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ADA Self-Evaluation & Transition Plan
City of Allen – Parks & Recreation
2023
1. Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym/Abbreviation</th>
<th>Expansion</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA</td>
<td>ADA 2010 Standards for Accessible Design</td>
</tr>
<tr>
<td>ASL</td>
<td>American Sign Language</td>
</tr>
<tr>
<td>ASTM F1487-21</td>
<td>Standard Consumer Safety Performance Specification for Playground Equipment for Public Use</td>
</tr>
<tr>
<td>ASTM F 1292-99 or 04</td>
<td>Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment.</td>
</tr>
</tbody>
</table>

2. Documents & Resources

2.1 Documents

The following documents are used as the main sources of comparison in this accessibility audit report.

Documents

Title II and III regulation 35.105 of the U.S. Department of Justice
<table>
<thead>
<tr>
<th>Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA 2010 Standards for Accessible Design</td>
</tr>
<tr>
<td>2012 Texas Accessibility Standards</td>
</tr>
<tr>
<td>Architectural Barriers Act</td>
</tr>
<tr>
<td>ASTM F 1292- 99 or 04 - Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment.</td>
</tr>
<tr>
<td>Outdoor Developed Areas, United States Access Board</td>
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<tr>
<td>Smithsonian Guidance for Accessible Exhibition Design, 2005</td>
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<tr>
<td>Individuals with Disabilities Education Act (IDEA)</td>
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<tr>
<td>Rehabilitation Act 1973</td>
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<tr>
<td>NFPA Fire Codes</td>
</tr>
<tr>
<td>International Building (IBC)</td>
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<tr>
<td>International Fire Code (IFC)</td>
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</tbody>
</table>
2.2 Resources

U.S. Department of Justice ADA Information
800-514-0301 voice
800-514-0383 TTY
www.ada.gov

ADA National Network
800-949-4232 voice/TTY connects to your regional ADA Center
www.adata.org

Accessible Play Areas
A Summary of Accessibility Guidelines for Play Areas
www.access-board.gov

U.S. Access Board 800-872-2253 voice 800-993-2822 TTY
www.access-board.gov

ADA Title III Regulations 28 CFR Part 36

2010 ADA Standards for Accessible Design
www.ada.gov/2010ADASTANDARDS_INDEX.HTM

1991 ADA Standards for Accessible Design
www.ada.gov/stdspdf.htm

Most of the illustrations used within this report are from the U.S. Department of Justice and the U.S. Access Board or are based on illustrations produced by the U.S. Access Board and the U.S. Department of Justice.
3. Executive Summary

3.1 Background

The City of Allen is a vibrant community located in north central Texas. It has a population of over 109,000 people. The City takes pride in providing access to its many community assets not only through vehicular access, but also through its connected sidewalk, trail, and shared use path network.

In an effort to improve access for all, the City’s Parks & Recreation Department has performed an ADA Self-Evaluation of its facilities, policies, and procedures in an effort to identify and work toward removing obstacles that may restrict access for people with disabilities. The information gathered from this assessment, with public input, will allow the City to update its ADA Transition Plan and further their ongoing commitment to all residents, employers, businesses, and visitors for creating an inclusive and accessible place to live, work, and play.

The City’s ADA Self-Evaluation & Transition Plan aligns with objectives of the Parks, Recreation and Open Space Master Plan 2021-2031. The purpose of this plan is to present community-wide goals, objectives and needs regarding the existing and future parks but based on citizen input. Secondly, to act as an informational guide related to parks, recreation, open spaces to help inform future City Councils, City Staff and the Parks and Recreation Department in marking future decisions. Finally, to help provide feasible and implementable recommendations for existing, future parks, open space system and the maintenance.

The mission: “We create meaningful LIFE experiences in Allen”

Vision: “Inspiring Your Best Life”
3.2 Report & Project Overview

The American with Disabilities Act (ADA) became effective in 1991. It is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and places that are open to the public. The purpose of the law is to prohibit discrimination against people with disabilities and to ensure these individuals have the same rights and opportunities as everyone else. The ADA was passed to prohibit discrimination against people with disabilities. Title II of the ADA requires that public agencies maintain an ADA Self-Evaluation and Transition Plan which details barriers identified and communicates an action plan for improving accessibility.

This report serves as an update to the City of Allen’s ADA Self-Evaluation and Transition Plan. This Plan has been developed so the City can identify and work toward removing obstacles that limit access by people with disabilities to its programs, activities, and services as required by the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The regulations of the ADA require the following information be contained with the ADA Transition Plan:

- An inventory of barriers, or a self-evaluation
- A schedule for removing the barriers
- A description of the methods to be used to remove the barriers
- Public involvement
- Identification of the ADA Coordinator and the official responsible for implementation of the Plan
- Complaint and grievance policy

As a result, the City conducted a self-evaluation to determine the extent to which individuals with disabilities may be restricted in their access to City services, programs, activities and facilities. This included the evaluation of fifty-two (52) individual park and recreation sites (some of which contained multiple public facilities). City programs and activities were evaluated through review of existing policies and analysis of a department wide ADA staff survey.

