



Americans with Disabilities Act (ADA) Transition Plan

November 2015

City of Oxford, Alabama

145 Hamric Drive East

Oxford, AL 36203

www.oxfordalabama.org

PART I: GENERAL REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(A) (B) (C) (D) (E) (F)

1. Grantees with 15 or more employees must designate a Section 504 Coordinator (give name/title in comments section). Aaron Sexton
oxfordrevenue@bellsouth.net
256-832-1553

2. Grantees with 15 or more employees must establish a grievance procedure that provides for the prompt and equitable resolution of complaints alleging violations of Section 504 requirements. Personnel Policies
July 1, 2015
Civil Service Act
June 3, 2015

3. Grantees with a workforce of 15 or more persons must give employees, beneficiaries, and the general public initial and continuing notice of non-discrimination on the basis of handicap using some or all of the following methods:

PART I: GENERAL REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(A)

(B) (C) (D) (E) (F)

a. post notices X

b. newspaper ads X

c. taped announcements X

d. employee memoranda X

e. distribution of Braille materials X

f. other X

Nutrition/Senior Center
Anita Collier, Manager

4. All recipients must consult with
handicap persons/organizations
in the development of the
self-evaluation (list individuals/
groups consulted in comments
section).

PART I: GENERAL REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A)

(B) (C) (D)

(E)

(F)

a.

Grantee with 15 or more employees must maintain on file the self-evaluation for a period of three years after its completion.

X

X

All recipients must develop a written transition plan outlining steps to be taken to eliminate all physical impediments to handicapped accessibility found in local government buildings/facilities, including a schedule for correcting each deficiency and the designation of the person(s) responsible for implementation.

PART I: GENERAL REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A)

(B) (C) (D)

(E)

(F)

5. All grantees must collect and maintain data showing to what extent handicapped individuals are beneficiaries of the CDBG and other Federally financed programs.

Nutrition Center Meals

X

a. applications for assistance

X

b. survey forms

X

c. census data

X

d. other methods

PART II: COMMUNICATIONS REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE YES NO N/A	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
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(A)	(B)	(C)	(D)	(E)	(F)
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4 All grantees must develop an information dissemination process to provide program information to interested handicapped persons in the community.

a. develop a mail out list to organizations who serve disabled persons in the community;

X Senior Center Manager Maintains Mailing list for Senior Citizens

d. make sure the wording on printed notices, brochures, and other program materials can be clearly read by disabled individuals;

X

e. utilize the services of sign language interpreters at public meetings whenever there is reason to believe deaf persons will be in attendance.

X

PART II: COMMUNICATIONS REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(B) (C) (D) (E) (F)

(A)

As Needed

n. All grantees must take steps to ensure effective communication with applicants, beneficiaries, and the general public:

X

As Needed

X

C. utilize a telecommunications device for the deaf (TDD) whenever conversing with hearing impaired applicants and beneficiaries over the telephone:

As Needed

X

d. furnish auxiliary aids (amplifiers, magnifying glasses, Braille materials, etc.) whenever necessary and appropriate for the handicapped to participate in programs and activities paid for with Federal assistance.

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

MODIFICATIONS NEEDED/REMEDIES
PLANNED

COMMENTS/DEFICIENCIES IDENTIFIED

COMPLIANCE
YES NO N/A

(F)

(E)

(A) (B) (C) (D)

SECTION 504 REQUIREMENT

1. No qualified individual with handicaps shall, solely on the basis of handicap, be subjected to discrimination in employment under any program or activity that receives CDBG or other Federal financial assistance. This prohibition applies to the following employment policies and practices;

EEO Employer
Statement Includes Handicapped

X

* Job announcement must contain a nondiscrimination statement with respect to handicap.

The Anniston Star

X

* Job announcement must be publicized in a manner that will adequately notify qualified disabled individuals in the community of employment opportunities.

