** -"General Fund Detailed Surveys Barrier Removal Implementation Schedule". These barriers will be the first priority in a long-term Transition Plan.

o   Full Transition Plan Update and Databases: For the nine priority facilities that had a detailed accessibility evaluation, a detailed report and computerized database exist of all accessibility barriers, not just those that prevent program access. A second database categorizes these barriers as priority "A", "B" or "C" for eventual removal based on their impact on the disability community.

o   General Evaluations: For 139 additional City facilities, documents exist that detail additional barriers identified from the Physical General Evaluations conducted at these sites.

The above documents constitute a comprehensive structural barrier inventory that will be used to develop and update the long term Transition Plan. There are also 150 Program Accessibility forms completed for City General Fund and Enterprise facilities.

It is recommended that the City of Santa Barbara use a systematic and methodic approach to the implementation of architectural barrier removal, and that it follow as closely as possible the recommendations of the Transition Plan in terms of priorities and sequence of barrier removal. A lot of interactive thinking went into this process in order to develop the Transition Plan recommendations. The priorities and Transition Plan Barrier Removal Implementation Schedule were developed to provide the most access at City facilities with greater needs first, with the goal of achieving barrier free environments where

the public and persons with disabilities will benefit the most. That said, the Transition Plan is a living document; the priority and sequence of barrier removal under the Transition Plan should be flexible enough over the long term to respond the changing circumstances and priorities of the community.

The barriers identified in the Transition Plan Barrier Removal Implementation Schedule will be the first priority, because they prevent program access, but over the long term the Transition Plan will continue to address the removal of the other identified barriers in order to improve physical access to City facilities and work toward a barrier free environment. Barrier free environments reduce the City's reliance on programmatic solutions and staff assistance, and provide people with disabilities the ability to have more independent access to City programs, services, and activities.

A key component of the Transition Plan will be the funding structure designed to ensure consideration of barrier removal during the development of each 2-year Financial Plan and 6-year Capital Program. Another key will be continued input from the AACS and from other members of the disability community to ensure that the Transition Plan continues to meet the needs of the community.

Program Related Work Products:

Equally important is the implementation of Self-evaluation policy recommendations to help the City of Santa Barbara fulfill its commitment to provide program accessibility to all programs, services and activities offered by the City to its citizens.

Program related resources that have been developed by the consultant and/or staff during this project include:

- o An ADA compliance structure and plan;

- o A revitalized Accessibility Advisory Committee to Staff (AACS);

- o A new public accessibility Web Site;
- o An email list of citizens who participated in the Transition Plan Update effort and would potentially be interested in participating in City access improvement efforts;

- o A new internal Portal site containing resources to assist staff in complying with the ADA;

o A revised ADA Notice and Grievance Policy;

o A new Communications Assistance Requests Policy and a list of resources available to help staff comply with such requests;

o New recommendations and resources for:
- Website accessibility
- Updates to the City's Pedestrian Master Plan
- Meeting and events held in City facilities
- Contracting and purchasing
- Maintenance of Accessible Features
- Accessibility-related signage needs;

o Freshly ADA-trained City technical and compliance staff;

o Guidelines for developing a comprehensive ongoing training program (see Chapter 7, Section B).

These resources will continue to be used and updated over the long term.

Implementation of the City's ADA efforts will be accomplished as follows.

A.1 Main Areas of Compliance:

The City of Santa Barbara, in order to have an organized and efficient way to address the various areas for compliance under the ADA, updated its internal "ADA Compliance Structure" as part of the Self-evaluation update process. See attached "City of Santa Barbara ADA Compliance Structure", in **Chapter 3, Section A** of this document.

The "City of Santa Barbara ADA Compliance Structure Chart" illustrates how each of the three main access compliance areas is structured:
1. Program Accessibility
2. Facilities Accessibility
3. Employment Accessibility (not part of this study)

The organizational chart also indicates the links between key areas of interdependence. See "City of Santa Barbara ADA Compliance Structure Chart" **Appendix A.1**.

A.2 Roles and Responsibilities:

In order to insure implementation of the Transition Plan and Self-evaluation, with monitoring of this process, the City has established an organizational structure and has defined the following roles and responsibilities:

1. At the top of this organizational chart is the **City Administrator**, who is the person in charge of overall ADA compliance including the implementation of the Transition Plan and Self-evaluation.