This report summarizes the evaluation of the City programs, activities, and physical assets assessed.
4. Introduction

4.1 Disability Demographics

At the time of the 2010 census, 54 million people (about 1 in every 5 people in the United States) had a disability that significantly limited one or more major life activities, such as walking, seeing, hearing, breathing, and thinking. Of that number, 7 percent used wheelchairs, and 2.1 percent used crutches, canes, walkers, or other assistive devices. 75 percent have disabilities that are not obvious at first glance.

Texas has the second largest number of individuals with disabilities of all the states. The percentage of individuals with disabilities relative to the entire Texas population (11.8 percent) has remained stable over the past seven years, although the Texas population has grown considerably over that same time period. Approximately 54 percent of Texans 75 and older had a disability. Overall, 11.84 percent of females (1,686,794 individuals) and 11.81 percent of males (1,660,211 individuals) reported having a disability.

People with disabilities constitute one of the largest minority groups in the United States (comprising about 50 million individuals). Additionally, the entire population of the United States is aging and living longer. By the year 2030, more than 80 million people will be 65 or older. As people age, impairments are more likely to hinder activities and there will be an inevitable impact on the disability population.

---

4.2 Federal Accessibility Requirements

A Self-Evaluation and Transition Plan of scheduled changes is required by the following:

**Section 504 of the Rehabilitation Act of 1973 (Section 504)**

This regulation applies to organizations receiving federal funds. Programs and services are to be available without discrimination to people with disabilities. Various other federal and state entities require the plan as a condition of receiving federal funds, including the U.S. Department of Transportation.

**The Americans with Disabilities Act (ADA)**

The ADA became law on July 26, 1990. The ADA covers a public entity’s employment, programs, activities, services, communications, and facilities. The ADA adopted the prohibitions of discrimination established under Section 504. Updates to the ADA include the ADA Amendments Act of 2008 (ADAAA) and the 2010 ADA Standards for Accessible Design (2010 ADA). Other standards used in determining accessibility for sidewalks, crosswalks and more, include the proposed 2011 Public Right-of-Way Accessibility Guidelines (PROWAG). While the guidelines are not yet law, they are accepted as the best guidance for public right-of-way application by federal agencies. Compliance with these updates have been included in the Self-Evaluation process.

**Background of the Federal Accessibility Requirements**

The development of an ADA Self-Evaluation is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act, which has become known as the “civil rights act” of persons with disabilities, states that:

> No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance (Section 504).

Subsequently, Congress passed the Americans with Disabilities Act (ADA) on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice’s (DOJ) Title II regulations adopt the general prohibitions of discrimination established under Section 504 of The Rehabilitation Act and incorporate specific prohibitions of discrimination for the ADA. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title V of The Rehabilitation Act.

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. This civil rights law mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and
telecommunications. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities. The law is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.

Since the original signing of the Americans with Disabilities Act, significant modifications and amendments have been made to the ADA statutes and the federal regulations implementing the ADA.

Specifically, under the ADA, public agencies may not, either directly or through contractual arrangements, do any of the following:

- Deny qualified persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny qualified persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered to others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity’s programs, activities, and services. This evaluation includes all of the public areas of the physical assets (such as facilities, buildings, parks, and streets) owned or operated by the City. This Summary of Findings, together with other detailed documents, surveys and data will be utilized in the preparation of budgeting and planning for barrier removal within the City’s parks and recreation facilities.
4.3 ADA Self-Evaluation and Transition Plan Requirements

The City of Allen is committed to inclusion, non-discrimination, barrier removal, and access.

ADA requirements for the City of Allen:

▪ Evaluate programs, services, and activities per the ADA;
▪ Identify physical and other barriers that may limit access to programs and services;
▪ Propose potential compliance solutions;
▪ Develop a tiered schedule for implementation.

Additionally, the ADA requires the City of Allen to:

▪ Designate an ADA Coordinator responsible for overseeing compliance;
▪ Develop an ADA grievance procedure;\(^2\);
▪ Maintain the Self-Evaluation and Transition Plan for public inspection for three years.

\(^2\) Allen’s ADA Grievance Procedure is detailed in Section 9.
4.4 Discrimination and Accessibility

Title II of the ADA and its related federal EEOC, DOJ, and DOT regulations link the concepts of discrimination and access which include physical access and program access.

Physical access requires a facility to be free of barriers preventing participation. Barriers are any obstacles that prevent or restrict access to or use of a facility, right-of-way, or park amenity as identified in ADA Title II, Section 35.149.

Program access is defined by ADA Title II, Section 35.150(a). It may include physical accessibility, but also covers policies, practices, communications, and procedures. Program access requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from programs and services. Program access may be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of auxiliary aids and assistance, or provision of services at alternate sites.

In general, both may be utilized to ensure program access, but there are some exceptions where existing facilities are involved. ADA Title II, Section 35.150:

- Does not require a public agency to make each existing facility accessible
- Does not require anything that impacts the historic significance of historic property
- Does not require a public agency to fundamentally alter services, programs, or activities
- Does not require a public agency to create hazardous conditions
- Does not require a public agency to incur undue financial and administrative burden
- Program access includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

---

3 ADA Title II Section 35.149 provides that “Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity’s facilities are inaccessible or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subject to discrimination by any public entity.