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(A) (B) (C) (D) (E) (F)

b.	Selection					
	<ul style="list-style-type: none"> * Applications and interviews for employment must not make inquiries about an applicant's handicap, unless it can be clearly shown that such questions directly reflect upon the individual's ability to perform job-related functions. 	x				
	<ul style="list-style-type: none"> * Employment tests must be job-related and not discriminate against persons with impaired communications abilities. 	x				
	<ul style="list-style-type: none"> * Medical history questionnaires must not request the nature or severity of an applicant's handicap if not directly job-related. 	x				

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(A) (B) (C) (D) (E) (F)

* Pre-employment medical exams must be mandatory for all prospective employees, not just those suspected of disabilities, and the results must be kept confidential. X

c. Promotion/Upgrading X
 The criteria for promotion, upgrading, tenure, transfer, etc. must not limit the eligibility of qualified handicapped employees.

d. Training X
 Training programs must be administered in a manner that will allow equal participation by qualified handicapped employees.

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED	
	YES	NO			
(A)	(B)	(C)	(D)	(E)	(F)

e. Compensation/Fringe Benefits

X

Employees with disabilities must not be offered different rates of pay solely on the basis of handicap.

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* Handicapped employees must be given the same benefits (insurance, leave, etc.) as non-handicapped workers.

X

X

f. Termination/Layoff

Decisions on layoffs and job terminations must not discriminate against disabled employees.

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES NO N/A		

(A)	(B)	(C)	(D)	(E)	(F)
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2. No grantee may deny an employment opportunity to a qualified handicapped applicant or employee if the basis for denial is the need to make reasonable accommodation to the physical or mental limitations of the applicant or employee. As used here, reasonable accommodation pertains to:

a. modification of the workplace (furniture, office equipment, vehicles, etc.) to be readily usable by handicapped employees; X

b. provision of assistive devices; X

PART III: EQUAL EMPLOYMENT OPPORTUNITY REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A)

(B)

(C)

(D)

(E)

(F)

c. job restructuring, modification of work schedules, relocation of work station to more accessible facilities, etc.; and

X

X

d. when none of the above measures are undertaken to accommodate handicapped employees, a determination has been made that to do so would impose an undue financial hardship or administrative burden on the grantee (explain in detail the basis for such a decision in the comments section).

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A)

(B)

(C)

(D)

(E)

(F)

c. The grantee's entire inventory of public buildings and other non-housing governmental facilities must be designed, constructed, and/or modified to be readily accessible and usable by handicapped employees, beneficiaries, and the general public unless it can be cleanly shown that:

X

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c. to do so would impose an undue financial or administrative burden;

X

d. alteration would result in substantial impairment to significant features of a certified historic property; or

X

e. other alternatives are equally effective in achieving compliance with Section 504 accessibility requirements.

X

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A) (B) (C) (D) (E) (F)

2. In determining each public facility's accessibility, the following factors should be analyzed with respect to Uniform Federal Accessibility Standards (UFAS):

e. Does the facility have designated parking spaces for the handicapped, marked and of adequate width, near building entrances?

City Hall/Courthouse	X				
Civic Center/Auditorium	X				
Library	X				
Parks/Recreation Facilities	X				
Senior Center	X				
Performing Arts Center	X				
Police Station	X				

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A) (B) (C) (D) (E) (F)

b. Is the main entrance wheelchair accessible (ramp, handrails, 32" wide doorway, etc.)?

City Hall/Courthouse X

Civic Center/Auditorium X

Library X

Parks/Recreation Facilities X

Senior Center X

Performing Arts Center X

Police Station X

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(B) (C) (D) (E) (F)

(A)

c.Are public restrooms handicapped accessible (w. sechair maneuverable, grab bars, lavatories/toilets at proper height, extended faucet handles, etc.)?

