



GIBSON COUNTY TENNESSEE
Americans with Disabilities Act
Self-Evaluation and
Transition Plan
November 2020

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ENGINEERS • ARCHITECTS • PLANNERS

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List of Abbreviations/Acronyms

AA – Affirmative Action
AASHTO – American Association of State Highway and Transportation Officials
ABA – Architectural Barriers Act of 1968
ADA – Americans with Disabilities Act of 1990
ADAAG – Americans with Disabilities Act Accessibility Guidelines
CDBG – Community Development Block Grant
CFR – Code of Federal Regulations
DOJ – U.S. Department of Justice
DOT – U.S. Department of Transportation
EEOC – Equal Employment Opportunity Commission
EMS – Emergency Medical Services
FHWA – U.S. DOT Federal Highway Administration
FTA – U.S. DOT Federal Transit Administration
GIS – Geographic Information System
HR – Human Resources Department
HTML - Hyper Text Markup Language
ISA – International Symbol of Accessibility
IT – Information Technology Department
NCA – National Center on Accessibility
PDF – Portable Document Format
RA – Rehabilitation Act of 1973
ROW – Right-of-Way
RTF – Rich Text Format
SETP – Self-Evaluation and Transition Plan
TDOT – Tennessee Department of Transportation
TDD – Telecommunications Devices for Deaf Persons
TTY – Teletypewriter
UFAS – Uniform Federal Accessibility Standards

Executive Summary

The Americans with Disabilities Act (ADA) is a comprehensive Federal civil rights statute enacted in 1990. Comprised of five major parts, or “titles”, the ADA’s stated purpose was to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. It is estimated by the U.S. Census Bureau that over 50 million U.S. residents have a disability, and over 50% of senior citizens age 65 or older have a disability. Title II requires that all public entities with 50 or more employees perform a self-evaluation, prepare a transition plan, make the transition plan available for three years, publish a notice of non-discrimination, designate an ADA Coordinator, and develop a formal complaint form and grievance procedure.

Gibson County has completed this self-evaluation of all County owned facilities and prepared a Transition Plan that outlines the necessary steps to be fully compliant with the requirements of Title II of the ADA. The County will strive to ensure that all residents and visitors are able to access all services, programs and activities and will promptly investigate any formal grievance filed according to the grievance procedures outlined. Additionally, the County will strive to include annual budgetary allotments to make required improvements that will eventually make the various facilities fully accessible, with emphasis given to the improvements that most impact the ability of persons with disabilities to access facilities or programs. Where access cannot be provided, alternate means to provide the same opportunities to persons with disabilities will be provided.

In performing this self-evaluation, only areas open to the public were assessed at the following County facilities:

- Gibson County Courthouse
- Gibson County Correctional Complex
- Gibson County Justice Complex
- Gibson County Juvenile Justice Building
- Gibson County Archives/Welcome Center
- Gibson County Memorial Library
- Gibson County Health Department
- Gibson County Chancery Building
- Gibson County Airport (Terminal Building)
- NWTEDC Gibson County Service Center
- Spring Hill Fire Station #1
- Moore’s Chapel Fire Station #2
- Brazil Fire Station #3
- Gann Fire Station #4
- Tyson Fire Station #5
- Fruitland Fire Station #6
- Goodluck Fire Station #7
- Fire Station #9
- Gibson County Highway Department
- Gibson County Animal Shelter
- Gibson County Ed Jones Agriplex
- Fairgrounds
- Public Safety Building

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Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of County facilities, or entire facilities, restricted to employees does not eliminate the need of the County to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

In addition to County facilities, the self-evaluation reviewed existing County policies and procedures within each department. Key items reviewed within each department included ADA-specific training of employees, past interaction and accommodation of persons with disabilities, review of publications produced by each department, and staff suggestions to help them accommodate persons with disabilities. Following this review, recommendations were made to improve accessibility of programs for each department. It is the goal of the County to make facilities for all services, programs and activities fully accessible within 100 years, though this will be largely dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that would necessitate additional improvements to County facilities.

The County has committed to provide training for staff on the requirements of the ADA and make accommodations for employees with disabilities, many of which can be done without costly architectural renovations. The Transition Plan will be reviewed and updated periodically to ensure the County is fully compliant with ADAAG standards.

The results of the self-evaluation identified a number of barriers at County-owned facilities. The estimated cost to correct these deficiencies is \$2,460,705. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.



1 - Introduction

The Americans with Disabilities Act of 1990 (ADA), enacted on July 26, 1990, is a Federal civil rights statute, under the jurisdiction of the United States Department of Justice (DOJ), which provides civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, transportation, and telecommunications. The law states its purpose is “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities”. Similar protections are provided by Section 504 of the Rehabilitation Act of 1973. The ADA was signed into law by President George Bush on July 26, 1990, providing civil rights protections for those with physical and mental disabilities in the following areas:

Title I - Employment (all Title II employers and employers with 15 or more employees.)

Title II - Public Services (state and local government including public school districts and public transportation)

Title III - Public Accommodations and Services operated by Private Entities

Title IV - Telecommunications

Title V - Miscellaneous

Gibson County is classified as a “public entity” pursuant to Title II of the ADA. The County is also required to comply with Title I, which requires state and local government to practice nondiscrimination in all parts of the employment process.

The DOJ is the lead agency that oversees the ADA.

Purpose

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal government. It is divided into 50 titles that represent areas subject to Federal regulation. The CFR is updated yearly.

Relative to the ADA, on July 26, 1990 the DOJ issued rules implementing Title II. Title II requires state and local governments to make programs and services accessible to those with disabilities. The requirement extends beyond physical access at government facilities and includes policy changes to ensure that all people can take part in, and benefit from the programs and services of state and local governments.

The ADA regulations require state and local governments to conduct a self-evaluation of their programs and services to identify barriers to access. One of the fundamental reasons for performing the evaluation is to identify problems before they occur. Title II of the ADA states that the County is required to perform six administrative responsibilities:

1. Publicize the name and contact information of the designated ADA Coordinator responsible to oversee compliance.
2. Administer and write self-evaluation of the programmatic barriers in services offered by the local government.
3. Publicize and inform applicants, participants, and beneficiaries of the County’s policy of nondiscrimination on the basis of disability related to County services, program, and activities.
4. Establish a complaint/grievance procedure to respond to complaints of noncompliance from the public.
5. Develop a transition plan if structural changes are necessary for achieving program accessibility.
6. Retain the self-evaluation and provide it for public inspection for three years.

Gibson County is committed to complying with the regulations of Title II of the ADA of 1990, and all other Federal and State regulations to make our services accessible for all of the citizens. The ADA self-evaluation and transition plan (SETP) establishes a measurable benchmark for compliance and identifies a plan to remove barriers within the County.

Self-Evaluation and Transition Plan Overview

In 2019, Gibson County was made aware of issues related to non-compliance with certain requirements of the ADA by the Tennessee Department of Transportation (TDOT). TDOT found that the County did not have a SETP in place that included an evaluation of all County facilities, programs, policies, services, and activities. The County responded by contracting A2H, Inc. to assist in preparing a SETP.

The planning team at A2H, Inc. assessed County-owned and operated facilities for compliance with ADA and to complete the ADA SETP. This work plan included:

- Facilitate designating an ADA Coordinator
- Develop grievance procedures
- Conduct Public Input meeting
- Facility audit (interior and exterior)
- Prioritize facilities improvements for accessibility
- Provide Opinions of Probable Construction Costs for identified ADA improvements
- Establish a schedule in conjunction with the County staff for implementing the identified ADA improvements
- Develop written transition plan
- Adoption of the transition plan

While the self-evaluation was on-going, the County has continued its standing policy on improving county owned facilities to be ADA-compliant. A public input meeting was incorporated to assist in the development of this SETP. These recommendations are intended to serve as the transition plan and framework for implementation. All of the recommendations in this plan for solutions to facilitate access to all individuals are subject to review, revision, and approval of the County Board and appropriation of funding to implement the improvements.