4 ADA Title II, Section 35.150(a) provides: A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.
4.5 Undue Burden

While it is rare that the City of Allen may not be able to provide program access, there are some instances where it is permissible under the ADA. Access to each service, program, or activity is to be “viewed in its entirety.” Program access does not require each facility to be made physically accessible, in all instances. However, physical accessibility is a requirement for new facilities intended to provide City programs. The City is not required to incur undue financial or administrative burden.

The decision that compliance would result in an undue burden must be made by the head of the public entity or his/her designee. Representing the City of Allen, the City Manager or his designee has the authority to identify an undue burden. The decision is to be accompanied by a written statement of reasons for reaching that conclusion.

Allen Heritage Center

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5 Undue Burden: The determination that an undue burden would result from actions must be based on an evaluation of all resources available for use in the matter. Allen must then consider options for providing access to the program that do not incur undue burden. The determination of “Undue Burden” may not be a permanent determination and should be continuously reviewed.
5. Self-Evaluation Scope

5.1 Built Environment Assessment

In March of 2023, both Direct Access and Cole performed a Self-Evaluation of 52 separate parks and recreation sites throughout the City. Cole focused on the sidewalks and hard surface trails whilst Direct Access focused on the facilities and associated elements. Sites within the Self-Evaluation scope included parks, recreation centers, aquatic facilities, and the Credit Union of Texas Event Center. The sidewalks and hard surface trails were evaluated by Cole as per applicable ADA regulations and guidelines. The information collected by Direct Access and Cole will better inform decision makers on how to plan and budget for improvements throughout the City for years to come.

In Exhibit A (page 15), sites within the City where thorough physical assessment was conducted are shaded green. The lines in red represent the locations of trails which were assessed and the lines in blue represent the location of sidewalks which were assessed. Reference pages 31-34 for the Summary of Findings for Hard Surface Trails and Sidewalk evaluations.

Heritage Park
Exhibit A

<table>
<thead>
<tr>
<th>Exhibit A Key</th>
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<tbody>
<tr>
<td>Green Areas- site boundaries within the scope of the project</td>
</tr>
<tr>
<td>Red Lines- hard surface trails collected within the scope of the project</td>
</tr>
<tr>
<td>Blue Lines- sidewalk collected within the scope of the project</td>
</tr>
</tbody>
</table>
The sites inventoried and assessed during this project included:

1. Allen Cemetery
2. Allen Heritage Center
3. Allen Heritage Village
4. Allen Station Park
5. Allenwood Park
6. Auburn Springs Park
7. Bethany Lakes Park
8. Bethany Ridge Park
9. Bolin Park
10. Bradford Crossing Park
11. Bridgewater Crossing Recreation Area
12. Celebration Park
13. Celebration Pass Greenbelt
14. Collin Square Greenbelt
15. Cottonwood Bend Park
16. Country Meadows Park
17. Credit Union of Texas Event Center
18. Custer Meadows Park
19. Dayspring Nature Preserve
20. Don Rodenbaugh Aquatics Center
21. The Edge
22. Ford Park
23. Fox Hollow Recreation Area
24. Glendover Park
25. Green Park
26. Greenville Heights Park
27. Heritage Park
28. Hillside Play Area
29. Hillside Wellness Park
30. Lost Creek Park
31. Morgan Crossing Park
32. Orchards Park
33. Quail Run Park
34. Reed Park
35. Ridgeview Crossing Park
36. Rolling Hills Park
37. Senior Recreation Center
38. Shadow Lakes Park
39. Spirit Park
40. Spring Meadow Park
41. Stacy Ridge Park
42. Story Park
43. Suncreek Park
44. The Bluffs at Lost Creek
45. The Courses at Watters Creek
46. The Trail
47. Twin Creeks Civic Space
48. Twin Creeks Park
49. Walden Park
50. Waterford Park
51. Watters Crossing Park
52. Windridge Park

- 63.47 miles of sidewalk and hard surface trails
- .73 miles of “Not Paved Sidewalk/Trail”
  - Unpaved Sidewalks/Trails did not receive a detailed evaluation as part of this project and do not inherently represent a barrier to access if the programs, activities, and services at a site are still accessible when viewed in their entirety.
- .07 miles of “Missing Sidewalk/Trail”
  - This category represents a gap in connectivity or service for sidewalk/trail facilities.

An overview of the findings from data collection within the scope of the Self-Evaluation can be found in Sections 6 and 7 of this report. Detailed reports are available upon request.
5.2 Policy/Program & Activity Assessment

An evaluation of the City’s current services, policies, and practices was completed as part of the update to the ADA Self-Evaluation.

In order to identify policies, procedures, and practices that may not meet, or are inconsistent with, the requirements of the Title II regulations the following activities took place:

1. Review of existing applicable ADA policies:
   a. Notice of Non-Discrimination
   b. Effective Communication Requests
   c. ADA Grievance Procedure

2. A Parks and Recreation department staff survey was developed, and issued, to gauge the level of knowledge City staff have related to ADA practices and procedures.