X

City Hall/Courthouse

X

Civic Center/Auditorium

X

Library

X

Parks/Recreation Facilities

X

Senior Center

X

Performing Arts Center

X

Police Station

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT

COMPLIANCE

YES NO N/A

COMMENTS/DEFICIENCIES IDENTIFIED

MODIFICATIONS NEEDED/REMEDIES PLANNED

(A) (B) (C) (D) (E) (F)

d. Are interior doorways and aisles free of obstacles and wide enough to accommodate wheelchairs?

City Hall/Courthouse X

Civic Center/Auditorium X

Library X

Parks/Recreation Facilities X

Senior Center X

Performing Arts Center X

Police Station X

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED	
	(B) YES	(C) NO			(D) N/A
e. Are elevators usable and accessible (sufficient width/depth for wheelchairs, tactile buttons, auditory floor indicators)?			No Elevators		
City Hall/Courthouse		X			
Civic Center/Auditorium	X				
Library					
Parks/Recreation Facilities					
Senior Center					
Performing Arts Center	X				
Police Station					

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE YES NO N/A	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
(A)	(B) (C) (D)	(E)	(F)
f. Do drinking fountains and public telephones have the proper height and clearance to be used from a wheelchair?			
City Hall/Courthouse	X		
Civic Center/Auditorium	X		
Library	X		
Parks/Recreation Facilities	X		
Senior Center	X		
Performing Arts Center	X		
Police Station	X		

PART IV: FACILITY ACCESSIBILITY REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE YES NO N/A	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
(A)	(B) (C) (D)	(E)	(F)

<p>g. All federally assisted, multifamily housing projects must be accessible to the handicapped. The agency responsible for the design, construction, renovation, and management/operation of the community's public housing units must also conduct a self-evaluation to determine if Section 504 requirements have been met.</p>	<p>X</p>	<p>There are no Federally assisted housing units in the City of Oxford</p>	
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PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
	YES NO N/A		

(A)	(B)	(C)	(D)	(E)	(F)
-----	-----	-----	-----	-----	-----

1. Handicapped individuals must be eligible to participate in any project, program, service or activity financed with CDBG funds. List below all of the recipient's recently completed (last three years) and on-going CDBG projects; and then indicate how each is constructed, and/or administered to meet the needs of disabled persons:
 - A. _____
 - B. _____
 - C. _____
 - D. _____

X

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE YES NO N/A	COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED
(A)	(B) (C) (D)	(E)	(F)
<p>2. Handicapped individuals must have access to, or be eligible to participate in, any program, service, or activity of general local government provided by a recipient of CDBG funds or any other Federal financial assistance. As such, the following functions, activities, services, and/or programs must be analyzed to determine their availability or accessibility to disabled persons.</p>			
<p>a. Public Transportation</p> <p>*Do all sidewalks have curb ramps for wheelchair accessibility?</p> <p>*Are public transportation vehicles (vans, buses, etc.) equipped to provide access to the disabled?</p>	<p>X</p> <p>X</p> <p>X</p>	<p>We have construction plans being developed to meet ADA requirements. Project will be bid soon.</p>	<p>The City of Oxford participates in the ADA Para-transit service provided through East Alabama Regional Planning Commission. The ADA Para-transit service is an on-demand curb to curb transit service for handicapped and disabled citizens provided during the same hours as the ACTS fixed route service. All ADA Para-transit vehicles are handicapped accessible with wheel chair lifts.</p>

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT COMPLIANCE COMMENTS/DEFICIENCIES IDENTIFIED MODIFICATIONS NEEDED/REMEDIES PLANNED

YES NO N/A

(A) (B) (C) (D) (E) (F)

b. Recreation/Cultural Activities

Are specialized, alternative Recreation programs/facilities provided for the enjoyment of elderly, disabled or handicapped individuals? X

Senior Center provides activities for disabled senior citizens
Freedom Park

Does the public library provide alternative methods (Braille, taped recordings, etc.) for the blind to have access to reading material? X

Taped recordings

Are hearing impaired individuals provided auxiliary listening devices for public assemblies, meetings, and performances? X