2. The City of Santa Barbara has designated its City overall **ADA Coordinator** (also the Section 504 coordinator) as the central point of communication for ADA compliance, as required by the ADA. (Refer to **Chapter 6, part B**, for additional information regarding the ADA Coordinator duties and responsibilities).

3. The City has established an **ADA Compliance Committee,** which consists of key ADA compliance staff and ADA Liaisons from each department. A subset of the ADA Compliance Committee, the Project Steering Committee, was set up during the ADA Transition Plan and Self-evaluation update process to work with Gilda Puente-Peters, Architects, the accessibility consultant, in a highly interactive decision making process. After the Transition Plan and Self-Evaluation Update process is completed, it is anticipated that the full ADA Compliance Committee will meet at least semi-annually to discuss overall compliance. The committee may initially meet more often on as-needed basis. Committee members will also share information with each other, as appropriate, via electronic media.

4. The **Facilities Compliance Staff** in charge of existing City facilities, the public rights-of-way, and new City facilities will also meet separately, at least on a quarterly basis, with the AACS committee. Human Resources (HR) and department liaisons will attend these meetings only if there is some reason for them to attend.

5. The City as part of this Transition Plan and Self-evaluation process has added new members to the **Accessibility Advisory Committee to Staff** (AACS), representing a variety of disabilities to insure that their diverse and sometimes conflicting needs are included in the decision making process. This committee has helped City staff for many years by making them aware of key issues affecting persons with disabilities within the City and helping the City resolved other related accessibility issues including barrier removal prioritization and development of interim solutions to

accessibility issues at existing City facilities. City facilities compliance staff will continue to meet quarterly with the AACS committee to insure that the implementation of the Transition Plan represents and meets the needs of people with disabilities in the community.

6. The **City website** has added a new section to its home page dedicated to accessibility. This will be an important means of dissemination of accessibility related information for use of staff and the general community. Items to be included in the City's website include but are not limited to:

    a. Notice for compliance
    b. ADA grievance procedures and complaint form
    c. City policies related to accessibility
    d. Transition Plan information
    e. Useful accessibility website links

The maintenance of the City's website and responsibility to insure that new content added to the website meets the accessibility requirements rests with the **City's web master**. The addition of new content for the "Accessibility" section of the website will go through the ADA Coordinator.

A.3 Transition Plan Barrier Removal Budgeting Process:

Another aspect of the Transition Plan implementation is the budgeting of architectural barrier removal projects, following the priority criteria established in the Transition Plan. This process is anticipated to take place every two years in coordination with the City's 2-year Financial Plan and also with the City's 6-year Capital Program report. Given the nature of this living document, every two years the City staff will update a list of priority projects that will be reviewed; they will obtain input from the AACS committee for recommendations for inclusion in the upcoming City's 2-year Financial Plan. Both General Fund and Enterprise facilities should use this implementation process. The Public Works department and ADA Coordinator will work together in this effort.

A.4 Self-evaluation Implementation Policies:

It is important to disseminate new policies, practices and procedures for staff program accessibility compliance to all levels of the City organizational structure. This may include, for example, posting this information in the City's internal Portal computer system, distributing it

to employees electronically, and highlighting various issues in the Employee Newsletter. Another method will be including this information when training pertinent staff.

These resources will also need to be updated regularly. The ADA Coordinator will lead these efforts.

A.5 Staff On-going Education:

The ADA Coordinator will follow as much as feasible the recommendations for on-going accessibility related training outlined in the next section of this report, **Chapter 7, section B.**

A.6 Use Federal, State and Local Accessibility Resources:

The ADA Coordinator will provide links on the City's internal Portal ADA page to the multiple resources found at the U.S. Department of Justice, U.S. Access Board, California Division of the State Architect and local accessibility related organizations. These website links and information from a variety of organizations will provide staff with a wide variety of up-to-date information regarding the multitude of topics related to access compliance. It is important to keep these Portal links updated, due to the continuous technical developments and changes in accessibility guidelines, standards and resources.

For a list and useful accessibility related website links, refer to Transition Plan Update, **Appendix C.**

A.7 Monitor the Implementation of the Transition Plan:

The ADA Coordinator will follow the recommendations for monitoring the implementation of the Transition Plan outlined in the last section of this chapter, **Chapter 7, Section C.**

B.   ACCESS COMPLIANCE STAFF TRAINING PROGRAM

B.1 Findings:

The City of Santa Barbara has an on-going staff education program in many disciplines, with the goal of giving staff the necessary tools to perform their duties. This "Learning for Excellence and

Achievement Program" (L.E.A.P) is conducted in partnership with several local institutions of higher learning.

