



Americans with Disabilities Act  
Transition Plan

January 2021

## Original Plan Prepared in 2021

The purpose of this Transition Plan is to provide formal guidelines and goals to improve accessibility throughout the city of Thornton (Thornton) and serve as a means of formal documentation of the procedures and progress that have already taken place in accordance with Title II of the Americans with Disabilities Act (ADA). This publication has been prepared by Alfred Benesch & Company in partnership with Thornton.

All information contained herein is expressly prepared for the sole use of Thornton. Should any portion of this publication be duplicated elsewhere, we request appropriate attribution for such usage.

## **Acknowledgements**

Many individuals were involved with the development of the ADA Transition Plan and other accessibility improvements within Thornton. The active participation of Thornton staff from multiple departments, City Council and leadership, and other stakeholders within the community indicates the level of engagement and commitment to improving accessibility in our Community. This assignment could not have been completed without the efforts and cooperation from the following:

**Thornton City Council**

**Thornton Department of City Development**

**Thornton Department of Parks, Recreation & Community Programs**

**Thornton Department of Infrastructure**

**Thornton Department of Management Services**

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## EXECUTIVE SUMMARY

The purpose of this Transition Plan is to provide formal guidelines and goals to improve accessibility throughout Thornton and serve as a means of formal documentation of the procedures and progress that have already taken place in accordance with Title II of the Americans with Disabilities Act (ADA). The ADA was enacted in 1990 and mandates equal opportunity for a qualified individual with a disability. Thornton's elected officials and staff believe promoting an accessible environment for all persons is essential to good customer service and consistent with the quality of life that Thornton residents desire. While Thornton has been improving accessibility within their limits for years, in 2020, Thornton initiated the process of developing a published ADA Transition Plan.

The self-evaluation process evaluates current practices utilized by the different city departments to provide accessibility to existing and new facilities and pedestrian facilities within the public right of way (ROW) and located in parks, trails, and open spaces owned, leased or operated by Thornton. Upon adoption of this Transition Plan, Thornton anticipates beginning the formal process to assess these city and pedestrian facilities. In conjunction with assessment efforts, Thornton will also create and update their databases to catalog existing accessibility conditions and improvements to pedestrian and city facilities.

The information gained from these evaluations will provide a basis for a more robust and holistic assessment of accessibility in and along city facilities; allow for planning and prioritizing removal of barriers; and further refine Thornton's strategy for any remaining assessments needed. This Transition Plan addresses proposed timelines for commencing assessments with anticipated associated costs and schedules.

During the development of this Transition Plan a review of city programs, procedures, and policies took place. This process involved meetings with several city departments to document existing information and identify potential needs, and an internal survey for city staff. Public involvement also took place during this period consisting of public surveys and an online website that were advertised using social media platforms, flyers, and direct stakeholder outreach.

This Transition Plan is a living document, intended to be periodically monitored and updated. Future updates to the Transition Plan will incorporate additional actions to continue Thornton's Transition Plan as well as document actions taken to remove barriers to accessibility and modify programs and procedures to increase accessibility.

## **1. Introduction & Project Background**

### **1.1 Project Purpose and Goal**

The purpose of this Transition Plan is to identify facilities, guidelines, standards, policies, procedures, and/or practices currently utilized or recommended for use to minimize or eliminate barriers to accessibility within Thornton. The goal is to provide safe and accessible city facilities and programs for all users while remaining in compliance with all federal, state, and local laws, regulations and standards. This Transition Plan is a living document to be reviewed and updated periodically.

This Transition Plan will assist Thornton with identifying both physical and non-physical barriers to accessibility and with developing solutions to increase the opportunity of accessibility to all individuals. The outcome of the self-evaluation, facility assessments, and public outreach will guide Thornton's efforts to modify its policies, practices, or procedures (as required by applicable law) to avoid discrimination against a qualified individual with a disability.

This Transition Plan describes the process Thornton will use to identify barriers to accessibility and to develop goals and recommendations to mitigate those barriers.

The main components for initially identifying barriers and developing goals included:

- Information gathering from city departments
- Performing an accessibility Self-Evaluation of Thornton's current practices, guidelines, standards, policies, and/or procedures identified during the information gathering
- Performing surveys (internal and external) to seek input on accessibility issues
- Designating an ADA Coordinator and Department ADA Contacts and their respective roles and responsibilities
- Developing a formal ADA complaint procedure

The Transition Plan also addresses training provided to Thornton employees regarding guidelines, standards, policies, procedures, and/or practices to minimize or eliminate barriers to access within Thornton.

Clarification on terminology and acronyms used throughout this Transition Plan are provided in Appendix A. The City Policy Regarding the ADA can be found in Appendix B.

### **1.2 Legal Requirements of the ADA**

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination based on disability. This comprehensive civil rights law further broadened the coverage of Section 504 of the Rehabilitation Act of 1973 and the Architectural Barriers Act (ABA) of 1968. The ADA consists of five titles outlining protections in the following areas:

- Employment (Title I)

- State and local government services (Title II)
- Public accommodations (Title III)
- Telecommunications (Title IV)
- Miscellaneous Provisions (Title V)

Title II of ADA pertains to the programs, activities and services public entities provide and extends the application of the ADA to include those provided by all state and local government entities. As such, policies, practices, and programs, must comply with the appropriate sections of the ADA when viewed in their entirety. This includes making reasonable modifications in policies, practices, and procedures that deny equal access to a qualified individual with a disability unless it would result in a fundamental alteration in the program. Thornton can provide services or benefits to a qualified individual with a disability through programs that are separate or different such that the separate or different measures are necessary to ensure that benefits and services are equally effective.

Title II of ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150 requires agencies to conduct a self-evaluation of its facilities, policies, practices, and programs and develop a Transition Plan to outline how reasonable accessibility improvements for a qualified individual with a disability, when needed, will be addressed. This Plan includes the findings of the self-evaluation and addresses areas of potential improvement as they pertain to facilities owned, leased or operated by Thornton. This Plan also identifies alternative methods of service delivery permissible under 28 CFR Part 35.150(a) and (b). While the ADA requires agencies to provide accessibility to all of its services, they are not required to remove all architectural barriers in all of their facilities. 28 CFR 35.150 states that the transition plan must include the following:

- Identify Physical and Programmatic Barriers
- Schedule and Method(s) to Mitigate Barriers
- Identify ADA Coordinator

The ADA requires the Transition Plan be submitted for public review before final approval and adoption. Open participation and feedback opportunities were provided throughout the development of the Transition Plan.

Certain elements of this Transition Plan (e.g., schedule) will be developed and refined as part of the updating process.

While the ADA requires agencies to reasonably modify their policies, procedures, and facilities to avoid discrimination towards persons with a disability, it is not required to remove all barriers in all situations. The ADA does not require Thornton to undertake any action that would fundamentally alter the intent of a program or activity, create a hazardous condition, or result in an undue financial burden.

## **2. Self-Evaluation**

Thornton must provide both program accessibility and physical accessibility as outlined within the ADA, to the extent reasonable. Programmatic accessibility includes all the policies, practices, and procedures

allowing people with disabilities an equally effective opportunity to participate in programs and services. Physical accessibility requires a service or facility to provide an accessible path free of barriers for users.