This transition plan is an on-going, dynamic document that will need periodic review and updating. In particular, additional evaluations will be required when updates are made to the ADA or supporting statutes or when existing accessibility guidelines change or new guidelines are

established. In its efforts to maintain compliance, the County has several mechanisms in place to provide for an ongoing update of the transition plan:

- Implementation activities will be part of the County's annual Capital Improvement Plan
- Training of staff

Legislative Background & Framework

For more than 40 years, Gibson County has been subject to many of the nondiscrimination provisions contained in the ADA. Significant precursory legislation to the ADA includes the Architectural Barriers Act of 1968 (ABA) and Section 504 of the Rehabilitation Act of 1973 (RA).

Congress' first significant effort to address discrimination on the basis of disability was its enactment of the ABA, which provided that all buildings constructed, altered, leased, or financed by the U.S. Government shall be accessible to, and usable by, individuals with physical disabilities.

Section 504 of the Rehabilitation Act states: "No otherwise qualified individual with a disability in the United States shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive Agency". It also requires Federal agencies to provide accessible programs and facilities.

The ADA was modeled on Section 504. The ADA applies to state and local government entities, public accommodations, public transportation, and commercial establishments. The key points of understanding for ADA are:

- The ADA is fundamentally civil rights legislation. This legislation protects the rights of people with disabilities in employment, transportation, public accommodation, and access to services offered by

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the public.

- The ADA addresses facility access and access to programs and services. Buildings are required to be accessible and the activities that are offered inside and outside those buildings also must be accessible.
- The ADA also addresses standards for outdoor recreation (i.e. boating and fishing facilities, swimming pools, stadiums, etc.)

The primary focus of this report is to assess the compliance of the County-owned facilities related to Title II of the ADA. Title II of the ADA was effective on January 26, 1992.

Governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic functions. Public entities are not required to take actions that would result in undue financial and administrative burdens. However, they are required to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless they can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided.

One important way to ensure that Title II's requirements are being met in cities of all sizes is through self-evaluation, which is required by the ADA regulations. Self-evaluation enables local governments to pinpoint the facilities, programs and services that must be modified or relocated to ensure that local governments are complying with Title II requirements of the ADA. A public entity that employs 50 or more employees must retain its self-evaluation for a minimum of three (3) years.

Facility Access versus Program Access

The ADA addresses two types of accessibility:

- Facility accessibility
- Program accessibility

Facility accessibility requires that a building or structure be

physically accessible. Individuals with disabilities cannot be provided access to programs, services, and activities if a building is inaccessible. Program accessibility includes facility accessibility, but also means that a person with a qualified disability receives the same benefits from a program or service and has an equal opportunity to participate as any other participant. The ADA requires all County programs, but not all County buildings, to be accessible.

There is some flexibility with regard to program accessibility. Not every building (or each part of every building) needs to be accessible. Structural modifications are required only when there is no alternative available for providing program access. The County is required to provide program access, which means that programs, services and activities when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

When choosing a method of providing program access, the County will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In accordance with Title II program accessibility requirements, the County is required to:

- Provide equal access to programs, services, and activities as provided to other members of the community.
- Provide programs, services and activities in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity.
- Absorb any costs necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters.
- Allow a person with a disability to participate in a program, service or activity regardless of disability.
- Eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy programs, services or activities unless necessary for the provisions of the program, service or activity.
- Modify policies, practices, or procedures that deny equal access to individuals with disabilities

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- Furnish auxiliary aids and services when necessary to ensure effective communication.
- Provide appropriate signage and structural communication to inform and alert individuals with visual, mobility, and hearing disabilities.
- Eliminate physical barriers to programs, services, and activities by remodeling existing facilities, constructing new facilities, or moving programs, services or activities to an accessible location.
- Ensure that newly constructed or altered buildings and facilities are free of physical and communication barriers that restrict accessibility of people with disabilities.

Undue Burden

The County does not have to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. A fundamental alteration is a change to such a degree that the original program, service, or activity is no longer the same. The determination that an undue financial burden would result must be based on an evaluation of all resources available for use in a program. For example, if a barrier removal action is judged unduly burdensome, the County must consider other options for providing access that would ensure that individuals with disabilities receive the benefits and services of the program or activity.

County-owned Buildings and Associated Public Spaces Audit

Also, in the summer of 2020, audits of the County-owned and operated facilities were performed by A2H, Inc. staff. This review identified physical barriers and provided recommendations to comply with Federal accessibility requirements.

The list of County-owned Buildings and Associated Public Spaces that received an accessibility audit included:

- Gibson County Courthouse
- Gibson County Correctional Complex
- Gibson County Justice Complex
- Gibson County Youth Services Office
- Gibson County Archives
- Gibson County Memorial Library
- Gibson County Health Department
- Gibson County Chancery Building
- Gibson County Airport (Terminal Building)
- NWTEDC Gibson County Service Center
- Spring Hill Fire Station #1
- Moore's Chapel Fire Station #2
- Brazil Fire Station #3
- Gann Fire Station #4
- Tyson Fire Station #5
- Fruitland Fire Station #6
- Goodluck Fire Station #7
- Fire Station #9
- Gibson County Highway Department
- Gibson County Animal Shelter
- Gibson County Ed Jones Agriplex
- Fairgrounds

Photographs of all amenities were taken for the record and are located in Appendix A. The specific County-owned Buildings and Park improvements recommended to remove barriers and improve accessibility are listed in Appendix A.

Public Input Meeting & Special Interest Outreach

A2H, Inc. facilitated a virtual public input meeting on October 20, 2020 to educate the public on the requirements of the ADA, to introduce the project goals and objectives, and to take comments on the progress of the self-evaluation. The meeting was advertised in the local newspaper (Trenton Gazette) on October 6th per the County's public notice policy. A survey was also distributed for public input. Special interest groups were also contacted for their input regarding access in Gibson County. Meeting Information can be found in Appendix B. Public comments should be considered in future planning

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corrections for County projects related to the removal of barriers within County-owned buildings.

Department Self-Evaluation

As part of this self-evaluation, the County distributed an internal memo to all County departments requesting information about their respective departmental policies regarding ADA compliance. A2H staff corresponded with many of the departments to discuss the intended use of the questionnaire. All policies, programs, activities, and services were evaluated and in the case where policies are not currently in place, this report provides recommendations for the implementation of corrective actions to comply with the ADA. Refer to Chapter 4 - Self-Evaluation of County Policies, Services, Activities, and Programs.

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2 - Definitions

The words, phrases and definitions summarized below are included in the ADA. Refer to the ADA 28 CFR 35.104 for full definitions. A list of common terms and definition are included below.

2010 Standards: the 2010 ADA Standards for Accessible Design (ADAAG). which consist of the 2004 ADAAG and requirements contained in 35.151.

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

Accessible: refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

Affirmative Action (AA): a set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management, development, and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds including persons with disabilities. Affirmative action means inclusion not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

Alteration: A change to a facility that affects or could affect pedestrian access, circulation or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

Americans with Disabilities Act (ADA): A comprehensive, Federal civil rights law that prohibits discrimination against people with disabilities in employment state and local government programs and activities, public accommodations, transportation and

telecommunications.

ADA Accessibility Guidelines (ADAAG): scoping and technical requirements to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulation issued by Federal agencies including the DOJ and the Department of Transportation (DOT).

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

Covered Entity: under the ADA, "covered entity" is an entity that must comply with the law. Under Title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities and public transportation systems.

