

2017

ADA Title II Compliance Self-Evaluation Report and Transition Plan

Lee County, Florida



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Section I



ADA Legislative Mandates

I. ADA Legislative Mandates

A. The Americans with Disabilities Act and Amendments

The Americans with Disabilities Act became law in 1990. For people with disabilities, it reinforces the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. ADA Title II regulations for government service providers were amended in 2008. Those amendments resulted in the 2010 ADA Standards of Accessible Design and the Department of Justice 2016 Final Rule.

Title II of the Americans with Disabilities Act (ADA) states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. Lee County complies with this mandate through self-evaluation, a transition plan for upgrading facilities and an action plan for directing policies and programs toward compliance with the ADA.

This ADA Self-Evaluation Report and Transition Plan assists Lee County administration, operations directors, program managers and all employees in identifying policies, program and physical barriers to accessibility with the goal of developing solutions to ensure the opportunity for access to all individuals.

This report and documents incorporated by reference and presented in the appendices establish the ADA Self-Evaluation Report and Transition Plan for Lee County. This report is available online at www.leegov.com/ada/. It can be viewed with the assistance of font size enhancers and is compatible with screen readers and optical character recognition devices. On the website, it can be translated into other languages, digitally downloaded or printed.

For assistance in obtaining a copy of Lee County's ADA Self-Evaluation and Transition Plan in any reasonable format, contact Joan D. LaGuardia, ADA Coordinator, (239) 533-2314, Florida Relay Service 711, or jlaguardia@leegov.com. Accommodation will be provided at no cost to the requestor.

B. Designation of an ADA Coordinator – 28 C.F.R. § 35.107(a)

The ADA 28 C.F.R. § 35.107(a) requires a public entity with 50 or more employees to designate at least one employee to coordinate ADA compliance. Lee County has a designated ADA Coordinator who provides centralized oversight and coordination of ADA compliance with all departments and offices reporting to the Lee County Board of County Commissioners. The identity and contact information of the ADA Coordinator is included in notices of ADA policies and grievance procedure and in notices regarding requests for accommodation, posted for the public on the ADA page of the County's website, placed in frequently used publications, and provided to staff.

Duties of the ADA Coordinator include:

- Validate County compliance with the ADA Title II;
- Coordinate investigation of ADA-related complaints;
- Oversee internal training and both internal and external communication regarding ADA rights and compliance;

- Assist departmental ADA initiatives and compliance;
- Oversee countywide self-evaluation and transition planning and implementation.

C. Notice of ADA Policy – 28 C.F.R § 35.106

All public entities must provide information to interested parties regarding the ways in which Title II applies to its particular programs, services and activities, according to 28 C.F.R § 35.106. For all departments and offices reporting to the Lee County Board of County Commissioners, the County uses Department of Justice recommended formats for public notices which include, but are not limited to:

- Continual posting on the Lee County website ADA page (www.leegov.com/ada); NOTE: It can be viewed online with the assistance of font size enhancers and is compatible with screen readers and optical character recognition devices. On the website, it can be translated into other languages, digitally downloaded or printed.
- Continual posting on the Lee County website Legal Advertisements page (www.leegov.com/legalnotices);
- Continual posting in all County building lobbies and public service areas;
- Routine posting in the Bulletin Board of LeeTV, the County's 24-hour government access channel airing on Comcast Cable Channel 97 and CenturyLink Prism Channel 88, and accessible online.

In addition, an abbreviated notice of request for accommodations is included in advertisements for public hearings, meetings, programs and events.

Three Lee County departments have additionally posted accessibility information particular to their service areas. These include Lee County Public Transit (LeeTran) information for Passport, a paratransit service; the Department of Information Technology's Website Policies and Notices; and the Department of Parks and Recreation ADA Notice.

Notices and templates are in Appendix 1.