To assist in evaluating program and physical accessibility throughout Thornton, meetings were conducted with representatives from the different city departments to obtain information on existing policies and practices as they pertain to the ADA. Each department has different roles and responsibilities in the overall effort to providing an accessible city.

Prior to the development of this Transition Plan, Thornton created an ADA Task Force consisting of representatives from different city departments. The purpose of the ADA Task Force was to take a more holistic approach to improving accessibility throughout Thornton and to strengthen this effort through consolidation and collaboration. The ADA Task Force operates independently of individual city departments and the Transition Plan project team. Information provided by the ADA Task Force was incorporated into portions of the Transition Plan.

## **2.1 Programmatic Accessibility**

The ADA requires Thornton to evaluate current policies and practices to identify and correct any barriers inconsistent with the intent of the law. City department representatives have examined current practices and policies related to the ADA and proactively identified gaps in information or training to address in the Transition Plan. To further refine and understand accessibility issues needing to be addressed, Thornton met with department representatives and circulated a questionnaire to all city employees to obtain opinions and input on the following:

- Overall accessibility of Thornton’s facilities and programs,
- Forms and methods to advertise and communicate program’s services or activities,
- Level of staff training related to the ADA, and
- Existing accommodations available for a qualified individual with a disability to access these services.

A sample of the questionnaire and an overview of the responses are in Appendix C.

Thornton’s Parks, Recreation & Community Programs Department implemented Adaptive and Inclusive Recreation (AIR), as of mid-2019. AIR’s goal is to accommodate everyone, especially those marginalized and with disabilities, in programs throughout Thornton and provide additional programs specifically for a qualified individual with a disability through a welcoming and supportive community. The AIR program develops plans for inclusion using an assessment questionnaire, provides training to program staff as needed, supports the program staff with any necessary equipment or resources, and keeps open communication using inclusion support to make adjustments as needed. The Inclusion Policy, AIR Inclusion Request Form, AIR assessment, and a summary of the inclusion process can be found in Appendix D.

## **2.2 Physical Accessibility**

The Self-Evaluation included parameters for future accessibility reviews to identify physical barriers that may impede access to the programs, services and activities Thornton provides.

### **2.2.1 Facilities Survey**

For the purpose of the Transition Plan, publicly owned and leased facilities can be broken down into the following categories:

**Buildings**

- Public Access Buildings
- City Staff Access Buildings
- Restricted and Controlled Access Buildings

**Transportation Pedestrian Facilities**

- Curb Ramps
- Sidewalk
- Pedestrian Push Buttons & Signals

**Parks, Trails, & Open Spaces**

- Play Features
- Play Surfaces
- Accessible Paths
- Shared Use Trails
- Recreational Trails

Current inventories of city facilities are summarized in Appendix E (Buildings), Appendix F (Pedestrian Facilities), and Appendix G (Parks, Trails, & Open Space Facilities). Thornton does not assume responsibility for, nor intend to evaluate, private facilities as they pertain to accessibility.

**2.2.2 Method for Evaluations, Data Collection, and Processing**

As part of the self-evaluation process, Thornton outlined a future comprehensive evaluation strategy consisting of review and inventory of city-owned, leased, and operated buildings, pedestrian facilities, parks, trails, and open spaces to provide a representative baseline regarding the accessibility of facilities throughout Thornton and to identify and prioritize removal of barriers.

Evaluations for publicly owned, leased, and operated building facilities will consider standards and requirements contained in Chapter 11 of the International Building Code (IBC), which specifies use of ICC A117.1 - 2009 or the most recently adopted version (Handicapped/Accessibility Design Code) for accessibility conformance. The Americans with Disabilities Act Accessibility Guidelines (ADAAG) are considered as guidelines for improving accessibility beyond the minimum requirements outlined in Chapter 11 of the IBC. Examples of barriers to be assessed include accessibility of restrooms, protruding objects, path of travel obstructions within facilities, accessible door entrance mechanisms, and cross-slope violations. Non-compliant attributes of the various features evaluated will be cataloged in a database then categorized and addressed based on the Thornton’s prioritization matrix. This database will not include any private facilities not leased or occupied by Thornton.

Evaluation of publicly owned, leased, and operated pedestrian facilities will be based on current ADA and Thornton standards and will consider the standards within the 2011 Proposed Public Right of Way Accessibility Guidelines (PROWAG) published by the United States Access Board. Examples of items to be assessed include curb ramp geometry, grades, and condition; detectable warning panel presence; clear space; turning space; and pedestrian push button presence. The current PROWAG document has not been adopted or formally approved as a governing document but is widely recognized as a best practice and has been recommended for use by the Federal Highway Administration (FHWA) and the Colorado Department of Transportation (CDOT). Assessed items will be cataloged utilizing Thornton’s Geographic Information System (GIS) database. Thornton will also identify any curb ramps, pedestrian signals, or sidewalks within Thornton belonging to CDOT or other agencies.

It is anticipated evaluation criteria will be based on PROWAG standards for the individual elements being evaluated as well as the feature as a whole. The criteria will also assist in determining the level of severity barriers pose to accessibility. In an effort to identify barriers in the areas with the broadest

reaching impact to users, field evaluation efforts will target “high priority” corridors throughout Thornton. Additionally, in order to establish program schedules and budgets for the removal of barriers to accessibility throughout Thornton, field evaluations will be conducted in other representative areas. Establishing criteria for high priority corridors needs to be completed. An example of high priority corridor criteria may include proximity to public transit, government buildings, hospitals, arterial roadways, or dense commercial developments.

**TRANSITION PLAN GOAL:**

Establish assessment criteria for future field evaluations of public ROW pedestrian facilities and classify high priority corridors throughout Thornton to identify barriers.

Assessments on parks, trails, and open space facilities currently take place on a regular basis as they contain or provide access to play surfaces and playground equipment. General location, widths and alignments of trails are inventoried in Thornton’s GIS database. Evaluations on the various parks, trails and open space facilities are based on a combination of the AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities (AASHTO Pedestrian Guide), the Americans with Disabilities Act Accessibility Guidelines (ADAAG), and the Architectural Barriers Act (ABA).

**TRANSITION PLAN GOAL:**

Perform field evaluations of accessibility of parking stalls, parking aisles, sidewalk and curb ramps to access publicly owned, leased, and operated parks and open spaces and Thornton facilities.

Evaluations shall identify barriers to accessibility for elements of the facility or feature being evaluated. To be compliant, the facility or feature must satisfy established criteria specific to each facility or feature type and purpose. If one element of a facility or feature does not meet established criteria for determining accessibility, the facility or feature shall be considered to have a barrier even though it may be substantially compliant. Appendices H, I, and J provide information related to the facilities or features being surveyed and different elements to evaluate for determining barriers and for prioritizing corrective action. When deemed practical by Thornton, facility or feature accessibility information will be cataloged using Thornton’s GIS database for easy reference and query for internal staff.