Findings from these activities can be found in section 7 of this report.
5.3 Public Outreach

Thorough public outreach strategy sessions were developed by the consultant and staff in conjunction with various City departments, to ensure that members of the Community living with disabilities would have an opportunity to be informed and provide feedback to the City of Allen. The event was promoted publicly through various City communication vehicles.

Outreach strategies included:

Public Outreach Presentations: Two in-person presentations were conducted on June 12th and June 14th, 2023.

Recorded Viewing: For individuals unable to attend in person, a video recording of the presentation was made available on the City’s website: https://engage.Cityofallen.org/en/projects/ada/2

Public Survey: A public survey was made available to allow valuable feedback from the community on accessibility at both in-person presentations and the City website listed above.

Public Outreach Information Details:

The Public Outreach Presentation highlighted information and general findings from the ADA Self-Evaluation. This material was made available for participants during the public outreach sessions and made available electronically for those unable to attend.

Publicity of the Public Outreach Sessions and Community Survey was made through an Engage Allen Project Page, social media advertisement with a supporting promotional video (link), and email marketing via the City’s weekly newsletter to ensure all citizens have an opportunity to understand the City’s findings and to gain valuable feedback from the accessible needs community and citizenry at large. A video of the live public outreach session continues to be available for viewing for those who were not able to attend open sessions.

The Public Comment Period was open for 30 days, allowing citizens to review the Summary of Findings Report and provide any insights or feedback via the survey regarding areas of priority throughout the City. Feedback received on areas of concern allows for additional consideration as the City prepares to prioritize sites for remediation both short and long-term. The public survey allows for questions and answers, as well as direct comments from the public.
6. Self-Evaluation Approach

6.1 Sidewalk and Hard Surface Trails

Methodology of assessment for the City of Allen’s Parks and Recreation Department is broken into two components:

a. Review of sidewalks and hard surface trails within park boundaries

b. GIS processing for unique City requirements

The method of conducting the Self-Evaluation for the City of Allen’s sidewalks and hard surface trails included field data collection to determine compliance with the following standards and guidelines:

1. 2010 ADA Standards for Accessible Design

The PROWAG was applied in limited conditions to the Self-Evaluation to follow industry best practices, allow for appropriate remediation guidance, and to improve the useability of the sidewalk and hard surface trail network to individuals with disabilities. All other data collected was evaluated against the 2010 ADA Standards for Accessible Design. The limited conditions where guidance from the PROWAG was applied were:

1. The grade of sidewalks and hard surface trails within a street right-of-way (i.e., immediately adjacent to a street or roadway) were evaluated against PROWAG §R302.5.1. The standard dictates that the grade of a pedestrian accessible route shall not exceed the general grade established for the adjacent street. In the 2010 ADA Standards for Accessible Design, the grade of an accessible route cannot exceed 5% without ramp features being installed (e.g., handrails).

2. Pedestrian facilities within the scope of work identified as a “trail” were evaluated against PROWAG §R302.3.2. The standard dictates that the pedestrian access route shall be provided for the full width of a shared use path. PROWAG defines a “shared use path” as a path which provides both recreation and transportation. In the 2010 ADA Standards for Accessible Design, an accessible route is only required to maintain 36” of clear width.
It is important to note that for facilities and features included within the sidewalk and hard surface trail evaluation that there are no material differences between the applicable standards in the 2012 Texas Accessibility Standards and the 2010 ADA Standards for Accessible Design.

6.2 Sidewalks and Hard Surface Trails - Technology

The traditional accessibility assessment process for hard surface sidewalks and trails can be labor-intensive. Many public entities rely on collection methods that provide limited information or assess barriers intermittently. This does not offer comprehensive data or allow for adequate cost estimates for the planning of barrier removal. The City of Allen’s Parks and Recreation Department indicated an interest in utilizing technology that would quickly and adequately document more information, such as the type, severity, and location of sidewalks/trails within the scope boundary. To achieve this, Cole utilized an exclusive technology called the ULIP-ADA (shown in below Exhibit B) to allow for an efficient and effective process to complete the City’s assessment for hard surface sidewalks and trails within their parks.

The technology was originally developed through a pilot program funded by the Federal Highway Administration. The Ultra-Light Inertial Profiler (ULIP) is mounted on a Segway. The device’s displacement laser, three accelerometers, optical trigger, distance measurement instrument, and gyroscope are designed to measure the sidewalk surface at a rate of 10,000 records per second. Together, these devices capture detailed information about cross and running slope and small surface variations. A mounted computer offers an interactive display during data collection. The technical approach offered by this technology was identified as a best practice in ADA Compliance at Transportation Agencies: A Review of Practices (NCHRP 20-07 Task 249), a National Cooperative Highway Research Program study.