B.2 Accessibility Training Program Performed As Part of this Self-evaluation and Transition Plan Update:

As part of the Self-evaluation update, the City of Santa Barbara provided a Disabled Access Compliance Training program for its staff. The training sessions addressed both compliance with the Americans with Disabilities Act Guidelines (ADAAG) and the California Building Code (Title 24 CBC).

The goal of this Disabled Access Compliance Training program was to increase staff awareness regarding the many aspects of access compliance.

The accessibility consultant for this ADA Transition Plan and Self-evaluation Update project, Gilda Puente-Peters, Architects, conducted the following training sessions:

1. Accessibility Awareness presentation for all City managers and supervisors at their quarterly meeting.

2. Outdoor Accessibility and Universal Design, which included Public Rights-of-Way and site issues training for staff responsible for implementing accessibility codes and regulations. This training included field trips where staff was able to experience using a wheelchair and the use of a white cane while blindfolded. This gave staff members the opportunity to better understand the issues that people with disabilities face on a daily basis. See ADA Transition Plan Technical **Appendix TA-E**: Public Right-of-Way, Outdoor Accessibility and Universal Design Training.

3. Building Accessibility and Universal Design, which included overview of laws and regulations as well as training on the different building elements that are part of accessible facilities, for staff responsible for implementing accessibility codes and regulations. See ADA Transition Plan Technical **Appendix TA-F**: Building Accessibility and Universal Design Training.

The training program that was provided to facilities design staff included detailed code training sessions regarding routine maintenance, purchase of accessible products, spatial use, maintenance of existing accessible features, field trips to buildings, parks and public rights-of-way to illustrate the issues discussed at the

specific training sessions, use of tools for inspections, and illustration of actual products. These customized training sessions were tailored to plan reviewers, inspectors and personnel that were already familiar with the accessibility codes and regulations. The goal of the detailed code training sessions was to improve the accuracy and consistency of interpretation of accessibility codes and regulations and expand staff knowledge to enhance their job performance.

B.3 Recommendations:

Ensure on-going accessibility training for City of Santa Barbara staff and dissemination of policies, procedures and information material regarding all aspects of compliance with the Americans with Disabilities Act (ADA) and State Accessibility Codes and Regulations. The accessibility training plan that follows was developed in conjunction with the City's ADA Coordinator.

B.3.1 On-going Accessibility Training Plan:

The City-wide ADA Coordinator will oversee the implementation of the citywide accessibility training program.

The goal of accessibility training will be to ensure each employee has an understanding of his/her role in compliance with the ADA and other accessibility related laws and regulations. Training will be provided through a combination of written communication, online web or City Portal System instruction, and in-house and external classroom instruction. Audio-visual and experiential elements will be used, where possible, to improve the efficacy of such training (e.g., PowerPoint presentations, accessibility videos, checklists, diagrams, illustrations with actual products, field visits, experiencing the use of wheelchairs as well as white canes with blindfolds).

The accessibility trainings recommended to be provided on an on-going basis include but not be limited to the following types of trainings as appropriate for each specific audience and target learning objectives:

B.3.2 General Accessibility Awareness Trainings:

1. Provide basic awareness training to all City employees, including managers and supervisors, regarding: The City's existing, updated, and new City disabled access compliance policies.

2. Basic disability sensitivity and basic aspects of access compliance, to avoid discriminatory practices, even when the policies in place are non-discriminatory.

3. Accessibility awareness and maintenance of accessible spatial features to ensure that the City accessible spaces and features continue to be accessible and usable by persons with disabilities.

B.3.3 Physical Accessibility Code Trainings:

Provide detailed Accessibility Code Trainings to technical staff including plan reviewers, inspectors, architects, planners, engineers and maintenance personnel on an on-going basis. Such training should be provided by technical experts and may include, depending on the employee's job responsibilities:

1. Accessibility code training updates, when new accessibility state and federal code changes occur, or new and proposed State and Federal accessibility guidelines are released.

2. Orientation training for newly hired staff with an emphasis on access compliance, department policies, practices and procedures, maintenance of accessible features as well as applicable state and federal disabled access codes and regulations.