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

Curb Line: A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

Curb Ramp: A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel or a combination of parallel and perpendicular ramps.

Disability: with respect to an individual, means a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Discrimination on the basis of disability:
means to:

- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodation to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the County's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and,
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicants skills or aptitude to participate in a program or activity.

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

Grade Break: The line where two surface planes with different grades meet.

Major Life Activity: term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty, such as walking, seeing, speaking, hearing, breathing, learning, performing manual tasks, caring for oneself, and working.

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

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

Physical or Mental Impairment: a physical or mental limitation that may include, but are not limited to: vision, speech, and hearing impairment; emotional disturbance and mental illness; seizure disorders; mental health problems; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs. The following conditions are not physical or mental impairments: transvestism, illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

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

Readily Achievable: easily accomplished and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include cost of action, overall financial resources and effect on expenses, safety requirements, impact on a site, overall financial resources needed.

Title V of the Rehabilitation Act of 1973: title of the law that prohibits discrimination on the basis of a disability by the Federal government, Federal contractors, by recipients of Federal financial assistance, and in Federally conducted programs and activities.

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Transition Plan: refers to a requirement that state and local governments employing 50 or more people develop plan detailing structural changes necessary to achieve facility program accessibility.

Undue Burden: means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the County. Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the Gibson County, the County shall attempt to identify another modification. If cost causes the undue burden, the County must consider whether funding for the modification is available from another source. If there is no available source to pay for the modification the County must give the person with disability the opportunity to fund the modification.

Undue Hardship: with respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

U.S. Department of Justice: Federal agency that is responsible for enforcing Titles I and II of the ADA.

U.S. Department of Transportation: Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and para transit, as well as privately

operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

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3 - Self-Evaluation and Transition Plan - Project Approach & Requirements

Data Collection and Methodology

All facilities were evaluated based on the most current standards (2010 ADA Guidelines). ADA guidelines do allow some lenience on items built before this time (i.e. - light switches, fire alarms pulls, bathroom stall sizes). The completed reports shows the cost to bring each facility up to the most current standard although some items would be allowed to be grandfathered in.

Upon completion of the County-owned buildings and associated spaces, the data collected was compiled into data sheets for each data collection point or location. Each location was reviewed for compliance within the required guidelines. A priority ranking based on usage and hazard was then established as well as an estimated cost to modify or reconstruct to achieve required accessibility.

ADA Self-Evaluation and Transition Requirements

The purpose of this ADA SETP is to document the County's review of access to facilities, programs, services, and activities by individuals with disabilities in order to determine if there are any discriminatory or potentially discriminatory practices, policies, or procedures.

In accordance with the Title II requirements for self-evaluation, the County:

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

If structural changes are identified to provide program

accessibility as part of the self-evaluation, the ADA identifies specific elements to be included in the transition plan.

At a minimum, the elements of the transition plan are:

1. A list of the physical barriers in the County's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities.
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible.
3. The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period.

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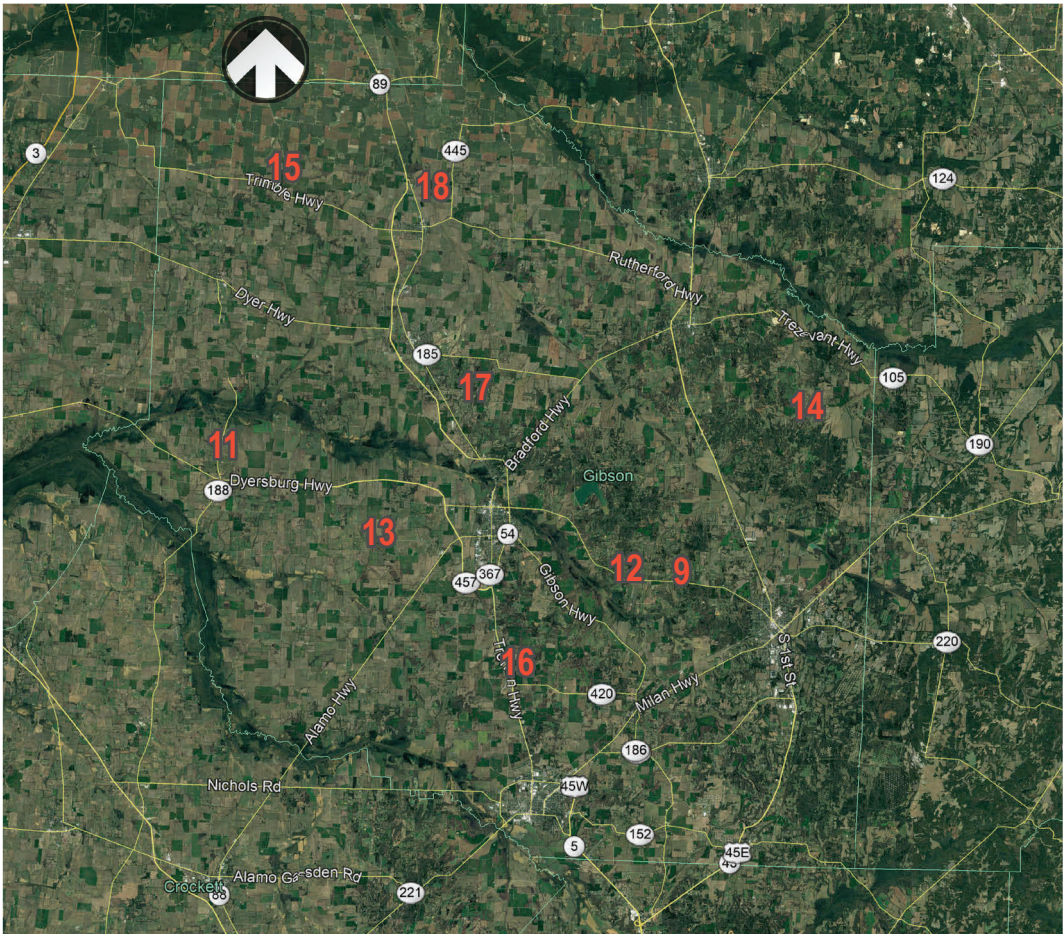
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Gibson County - Inventory Map of County-owned Buildings and Associated Spaces