The City obtains these services as necessary for requested meetings

PART V: PROGRAM PARTICIPATION REQUIREMENTS

SECTION 504 REQUIREMENT	COMPLIANCE		COMMENTS/DEFICIENCIES IDENTIFIED	MODIFICATIONS NEEDED/REMEDIES PLANNED	
	YES	NO			
	(B)	(C)	(D)	(E)	(F)
c. voting		X			
Are polling places physically accessible to disabled persons?		X			
Do election officials make voting convenient for the handicapped, including the blind?		X			
d. Senior Citizen Programs					
Are transportation services for the handicapped provided to elderly recreation/day care programs?					
Is home delivery an option for elderly nutrition programs?					

SECTION 504 REQUIREMENT

MODIFICATIONS NEEDED/REMEDIES
PLANNED

COMMENTS/DEFICIENCIES IDENTIFIED

COMPLIANCE
YES NO N/A

3. Legal/Administrative

(A)

Do insurance or medical eligibility requirements limit the participation of handicapped individuals in local government programs or activities:

(B) (C) (D)

X

(F)

(E)

X

f. Do any other administrative policies or procedures prevent disabled individuals from participating in programs, services, or activities provided by the grantee?

Other Government Functions/
Activities

None

City of Oxford
Americans with Disabilities Act Discrimination Complaint Form

Please complete this form and return it to the City of Oxford. You may include additional sheets if attachments are necessary.

Person filling out this form

Last Name	First Name	Middle	Suffix
Address	City	State	Zip
Telephone Number		Email	

Person(s) Discriminated Against (if other than the complainant)

Last Name	First Name	Middle	Suffix
Address	City	State	Zip
Telephone Number		Email	

Discriminatory incident

Government, organization, institution or business which you believe has discriminated

Name		Telephone Number	
Address	City	State	Zip

When did the discrimination occur?

Date: ____/____/____

Primary type of disability (check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Mobility | <input type="checkbox"/> Seizure |
| <input type="checkbox"/> Cognitive/Intellectual/Developmental | <input type="checkbox"/> Speech |
| <input type="checkbox"/> Learning | <input type="checkbox"/> HIV/AIDS |
| <input type="checkbox"/> Mental/Psychiatric | <input type="checkbox"/> Diabetes |
| <input type="checkbox"/> Vision | <input type="checkbox"/> Other or Not Listed _____ |
| <input type="checkbox"/> Hearing | |

Issue (check all that apply):

- | | |
|--|---|
| <input type="checkbox"/> Employment | <input type="checkbox"/> Housing |
| <input type="checkbox"/> Physical Access | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Interpreter/Assistive Listening | <input type="checkbox"/> Denial of Service/Refusal to Admit |
| <input type="checkbox"/> Service Animal | <input type="checkbox"/> Other or Don't Know _____ |

U.S. Department of Justice
Civil Rights Division
Disability Rights Section

How to File a Title III Complaint

This is in response to your request for information on how to file a complaint under title III of the Americans with Disabilities Act.

Title III prohibits discrimination based on disability in public accommodations. Private entities covered by title III include places of lodging, establishments serving food and drink, places of exhibition or entertainment, places of public gathering, sales or rental establishments, service establishments, stations used for specified public transportation, places of public display or collection, places of recreation, places of education, social service center establishments, and places of exercise or recreation. Title III also covers commercial facilities (such as warehouses, factories, and office buildings), private transportation services, and licensing and testing practices.

If you feel you or another person have been discriminated against by an entity covered by title III, send a letter to the Department of Justice, at the address below, including the following information:

- Your full name, address, and telephone number, and the name of the party discriminated against;
- The name of the business, organization, or institution that you believe has discriminated;
- A description of the act or acts of discrimination, the date or dates of the discriminatory acts, and the name or names of the individuals who you believe discriminated; and
- Other information that you believe necessary to support your complaint. Please send copies of relevant documents. Do **not** send original documents. (Retain them.)