Using the ULIP-ADA, the sidewalk and hard surface trail corridors were evaluated for:

- run slope
- cross slopes
- obstructions
- joint heaving
- width
- gaps in connectivity
- missing sidewalk

Exhibit B
6.3 Facility Auditing Approach

Accessibility is not just about physical access but how an accessible experience is created and how the interpretation, curation and management of sensory interaction is maximized for every visitor or user of a park. Its understanding the nature and dynamics of a physical building, public realm, or open space to create an accessible and immersive *experience*. The intention is to go beyond physical access to a holistic approach covering the four pillars of accessibility:

- **Physical** – the provisions in the built environment or park that ensure equal access and movement of people with disabilities.
- **Sensory** – the communication of and provision for individuals with sensory impairments to include sound, texture, odors, temperature, lighting levels, and effects and proximity of others.
- **Social** – the authentic social processes and attitudes to make people with disabilities feel welcome.
- **Digital** – the accessibility of the digital environments of onsite content, websites, and apps to include people with disabilities.
6.4 Accessibility Starts at Home

To create an accessible park or facility, the City of Allen and its citizens need to understand and consider the implications of any changes and how that may impact on a customer journey wherever the touchpoint is. Some will be within the City of Allen’s control. Where external factors that may hamper an accessible experience and seek to influence those stakeholders that have control. Examples may include tourist information centers or website reviews of a park – do they have the correct information about access to the City of Allen sites?

Thinking about visiting a park or site
- Tourism industry
- Marketing
- Word of mouth
- Travel
- Accessibility
- Equipment
- Specialist disability media

Information
- Telephone
- Website
- Mobile apps
- Search engines
- Journey planners
- Travel apps
- Equipment
- Specialist disability media
- Access guides

Transportation to and from site
- Bus
- Car
- Taxi
- Parking
- Drop off
- Assistance
- Mobility equipment

Arrival
- Information
- Brochures and maps
- Visit planner
- Staff training
- Mobile apps
- IT accessibility
- Mobility services
- Equipment hire
- Access guides

Exploring sites
- Locations
- Special events
- Seating / rest areas
- Alternative formats
- Hearing loop systems
- Signage
- Assistance
- Accessible facilities

Food/drinks (if app)
- Dietary requirements
- Access to cafe area
- Accessible servery
- Hearing loop systems
- Seat and table access
- Accessible layouts
- Staff training

Washrooms and sanitary provision
- Locations
- Signage
- Design and layout
- Fixtures and fittings
- Accessible restrooms
- Accessible changing
- Feeding Rooms

Experience feedback
- Social media
- Word of mouth
- Links from City of Allen
- IT accessibility
- Specialist disability media
- Reviews by people with disabilities
To better understand a typical customer journey and to achieve the goals of Allen’s Parks, Recreation and Open Space Master Plan 2021-2031, detailed consideration is needed of each point identified. This has been highlighted within the report for the City of Allen’s consideration and further development where it is beneficial to do so to achieve the accessible experience. It is not possible for the City of Allen to have input into and impact on every aspect of the customer journey – the key is to identify those that the City of Allen does have an opportunity to enhance the customer journey. The journey starts from home and getting people to think about visiting, whetting their appetites.
### 6.5 Facility Accessibility Audit Process

The access audit was undertaken in three stages employing plans of the building/park, if available, and the checklists below. Every site was researched online prior to the survey then on actual site the following generalized order was used.

**Checklist 1:** Approach Routes, Exterior Fixtures and Crosswalks  
**Checklist 2:** Parking and ADA Compliant Parking Areas  
**Checklist 3:** External Ramps  
**Checklist 4:** External Steps  
**Checklist 5:** Entrances  
**Checklist 6:** Reception Areas and Lobbies  
**Checklist 7:** Corridors and Internal Surfaces  
**Checklist 8:** Internal Doors  
**Checklist 9:** Internal Ramps  
**Checklist 10:** Internal Stairs  
**Checklist 11:** Elevators  
**Checklist 12:** WCs: General Restrooms  
**Checklist 13:** ADA Wheelchair Accessible Toilet Compartments  
**Checklist 15:** Way Finding  
**Checklist 16:** Lighting and Acoustics  
**Checklist 17:** Emergency Exits  
**Checklist 18:** Building Management

The general order of a park checklist is:

**Checklist 1:** Approach Routes, Exterior Fixtures and Crosswalks  
**Checklist 2:** Parking and ADA Compliant Parking Areas  
**Checklist 3:** Entry Points  
**Checklist 4:** External Ramps/External Steps  
**Checklist 5:** Play Components and Use Zone – Ground & Elevated  
**Checklist 6:** Seating and Recreation Areas  
**Checklist 7:** WCs: General Restrooms  
**Checklist 8:** ADA Wheelchair Accessible Toilet Compartments  
**Checklist 9:** Sports Facilities / Changing Facilities  
**Checklist 10:** Way Finding  
**Checklist 11:** Other / Miscellaneous
Stage 1 – Pre-Visit information e.g Website

Stage 2 – On site information gathering

This is undertaken as a walkthrough audit and inspection of the park/building using the above checklists.

Stage 3 – Results and Recommendations

The report suggests improvements that can be made to the park/building. These range from small non-structural adjustments to possibly major structural alterations. It also gives an indication to priorities and costs.


Checklist 5: Play Components and Use Zone

1) Elevated Accessible Route
2) Use Zone
3) Ground Level Play Component
4) Elevated Play Component
6.6 Geographic Information System (GIS) Database Analysis

The Consultant team created and utilized a geodatabase using the ESRI ArcGIS system. The data structure was pre-programmed for the specific project requirements as detailed by the City. After collection, data was then logged into a project database and analyzed for compliance.