D. Establish and Publish Grievance Procedures – 28 C.F.R. § 35.107(b)

Local governments with 50 or more employees must have a system for promptly and fairly resolving complaints of disability discrimination, according to 28 C.F.R. § 35.107(b). This mechanism is intended to resolve issues at the local rather than the federal level. Grievance issues for the general public are handled by Lee County's ADA Coordinator for all departments and offices reporting to the Lee County Board of County Commissioners. In addition, employee grievances are addressed through Human Resources Policies 201-Equal Employment Opportunity and 202-Workplace Harassment and through Standard Operating Procedures for ADA Interactive Process 09-04-2013 and Harassment/Discrimination 09-11-2013.

The Notice of Grievance Procedure also uses the Department of Justice recommended format and is distributed to the public in the same methods outlined above for the Notice of ADA Policy.

The Notice of Grievance Procedure is in Appendix 1.

Section II



Self-Evaluation

II. Self-Evaluation – 28 C.F.R § 35.105

Lee County conducted its first mandated self-evaluation for ADA compliance to 28 C.F.R § 35.105 in the 1990s and has periodically reviewed it. From 2012 through 2016, County Administration again assessed its overall compliance for ADA policies, public notice and grievance procedures; physical accessibility to roads, mass transit and structures; and accessibility to all departmental services and programs. This included updates for the 2010 ADA revisions, particularly the Standards for Accessible Design and the 2012 Florida Accessibility Code.

A. Physical Accessibility – 28 C.F.R §§ 35.150 and 35.151

Physical assessments were done for the departments of Transportation, Public Transit, and Facilities Construction and Management.

1. Transportation

Evaluation of arterial and collector roads with an emphasis on intersections was completed with assistance from Atkins Traffic Engineering. Recommendations have been categorized into 21 priority groups. The Atkins Report finalized in February 2015 is in Appendix 2.

The report is structured as follows:

- Project Area Development – Reviews the development of the project area for the Lee County Department of Transportation Transition Plan. It also discloses how the project area was prioritized for the order of inspections;
- Final Project Area – Presents the list of the final project area that was identified;
- Evaluation Criteria – Documents the criteria that were identified to assess compliance of the project area with ADA accessibility;
- Data Collection – Reviews the processes that were taken during field inspections as well as the quality control;
- GIS Database – Summarizes the development of the geographic information system (GIS) database which is submitted electronically in conjunction with this report.

In addition, Lee County received its Local Agency Program recertification in November 2016 from the Florida Department of Transportation, which included a review of ADA compliance by the Florida Department of Transportation, the Federal Highway Administration Civil Rights Coordinator and State LAP Administrator. No deficiencies were noted and the County's transition plan for intersections was approved.

2. Transit (LeeTran)

LeeTran provides more than 3 million rides per year as the County's public transit system. LeeTran's evaluation includes:

- Vehicles, stop locations and shelters serving 24 bus routes;
- Passport paratransit service, which the ADA mandates for transporting disabled persons to destinations within $\frac{3}{4}$ of a mile of fixed-route stops;
- Passport Premium Service, an additional, locally provided service for transporting the disabled to locations beyond the $\frac{3}{4}$ mile area;
- An employer vanpool program.

Passport passenger trips are approximately 119,000 annually. Passport administrators reach out annually to approve disabled residents for the Passport program. These annual approvals range from 214,000 to 273,000, and interaction with these potential clients assists Passport managers to determine trends and needs. Passport vehicles cover more than 1 million miles annually.

In its 2014 triennial review of LeeTran, the Federal Transit Administration cited no deficiencies for ADA compliance. All vehicles and service thresholds are ADA compliant. The next federal triennial review is in 2017.

Therefore, LeeTran now focuses its self-evaluation and transition planning on stop locations and shelters. This ADA review dovetails with LeeTran's continuing Shelter Program, which identifies bus stop locations to improve amenities such as landing pads, shelters, bike racks, and trash receptacles. Stop locations which are part of the Shelter Program will be built to ADA standards and will have security lighting included as a part of the project.