Sign and send the letter to the address below:

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Civil Rights Division
Disability Rights - NYAVE
Washington, D.C. 20530

The Disability Rights Section will consider your complaint and inform you of its action. The office will investigate the complaint and determine whether to begin litigation. We will not necessarily make a determination on each complaint about whether or not there is an ADA violation. If we believe there is a pattern or practice of discrimination, or the complaint raises an issue of general public importance, we may attempt to negotiate a settlement of the matter or we may bring an action in U.S.

District Court. Any such action would be taken on behalf of the United States. We do not act as an attorney for, or representative of, the complainant.

You also have the option of filing your own case in U.S. District Court.

Depending on the nature of your complaint, other information would also be helpful to our investigation:

1. Small businesses have limited protection from lawsuits. Except with respect to new construction and alterations, no lawsuit can be filed concerning acts or omissions that occur before --
 - 1) July 26, 1992, by businesses with 25 or fewer employees and gross receipts of \$1,000,000 or less.
 - 2) January 26, 1993, by businesses with 10 or fewer employees and gross receipts of \$500,000 or less.
2. The name or names of the individuals or entities who have an ownership and/or managerial interest in each facility or business that is the subject of your complaint, with phone numbers and addresses, including zip codes, if you have them.
3. Information specifying whether the facility is owned and/or operated by a private entity or a state or local government.
4. The nature of the activity or service provided by the business.
5. If you are alleging failure to remove architectural barriers, a description, including as much detail as possible, of the barriers. If possible, please provide pictures, videotapes, diagrams, or other illustrations that accurately set forth the alleged violation.
6. Any suggestions for remedying the alleged violations of the ADA.
7. Information about whether you have filed a related complaint with a U.S. Attorneys Office, or any other Federal, State, or local agency, or any court, or whether you intend to file such a complaint.

Privacy Act Statement

The authority for collecting this information is contained in 42 U.S.C. 12188(b). We need this information in order to investigate your complaint. The personal information will be used primarily for authorized civil rights compliance and enforcement activities conducted by the Department of Justice. The Department will not disclose the name of, or other identifying information about, an individual unless it is necessary for enforcement activities against an entity alleged to have violated federal law, or unless such information is required to be disclosed under the Freedom of Information Act, 5 U.S.C. 552, or as is allowed through the publication of a routine use in accordance with the Privacy Act of 1974, 5 U.S.C. 552a. To further the Department's enforcement activities, information we have about you may be given to appropriate Federal, State, or local agencies. Additional disclosures of information may be made: to Members of Congress or staff; to volunteer student workers within the Department of Justice so that they may perform their duties; to the news media when release is made consistent with the Freedom of Information Act and 28 C.F.R. 40.2; and to the

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National Archives and Records Administration and General Services Administration to perform records management inspection functions in accordance with their statutory responsibilities. Furnishing of the requested information is voluntary except that the failure to provide such information may result in our being unable to process your complaint.

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**INDIVIDUALS/ORGANIZATIONS ASSISTING IN THE FORMULATION
OF THE SELF-EVALUATION AND TRANSITION PLAN**

Pursuant to the Section 504 requirements contained in 24 CFR, Subpart C, Section 8.21 and Subpart D, Section 8.52; the following disabled person(s) and/or organization(s) representing handicapped individuals assisted in the formulation of this self-evaluation and transition plan:

<u>Person Consulted</u>	<u>Organization</u>	<u>Address</u>
Alton Craft	City of Oxford	P.O. Box 3383 Oxford, AL 36203
Aaron Sexton	City of Oxford	P.O. Box 3383 Oxford, AL 36203


Indicate below the relevant education, work experience, special expertise, etc. which makes the person(s) and/or organization(s) named above qualified to assist in the formulation of the self-evaluation and transition plan:

City Employees familiar with City policies

I certify that this self-evaluation and transition plan was completed in full compliance with the Section 504 requirements contained in 24 CFR, Part 8.

Chief Election Official

Date



Leon Smith, Mayor

11-9-15