**2.2.3 Overview of Findings**

Currently, Thornton owns, leases, and/or operates 31 buildings. Fifteen are open to or frequently visited by the public. Thirteen are restricted to employee-use only. Three are considered controlled access (buildings to which public access is restricted). There are approximately 10,000 curb ramp locations, 800 miles of sidewalk, 141 parks, and 133 miles of trails.

A current summary of findings for accessibility reviews performed and analyzed to date are provided in Appendix K (Buildings), Appendix L (Public ROW Pedestrian Facilities), and Appendix M (Parks, Trails, & Open Space Facilities). The Transition Plan will be updated as deemed necessary by the ADA Coordinator.

**3. Prioritize and Identify Goals, Strategies, & Schedules**

**3.1 Goals for the Program**

The overall goal of the Transition Plan is to improve accessibility to the programs, activities, and services provided by Thornton. To achieve this goal, Thornton will:

- Create and prioritize a list of identified barriers, generated strategies and methods that can be used to remove or reduce barriers achievable within fiscal constraints,
- Provide guidance to Thornton staff and the public on the requirements of the ADA and Thornton’s approach to improve accessibility,
- Develop a realistic schedule based on estimated available budget for the removal of barriers, and
- Recognize potential funding sources and opportunities to remove identified barriers.

### **3.2 *Prioritization of Barriers***

Historically, Thornton has largely relied upon formal and informal comments received to identify barriers to accessibility. These were addressed on a case-by-case basis as determined and prioritized by the department responsible for the facility or feature and based on available resources. This Transition Plan will enhance the current practice by attempting to proactively identify barriers to accessibility; provide a means to catalog facilities, features, and barriers associated with each; and provide a means to program and execute plans to remove barriers to accessibility as funding and other resources allow.

As with current practice, any non-compliance, regardless of location or type, identified from the grievance process will be prioritized and addressed on a case-by-case basis.

#### **3.2.1 *Prioritization of Barriers - Buildings***

For publicly accessible areas of Thornton owned, leased, or operated buildings, Thornton currently addresses accessibility issues as they are identified and as funds are available. Whenever possible, barriers are removed immediately, or they are programmed and scheduled for removal. In the event mitigating a barrier is not feasible, either from a technical or financial standpoint, the element is made as accessible as reasonably possible and/or a reasonable accommodation is provided.

Thornton is in the process of developing an evaluation and ranking system to help proactively identify physical barriers to accessibility in publicly accessible areas of Thornton owned, leased, or operated buildings. The ranking system will help categorize features determined to be non-compliant with Chapter 11 of the IBC by assigning functionality of the element as well as the difficulty to mitigate. Non-compliant building features will then be prioritized and programmed based upon their category, potential efficiencies gained during the implementation of other planned improvement projects, and available funding and resources.

#### **TRANSITION PLAN GOAL:**

Finalize evaluation approach and perform evaluations on as many publicly accessible spaces on buildings owned, leased, or operated by Thornton as allowed within the 2021 budget. Finalize matrix for Thornton to rank and prioritize issues and programs as funding allows.

#### **3.2.2 *Prioritization of Barriers – Transportation Pedestrian Facilities***

Currently, as street segments within the city are resurfaced as part of Thornton’s annual maintenance program, any adjacent noncompliant curb ramps are reconstructed, including by adding dome panels to curb ramps without detectable warning surfaces. Similarly, driveways adjacent to roadways being resurfaced are evaluated for trip hazards and corrected as needed. Sidewalk-related accessibility issues are evaluated and addressed both through periodic inspections and in response to citizen requests. Locations are prioritized and addressed through the annual budget process unless they can be immediately addressed utilizing existing resources.

Pedestrian crossings and pedestrian push buttons are reviewed and installed when absent on a case-by-case basis using engineering judgement. Pedestrian studies are conducted as needed to further evaluate when signalized crossings are warranted. When Thornton receives a request to install a curb ramp or remove a barrier, Thornton staff will contact the requesting individual to determine the provided route’s characteristics and evaluate the feasibility of the proposed improvements and availability of other accommodations. Pedestrian push buttons found to be inoperable by staff or reported by the public are addressed as part of annual preventative maintenance.

**TRANSITION PLAN GOAL:**

Develop formal guidance on preferred locations and accommodations for pedestrian street crossings. Guidance should address maximum spacing between street crossings and criteria for pedestrian signals and pushbuttons.

**TRANSITION PLAN GOAL:**

Develop a ranking system to help prioritize and schedule implementation of accessibility improvements on pedestrian facilities along Thornton’s transportation network considering the level of severity of a barrier’s impact to accessibility while acknowledging fiscal constraints. The ranking system should consider the location, level of use by the public, proximity to public facilities and public transit, severity of barriers, geographic distribution, and/or cost.

**3.2.3 Prioritization of Barriers – Parks, Trails and Open Spaces**

The Parks, Recreation, and Community Programs department currently addresses most barriers on a case-by-case basis. Play surfaces for park areas generally consist of engineered wood fiber and are re-filled, leveled, and maintained on a bi-annual basis. Playground equipment is generally maintained on a regular schedule and replaced as needed. Typical life cycles for playground equipment range from 12 to 15 years. A five-year replacement list is maintained and updated based on age and condition of equipment assessed. There are currently two large playgrounds in the system – Carpenter Park and Northern Lights Park – which are accessible. The city plans to add more in the future. Other playgrounds have at least one piece of equipment that is accessible. There are many shelters available to the public in the parks, but not all of them are currently accessible. Through this Transition Plan, shelters and other features will be updated and made accessible.

**TRANSITION PLAN GOAL:**

Perform field evaluations on Carpenter Park and Northern Lights Park to confirm they are barrier-free and accessible, and identify and remove remaining barriers. Develop an approach and schedule to evaluate the remaining Thornton parks in subsequent years based on geography, park usage, unique play features, programs (i.e., festivals, events), funding and replacement schedule.

**TRANSITION PLAN GOAL:**

Expand GIS database to capture park features (playground equipment, picnic tables, etc.), park types (dog park, baseball field, etc.), additional trail data such as pavement type, trail condition, other features, and accessible parking spaces to help Thornton determine where funds should be directed to increase accessibility of the parks and trail systems.

**3.3 Strategies to Improve Accessibility**

Implementing physical infrastructure and structural changes will take time and resources to properly plan, design, and upgrade existing facilities and remove identified barriers. Public projects currently require ADA compliance and are reviewed by city staff or designated representatives. Private projects are required to be ADA compliant to the extent accessibility features are required by the building code and applicable laws.

Additionally, Thornton plans to include annual budgetary allotments for projects targeting accessibility on top of what is currently programmed, with emphasis given to the removal of barriers based on the Transition Plan priorities. Where access cannot immediately be provided, interim measures are to be explored and potentially implemented to provide programmatic access to a qualified individual with a disability pending the remediation of physical barriers.

It is anticipated a majority of the physical accessibility improvements on Thornton owned, leased or operated facilities and ROW will be performed in conjunction with other projects and activities occurring within Thornton. The following illustrates the efforts most anticipated and how each may improve accessibility:

**New Construction Projects:** Work involving constructing new facilities or pedestrian features in locations within current or future public ROW shall provide accessible features in the project that meet current ADA design standards.