The stop location and shelter self-evaluation is in two categories:

- The evaluation of stop locations and shelter locations along the 24 bus routes;
- Assessment of major shelters that will be upgraded with grant funding as it becomes available. This includes the Rosa Parks Intermodal Center, where expansion options are being considered.

3. Facilities

Physical compliance of all administration and service structures under the jurisdiction of the Board of County Commissioners is coordinated countywide by the Facilities Construction and Management Department. Lee County worked with ADA Consulting of Southwest Florida to evaluate approximately 120 structures, including offices, libraries, park structures, law enforcement and justice facilities.

The ADA establishes requirements to ensure that buildings and facilities are accessible to and usable by people with disabilities. At a minimum, each facility was evaluated in these categories:

- Point of entry, which includes parking, sidewalks, doors, entry halls and other considerations;
- Access to service areas, which includes entry to service lobbies and offices, counters, auxiliary service-delivery areas, equipment and other considerations;
- Restrooms;
- Miscellaneous obstructions.

Deficiencies were determined based on the 2010 ADA Standards for Accessible Design and the 2012 Florida Accessibility Code.

Two county departments have specific programs for ADA structural improvements in addition to those generally handled by the facilities department:

- Libraries have targeted upgrades to self-checkout centers as a specific ADA project.
- Parks and Recreation routinely upgrades and maintains playground equipment and other customer service amenities to ensure ADA compliance.

B. Non-Structural Service and Program Accessibility – 28 C.F.R §§ 35.149 - 35.150

Operating departments under the jurisdiction of the Lee County Board of County Commissioners were directed to evaluate their adherence to the County's ADA policies and access to their services and programs. The policies, service and program self-evaluation was conducted with a questionnaire. Results of this survey were reviewed by an internal working group, which was tasked with the broad examination of these Title II considerations:

- Physical barriers to access programs and services and the steps needed to enable accessibility, when viewed in their entirety;
- Policy modifications to provide access to individuals with disabilities and justifications for any exclusionary or limiting policies that will not be modified;
- Methods of communication with the public;
- Alternative communication methods and devices;
- Emergency evacuation techniques;
- Portrayal of individuals with disabilities in written and audio-visual materials;
- Policies and methods to provide access to historic preservation programs;
- The rationale for making decisions that providing access poses an undue financial or administrative burden;
- Building and construction policies;
- Measures that have been made to familiarize staff with the policies and practices for providing full participation of individuals with disabilities;
- Ensuring that no practices limit participation by individuals based on drug usage.

The County's ADA working group reviewed the questionnaires and other aspects of the countywide self-evaluation of policies, services and programs as well as the physical inventories of County structures and the County's transportation and mass transit networks. The questionnaire is in Appendix 2.

In general, this comprehensive review assured County Administration that staff is working toward compliance, that accommodation needs are being routinely met by existing conditions and aids with few additional requests for accommodation, and that staff is working steadily toward the removal of remaining barriers to accessibility.

In addition, the following specific categories were reviewed.

1. Subrecipient and Vendor Contracts

Lee County requires vendors and contractors who are hired to offer County services to the public and subrecipients of County grants to comply with the ADA.

Self-evaluation included a review of those contracts and an update of applicable contract language. The language can be viewed in Appendix 2.

2. Communication/Training – 28 C.F.R. § 35.160

a. Telephone Service

Hearing impaired persons may contact the County through the Florida Relay Service at 711. The service provides specially-trained operators to relay telephone conversations between people who are deaf, hard of hearing, or speech-disabled and Lee County's customer service staff. The computerized telephone system installed in the Lee County Public Safety Communications automatically recognizes a teletypewriter (TTY) call, and the 9-1-1 and dispatch personnel are trained to answer emergency calls from persons who are hearing and/or speech impaired.

b. Website

Adaptations for customer access via the Internet have focused on:

- Ensuring that the Lee County website is compatible to the technology and equipment most frequently used by persons who have adapted their personal computers or use other smart devices to accommodate their disabilities;
- Ensuring that the design of the Lee County website is consistent with the best practices for accommodating users with disabilities;
- Ensuring that public access terminals, particularly in libraries, are updated with Microsoft Windows 7, which offers these accessibility features:
 - Magnifier, to make items on the screen appear bigger;
 - On-screen keyboard, to allow entry without using a keyboard;
 - Narrator, which allows the user to hear text read aloud;
 - Use of speech recognition;
- Ensuring that departmental webmasters and content managers are trained in the County's ADA accessibility standards, which include:
 - Images on the website contain "alt tags" to help users with screen readers listen to the content. A "skip to" link allows these users to bypass the header and go directly to the main content each time a page is accessed;
 - Users can get information regarding the accessibility of Adobe Portable Document Format (PDF) files from the Adobe website www.adobe.com/accessibility;
 - To improve the accessibility of our website, Lee County Government reviews the site's accessibility with outside web tools and periodically will ask users with disabilities to review the site. Adjustments are then made as necessary.

Approximately 350 employees have been trained to post documents online in accessible formats.

Questions or grievances about the website are directed to the Website Content Coordinator, who welcomes comments on how to improve the site's accessibility for users with disabilities and works in conjunction with the County's ADA coordinator.

Lee County's Website Policies and Notice, Website Standards and Guidelines for webmasters and content managers, and the Accessibility in Windows 7 users guide are in Appendix 2.

3. Public hearings/meetings

a. Board of County Commissioners

Sites used for public hearings and meetings were inspected and deemed structurally accessible or accessible with non-structural modifications. Lee County contracts with American Sign Language interpreters and verbal language interpreters for those who request accommodations during a meeting. Meetings and public hearings in the Board of County Commissioners Chambers are televised on local cable and streamed live online. Closed captioning is provided live by The Captioning Group. Audio/video recordings in MP3 format are available online immediately after the event. Transcripts in OCR-accessible PDF format are available online within two weeks. Requests to have recordings downloaded to disk or thumb drive are honored. Personal hearing devices receiving a feed from the chamber's audio system are also available on request for the hard-of-hearing.

b. Hearing Examiner

Public hearings in the Hearing Examiner chambers have audio recordings in MP3 format. Staff summaries or transcripts prepared by court reporters are available online in OCR-accessible PDF format. Requests to have recordings downloaded to disk or thumb drive are honored. In 2016, the County expanded the availability of personal hearing devices for the hard of hearing in the Hearing Examiner's meeting room.

4. Alternate Delivery of Services

The departmental self-evaluation surveys assured Staff that the departments are offering new, alternative service delivery including, for example:

- The Library Department is installing accessible self-checkout kiosks;
- The Library Department manages a program for home-delivery of printed and audio books;
- The Technology Services department has trained departmental web masters to meet evolving website accessibility standards.

5. Public Safety

Lee County meets accessibility standards for:

- 9-1-1 Emergency Services Dispatching;
- Ambulance services;
- Emergency management notices and warnings through its accessible website and through Code Red, an emergency notification process that allows residents to sign up for preferred methods of notification to personal smart devices;
- Lee County hosts a Special Needs Shelter for disabled persons during evacuations.

The Public Safety Department has formed a Disability Working Group to specifically collaborate with community advocates on ADA issues regarding emergency services. Recent project goals are creating a disability Appendix to the Comprehensive Emergency Management Plans (CEMP)

and devoting specific information for the ADA-qualified community in the All Hazards Guide.

6. Language Assistance

Lee County also complies with Executive Order (E.O.) 13166 and Title VI of the Civil Rights Act of 1964 providing that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, including the Title VI prohibition against discrimination affecting Limited English Proficient (LEP) Persons. A Limited English Proficiency (LEP) person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. Lee County takes reasonable steps to ensure that persons with Limited English Proficiency have timely meaningful access and an equal opportunity to participate in services and benefits.