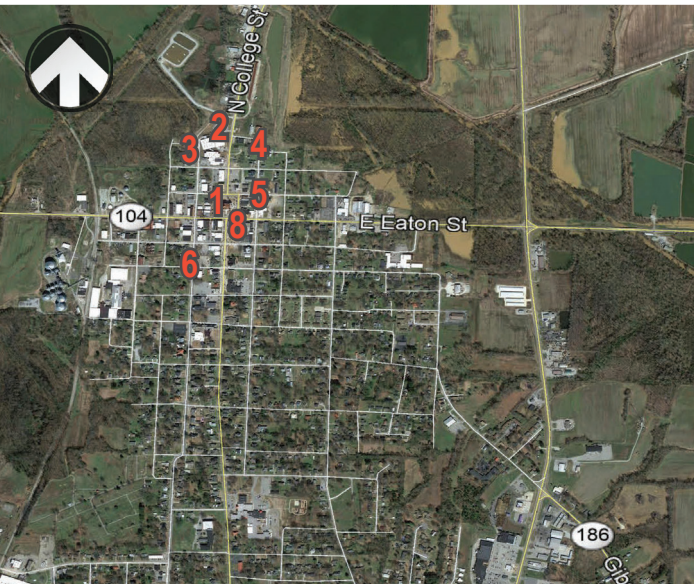
Legend

1. Gibson County Courthouse - 1 Court Square, Trenton, TN
2. Gibson County Correctional Complex - 401 N. College St., Trenton, TN
3. Gibson County Justice Complex - 295 N. College St., Trenton, TN
4. Gibson County Youth Services Office - 301 N. College St., Trenton, TN
5. Gibson County Archives - 200 E. Eaton St., Trenton, TN
6. Gibson County Memorial Library - 303 S. High St., Trenton, TN
7. Gibson County Health Department - 1250 Manufacturers Row, Trenton, TN
8. Gibson County Chancery Building - 204 N. Court Square, Trenton, TN
9. Gibson County Airport (Terminal Building) - 56 Airport Rd., Milan, TN
10. NWTEDC Gibson County Service Center - 1600 Industrial Drive, Trenton, TN
11. Spring Hill Fire Station #1 - 1 TN - 188, Trenton, TN
12. Moore's Chapel Fire Station #2 - 54 Airport Rd., Milan, TN
13. Brazil Fire Station #3 - 383 Gibson Wells Rd., Trenton, TN
14. Gann Fire Station #4 - 12 Herbert Neal Rd., Milan, TN
15. Tyson Fire Station #5 - 475 Trimble Hwy., Kenton, TN
16. Fruitland Fire Station #6 - 34 Fruitland-Eldad, Humboldt, TN
17. Goodluck Fire Station #7 - 450 China Grove Rd., Bradford, TN
18. Fire Station #9 - 570 N. Trenton St., Rutherford, TN
19. Gibson County Highway Department - 1244 Manufacturers Row, Trenton, TN
20. Gibson County Animal Shelter - 1242 Manufacturers Row, Trenton, TN
21. Gibson County Ed Jones Agriplex - 1251 Manufacturers Row, Trenton, TN
22. Fairgrounds - Martha Taylor Building - 1242 Manufacturers Row, Trenton, TN
23. Fairgrounds - Standalone Restroom Facility 1 - 1242 Manufacturers Row, Trenton, TN
24. Fairgrounds - Standalone Restroom Facility 2 - 1242 Manufacturers Row, Trenton, TN
25. Fairgrounds - Standalone Restroom Facility 3 - 1242 Manufacturers Row, Trenton, TN
26. Fairgrounds - Café - 1242 Manufacturers Row, Trenton, TN
27. Fairgrounds - Durand Lowery Exhibit Building - 1242 Manufacturers Row, Trenton, TN
28. Public Safety Building - 1246 Manufacturers Row, Trenton, TN

Gibson County - Inventory Map of County-owned Buildings and Associated Spaces



Enlargement of Gibson County Properties in Trenton, TN



4 - Self-Evaluation of County Policies, Services, Activities, and Programs

This segment of the self-evaluation plan summarizes the review of current County-wide policies, services, activities, and programs based on meetings with County staff. The findings and recommendations contained in this segment will provide the basis for the implementation of specific improvements for providing access to County programs.

Program Evaluation Interdepartmental Memo

The self-evaluation of the County's services, programs, and activities required and involved the participation of every County department. The County evaluated its policies, procedures and programs to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. A2H distributed a memo to all department heads to determine the level of ADA compliance. This memo requested department staff to provide the following:

- A list of any ADA training that has been attended, performed or is planned to be done
- A list of current services/programs that the department provides to the public
- A list, including any supporting documentation of policies and practices in place for interacting/communicating with persons that have disabilities
- A contact person who can provide answers to inquiries about ADA compliance in the department
- Provide background on how that department has interacted with anyone with a disability and what actions were taken to assist meeting that person's needs
- A list of any suggestions for modifications to the department's service, policies, and procedures that may better serve persons with disabilities



Overall Findings – General Policies and Practices

The County's self-evaluation of their Departments identified common accessibility issues between all County Departments. The findings from the County Departments can be organized into the following general categories:

- Public Information
- Designation of ADA Coordinator
- Grievance/Uniform Complaint Procedures
- Public Meetings
- Accommodations to Access Programs, Services and Activities
- Equally Effective Communication
- Alternate Communication Formats
- Information and Signage
- Staff Training

The findings and recommendations in the following subsections apply to all departments.

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Public Information

The County is required to notify the public of their rights and protections under the ADA (28 CFR 35.106), which states: "A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part." In addition, notices regarding ADA should be included in a number of other situations to inform the public of their rights and opportunities to ensure accessibility, including signage directing the public to accessible routes and entrances.

Self-Evaluation General Findings:

- Public notices, public meeting agendas, and other information published by the County do not have an ADA compliance statement included within.
- Signage directing visitors to County buildings along an accessible routes is lacking and the International Symbol of Accessibility (ISA) is not present or in clear view at all accessible entrances.

Recommended Action:

- Standard language for a Notice of Nondiscrimination needs to be used by all departments for all County publications and printed materials. This statement should include, at a minimum, the following language: "Gibson County acknowledges its responsibility to comply with the Americans with Disabilities Act of 1990. In order to assist individuals with disabilities who require special services (i.e. sign interpretative services, alternative audio/visual devices, and amanuenses) for participation in or access to County sponsored public programs, services and/or meetings, the County requests that individuals make requests for these services forty-eight (48) hours ahead of the scheduled program, service and/or meeting. To make arrangements, contact Carl Campbell, (731)487-2322."
- All departments need to include the above language in their meeting agendas.
- Public notification should always identify a contact person for individuals with disabilities who may request program modifications, or information on how a hearing or speech impaired person could communicate by telephone
- Increase outreach to persons with disabilities by finding additional methods and formats to provide information about meetings and other County activities. The County should attempt to inform the

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public of the possible modifications required to make its services, programs, and activities accessible.

- The County Clerk's Office should have a list of qualified individuals to contract for services to provide information in alternate accessible formats when individuals have had a request for accommodation.
- Signage directing visitors to County buildings should be placed along the accessible routes and the International Symbol of Accessibility (ISA) should be placed in clear view at all accessible entrances.

Designation of ADA Coordinator

The ADA regulations require any public entity with fifty or more employees to designate at least one employee to coordinate ADA compliance (28 CFR 35.107 (a)). Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. The ADA Coordinator's role is to plan, coordinate, organize, facilitate, and promote compliance efforts. The Coordinator responds to requests for accommodations or barrier removal. The Coordinator also receives and investigates complaints and grievances.

Self-Evaluation Findings:

- The County has a named an ADA Coordinator, Carl

Campbell, 1 Courtsquare, Suite 200, Trenton, TN 38382, carlmaintdept@gmail.com.

Recommendations:

- Information regarding the identity of the County's ADA Coordinator should continue to be provided to staff, posted at all County locations, incorporated into employee handbooks, staff and public phone directories, placed in frequently used publications, and on the County website.
- The designated ADA Coordinator must be familiar with the requirements of ADA and get appropriate training to ensure compliance by the County.
- It is strongly suggested that each department have one individual with knowledge of ADA issues that can respond to issues that arise within their department and assist the ADA Coordinator.

Grievance/Uniform Complaint Procedures

A public entity that employs 50 or more employees must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA (28 CFR 35.107 (b)).

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staff and the general public of the name of the County's ADA Coordinator, grievance procedures, the steps for handling grievances, and the County policies for remediation of grievances.

Public Meetings

Public meetings are routinely held by various County departments, boards, and commissions. The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities (28 CFR 35.150 (a)(1); (b)(1)).

Self-Evaluation Findings:

- The County has posted their Grievance Procedure on the County Website. Grievance Procedure Information can be found in Appendix C.