**Improvements Projects:** Work involving improving existing public ROW pedestrian facilities will provide new or necessary upgrades to existing features in the project area to meet current ADA design standards. Such projects may include road widening as part of Thornton’s Capital Improvement Program with associated sidewalk improvements or a remodel of an existing facility. Accessibility improvements within the public ROW are achieved through private in-fill projects on frontage improvements consistent with applicable section of the City Code. Typically, one to three parks are replaced annually.

**Major Maintenance and Rehabilitation Projects:** Work involving any alteration or major maintenance activity performed on transportation assets in the existing public ROW or Thornton facilities shall provide or upgrade accessible features in, or immediately adjacent to, the project

to meet current ADA design standards to the extent feasible without undue burden. Such projects shall include any project requiring pavement reconstruction, major pavement rehabilitation, public sidewalk improvements, re-paving of a parking lot, replacing of flooring or the reconstruction of accessibility facilities caused by private permittees. Parks are generally inspected weekly with repairs to specific components or replacement of entire pieces of equipment.

**Routine Maintenance & Repair Projects:** Minor or routine maintenance activities (patching, sealing, replacing signs, repairing door fixtures, etc.) limited to specifically repairing spot areas or locations directly affecting accessibility will include upgrades or improvements that meet current ADA design standards when required or when such improvements are consistent with the scope of the activity being performed. Park play surfaces are re-raked throughout the seasons and refilled as needed during winter months.

Currently, Thornton is in the process of updating its Transportation Master Plan and completing the Parks, Recreation & Community Programs Strategic Plan. Thornton anticipates that the Parks, Recreation & Community Programs System Master Plan will be fully updated in 2022 after a rigorous process that will include all of the Divisions in the department. One of the primary focuses of both of these plans will be to improve mobility and accessibility to users.

On-going training (both internal and external) for city staff is being put in place to increase their knowledge of the ADA and improve accessibility. Thornton intends to hold in-house training seminars to educate city staff on the basics of the ADA such as how to interact with someone who has a disability and what resources are available for alternative effective communication. These training seminars will include all city employees. Additionally, technical training for design and construction requirements will be made available to city staff.

**TRANSITION PLAN GOAL:**

Identify technical training opportunities and resources for different city departments.

**3.4 Implementation Schedule**

Thornton plans to address and remove barriers to accessibility systematically based upon the priorities outlined in the Transition Plan using established program priorities, available funding, and standard city processes and procedures.

Any non-compliance regardless of location or type identified from the grievance process will be addressed and prioritized on a case-by-case basis.

Thornton reserves the right to modify the removal of barriers to accessibility priorities in order to allow flexibility in addressing reasonable accommodations for persons with disabilities, community requests, changes in city programs or facility usage, funding availability and constraints, and opportunities with similar capital improvement projects.

Current program level schedules for identified removal of barriers to accessibility are shown in Appendix N.

**TRANSITION PLAN GOAL:**

Develop projected timeline to remove barriers to accessibility in order to assist with budgeting decisions. Develop ADA checklists to assist city Staff with design review and construction oversight.

**4. Procedures, Standards and Practices**

**4.1 New Construction and Alterations**

The ADA Standards and Specifications described in this section are intended to apply to all construction within Thornton that is required to adhere to city requirements.

Currently for building design, Thornton utilizes Chapter 11 of the International Building Code (IBC), which specifies use of ICC A117.1 – 2009 (Handicapped/Accessibility Design Code) for accessibility conformance. For pedestrian facilities within the public ROW, Thornton’s standards are based on the previous ADAAG published by the United States Access Board. Parks, trails, and open space facilities standards are currently based on the AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities, in addition to city standards based on ADAAG.

In addition to the technical training outlined in Section 3.3, ADA checklists will be created to further assist city staff in their effort to achieve accessibility on new improvements. These checklists are not intended to replace referenced ADAAG requirements and PROWAG guidelines but assist staff with design review and construction oversight.

**TRANSITION PLAN GOAL:**

Develop ADA checklists to assist city Staff with design review and construction oversight.

Thornton is in the process of updating standard details and construction specifications considering 2011 Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG) for transportation facilities. In the interim, Thornton typically utilizes the 2010 ADAAG and Colorado Department of Transportation (CDOT) standards as a reference. CDOT standards are available at:

<https://www.codot.gov/business/designsupport/>

**TRANSITION PLAN GOAL:**

Examine current Thornton engineering standard details and evaluate incorporation of PROWAG guidelines.

To account for construction tolerances and to avoid exceeding listed thresholds, designers and construction crews should use specified slopes and dimensions below the maximum and above the minimum requirements stated in the applicable accessibility compliance standards while maintaining positive drainage.

In alterations to existing facilities, where compliance with applicable standards and specifications is technically infeasible or would result in undue burden, the alteration will be required to conform to

standards to the maximum extent possible. Such exceptions will be documented on the Design & Construction Exception Form contained in Appendix O and submitted to the ADA Coordinator or designated city staff for their recordkeeping.

Future Applicable Federal and State Code Revisions: All future enactments and revisions to legally applicable Federal or State accessibility codes, standards or guidelines, will be incorporated into these ADA Codes and Standards to the extent that such enactments or revisions exceed the requirements contained herein. Nevertheless, such enactments or revisions will not decrease any requirement as contained herein.

#### **4.2 Program Access and Effective Alternative Communication**

A large part of the effectiveness of increasing accessibility and complying with the ADA is taking appropriate steps to ensure that communications with persons with disabilities are as effective and complete as communications with others. To effectively communicate with a qualified individual with a disability, Thornton provides alternative effective communication methods, including but not limited to, sign language interpreters, assistive devices, Braille, and large print text when requested and available. Across the different city departments, there are varying levels of access to auxiliary aids and resources available for use by programs upon request and dependent on level of public interaction. The departments work with each other to provide auxiliary aids and resources whenever reasonably possible.

**TRANSITION PLAN GOAL:**

Dedicate and develop internal resources for ease of use and access to alternative forms of communication when requested by a person with a disability in a timely manner. This includes obtaining TTD/TTY phone lines or a similar relay system.

During the self-evaluation process, some inconsistencies were noted with regard to the presence of Braille on permanent signage throughout city facilities. These identified inconsistencies will be remedied to the extent required.

**TRANSITION PLAN GOAL:**

Perform inventory on indoor permanent signage throughout city facilities to determine where Braille is present and replace signage which does not include Braille where required.

Thornton strives to provide access to its programs for all citizens. Beyond physical access, this includes program access. Because the nature of communications differs from program to program, there is flexibility in determining effective communication solutions. The goal is to find a practical solution that fits the specific situation.