Using U.S. Census material and statistics from the Lee County School System, the County annually assesses the languages spoken by LEP persons within our service area and the number of LEP persons who are eligible for the services, and then supply appropriate language assistance according to guidelines. Based on its assessments and these guidelines, the County makes arrangements to access appropriate interpreters and translation services, including joining in the State of Florida contract for Language Line Services. Agreements usually cover language interpreters for Spanish, German, Danish, French, Italian, Japanese, Polish, Portuguese, Swedish and Ukrainian. These interpreters can be reached "on call" by telephone in emergency situations or their assistance can be requested in advance.

Lee County's LEP Plan is in Appendix 1.

C. Public Input

Lee County continually invites interested persons to evaluate the accessibility of County services, programs and facilities through these outreaches:

- Submitting comments through the ADA page on its Website;
- Responding to the invitation to request accommodations that is part of legally advertised meetings and public hearings;
- Participating in annual Passport/LeeTran outreach to approve disabled residents for the Passport program;
- Lee County staff's regular attendance at meetings of the ADA Advisory Council of Southwest Florida and other advocacy groups;
- Lee County Emergency Management hosting of the Disability Working Group.

For the 2016 self-evaluation update, Lee County added two additional public outreaches:

- A special presentation by the Lee County ADA Coordinator to the ADA Advisory Council of Southwest Florida to update them on progress of the self-evaluation and to specifically receive input on planning a public open house to discuss accessibility;
- An open house scheduled for one-on-one input from the community with the County ADA Coordinator and representatives of key departments including transportation, transit (LeeTran and Passport), facilities, parks and recreation, and libraries.

D. Records Retention

Lee County not only complies with ADA requirements for retaining self-evaluation and transition plan records for a minimum of three years, but also complies with Florida Statute Chapter 119, which regulates access to public records and requires that all documents relating to self-evaluation of ADA compliance be available for public review.

For assistance in obtaining records related to Lee County's ADA Self-Evaluation and Transition Plan, contact Joan D. LaGuardia, ADA Coordinator, (239) 533-2314, Florida Relay Service 711, or jlaguardia@leegov.com. Accommodation will be provided at no cost to the requestor.

In concluding this Self-Evaluation section, the County notes that this survey process also revealed the need for action items that will be undertaken in FY17 and FY18, including formalizing staff compliance through Standard Operating Procedures, staff training, reaching out to the community for input, and discussing possible revisions to budgeting for the ADA transition plan. The Action Plan is detailed in Section IV of this report.

Section III



Transition Plan

III. Transition Plan 28 C.F.R. §35.150(d)

Lee County's evolving transition plan addresses remaining structural accessibility issues that were identified through its self-evaluation process.

To comply with ADA requirements for an acceptable Transition Plan, Lee County has compiled:

- Lists of the physical barriers that limit the accessibility to programs, activities or services for individuals with disabilities;
- An explanation of the approach used to prioritize removal of these barriers according to ADA Accessibility Guidelines, federal and state transportation guidelines, and Lee County's established planning for capital improvement, major maintenance projects, and ADA-specific line items in departmental budgets;
- Goals for achieving compliance, including project lists with target dates and costs;
- Demonstration of opportunities for input from ADA-qualified residents;
- Identification of Glen Salyer, Assistant County Manager, as the official responsible for implementation of the plan.

This Transition Plan represents the remedies that are most likely to be undertaken in FY17 and FY18. The order in which these projects are completed may be altered by the emergence of newly discovered safety considerations, public requests, availability of funds and emerging efficiencies of grouping projects and buying materials.

It is also important to note that significant progress toward improved accessibility begins with Lee County's ongoing Capital Improvement and Major Maintenance planning. Lee County addresses ADA deficiencies at intersections and bus stops as roads are resurfaced or otherwise improved. Structural barriers are addressed in expansions and remodels.

Therefore, the primary factors for moving a project from the comprehensive list of needed remedies to the Transition Plan for a specific fiscal year are:

- Scheduling in current CIP and major maintenance planning and budgeting;
- Fiscal year departmental budgeting for ADA-specific projects;
- Departmental prioritization methodologies.