Recommendations:

- The County should formalize and publish procedures for ADA-specific complaint handling to assist with the tracking of complaint resolution. Centralized record keeping of such information will help the County to regularly update its compliance efforts, and plan for additional compliance implementation.
- Information regarding complaint procedures should be available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.
- The County should review its current administrative policy and provide a form for use by members of the public who wish to file a formal complaint or grievance. The form should also note that it may be requested in an alternate accessible format, i.e. Braille, audio-tape, e-text, large print, etc.
- Administrative policies and procedures should continue to be developed, adopted, and implemented to provide consistency for filing complaints or grievances and record keeping.
- The County should make efforts to inform County

Self-Evaluation Findings:

- The County holds several meetings at various times and places that can be attended by anyone. Some of the meetings held are not in places that would be easily accessible by all.
- The County does have procedures in place for obtaining and providing auxiliary aids such as assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies.

Recommendations:

- The County should continue to schedule and hold public meetings in the most accessible locations whenever possible.
- The County should develop means and methods to provide closed captioning (or sign language interpretation on the screen) for televised programs and for audiovisual presentations produced by the County (including videos and films) in order to ensure that persons with hearing impairments can benefit from these presentations.
- The County should make reasonable modifications to enable individuals with disabilities to attend and participate in all public meetings.
- Provide meeting agendas in alternative formats

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when requested.

- The County should assemble a list of readily accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
- The County should create a simple checklist for creating accessible meetings and selection of accessible meeting spaces. This checklist should be utilized and available to all County departments for their programs and events.

Accommodations to Access Programs, Services, and Activities

The ADA prohibits public entities from excluding persons with disabilities from programs, services, or activities offered by a public entity. A public entity may not adopt policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral, but have discriminatory effect. The law does allow a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services, and activities (28 CFR 35.130 (b)(3); 35.150 (a)(1); (b)(1)).

Self-Evaluation Findings:

- There is no evidence of intentional discriminatory practices, intentional exclusion of individuals with disabilities, or practices to segregate individuals with disabilities or limit access to County programs, services, or activities.
- County staff stated public meetings are generally held in locations that are thought to be accessible to persons with mobility impairments and had no recollection of any previous complaints of issues.
- Staff in most departments noted circumstances where they have improvised to achieve satisfactory solutions to remove barriers to the best of their ability.

Recommendations:

- Information directing the public how to request accommodations should appear on all public notices, announcements, and agendas. All County departments and divisions should be provided with the County's ADA compliance statement for accommodations.
- Front line staff such as administrative assistants, receptionists, and staff that has everyday contact with the public, should receive training on interacting and accommodating individuals with disabilities.
- The County should provide additional and ongoing training for staff, including volunteers, regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.
- The County should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The County should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.
- The ADA Coordinator should continue to monitor programmatic access.

Equally Effective Communication

ADA calls for public entities to provide applicants, participants, members of the public, and companions with disabilities with communication access that is equally effective as that provided to persons without disabilities (28 CFR 35.160(a)A(d)). The regulations also require that the public entity provide the appropriate auxiliary

aids and services where necessary to give people with disabilities an equal opportunity to participate in, and enjoy the benefits of a service, program, or activity of a public entity. The law stipulates that the individuals can request the auxiliary aids and services of their choice and that the County will honor the request unless a suitable substitute exists or the request is not required under the law. In addition, the County may provide qualified interpreters via video from a remote location as long as it can meet the performance requirements of 28 CFR 35.160(d).

Auxiliary Aids and Services

Self-Evaluation Findings:

- The County has assisted customers with disabilities by modifying procedures to provide alternate means to complete transactions and offered assistance to complete County forms.

Recommendations:

- The County should provide staff training and information regarding auxiliary aids and effective communication.
- The County should confirm and update a complete list of auxiliary service providers, i.e. Braille transcription services, computer assisted transcript, dictation and transcription, assistive listening system, etc.

Interpreter Services

Self-Evaluation Findings:

- There is not a County-wide contract for qualified sign language interpreters for departments to select from.

Recommendations:

- The County should consider a County-wide contract for qualified sign interpreter services that departments could utilize as needed.
- Interpreters should be provided upon request for

accommodations or in situations where an interpreter is known to be required.

- The County should explore the viability of providing qualified sign interpreters from a remote location and transmitting the disabled participant's response to the interpreter in accordance with 28 CFR 35.160(d).

Telecommunications Devices for the Deaf

Self-Evaluation Findings:

- TDD/TTY numbers are not available for any of County departments.

Recommendations:

- The County should consider the purchase of a network PC compatible TDD/TTY system that would allow individual computers to be networked and access TDD/TTY calls, instead of purchasing separate TDD/TTY units that require a dedicated line. The advantages of a networkable system will allow the user to transfer calls, conduct conference calls, and utilize voice mail.
- All staff responsible for responding to incoming telephone calls should be trained in the protocol and use of TDD/TTY communications. Information and training should be provided on an ongoing basis.
- The County should provide a centralized, direct, TDD/TTY telephone in the office of the ADA Coordinator.
- The County should develop procedures to ensure that TDD/TTY are maintained in a working and operable condition.

Website

Self-Evaluation Findings:

- The County website does have a link related to accessibility issues and provides contact information for County ADA Coordinator and grievance and complaint procedures.
- The County is in the process of updating the website to meet current ADA standards.

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- Many forms are available in Portable Document Format (PDF). Problems can be reported on the County website via e-mail.

Recommendations:

- The County's web-master developer should work to develop and refine procedures to design, maintain, update, and monitor website accessibility.
- The County should continue to take proactive steps to ensure its web pages provide for access for the cross-section of disabilities covered under the ADA and should ensure that web pages do not exclude individuals when describing programs, services, or activities.
- The County's website should provide documents in an alternative text-based format, such as HTML (Hyper Text Markup Language) or RTF (Rich Text Format), in addition to PDF.
- The County should list the departments that offer TDD/TTY in the website phone directory (when this is implemented).
- The County should work to improve the accessibility of web pages through the use of web accessibility analysis to meet or exceed Section 508 of the Rehabilitation Act Amendments of 1998. Section 508 establishes a minimum level of accessibility for electronic information. Information on the requirements, along with suggestions for making websites accessible can be found at www.ada.gov/websites2_prnt.pdf.
- The Web Accessibility Initiative (WAI) provides guidance on making websites fully accessible (www.w3.org/WAI/).
- The International Center for Disability Resources on the Internet (ICDRI) provides information on accessibility (www.icdri.org/section508/index.htm).

Alternate Communication Formats

A public entity has a responsibility to provide information in alternative formats to comply with 28 CFR 35.160. This section of the ADA requires state and local government

entities to communicate effectively with individuals who are deaf, hard-of-hearing, or have a speech, vision, or learning disability. Communication access involves providing content in methods that are understandable and usable by people with reduced or no ability to: speak, see, hear and limitations in learning and understanding. Some alternative formats can be produced in-house at minimal costs, i.e. large print, disks, and e-mail attachments. Other formats, such as Braille and audio-formats, may need to be produced by a vendor. Alternate communication formats that are likely to be requested include, but are not limited to: audio-formats, Braille, large print, captioned films and video, electronic text/disk/CD-ROM, or sign interpreted films and video.

Self-Evaluation Findings:

- County staff indicated that they assist with filling out forms, as requested, or when alternative formats are not available.
- The majority of the departments stated they did not have a standard procedure to communicate and produce accessible alternate formats for people with disabilities.

Recommendations:

- The County should provide staff training regarding the requirements of accessible alternate formats, what accessible alternate formats are, and how to provide accessible alternate formats.
- Procedures and methods should be established for the development of accessible alternate formats to ensure that requests are handled in a uniform and consistent manner.
- The County should centralize the production of alternate formats for agendas, publications, and documents, which may result in efficiency and a cost savings.

Information and Signage

A public entity is required to ensure that individuals with

disabilities are directed to an accessible entrance to a building and to the location and existence of accessible services, activities, and facilities. The ISA shall be used at each accessible entrance of a facility (28 CFR 35.163). Paragraph (b) requires the public entity to provide signage at all inaccessible entrances to each of its facilities that directs users to an accessible entrance or to a location with information about accessible facilities.