Thornton's goal is to provide accessible routes in all facilities and other program locations so that services, programs and activities offered in such facilities are accessible to everyone. However, this does not in all instances require Thornton to remove physical barriers in all existing buildings, provided that city programs are made accessible to qualified individuals. When appropriate, this can be achieved by providing such services, programs, and activities through alternative methods, such as:

- Relocating a service to an accessible location within the facility

- Providing a service at multiple locations within the facility with at least one location being accessible
- Providing an auxiliary aide to enable a qualified individual with a disability to obtain the service
- Providing benefits or services at an alternative accessible site

Integration and inclusion of a qualified individual with a disability into the general public is a fundamental purpose of the ADA. Whenever feasible, standard city practice is to not provide services or benefits to a qualified individual with a disability through programs that are separate or different, unless the separate programs are necessary to ensure the benefits and services are equally effective. While reasonable accommodations are made available when practical, Thornton does not require a qualified individual with a disability to accept a special accommodation or benefit.

### **4.3 Public Information Sharing**

Thornton makes information available to all applicants, participants, beneficiaries, and interested persons regarding the provisions of the ADA and its applicability to the services, programs or activities of Thornton. Thornton is committed to sharing information with the public regarding efforts to improve accessibility throughout Thornton. Information sharing occurs mostly through contact with the ADA Coordinator, Thornton’s webpage, press releases and other public notifications, and other typical public outreach methodologies. While most public notifications and invitations include some method for requesting accessibility accommodations or information (e.g., signers, ESL, TTYD/Closed Captioning), it lacks standardization across departments.

**TRANSITION PLAN GOAL:**

On all communications sent to the public inviting them to city-run meetings, open houses, events, etc., include standard language notifying those who require accommodations of who to contact, how to contact them, and the date by which requests should be made.

In June of 2019, Thornton launched a new website and began using tools through the World Wide Web Consortium (W3C) to audit website accessibility issues. These tools are used to help Thornton improve and meet standards and guidelines included in Section 508 of the Workforce Investment Act of 1998, Web Content Accessibility Guidelines (WCAG), and the Americans with Disabilities Act (ADA). Additional updates planned include more accessibility options on the website for individuals with hearing and visual impairments such as text to audio.

### **5. Public Involvement**

Thornton created and distributed information about the development of the formal Transition Plan to encourage the public, advocacy groups, and other stakeholders to provide input and identify areas of concern.

This was accomplished with the creation of an ADA Transition Plan webpage within Thornton’s website providing updates and soliciting input. Another method of soliciting input for the Transition Plan was through a public survey made available in a variety of formats. Thornton advertised the public survey using multiple social media outlets and by distributing a bi-lingual flyer to parties that have no or diminished access to the internet, such as senior citizens and low-income residents. Input received from the survey and meetings was evaluated and included in Appendix P.

A draft version of the updated Transition Plan was made available to the public for a review period on the Transition Plan webpage from February 8, 2021 through March 10, 2021 soliciting comments and feedback.

Appendix P shows the different forms of public involvement used during the development of the Transition Plan and the results of the public survey.

## **6. ADA Coordinator Role & Responsibilities**

The ADA requires public entities with fifty (50) or more employees to designate one or more individuals as responsible employees for monitoring compliance with and investigating potential violations of the ADA. While the law does not require the use of the term “ADA Coordinator”, it is commonly used across the country. This individual is the primary point of contact for a qualified individual with a disability to:

- Request auxiliary aids and services, policy modifications, and other accommodations;
- File a complaint with Thornton regarding accessibility to city programs, activities, and services; and

This individual is also the point person for addressing ADA concerns from the public and from other departments and employees of the public entity.

The ADA Coordinator is responsible for the implementation of this Transition Plan. The ADA does not require Thornton to undertake any action that would result in a fundamental alteration in the intent of its program or activity, would create a hazardous condition, or would represent an undue burden. Undue burden exists when a significant difficulty or expense relative to the nature and cost of the accommodation in relation to the size, resources, and facility of the specific operation. The determination that a proposed action or accommodation does or does not represent an undue burden to the city will be based on an evaluation of all resources available for use in the programs and will be reached through collaboration between the ADA Coordinator, the Department Head, and the City Attorney’s Office on a case-by-case basis. A determination of undue burden will be accompanied by a statement citing the reasons for reaching the conclusion.

To support the ADA Coordinator and Thornton’s effort of improving accessibility, Thornton currently has staff designated in various Departments to assist with improving accessibility. This system allows for each department and Thornton collectively to better address the needs of employees and citizens with disabilities. Each department designates a Departmental ADA Contact to collaborate with Thornton’s ADA Task Force and Thornton’s ADA Coordinator regarding the needs of their department and the programs their department is responsible to manage. The benefit of having a Departmental ADA Contact for each department is the availability of a departmental subject matter expert and someone with knowledge of department operations and budgets for the ADA Task Force to work with. Thornton’s ADA Coordinator, or designee, will follow-up with each Departmental ADA Contact to coordinate the implementation of plans, programs, policies, and procedures and to determine any undue burden specific to that department.

Appendix Q identifies the office, address, and telephone number of Thornton’s ADA Coordinator. This position is currently performed by a Thornton staff member with other day to day responsibilities. The

Department ADA Contacts, ADA Task Force, and other designees are typically utilized to fulfill the duties associated with this position.

**TRANSITION PLAN GOAL:**

Create an ADA Coordinator position at Thornton whose main responsibility and focus is related to ADA compliance, support and increasing accessibility.

**7. Complaint & Grievance Procedure**

Establishing a complaint and/or grievance procedure to provide prompt and equitable resolution of complaints is required for public entities with over fifty (50) employees. Equally important to Thornton, it ensures its citizens have a clear, established process for being heard and responded to in an accurate and timely manner. Formalizing the process allows for transparency and timely resolution to issues brought to Thornton’s attention.

Thornton currently has a formal grievance procedure in place to provide citizens with a way to file complaints regarding accessibility and a documented method for Thornton to handle complaints. Appendix R identifies Thornton’s grievance procedure and responsibilities with regard to filing, investigating, and initiating a response and the grievance procedure form.

In the event available funds are insufficient for responding to grievances that request barrier removal or structural modifications, improvements will be prioritized and scheduled.

**8. Monitoring & Updating Transition Plan**

The ADA Coordinator will review the Transition Plan on an annual basis, or more frequently as necessary, to update it as deemed appropriate to address progress towards improving accessibility and to provide for any Transition Plan modifications. The ADA Coordinator will work with the different city department ADA contacts and appropriate staff during these reviews to identify updates and incorporate new information pertaining to accessibility and the ADA into the Transition Plan. Public comments or suggestions received will be incorporated as deemed appropriate.

**8.1 Database Management**

As new facilities or features are constructed or re-constructed such as curb ramps, sidewalks, pedestrian pushbuttons, play surfaces, and play features, Thornton will update its GIS database or matrices to reflect these improvements. Updating these databases will allow Thornton to monitor accessibility in specific areas, as well as Thornton’s overall assets. The databases can also be used to re-prioritize and allocate budget appropriately. Databases are intended to be a tool to assist Thornton with identifying accessibility issues and improvements and not to be the sole method for determining accessibility improvement projects.

**8.2 Summary of Transition Plan Goals**

Below is a summary of the current Transition Plan Goals listed throughout this document. Thornton's ADA Coordinator will monitor and update these goals regularly.