Lee County's Transition Plan includes separate project lists for transportation, transit and facilities. The Transition Plan has been developed according to the prioritization methodologies explained below.

A. Transportation

Lee County's Transportation Transition Plan was completed in two phases.

In the first phase, Lee County worked with consultant Atkins to process the results of the inventory of arterial and collector roadways and intersections into 21 prioritized groups of projects. Atkins developed its methodology from the following documents:

- 2010 Standards for Accessible Design, Department of Justice;
- Manual for Uniform Traffic Control Devices;

- Public Rights of Way Accessibility Guidelines;
- DOT's ADA Standards for Transportation Facilities 2006;
- Section 400 (curb ramps);
- Section 705 (detectable warnings).

Various scenarios of ADA deficiencies for curb ramps and cross walks were identified and prioritized by their degree of severity, as shown in *Table 1 Prioritization of Types of Deficiencies* on p. 69 of the Atkins report and by their type of ADA deficiency, as shown in *Table 2 Types of ADA Deficiencies* on p. 71 of the Atkins report. Every deficiency had a value associated with it. Priority 1-5 was ranked highest because they had the greatest value of overall deficiency. Any inspected intersection that required attention was listed within 21 priority categories. Both tables and the resulting Priority 1-5, 5-10, 10-15 and 15-21 project lists can be viewed in the Atkins Report in Appendix 2 – Self-Evaluation.

In the second phase, Lee County reviewed these lists with its existing policies, budgets, project lists and funding allocations, including:

- Lee County's overall practice that all transportation improvements include bringing intersections into full ADA compliance;
- The existing multi-year plan for Transportation Capital Improvement Projects approved by Lee County Commissioners and the Lee County Metropolitan Planning Organization;
- The existing budget for Transportation Major Maintenance Projects approved by Lee County Commissioners;
- Allocation of an additional \$250,000 specifically for ADA improvements in FY17 according to these general guidelines:
 - Allocate approximately \$150,000 to be used on the top-rated ADA non-compliant intersections identified in the Atkins report;
 - Allocate approximately \$50,000 to repave arterial/collector intersections identified in the Atkins report;
 - Allocate approximately \$50,000 to respond to ADA-specific requests with any year-end remainder to be reallocated to the top-rated intersection in the Adkins ADA Arterial and Collector study that can be completed with the money available.

1. Cost Consideration

Costs associated with the transportation transition plan include these sources for allocation:

- \$250,000, as outlined above, is funded through gas taxes for ADA-specific projects in the transition plan for FY17. It is anticipated that this amount will also be budgeted in FY18;
- \$3.9 million is allocated for DOT Bicycle and Pedestrian facilities in FY17 and \$2.6 million in FY18; these will be done to ADA standards. These are paid for through gas tax and impact fee funds;
- \$15.5 million is allocated in FY17 and \$30.0 million in FY18 for CIP projects, which will be completed to ADA standards and which will include intersection improvements that address projects in the transition plan. These are paid for through gas tax and impact fee funds;
- \$1.1 million for FY17 & \$1.1 million in FY18 for major intersection improvement, which includes some of the intersections identified in the transition plan. These are paid for

through gas tax and impact fee funds.

2. Target Timeline

Looking initially at the Priority 1-5 list and noting which projects are already earmarked for completion in current CIP and maintenance programs, Lee County has committed to addressing the remaining Priority 1-5 projects which can reasonably be addressed within FY17 and FY18. There are six projects for which engineering design services will be done in FY17 with work to be offered for bid in FY17. An additional 10 projects are targeted to have engineering design services done in FY17 with work to be offered for bid in FY18. Through FY21, there are 53 projects on the transition plan list.

Costs for these projects will be entered into the transition plan project list/spreadsheet as the design services are completed. A construction estimate will be completed with the design, and projects will be programmed with the available funds. Lee County will continue through the priority list on a yearly basis as funds are available.