The City of Allen’s hard surface sidewalks and trails provides staff geographic data with:

- Positional information: the digital representation of a barrier conforms to the location found in the field.
- Attribute information: the digital representation of the conditions found in the field (% running slope, % cross-slope, inches of vertical separation, etc.).

Once the field data collection and validity checks were performed, the raw data was processed so it could be stored in the City’s centralized GIS database for analysis and reporting. Unique GIS processing that Cole executed on behalf of the City for this project included:

- Segmenting sidewalk collection lines for manageable reporting vehicles
- Unique nomenclature utilizing existing City identifiers and Cole produced identifiers

GIS played a pivotal role in the project from data acquisition (organizing the millions of data points generated during the study) to creating a geodatabase deliverable for asset management and compliance monitoring.

The City received all collected data from the Self-Evaluation in a GIS deliverable. Facility collected information was delivered via a point feature class with each site point equipped with the related audit report. Sidewalk and hard surface trail data was delivered via line work with related audit reports attached.
6.5 Priority Ratings & Definition

Each finding from data collection was assigned a priority for removal: “High, Medium, or Low.” Additionally, “Blue Sky” items which support inclusive practices, but are not strictly required per accessible design standards, were also noted by the collection teams. This priority level for removal represents the “severity” of a non-compliant element.

Severity: Ranking of “High, Medium, or Low” represents degrees of non-compliance, safety, and usability.

<table>
<thead>
<tr>
<th>Access Audit &amp; Suggested Action Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> HIGH PRIORITY – ADA Compliance breach, where there are potential health and safety risks or where failure to implement changes would be highly likely to attract legal implications. Immediate action is recommended to put changes into effect. Change would also make a substantial difference to the current accessibility.</td>
</tr>
<tr>
<td><strong>2</strong> MEDIUM PRIORITY - Where action is recommended within the short term to alleviate an access problem or make improvements that will have a considerable impact. These may include quick fixes that can be achieved easily with minimal cost.</td>
</tr>
<tr>
<td><strong>3</strong> LOW PRIORITY - Where action is recommended within the medium to long term to make improvements that will have an impact. These may include items that have considerable costs or should be considered as part of a long term refurbishment.</td>
</tr>
<tr>
<td><strong>4</strong> ‘BLUE SKY’ - Direct Access included where innovation or best practice may be worth considering that is not covered by or exceeds ADA requirements and which does not fit in the first three categories. This is known as ‘Blue Sky’ thinking.</td>
</tr>
</tbody>
</table>
An “activity” score was assigned to each site to allow the City to evaluate remediation priority at a project level. This activity score quantifies public level of use at a site. Combining the severity scores of a site and the “activity” score of a site provided a priority ranking used by the City in developing their Implementation Schedule.
7. Summary of Findings

7.1 Introduction

The Summary of Findings provides a high-level overview of the results of the Self-Evaluation for both policy review as well as the physical assessment of City parks and recreation facilities. Please see Section 5 for information regarding the scope included. Please see Section 6 for details on the methodology used to complete the assessments for ADA compliance.

7.2 Policy Assessment

An evaluation of the City’s current services, policies, and practices was completed as part of the update to the ADA Self-Evaluation. It identifies policies, procedures and practices that may not meet, or are inconsistent with, the requirements of the Title II regulations. To the extent modifications of the services, policies and practices are required; the City is expected to make such modifications.

Following approval of this Update, non-structural policy modifications are expected to be made as soon as is reasonably possible.

ADA Coordinator & ADA Liaisons

- Provide official title of ADA Coordinator to a City of Allen representative
- Introduce and provide ADA Coordinator Training through ADA National Network
- Establish central databases for complaints, accommodation requests and training
- Establish 2 ADA Liaisons within the Parks & Recreation Department

Policies & Procedures

- Develop a departmental policy on other power-driven mobility devices
- Develop a departmental policy on service animals
- Develop a departmental policy in accessible ticket sales
- Maintain a list of pre-qualified contractors that ensure ADA compliance
- Evaluate City leased properties to ensure ADA compliance

Program Access & Communication

- Identify alternate, accessible locations for facilities that are non-compliant
- Provide interpreters and captioning for City meetings
- Provide assistive listening devices for all public meetings
Staff Training

- Training developed to all learning levels
- Provide follow-up/refresher training
- Produce ADA supportive material for staff reference of City policies/procedures
- Establish a Disability Resource page on the City’s intranet
- Showcase case law (litigation) relevant to each department/division
7.3 Summary of Findings – Hard Surface Trails and Sidewalks

Celebration Park - RP2

Observations showed that many of the sidewalk and hard surface trail facilities within the Self-Evaluation scope comply with accessibility standards and guidelines.

The image on the left represents one of the reporting deliverables of the project that was produced for each site within the scope of the Self-Evaluation.
A. Trail/Sidewalk Quantity & Connectivity

Trail/Sidewalk Connectivity represents a gap in service or inadequate service. Missing trail/sidewalk was used by the collection team when missing trail/sidewalk created a gap between two sections of trail/sidewalk. “Buried” sidewalk was used by the collection team when debris, mud, or overgrown vegetation covered a trail/sidewalk. It is important to note that these gaps/inadequacies in service have possible solutions for remediation outside of installing new trail/sidewalk.