- Establish assessment criteria for future field evaluations of public ROW pedestrian facilities and classify high priority corridors throughout Thornton to identify barriers.
- Perform field evaluations of accessibility of parking stalls, parking aisles, sidewalk and curb ramps to access publicly owned, leased, and operated parks and open spaces and Thornton facilities.
- Finalize evaluation approach and perform evaluations on as many publicly accessible spaces on buildings owned, leased, or operated by Thornton as allowed within the 2021 budget. Finalize matrix for Thornton to rank and prioritize issues and program as funding allows.
- Develop formal guidance on preferred locations and accommodations for pedestrian street crossings. Guidance should address maximum spacing between street crossings and criteria for pedestrian signals and pushbuttons.
- Develop a ranking system to help prioritize and schedule implementation of accessibility improvements on pedestrian facilities along Thornton's transportation network considering the level of severity of a barrier's impact to accessibility while acknowledging fiscal constraints. The ranking system should consider the location, level of use by the public, proximity to public facilities and public transit, severity of barriers, geographic distribution, and/or cost.
- Perform field evaluations on Carpenter Park and Northern Lights Park to confirm they are barrier-free and accessible and identify and remove remaining barriers. Develop an approach and schedule to evaluate the remaining Thornton parks in subsequent years based on geography, park usage, unique play features, programs (i.e., festivals, events), funding and replacement schedule.
- Expand GIS database to capture park features (playground equipment, picnic tables, etc.), park types (dog park, baseball field, etc.), additional trail data such as pavement type, trail condition, and other features, and accessible parking spaces to help Thornton determine where funds should be directed to increase accessibility of the parks and trail systems.
- Identify technical training opportunities and resources for different city departments.
- Develop projected timeline to remove barriers to accessibility in order to assist with budgeting decisions. Develop ADA checklists to assist city staff with design review and construction oversight.
- Examine current Thornton engineering standard details and evaluate incorporation of PROWAG guidelines.

- Dedicate and develop internal resources for ease of use and access to alternative forms of communication when requested by a person with a disability in a timely manner. This includes obtaining TTD/TTY phone lines or similar relay system.
- Perform inventory on indoor permanent signage throughout city facilities to determine where Braille is present and replace signage which does not include Braille where required.
- On all communications sent to the public inviting them to city-run meetings, open houses, events, etc., include standard language notifying those who require accommodations of who to contact, how to contact them, and the date by which requests should be made.
- Create an ADA Coordinator position at Thornton whose main responsibility and focus is related to ADA compliance, support and increasing accessibility.

## APPENDIX A – TRANSITION PLAN TERMINOLOGY

**Accessible Pedestrian Signal** – An integrated device that communicates information about the pedestrian walk phases in non-visual formats.

**Accessible Route** – a continuous, unobstructed path connecting all accessible elements and spaces including public transportation facilities, parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps and lifts.

**ABA** – means and refers to the Architectural Barriers Act which requires facilities designed, built, altered, or leased with funds supplied by the United States Federal Government be accessible to the public.

**ADA** – means and refers to the Americans with Disabilities Act as contained and explained in Title 42, Chapter 126 of the United States Code.

**ADAAG** – ADA Accessibility Guidelines set forth at 36 CFR part 1191, together with appendices B (Scoping) and D (Technical) thereto.

**Adaptive and Inclusive Recreation (AIR)** – a program to assess, accommodate, and include marginalized and qualified individuals with a disability in all programs, as required by the ADA law. This program is managed by the Parks, Recreation & Community Programs department.

**Auxiliary Aids and Services** – services and devices promoting effective communication or allowing access to goods and services as defined by Titles II and III of the ADA.

**Complaint** – a claimed violation of the ADA.

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

**Detectable Warning** – a surface of truncated domes, built in or applied to a walking surface that are detectable underfoot. Detectable warnings are typically pre-fabricated and installed or stamped into a walkway, providing a tactile surface at the transition from a curb and the street or other hazardous vehicular crossings, assisting pedestrians with vision disabilities in determining when they enter the street.

**Disability** – a physical or mental impairment that substantially limits one or more of the major life activities of an individual; or a record of such an impairment; or being regarded as having such an impairment, as described in Title II of the ADA.

**Facility** – All or any portion of buildings, structures, sites, complexes, equipment, rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real or personal property, including the site where a building, property, structure, or equipment is located.

**Pedestrian Rights-of-Way (PROW)** – sidewalks, curb ramps, crosswalks serving such sidewalks, and any other designated routes or pathways used by pedestrians along public rights of way.

**Physical or Mental Impairment** – any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary,

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immune, circulatory, hemic, lymphatic, skin, and endocrine; or any mental or psychological disorder, such as an intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

### **Program Accessibility**

Thornton's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by a qualified individual with a disability.

**PROWAG** – (Proposed) Public Rights-of-Way Accessibility Guidelines published by the United States Access Board. This document provides guidelines for public rights-of-way addressing various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain.

**Qualified Individual with a Disability** - an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.

**Reasonable Accommodation** – reasonable changes or adjustments that provide, without undue burden or fundamental alteration of the nature of the service, program, or activity, a means for a qualified individual with a disability to participate in or receive a service, program, or activity. Where existing physical constraints make it impractical for altered elements, spaces, or facilities to fully comply with new construction requirements, compliance is required to the extent practicable within the scope of the project. Existing physical constraints include, but are not limited to, underlying terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature.

**Undue Burden** – significant difficulty or expense. In determining whether an action would result in an undue burden, factors to be considered include: (1) the nature and cost of the action needed; (2) the overall financial resources of the site or sites involved in the action; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements that are necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the site; (3) the geographic separateness, and the administrative or fiscal relationship of the site or sites in question to the public entity; (4) if applicable, the overall financial resources of the public entity; the overall size of the public entity with respect to the number of its employees; the number, type, and location of its facilities; and (5) if applicable, the type of operation or operations of the public entity, including the composition, structure, and functions of the workforce of the public entity.

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## APPENDIX B – THORNTON POLICY REGARDING THE ADA

### **NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT (JUNE 2020)**

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

#### **Employment:**

Thornton does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

#### **Effective Communication:**

Thornton will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Thornton's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

#### **Modifications to Policies and Procedures:**

Thornton 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 Thornton should contact the Thornton's ADA Coordinator at 303-538-7334 or [adacoordinator@thorntonco.gov](mailto:adacoordinator@thorntonco.gov) as soon as possible, but no later than 48 hours before the scheduled event.

The ADA does not require Thornton to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden. Complaints that a program, service, or activity of Thornton is not accessible to persons with disabilities should be directed to the ADA Coordinator at 303-538-7334 or [adacoordinator@thorntonco.gov](mailto:adacoordinator@thorntonco.gov).