B. Transit (LeeTran)

Lee County Transit has a Shelter Program that aimed to upgrade approximately six shelters annually from 2010 through 2021. Shelters targeted in the program go through two phases of planning. The first is site design, which includes the investigation of existing right-of-way, and the second phase is site construction. Due to budget cuts through the recession and County Administration interest in evaluating the shelter program with new criteria – including increased focus on ADA guidelines – this program is being substantially refined in 2017.

During FY17, County Administration will reassess the shelter projects according to these criteria:

- Requests from the mobility-impaired community and the public in general;
- Scheduling of projects that are not functionally accessible due to obstructions;
- Scheduling of projects that are functionally accessible but may not meet all ADA requirements of accessibility;
- Number passenger trips recorded at that stop location;
- Synergies with other County projects, especially road and sidewalks repairs.

Several stop location/shelter projects, which are through Phase 1 site design and ready for permitting, are on the FY17 LeeTran plan. However, the focus of FY17 will be to propose a new capital improvement plan for stop locations for FY18 funding, to begin the request for proposal and contracting work for stop locations already through the design phase and to complete the transition plan for LeeTran stop locations through 2021.

Selection of appropriate standards and criteria for design includes the Americans with Disabilities Act (ADA) Compliance, February 2003 and is influenced by several factors, which may include but is not limited to traffic volume, composition, policies and regulations, terrain features, surrounding developments, existing conditions, and budgetary constraints.

Each year, LeeTran will review the system as a whole to ensure that emerging needs from the ADA community, changing passenger trip statistics and public input are reflected in the selection of projects in the transition plan.

1. Cost Consideration

LeeTran has prioritized approximately \$1.2 million in existing federal grants for passenger amenities. Historic Lee County Transit spending in its Shelter Program has equated to an average cost of \$25,000 per site. However, based on topology, design or construction difficulties, or additional permitting requirements based on location specific issues, costs will vary.

2. Target Timeline

During FY17, Lee County will investigate approximately 15 stop location projects for design review and/or permitting.

C. Facilities

Primary placement of projects on the Facilities plan is determined by Capital Improvement and Major Maintenance budgeting not only for the facilities department but also for the operating departments.

For FY17, the department is phasing in a new Transition Plan methodology based on the updated self-evaluation inspections to determine the priority of projects not addressed by CIP and Major Maintenance planning. This new system is based on three categories of weighted criteria to determine the importance of removing structural deficiencies and the timing of corrections:

- The necessity of the structure in providing direct customer-service for vital, tax-supported services:
 - Tier 1 service centers are open to the public and perform vital, tax-supported services. These are given a weight of 5. Examples of these buildings are the Old Courthouse, the Community Development/Public Works Center, the Melvin Morgan Constitutional Complex and the Lee County Justice Center.
 - Tier II service centers are open to the public and provide important, tax-supported services. These are given a weight of 4. Examples include libraries, community centers, and satellite centers and annexes to the Tier I structures.
 - Tier III recreational and entertainment structures open to the public are given a weight 3. Examples include park facilities, sports facilities and beach facilities.
 - Tier IV structures are operations facilities and structures which are not open to the public. These are assigned a weight of 2. Examples include emergency operations and public safety facilities, solid waste facilities, and water treatment and distribution facilities.
- ADA Accessibility Guidelines prioritization:
 - Priority 1 projects improve accessibility of approach and entrance and are given a weight of 5;
 - Priority 2 improve access to services and goods and are given a weight of 4;
 - Priority 3 improve access to public toilet rooms and are given a weight of 3;
 - Priority 4 improve access to ancillary items including water fountains and public telephones and are given a weight of 2.
- Subjective departmental considerations, including immediate safety concerns, public requests, and efficiencies in grouping work orders and buying parts and materials. These are

decided by the department's director, manager of public works projects and the County's ADA coordinator. These may include work needed to accommodate employees, respond to public requests, and a variety of other considerations, including efficiencies in grouping work orders and buying parts and materials. In the worksheet, these are justified by notes and assigned subjective weights up to 10 points. These subjective considerations may also include a negative weight. For example, points could be subtracted from a low-priority but high-cost project to keep it from delaying multiple projects of equal weight due to scarce funding resources.