Self-Evaluation Findings:

- Most inaccessible entrances do not provide signage directing users to accessible entrances.

Recommendations:

- An accessible signing strategy for County facilities should be developed for interior and exterior directional, informational, and permanent room signs.
- Design standards for accessible signs should be created to guide the production and installation of the accessible signs.
- Signage replacement projects should include replacement or installation of accessible signs as required.

Staff and Training

On-going compliance with the ADA can only be achieved if County staff receives training and education about the rights of persons with disabilities and the obligations of public entities and its employees under Title II of the ADA. Although training is not required by the ADA, training regarding the requirements of the ADA is recommended.

Self-Evaluation Findings:

- County staff may not be knowledgeable about the different types of reasonable modifications that would make their services accessible. Some Departments have made minor adaptations to their programs regarding accessibility.

Recommendations:

- The County should provide training regarding ADA and related civil rights legislation.
- Suggested training topics include, but are not limited to:
 - Requirements of the ADA for Gibson County
 - Consequences of Non-Compliance
 - Acceptable Terminology and Phrases
 - Grievance/Complaint Procedures
 - Reasonable Accommodations
 - Awareness and Sensitivity
 - Accessible Locations for Meetings
 - Consequences of Non-Compliance
 - Barriers to Access – Programmatic and Physical
 - Auxiliary Aids and Services
 - TDD/TTY
 - Building Evacuation Procedures to Assist Persons with Disabilities
- Training materials and handbooks should be prepared, if needed, in alternate formats.
- The ADA Coordinator should continue to provide or coordinate additional ADA training to all Department managers and staff who have regular contact with the public.

Department Self-Evaluation Findings and Recommendations

A2H prepared and distributed a memo on September 1, 2020 to all County departments that included a request for information about each. This information included six specific items that the departments were requested to provide information to help A2H better understand the policies and procedures of each related to ADA understanding, training, and accommodation. The questions posed, along with the findings and comments of the self-evaluation received from each County Department are reported on the following page. Note that the responses reported are as provided by the Department to illustrate current procedures and policies. Corrections to the information provided for inaccuracies have not been made and, where appropriate, the editor

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of this report has added notes to clarify or supplement the responses. If a question was left blank or not addressed, it has been noted as “No Response”.

Questions

Q1. Provide a list of any training related to the Americans with Disabilities Act that have been attended by any of them or their staff. This would include conferences, seminars, webinars, etc. Include the staff person that attended, who provided the training, date, etc.

Q2. Provide a list of all services that each department provides to the public

Q3. A list of any policies or documents that exist within the County and each department related to dealing with and interacting with individuals with disabilities. This would include policy manuals, memos, legal directives, statements on agendas or other written documents, etc.

Q4. Who would be the person responsible for ADA compliance in each department? Please list the name and contact information.

Q5. If your department has interacted with anyone with a disability, please provide information about the specifics of how you accommodated them to provide them with what they needed from your department.

Q6. Please list any suggestions you would have for your department to provide better service to persons with disabilities.

Mayor’s Office - No Response

Analysis & Recommended Actions:

The Mayor of a County is generally considered the “go to” person for complaints and issues. As such, the staff in this office must be prepared to handle a variety of issues and individuals coming into their office unannounced. It is recommended that staff in the Mayor’s Office be provided basic training in how to accommodate various persons with disabilities. A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

The architectural barriers noted in Appendix A should be removed or equal accommodation provided elsewhere in the County Courthouse.

Police Department - No Response

Analysis & Recommended Actions:

The Police Department is very visible to the residents and has regular interaction. It is recommended that the Police Department receive training on ADA accessibility issues related to their activities (<https://www.ada.gov/policeinfo.htm>). The architectural barriers noted should be removed.

Chancery Court Clerk

1. Carla Ewell took an Americans with Disabilities Act course through the County Technical Assistance Service (CTAS).

2. This office provides the following services to the public:

a. Files court proceedings, holds court proceedings in the courtroom

b. Provides access to public records—this is done in person, by phone, by email, or by fax

c. Conducts online annual delinquent tax sales

d. Conducts court ordered property sales in the courtroom

3. The Tennessee Judicial Branch requires the courts to go by the Americans with Disabilities Act. We have the Request for Modification form for individuals that request accommodations. We are able to obtain assistance for deaf and hearing-impaired individuals. When we send out Summons or Subpoenas, all clerks prepare the service utilizing a disability stamp that states to call our office at 731-855-7639 for disability assistance.

4. I became Clerk & Master on August 1, 2020 which is when I became the Local ADA Coordinator for Gibson County Chancery Court-Trenton. Due to COVID-19, the Tennessee Judicial Program has not been able to have ADA Coordinator training yet. I can be reached at 731-855-7639 or by email at katelyn.orgain@tncourts.gov

5. We have had several individuals that have hearing difficulties while in court. In those situations we have provided hearing devices for them to use. We have had individuals in wheelchairs in court, they were able to gain access to the courtroom through the courtroom door and/or by going through the file room in the clerk’s office. We have had deaf/hearing-impaired individuals in court, we

were able to obtain interpreters for these individuals---this occurred before I was employed in this office.

6. I do not have any suggestions.

Analysis & Recommended Actions:

The Chancery Court has several interactions and provides several services to the general public. An administrative policy has been adopted that outlines the modifications that the Courts will provide to make sure anyone with a disability is served as required.

A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Circuit Court Clerk

1. The Clerk's conferences have had classes that I have attended related to the Americans with Disabilities Act. I do not know the dates.

2. We issue criminal summons, criminal warrants, capias, subpoenas, civil summons, detainers, writs, garnishments, slow pays, traffic citations, Order of protections, and all civil and criminal paperwork. We issue bad check summons. We bill the State for felonies and send all felonies to the Election Commission. We handle adoptions and termination of parental rights. We enter all cases into our computer system. When the paperwork is returned, we enter all of this into the computer. We send reports of everything to the State. We keep up with the pending case load.

We receipt payments, set up payment arrangements, prepare cases for court, go into court, dispose cases, figure cost bills, swear in people who testify to the court. Talk with people on the phone regarding their cases or any questions they have. Talk with people who come into the office, answer their questions, etc. Send out jury summons and questionnaires. Send Grand Jury notices to the paper. Keep up with the Grand Juror information. Enter all of the juror information into our computer. Keep up with all of the jurors attendance. We prepare juror excuses for the jurors to give to their employers. Calculate their pay and send out jury checks.

We call the roll for their appearance and trials. Prepare the Grand Jury minutes and trial orders. File all orders

and motions that come to us and send to the appropriate agencies. File search warrants. Check all the petitions and requirements for bonding companies that are filed. Send orders for new bonding companies and/or agents to the jail. Check all of the semi-annual reports filed by the bonding companies. We send letters for unclaimed property that we are holding. If no response we send this to the State of Tennessee. We file indictments and arraignment orders. We keep up with all court dates and reset these as needed. We print checks and send out twice per month in General Sessions and at the end of the month for Circuit Court. We balance the books and close out the end of the month and send checks and reports to the required agencies.

3. I do not have a policy manual at this time related to the Americans with Disabilities Act. We have a stamp for documents that we use "ADA for assistance call 731-855-7615: Also our computer generated documents have "ADA: If you need assistance or accommodations, please call Cindy Flowers, ADA Coordinator, at 731-855-7615".

4. Cindy Flowers, Circuit Court Clerk 731-855-7615

5. We have a deaf person at this time who has a pending case in Circuit Civil Court. I coordinate with the interpreters for the hearings. Two interpreters are required for each day if the hearing goes over two or three hours. There is one in Jackson, TN and the other has to travel from Memphis, TN.