<table>
<thead>
<tr>
<th>Trail/Sidewalk – Quantity</th>
<th>Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Path Length Assessed</td>
<td>63.47</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trail/Sidewalk – Connectivity</th>
<th>Miles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connectivity Gaps (Missing)</td>
<td>.07</td>
</tr>
<tr>
<td>Buried Sidewalk</td>
<td>.03</td>
</tr>
</tbody>
</table>

B. Trail/Sidewalk Run Slope

*Where the Sidewalk is contained within the street or highway rights-of-way, Sidewalk Run Slope is permitted to match the general grade of the adjacent street or highway, according to PROWAG §R302.5.1

<table>
<thead>
<tr>
<th>% Slope</th>
<th>Miles</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5.00</td>
<td>62.29</td>
<td>Compliant</td>
</tr>
<tr>
<td>5.01-8.33*</td>
<td>1.04</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>8.34-10.00*</td>
<td>.1</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>10.01-12.00*</td>
<td>.04</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>12.01-25.00*</td>
<td>.01</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>Total</td>
<td>63.47</td>
<td></td>
</tr>
</tbody>
</table>
C. Trail/Sidewalk Cross Slope

Trail/Sidewalk Cross Slope, as depicted by arrow

<table>
<thead>
<tr>
<th>% Cross Slope</th>
<th>Linear Feet</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00 – 2.00</td>
<td>38.93</td>
<td>Compliant</td>
</tr>
<tr>
<td>2.01 – 3.00</td>
<td>12.87</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>3.01 – 4.00</td>
<td>6.58</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>4.01 – 5.00</td>
<td>3.03</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td>5.01+</td>
<td>2.06</td>
<td>ADA Concerns</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>63.47</strong></td>
<td></td>
</tr>
</tbody>
</table>

D. Trail/Sidewalk Poor Surface Condition

Poor Surface Condition is multiple measurements of vertical displacement in close proximity, consistent with broken/cracked panels, spalling, or other surface roughness. When surface condition issues were minor enough to not be captured by the ULIP-ADA, but still perceivable to the ULIP-ADA operator, the operator identified these areas as Damaged Panels. As such, Damaged Panels & Poor Surface Condition are mutually exclusive conditions.

<table>
<thead>
<tr>
<th>Poor Surface Condition</th>
<th>Square Yards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>791</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Damage Panels</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>113</strong></td>
<td></td>
</tr>
</tbody>
</table>
E. Trail/Sidewalk Poor Changes in Level (Heaves)

Changes in level, or heaves, are common issues found in trails/sidewalk for every community. Heaves are caused by many factors, including but not limited to tree root growth and changing soil conditions over time.

<table>
<thead>
<tr>
<th>Vertical Displacement (Heave)</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>≤ 1”</td>
<td>1224</td>
</tr>
<tr>
<td>&gt;1”</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>1,241</td>
</tr>
</tbody>
</table>

Trail/Sidewalk Heave

F. Trail/Sidewalk Obstructions

Obstructions are fixed items which restrict or protrude into the width of an accessible route. Vegetation growing overhead or alongside the path are common obstructions within park and recreation facilities for every community.

<table>
<thead>
<tr>
<th>Obstruction Type</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Utility Obstruction</td>
<td>10</td>
</tr>
<tr>
<td>Low Vegetative Obstruction</td>
<td>70</td>
</tr>
<tr>
<td>Overhead Vegetative Obstruction</td>
<td>45</td>
</tr>
<tr>
<td>Other Obstruction*</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>142</td>
</tr>
</tbody>
</table>

Trail/Sidewalk Obstruction – Overhead Vegetation Protrusion

*Other Obstructions could include bollards, retaining walls, handrails, and trash cans. This list is not exhaustive.
7.4 Summary of Findings – Facilities/Parks

Sites were found to have varying degrees of compliance with applicable accessibility standards. Below are some examples of common non-compliant findings throughout all sites.

Inaccessible Play Area Surface Material

Inaccessible Seating & Dinning Surfaces
Inaccessible Restroom Signage

Inaccessible Curb Ramps
Site Amenities or Features Without an Accessible Route

Coat Hooks Mounted Outside of Compliant Reach Ranges
Below are some examples of common “blue sky” recommendations made throughout all sites.

Obtaining adaptive play equipment and communication boards

Obtaining Tactile Braille Map Boards and Swell Paper Braille Maps
8. Transition Plan Details

The updated Transition Plan provides a schedule by which the City facilities will be prioritized within an implementation schedule that outlines timing for remediation over time. Detailed reports provide the barrier information and barrier removal options. These reports guide the City of Allen’s planning for barrier removal based on their priorities utilizing numerous strategies.

Not all barriers must be removed to provide program access. The highest priority is to remove those barriers that limit access to City programs or present safety concerns. Barrier priorities and ranking methodology are discussed in Section 4.6. Due to the volume of individual reports, the ADA Transition Plan Report summarizes the findings and addresses the City’s action plan to remove barriers over time. The individual reports will be available by contacting the ADA Coordinator for access to the detailed information.