3. Detailed training regarding Maintenance of Accessible Features. This training should include but not be limited to operation, inspection and maintenance of site and building accessibility features, accessible equipment, furniture, plumbing fixtures and accessories.

4. Communications, Assistive Technology and Electronic and Information Technology standards, including Rehabilitation Act Section 504 requirements, as well as Section 508 guidelines.

5. City policies for purchase of accessible products, equipment and services. This training should include installation procedures, construction tolerances and best practices, to insure that the accessible products selected are installed at in the right location, with the required maneuverable clearances and reach ranges.

6. The procedures, operation, inspection and maintenance of specialized equipment such as elevators, wheelchair lifts, swimming pool lifts and assistive listening devices. Include in the training instructions for use of the equipment and identification of assigned staff responsible for insuring that the specialized equipment is available and usable during business hours and all public functions.

7. Implementation and monitoring of the City of Santa Barbara ADA Transition Plan and Self-evaluation.

8. Available products and new technological advances.

B.3.4 *Program Accessibility Trainings:*

Provide more advanced program accessibility training to key staff, such as managers, supervisors and ADA Liaisons, regarding the City of Santa Barbara's policies for program accessibility. Depending on the employee's job responsibilities such training may include the following:

1. Grievance procedures and the requirements for posting of access compliance and non-discriminatory notices.

2. The City's policy and procedures to ensure accessible public meetings.

3. The City's policy about providing assistive communication devices and services, how to respond to requests for effective accessible communication methods, and how to use City owned assistive communication equipment. Training should include awareness of the two major types of communication barriers, visual and aural/oral and the various devices and services available.

4. How to recognize, answer, and handle incoming calls over relay services. For 9-1-1 dispatch staff this should include training on the TTY/TDD text system.

5. Safety evacuation policies and procedures for persons with disabilities, and use of emergency evacuation chairs.

6. Sensitivity and safety procedures for use of assistive equipment for special recreation programs or other activities offered for persons with disabilities.

7. The City's accessibility requirements and policy for temporary public events.

B.3.5 Dissemination of Information:

Continue to update the new section on the City's public website for Disabled Access, which will have pertinent accessibility information including:

1. Notices for ADA compliance, grievance procedure and grievance forms.

2. New updated policies available at the City's website.

3. Other information staff deems appropriate, such as information regarding the location of accessible City facilities, parks, restrooms, drinking fountains and public telephones.

C.   MONITOR THE IMPLEMENTATION OF THE TRANSITION PLAN

C.1 Findings:

Each department of the City of Santa Barbara has been implementing the ADA Transition Plan prepared in 1992, and removing physical barriers to access their facilities. Status update reports have been submitted upon request to the City Administrator's office.

C.2 Recommendations:

1. *Monitor on a yearly basis the implementation of the Transition Plan Update. Yearly updates of this plan are necessary to maintain the information current regarding what has been accomplished in terms of barrier removal and what remains to be done. In order to accomplish this task, the detailed Transition Plan data base document, which was developed for the nine high priority City General Fund facilities, has a field assigned to enter the completion date for each architectural barrier project listed.*

2. *The ADA Transition Plan is a "living document", that is, in need of frequent updating, and should be used as such. Since often the actual yearly budgets assigned for access barrier removal differ from the previously projected schedule, it is necessary to adjust yearly the priorities, responding to the new actual budgets. Members from the disabled community should be invited to participate in this re-prioritizing process, to validate the decision making process. The Accessibility Advisory Committee to Staff (AACS) should actively participate with staff on this process. Given the "living document" nature of the Transition Plan, it is very important the progress made on barrier removal projects identified in the Plan, be documented as projects are completed.*

3. *This effort to monitor the implementation of barrier removal projects, for both the nine high priority City General Fund facilities and the other General Fund facilities that had only summary evaluations, will be coordinated by the Public Works Facilities Division.*

    A list of completed projects should be submitted on a yearly basis by the Public Works Facilities Division to the City's ADA Coordinator at the City Administrator's Office so that the Transition Plan can be updated.

4. *The Enterprise Fund departments are individually responsible to monitor the implementation of barrier removal projects within their department. A list of completed projects should be prepared on a yearly basis, and submitted by each department to the City's ADA Coordinator at the City Administrator's Office.*