6. There needs to be better parking provided for people with disabilities. The doors into the building, the office and the courtrooms need to be better equipped for disabilities and not as heavy to open. Maybe ones that will automatically open when you touch a button. The metal detectors are not accommodating for a wheelchair to pass through.

Analysis & Recommended Actions:

Circuit Court has several interactions and provides several services to the general public. There are accessibility guidelines that outline the modifications that the Courts will provide to make sure anyone with a disability is served as required. A formal written policy should be adopted.

A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

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The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Gibson County Court

1. No Training.
2. Title & license all motor vehicles, issue marriage license, business license, notary. etc
3. No policies.
4. Joyce Brown, Gibson County Clerk
5. Our office is wheelchair accessible. Also if they are unable to stand for a period of time, we have chairs.
6. No suggestions.

Analysis & Recommended Actions:

Gibson County Court has several interactions and provides several services to the general public. An administrative policy should be adopted that outlines the modifications that the Courts will provide to make sure anyone with a disability is served as required. A TDD/TTY should be provided in this office and staff trained in how to use the equipment. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Property Assessor Office - No Response

Analysis & Recommended Actions:

The Property Assessor's department interacts with citizens via both telephone as well as in person. The department can perform many of their functions and interactions with the public via telephone, however there is no TDD/TTY available. Train and provide a TTY phone for staff.

Highway Department

1. Carl Stoppenhagen, Superintendent - CTAS has provided several training classes that included ADA (transcript)
2. Most provided services are not in person, but rather by phone. In person visits by the public are usually requests for driveway or road maintenance. Other public services: meetings, vendors, sales representatives, and tire & oil recycling.
3. Employee Handbook - ADA Statement

4. Carl Stoppenhagen, Superintendent
5. Never recall a wheelchair, only walkers or canes. We have helped open doors. Paved front to top of walk to eliminate step-up. Provided additional rubber backed mat at the entrance where concrete can be slippery when wet.
6. Looking to this evaluation to note.

Analysis & Recommended Actions:

It is recommended that staff in the Highway Department be provided basic training in how to accommodate various persons with disabilities. A TDD/TTY should be provided in this office and staff trained in how to use the equipment. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Fire Department - No Response

Analysis & Recommended Actions:

The Fire Department provides fire suppression, fire prevention, fire investigation, and education services to the taxpayers of Gibson County. Public access to the fire stations is limited. All architectural barriers should be removed.

Health Department - No Response

Analysis & Recommended Actions:

Health Department staff will have several interactions with the general public. Staff Training is recommended to ensure that all patients receive the appropriate interactions pertaining to any additional needs someone with a disability may have. A TDD/TTY should be provided in this office and staff trained in how to use the equipment. The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Election Commission - No Response

Analysis & Recommended Actions:

The Election Commission interacts with people often during election season and must be able to accommodate voters. The department appears to have a good understanding of the need to accommodate individuals

with disabilities. A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

Emergency Management Services - No Response

Analysis & Recommended Actions:

A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

The architectural barriers noted should be removed or equal accommodation provided elsewhere.

Register of Deeds - No Response

Analysis & Recommended Actions:

It is recommended that staff in the Register of Deeds be provided basic training in how to accommodate various persons with disabilities and on the requirements for the various legal and other publications prepared by this department. The department needs to designate someone within the department to be responsible for ADA compliance for daily business. Verbiage regarding accessibility should implemented on all documentation immediately. The Register of Deeds should have and maintain a list of qualified individuals that can provide services to persons with disabilities if accommodation is requested (signers, interpreters, etc.). A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

The architectural barriers noted should be removed or equal accommodation provided elsewhere in the County Courthouse.

Trustee - No Response

Analysis & Recommended Actions:

Staff Training is recommended to ensure the appropriate interactions pertaining to any additional needs someone with a disability may have.

A TDD/TTY should be provided in this office and staff trained in how to use the equipment.

5 - Self-Evaluation of County-owned Buildings and Public Spaces

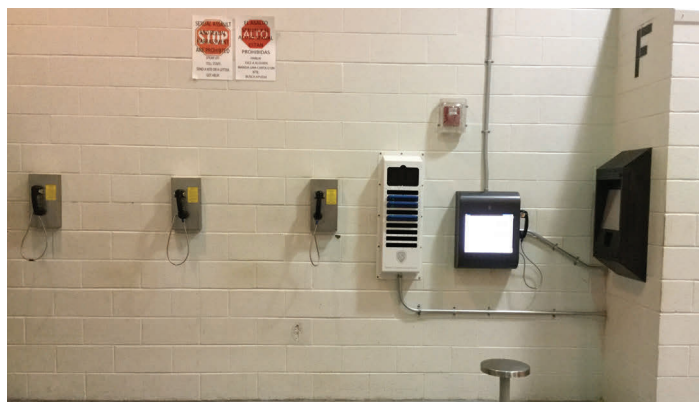
In the summer of 2020, interior and exterior audits of buildings, facilities, and parks were performed only in those areas open to the public. This review identified physical and architectural barriers and provided recommendations to comply with Federal accessibility requirements. The list of facilities that received an accessibility audit included:

- County-owned buildings

Areas of these facilities open to the public generally included parking lots, walks, park amenities, and areas within buildings that are not restricted to employees. Some buildings or areas of certain buildings have infrequent public access and were evaluated under the same guidelines. The decision to exclude areas of County facilities, or entire facilities, restricted to employees does not obviate the need of the County to ensure full accessibility is provided to employees with disabilities, consistent with the requirements of Title I of the ADA.

The results of the self-evaluation identified a number of barriers at County facilities. The degree to which these barriers limited accessibility and their priority for corrective action was subjectively categorized as “high”, “medium”, or “low”. “High” priority included barriers that effectively prohibited access to a service or program or present a safety hazard. “Medium” priority included barriers that either partially prohibited access or made it quite difficult. “Low” priority barriers typically do not limit access but are not compliant with standards. The actual implementation schedule, budgeting, and prioritization is up to the administration and is likely to be impacted by complaints, new regulations and requirements, and availability of funding.

The specific site and architectural improvements recommended to remove barriers and improve accessibility are listed in Appendix A.



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Chapter 6 - Transition Plan

The Transition Plan describes how the County will be transitioning to compliance with the ADA requirements. The County must provide access for individuals with disabilities and document areas of noncompliance.

If structural changes are identified to provide program accessibility as part of the self-evaluation, ADA identifies specific elements to be included in the transition plan. At a minimum, the elements of the Transition Plan are:

1. A list of the physical barriers in the County facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities [28 CFR 35.150 (d)(3)(i)]
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible [28 CFR 35.150 (d)(3)(ii)]
3. The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period [28 CFR 35.150 (d)(3)(iii)]
4. The name of the official responsible for the plan's implementation. [28 CFR 35.150 (d)(3)(iv)]

The transition plan reports the findings of the County-owned building audits. The specific improvements required to make the County-owned buildings accessible are listed in Appendix A. Removing barriers limiting access to high priority areas such as publicly accessible County owned offices or those which present a safety hazard should be the County's first priority.

Financial Considerations for Barrier Removal

Within a typical budget, the cost of making these improvements within a specified time frame and with the current economy can be overwhelming. Due to the magnitude of estimated construction costs to modify these existing pedestrian facilities, it will be necessary for the County to make accessibility improvements on a yearly basis. As the County grows more funding should be dedicated to the improvements of County-owned buildings. The County will strive to include an amount of approximately \$25,000 during the annual budget process. These funds will be dedicated to making improvements to accessibility in high priority areas providing the greatest access benefit to buildings.