Thornton will not place a surcharge on a particular qualified individual with a disability or any group of qualified individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

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APPENDIX C – INTERNAL STAFF QUESTIONNAIRE AND RESULTS

## APPENDIX D –ADAPTIVE AND INCLUSIVE RECREATION (AIR) PROGRAM

### **Inclusion Policy**

Thornton includes people of all abilities in our Parks, Recreation, and Community Programs activities. We strive to not only meet the requirements of the ADA but to create a welcoming and supportive community. If you see a program offered in any of the Activities Guides, in which you wish to participate, but require accommodation, please submit an Inclusion Support Request Form, answer yes on the related question during registration, or contact the AIR Coordinator directly. A confidential assessment may be completed to determine what reasonable accommodations or inclusion support is needed. When possible, please submit requests at least two weeks in advance of your desired start date. For more information, please contact Becky Post, AIR Coordinator at 720-977-5702 or [becky.post@thorntonco.gov](mailto:becky.post@thorntonco.gov)

# Inclusion Support/ADA Accommodation Request Form

1. Please contact Becky Post, Adaptive and Inclusive Recreation (AIR) Coordinator with questions at [Becky.post@ThorntonCO.gov](mailto:Becky.post@ThorntonCO.gov) or 720-977-5702.
2. When possible please complete the Inclusion Support/ADA Accommodation request form 2 weeks prior to the start of service.
3. The AIR Coordinator will contact you to conduct a voluntary assessment of the participant and will provide a recommendation to all parties involved. The purpose is to determine appropriate inclusion supports or accommodations for the program to be inclusive.
4. Thornton Recreation reserves the right to deny a request if the information provided by or on behalf of the participant does not support the requested program modification, the participant does not meet the essential criteria of the program, this participant would present a threat to the safety of other participants, the requested accommodation would present an undue financial or administrative burden for Thornton, or the participant or requested accommodation is otherwise not within the scope of the Americans with Disabilities Act.
5. Personal needs assistance: Unless otherwise noted, accommodations provided by Thornton will not include assisting the participant with personal needs such as feeding, administering medication, using the restroom or dressing. You will be solely responsible for arranging for such assistance.

<b>First name:</b>	<b>Last name:</b>
<b>Parent/Guardian name:</b>	
<b>Primary Phone:</b>	<b>Secondary Phone:</b>
<b>Email:</b>	<b>Date of Birth:</b>
<b>Describe the support/modification you are requesting:</b>	

**ADAPTIVE AND INCLUSIVE RECREATION (AIR) ASSESSMENT**

*Completion of this form is voluntary. Only information related to the accommodation requested need be provided.*

Participant Name: \_\_\_\_\_ Age: \_\_\_\_\_ DOB: \_\_\_\_\_

Diagnosis: \_\_\_\_\_ Date of Onset: \_\_\_\_\_

Parent/Guardian: \_\_\_\_\_ Phone: \_\_\_\_\_

Emergency Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

What is your relationship to the participant? \_\_\_\_\_

Do you have legal decision-making authority for the participant? \_\_\_\_\_

In what program at which facility does the participant wish to engage? \_\_\_\_\_

What are some of the participant's interests/strengths? \_\_\_\_\_

Are there any sensory needs our staff should be aware of? (loud noises, touch, etc)

Are there any medical concerns our staff should be aware of? (Seizures, allergies, etc)

If Down syndrome is a diagnosis, does participant have Atlanto-Axial Instability? YES\_\_ NO\_\_ Date of onset\_\_

**Getting to know the participant's needs: Please identify which number best matches the participant's needs.**

**Key:** 3 = Independent      2 = Needs Some Assistance      1 = Dependent on Assistance

**Physical:**

Sitting:                      3                      2                      1                      \_\_\_\_\_

Standing:                    3                    2                    1                    \_\_\_\_\_

Changing Position:        3                    2                    1                    \_\_\_\_\_

Getting around:            3                    2                    1                    \_\_\_\_\_

How does the participant ambulate?                      W/C                      Ambulatory                      Adaptive Equipment

Vision:                      Intact                      Impaired                      \_\_\_\_\_

Hearing:                    Intact                    Impaired                    \_\_\_\_\_

Speech:                      Intact                      Impaired                      \_\_\_\_\_

**Communication:**

Listening and understanding:                      3                      2                      1                      \_\_\_\_\_

Communicating needs/wants:                      3                      2                      1                      \_\_\_\_\_

Participating in conversation:                      3                      2                      1                      \_\_\_\_\_

**Participation:**

Responding to new experiences:	3	2	1	_____
Meeting new people:	3	2	1	_____
Completing tasks:	3	2	1	_____
Transitions:	3	2	1	_____

**Emotional/Behavioral:**

Are there any specific goals you are working on? \_\_\_\_\_

Can you share any interventions you currently use? (rewards, techniques, phrases/words, etc)

Does the participant display any negative behaviors? \_\_\_\_\_

Does the participant display any aggressive behaviors? \_\_\_\_\_

Does the participant display any sexual behaviors? \_\_\_\_\_

What triggers these behaviors? \_\_\_\_\_

Comments: \_\_\_\_\_

**Community:**

Bathroom reminders:	1:1	-----	-----	verbal prompting	NA
Safety awareness:	1:1	close	line-of-sight	verbal prompting	NA
Open spaces:	1:1	close	line-of-sight	verbal prompting	NA

Comments: \_\_\_\_\_

**Swimming:**

Comfort in water: 1:1 close line-of-sight

What is the participant's history of swim lessons? \_\_\_\_\_

Comments: \_\_\_\_\_

**Previous Program Experience:**

What are some programs the participant has enjoyed in the past? \_\_\_\_\_

Any other information you would like to share? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Recommendations:**

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\*Information provided is confidential and will only be used by staff/volunteers working with this participant.

\*Please sign to acknowledge that the information provided is correct to the best of my knowledge.

Parent/Guardian Signature: \_\_\_\_\_ Date: \_\_\_\_\_

If information collected verbally: Name of participant/guardian: \_\_\_\_\_

Name of Employee: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**AIR Inclusion Process**

1. Initial contact made for inclusion  
Option 1: WebTrac/RecTrac Automatic Pop up on all registrations:  
**Would you like to request ADA accommodation or inclusion support services for participation in this program?**
  - o **No** (they are required to select yes/no)
  - o **Yes** (if yes, you will be contacted by Inclusion Coordinator)
    - I also have an Inclusion Support Service request form that coordinators or other staff can offer to people in case they didn't check the box or until we get that live on Rec Trac.  
Option 2: Participant submits AIR Inclusion Request form
  - Available in person at any rec center
  - Available online on the registration information page [www.gocot.net/registration](http://www.gocot.net/registration) under Inclusion Policy or AIR webpage [www.gocot.net/AIR](http://www.gocot.net/AIR)
  
2. Coordinator reaches out to those who submitted requests or checked yes to complete an assessment (over the phone or in person) and discuss needs. If something simple like sign language interpreter or wheelchair accessible van, I will bypass the full assessment.
  
3. Coordinator will develop an inclusion plan based off the assessment with recommendations/strategies and communicate that with the program coordinator and/or instructors in the area the participant registered.
  
4. For some participants coordinator may be present for the first session or two as needed and can meet with the instructors to give some additional training or assistance.
  
5. After the program, a brief eval will be available for participants/guardians AND for instructors.
  
6. Each participant participating in AIR will have a file with their assessment and plan saved so they don't have to complete a new one every time they sign up. I will still touch base with the plan for each program that they enroll in. Every two years (or as needed), we will complete an update.