For FY17 and FY18, the top three areas of structural projects for Lee County are Lee Civic Center renovations; updates to a variety of Parks and Recreation facilities, including restrooms and boat ramps; and updates at libraries to make self-checkout fully accessible to the disabled.

1. Cost Consideration

As new County facilities have been constructed or existing buildings remodeled, Lee County has complied with State of Florida design requirements through review by the Florida Department of Professional Regulation. The department estimates that 8% of Capital Improvement and Major Maintenance spending has been for ADA compliance.

ADA projects that will be addressed through the CIP and major maintenance budgets appear on the Transition Plan for FY17 and FY18. These budgets are funded by ad valorem taxes through the general fund, library fund and municipal services taxing unit, by utilities and solid waste enterprise funds, and by tourist development (bed) tax.

For FY17, the department's budget includes a \$7,700 line item for ADA enhancements not funded through the CIP or major maintenance budgets. For FY17, most of this is allocated to inspections.

Lee County has spent \$2.2 million from FY02 through FY16 on ADA-specific projects to upgrade or replace structures to conform to ADA requirements.

2. Target Timeline

As part of its FY17 Transition Plan, the department will complete the weighted evaluations. Because the department is phasing in this new methodology, the FY17 transition plan includes only the projects which will remedy ADA issues associated with the FY17 and FY18 CIP and Major Maintenance projects.

Section IV



Action Plan

IV. Action Plan

ADA compliance is a complex process that is best achieved through coordinated plans that are periodically updated. In addition to the Transition Plan for structural accessibility, Lee County has identified an Action Plan of specific steps to enhance its compliance to policy requirements and service/program accessibility. These include implementation of policies and procedures, training and community outreach.

No priority methodology is required; all will be accomplished in FY17 and FY18, which is the target period for this most recent review of the Self-Evaluation and Transition Plan.

#	Action Detail Task Manager	Additional Direct Cost	Target Timeline
1	Review existing contracts with ADA service providers including American Sign Language and verbal language translators; review ADA language in Facilities Construction and Management scopes, RFPs and contracts. ADA Coordinator/Procurement	None	FY17 Quarter 2
2	Establish Standard Operating Procedures for staff handling of ADA notices of Lee County policies, grievance procedure, and accommodations; for recording and handling requests for accommodation and grievances; guidelines for service animals and comfort animals; and training. ADA Coordinator/Senior Team	None	FY17 Quarter 2
3	Welcome input from the ADA community and the public during a public open house to allow one-on-one feedback from the public with untimed access to staff. ADA Coordinator/ADA Specialists	None	FY17 Quarter 2
4	Train reception, customer service staff and marketing/advertising staff. Compile an FAQ to assist staff with common questions. ADA Coordinator/Director, Talent Development		FY17 Quarter 3
5	Review budgeting issues for ADA-specific projects. Senior Team	TBD Budget process	FY17 Quarter 2 and 3
6	Provide ½ day onsite training by an outside consultant for the Lee County ADA Coordinator, key managers, and departmental ADA coordinators. ADA Coordinator	\$400	FY17 Quarter 2

#	Action Detail Task Manager	Additional Direct Cost	Target Timeline
7	<p>During the Risk Management updating of Administrative Code 7-2: The Employee Emergency Action Plan, practices for emergency evacuation of ADA-qualified employees and customers will be reviewed.</p> <p>Risk Management</p>	None	FY17 Quarter 4
8	<p>Design an online-based training program for reception and customer service staff, marketing and advertising, webmasters and online content managers.</p> <p>ADA Coordinator/Director, Talent Development</p>	TBD Budget process	FY18 Quarter 1