The number and size of these projects will largely be dependent on a number of economic factors and future changes to the ADA Accessibility Guidelines (ADAAG) or other unforeseen requirements that may necessitate additional improvements to County facilities.

Determination of yearly scope of improvements should include the physical barrier prioritization, consideration of contributing contextual factors and high traffic areas, as well as planned infrastructure improvements. It is recommended that all safety hazards be addressed individually where needed for the safety of all citizens. Complaints received may also help determine the priorities of the improvements. If the County receives complaints about access at a particular location that is not slated for upgrades for several years, they should adjust the Transition Plan to accommodate the implementation of improvements as necessary.

Gibson County may choose to modify the priorities based on funding levels and changes in County programs activities and services, to have flexibility in accommodating community requests and complaints. All costs noted are 2020 estimates and subject to change based on market conditions, economic conditions, inflation, material selection, etc.

Based on the self-evaluation, a total of approximately \$2,460,705 in improvements would be required (2020 costs) to achieve accessibility at all County-owned facilities. Note that the cost of some improvements is not comprehensive due to lack of information (survey), utility relocation or potential land acquisition, etc. These costs do not include any costs associated with training of staff, staff time related to training or overseeing implementation, fees, etc. Note that actual phasing, transitioning of improvements, etc. can be impacted by a number of factors that may be unknown currently, as well as economic conditions, grant opportunities, etc.

Any changes to the ADA guidelines after the evaluations were completed are not reflected in these basic cost opinions. Additionally, it is the County's responsibility, as required by the ADA mandate, to regularly update the Transition Plan based on the latest requirements of the ADA laws and to document constructed infrastructure that is brought up to current ADA standards. At this time, costs are estimated but precise costs cannot be determined and the Transition Plan should be adjusted to reflect this knowledge.

Facilities Priority List

The Facilities Priority List is based on the public use of each facility. Buildings that provide access to the public most often should be top priority. This list is subject to change per the County's recommendations and financial obligations.

1. Gibson County Courthouse
2. Gibson County General Sessions Court
3. Gibson County Memorial Library
4. Gibson County Ed Jones Agriplex
5. Gibson County Chancery Building
6. Fairgrounds
7. Gibson County Youth Services Office
8. Gibson County Health Department
9. Gibson County Correctional Complex
10. NWTEDC Gibson County Service Center
11. Gibson County Airport (Terminal Building)
12. Gibson County Archives
13. Gibson County Highway Department
14. Public Safety Building
15. Gibson County Animal Shelter
16. Spring Hill Fire Station #1
17. Moore's Chapel Fire Station #2
18. Brazil Fire Station #3
19. Gann Fire Station #4
20. Tyson Fire Station #5
21. Fruitland Fire Station #6
22. Goodluck Fire Station #7
23. Fire Station #9

Gibson County, Tennessee

ADA Self-Evaluation and Transition Plan

Opinion of Probable Cost - County-Owned Facilities Summary

Location:		
Gibson County Courthouse:		Estimated Completion Date: 2028
Interior Repairs	\$158,500.00	
Exterior Site Repairs	\$17,075.00	
	\$175,575.00	
Gibson County General Sessions Court:		Estimated Completion Date: 2033
Interior Repairs	\$113,725.00	
Exterior Site Repairs	\$9,500.00	
	\$123,225.00	
Gibson County Memorial Library:		Estimated Completion Date: 2036
Interior Repairs	\$63,975.00	
Exterior Site Repairs	\$8,000.00	
	\$71,975.00	
Gibson County Ed Jones Agriplex:		Estimated Completion Date: 2041
Interior Repairs	\$107,050.00	
Exterior Site Repairs	\$17,000.00	
	\$124,050.00	
Gibson County Chancery Building:		Estimated Completion Date: 2044
Interior Repairs	\$74,840.00	
Exterior Site Repairs	\$8,000.00	
	\$82,840.00	
Fairgrounds:		Estimated Completion Date: 2062
Interior Repairs	\$335,750.00	
Exterior Site Repairs	\$113,000.00	
	\$448,750.00	
Gibson County Youth Services Office:		Estimated Completion Date: 2065
Interior Repairs	\$78,500.00	
Exterior Site Repairs	\$0.00	
	\$78,500.00	
Gibson County Health Department:		Estimated Completion Date: 2069
Interior Repairs	\$75,250.00	
Exterior Site Repairs	\$14,650.00	
	\$89,900.00	
Gibson County Correctional Complex:		Estimated Completion Date: 2073
Interior Repairs	\$101,400.00	
Exterior Site Repairs	\$6,500.00	
	\$107,900.00	
NWTEDC Gibson County Service Center:		Estimated Completion Date: 2076
Interior Repairs	\$74,290.00	
Exterior Site Repairs	\$9,500.00	
	\$83,790.00	
Gibson County Airport (Terminal Building):		Estimated Completion Date: 2080
Interior Repairs	\$87,425.00	
Exterior Site Repairs	\$9,500.00	
	\$96,925.00	
Gibson County Highway Department:		Estimated Completion Date: 2084
Interior Repairs	\$30,675.00	
Exterior Site Repairs	\$150.00	
	\$30,825.00	
Public Safety Building:		Estimated Completion Date: 2095
Interior Repairs	\$249,500.00	
Exterior Site Repairs	\$26,650.00	
	\$276,150.00	
Gibson County Animal Shelter:		Estimated Completion Date: 2096
Interior Repairs	\$4,800.00	
Exterior Site Repairs	\$14,500.00	
	\$19,300.00	
Spring Hill Fire Station #1:		Estimated Completion Date: 2098
Interior Repairs	\$51,125.00	
Exterior Site Repairs	\$1,500.00	
	\$52,625.00	
Moore's Chapel Fire Station #2:		Estimated Completion Date: 2099
Interior Repairs	\$23,950.00	
Exterior Site Repairs	\$9,500.00	
	\$33,450.00	
Brazil Fire Station #3:		Estimated Completion Date: 2101
Interior Repairs	\$43,675.00	
Exterior Site Repairs	\$11,000.00	
	\$54,675.00	
Gann Fire Station #4:		Estimated Completion Date: 2103
Interior Repairs	\$41,475.00	
Exterior Site Repairs	\$17,650.00	
	\$59,125.00	
Tyson Fire Station #5:		Estimated Completion Date: 2107
Interior Repairs	\$83,025.00	
Exterior Site Repairs	\$20,500.00	
	\$103,525.00	
Fruitland Fire Station #6:		Estimated Completion Date: 2112
Interior Repairs	\$90,275.00	
Exterior Site Repairs	\$25,500.00	
	\$115,775.00	
Goodluck Fire Station #7:		Estimated Completion Date: 2115
Interior Repairs	\$49,325.00	
Exterior Site Repairs	\$22,500.00	
	\$71,825.00	
Fire Station #9:		Estimated Completion Date: 2119
Interior Repairs	\$78,275.00	
Exterior Site Repairs	\$25,500.00	
	\$103,775.00	
Total Cost of all Building Repairs:		\$2,460,705.00

Phasing of Corrections

A phased implementation plan of the required corrections to remove physical barriers is required. The County has limited funds and cannot immediately make all facilities fully accessible. Priority phasing was developed with 2021 being the first year of construction.

Compliance of all County-owned Facilities (Interior and Exterior)

Locations: 23 (See Facilities Priority List on Page 37)

Estimated Funding for ADA Improvements

Approximately \$25,000 per year but costs will vary

Target Completion Date: 2120

Plan Updates and Enforcement

Improvements eliminating the deficiencies identified should be tracked to show progress in increasing accessibility within the community and to ensure the County is following through on the commitments made herein.

The Transition Plan will be reviewed and updated periodically to ensure the County is continuing to improve the accessibility within their facilities.