8.1 City Official Responsible

The ADA Coordinator is responsible for ensuring that Allen programs, services, and activities are accessible to and usable by individuals with disabilities. The City’s ADA Coordinator is:

Zach Cain
Risk Manager
City of Allen
305 Century Parkway
Allen, Texas 75013
Phone: 214-509-4685
e-mail: coa@Cityofallen.com

For questions regarding the ADA Transition Plan, or to request an ADA accommodation or file an ADA complaint, please contact the ADA Coordinator or see:

https://www.Cityofallen.org/1688/ADA-Information
8.2 Prioritized Recommendations for Barrier Removal

The City of Allen may choose to modify priorities to allow flexibility in accommodating Community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, on-going evaluation, and funding constraints and opportunities.

It is not financially feasible to remove all barriers to access immediately. It is the goal of the updated ADA Transition Plan to provide access to the programs, activities, and services provided by the City. The City of Allen has on-going programs that monitor proposed alteration projects and include the review of the various accessibility concerns identified, in order to bring facilities to current ADA standards when projects take place. The City plans to remove barriers over time, as is indicated by the completed Implementation Schedule. Sidewalk corridors, trails, buildings, and parks identified barriers will be addressed based on their priority by the City and with available funds.

8.3 Implementation Schedule

Because the City of Allen has many parks and facilities, it is not possible to remove all barriers immediately. Prioritized barriers will be removed systematically, Citywide, to ensure equality among City programs. It is the intent of the City to address barriers to accessibility over many years, contingent upon City Council approval, depending on the immediate necessity, degree of complexity, and overall cost.

The City of Allen reserves the right to modify barrier removal priorities to allow flexibility in accommodating Community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, on-going evaluations, and funding constraints and opportunities.

In addition to CIP programs, other development initiatives will include opportunities to provide ADA compliance. The City may elect to apply an annually approved budget with ADA remediation components built into the budget, subject to City Council approval.
The City of Allen has approved $100,000 for Fiscal Year 2024-2025 to be dedicated to removal of accessibility barriers. It is anticipated this level of funding will continue annually, however it is subject to City Council approval.
9. Current ADA Policy & Grievance Procedure

9.1 Policy

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Allen will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

The City of Allen will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Allen, should contact the office of the City Secretary at 214-509-4107 or coa@Cityofallen.org as soon as possible but no later than 48 hours before the scheduled event.

9.2 Grievance Procedure Grievance Procedure Under the Americans with Disabilities Act

Pursuant to the Americans with Disabilities Act of 1990 (ADA), the City of Allen (“The City”) is providing this Grievance Procedure and associated forms to any persons wishing to file a complaint alleging discrimination by The City. Grievances may be filed on the basis of disability in the provision of services, activities, programs, or benefits by the City of Allen. The City of Allen accepts employment-related complaints through its Personnel Policy, under separate cover.

The complaint must be in writing and contain information about the alleged discrimination including name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints for any person with disabilities that hinder written submission will be made available upon request. Some alternate forms of documenting a complaint may include personal interviews or a tape recording of the complaint. The alternate form of documentation will then be transcribed by City Staff to record the concern. The attached form can also be used to file complaints.

The complainant and/or their designee, hereinafter referred to as Complainant, should submit the complaint as soon as possible, but no later than 60 calendar days after the alleged violation to:

City of Allen ADA Coordinator
City of Allen Human Resources Department
305 Century Parkway
Allen, TX 75013

Within 15 business days after receipt of the complaint, the City of Allen ADA Coordinator or their designee, hereinafter referred to as ADA Coordinator, will contact the Complainant to discuss the complaint and the possible resolution. The discussion could take place by meeting in person, by phone or other means. Within 15 business days of that discussion, the ADA Coordinator will respond in writing, and as needed, in a format accessible to the Complainant, such as large print, braille, or audio recording. The response will explain the position of the City of Allen and offer any possible option(s) for substantive resolution of the complaint, if they exist.

The Complainant may appeal the decision from the ADA Coordinator to the City Manager. The appeal shall be filed with the City Manager’s Office within 15 business days after receipt of the response from the ADA Coordinator. The City Manager or designee, at his/her discretion, may meet with Complainant in person to discuss reconsideration of the issue. In the absence of an appeal within this timeframe, the initial response from the ADA Coordinator will be deemed accepted.

Should Complainant file an appeal to the City Manager, within 15 business days after receiving the
appeal notification, the City Manager will respond in writing, and as needed, in a format accessible to the Complainant, with a final decision on the complaint.

The Complainant may appeal to the Department of Justice (DOJ) if the final decision from the City Manager is not deemed acceptable by the Complainant. The Complainant is then responsible for contacting, receiving, and providing any communications regarding the complaint to and from the DOJ.

All written complaints received by the City of Allen ADA Coordinator, appeals to the City Manager, and responses from these two offices will be retained by the City of Allen for three years from the date of the final resolution or dismissal of the complaint.
10. Appendix

Due to the size and nature of the extensive data collected, the files noted in these Appendices are not directly attached to the report but are available from the City upon request.

A. Policy & Practice Departmental Staff Survey
B. Sidewalk Corridor Compliance Reports
C. Buildings & Facility Reports