## APPENDIX E – INVENTORY OF BUILDINGS ASSESSED

*This Appendix is under development*

## APPENDIX F – INVENTORY OF TRANSPORTATION PEDESTRIAN FACILITIES ASSESSED

*This Appendix is under development*

## APPENDIX G – INVENTORY OF PARKS FACILITIES ASSESSED

*This Appendix is under development*

APPENDIX H – OVERVIEW BUILDINGS ASSESSMENT ATTRIBUTES/PARAMETERS

*This Appendix is under development*

## APPENDIX I – OVERVIEW TRANSPORTATION PEDESTRIAN FACILITIES ASSESSMENT ATTRIBUTES/PARAMETERS

*This Appendix is under development*

## APPENDIX J – OVERVIEW PARK FACILITIES ASSESSMENT ATTRIBUTES/PARAMETERS

*This Appendix is under development*

## APPENDIX K – BUILDINGS ASSESSMENT FINDINGS

*This Appendix is under development*

## APPENDIX L –PUBLIC ROW FACILITIES ASSESSMENT FINDINGS

*This Appendix is under development*

## APPENDIX M – PARKS FACILITIES ASSESSMENT FINDINGS

*This Appendix is under development*

## APPENDIX N – IDENTIFIED BARRIER REMOVAL SCHEDULES

*This Appendix is under development*

## APPENDIX O – LIST OF STANDARD DRAWINGS, SPECIFICATIONS, AND DESIGN GUIDANCE RELATED TO ACCESSIBILITY

The following are a list of standard drawings, specifications, and design guidelines related to accessibility. This list does not establish order of precedence or minimum design standards for Thornton, nor is it intended to be all encompassing, but rather is provided as a reference for individuals trying to achieve accessibility through design or construction.

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Thornton Standards and Specifications.

<https://www.thorntonco.gov/government/citydevelopment/Pages/standards-specifications.aspx>

Colorado Department of Transportation (CDOT) ADA Resources for Engineers.

<https://www.codot.gov/business/civilrights/ada/resources-engineers>

*International Building Code (IBC), 2009 Edition, Chapter 11.* Published by the International Code Council (ICC).

U.S. Access Board. *Guidance Documents. (commonly referenced documents shown)*

<https://www.access-board.gov/guidance.html>

*Guidance on the Americans with Disabilities Act (ADA) Accessibility Standards*

*Guidance on Recreation Facilities*

*Guidance on the Architectural Barriers Act (ABA) Accessibility Standards*

*Animations on the ADA and ABA Standards*

*Guidance on the ADA Accessibility Guidelines for Transportation Vehicles*

Architectural Barriers Act (ABA) Standards. *Accessibility Standards.*

<https://www.access-board.gov/aba/>

Americans with Disabilities Act (ADA) Standards. *2010 ADA Standards for Accessible Design.*

<https://www.access-board.gov/ada/>

U.S. Access Board. *(Proposed) Public Rights-of-Way Accessibility Guidelines.*

<https://www.access-board.gov/prowag/>

Uniform Federal Accessibility Standards (UFAS).

<https://www.access-board.gov/aba/ufas.html>

American Association of State Highway and Transportation Officials (AASHTO). *Guide for the Development of Bicycle Facilities (2012).*

Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways.

<https://mutcd.fhwa.dot.gov/>

National Center on Accessibility. <https://ncaonline.org>

Rocky Mountain ADA Center. <https://www.rockymountainada.org>

APPENDIX P – Design & Construction Exception Form

Please fill out this form completely if an element of new construction or alteration to an existing facility seemingly cannot meet the ADA requirements or appear that it might present an undue financial or administrative burden to Thornton. Once completed, return this form to the Thornton ADA Coordinator at:

Bill Rush  
Human Resources - Risk Management Division  
9500 Civic Center Drive  
Thornton, Colorado 80229

*This form applies to facilities in public right-of-way or property owned by the city of Thornton.*

Project: \_\_\_\_\_

City Project No.: \_\_\_\_\_ Location/Intersection: \_\_\_\_\_

New Construction:  Alteration to Existing Facility:

ADA requirement seemingly not being satisfied or creating undue burden: \_\_\_\_\_

Reason for perceived non-compliance: \_\_\_\_\_

Reasonable accommodation provided: \_\_\_\_\_

Sketch of area (if needed) or indicate if attached

City Representative/Title: \_\_\_\_\_ Date: \_\_\_\_\_

If you have questions about this form please contact the ADA Coordinator at 303-538-7334.

APPENDIX Q – PUBLIC OUTREACH MATERIALS AND RESULTS

## APPENDIX R – ADA COORDINATOR CONTACT INFO

### **City of Thornton ADA Coordinator**

Bill Rush  
Risk Management Department  
9500 Civic Center Drive  
Thornton, Colorado 80229

Ph: 303-538-7334

Email: [adacoordinator@ThorntonCO.gov](mailto:adacoordinator@ThorntonCO.gov)

#### Hours

Monday - Friday  
8 a.m. - 5 p.m.  
(Excluding city holidays)

APPENDIX S – COMPLAINT & GRIEVANCE PROCEDURES

**City of Thornton**  
**Grievance Procedure under**  
**the Americans with Disabilities Act**  
**June 2020**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by Thornton. Thornton's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem and possible solutions. Alternative means of filing complaints, such as personal interviews or an audio recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the complainant and/or the complainant's designee as soon as possible but no later than 60 calendar days after the alleged violation to:

**ADA Coordinator**  
**City of Thornton**  
**9500 Civic Center Drive**  
**Thornton, CO 80229**  
[adacoordinator@ThorntonCO.gov](mailto:adacoordinator@ThorntonCO.gov)

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio recording. The response will explain the position of Thornton and, if deemed necessary, offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or designee does not satisfactorily resolve the issue, the complainant and/or the complainant's designee may appeal the decision within 15 calendar days after receipt of the response to the Human Resources Director or designee.

Within 15 calendar days after receipt of the appeal, the Human Resources Director or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Human Resources Director or designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or designee, appeals to the Human Resources Director or designee, and responses from these two offices will be retained by Thornton according to Thornton's record retention schedule.

**CITY OF THORNTON**  
**ADA GRIEVANCE FORM**

Under Title II of the Americans with Disabilities Act (ADA) the City of Thornton is required to make city facilities, services, and programs accessible to people with disabilities and in compliance with the ADA. Please fill out this form if you feel that you have not been able to access any facility owned, leased, and/or operated by the city; participate in any activity, service, or program offered by the city; participate in any other element of the city of Thornton’s government because of an accessibility issue; or have been discriminated against based on your disability. Your complaint will be investigated and you will be contacted with the results, or how to further proceed. This form and process are designed to provide you with the opportunity to quickly and effectively resolve any issue(s) as they relate to the ADA and the city of Thornton. For organizations or businesses outside the city of Thornton’s responsibility please contact the Department of Justice at 1-800-514-0301.

Instructions: Please fill out this form completely. Sign and return to: City of Thornton, ADA Coordinator, 9500 Civic Center Drive, Thornton, CO 80229. This information will not be shared with anyone outside this organization unless instructed otherwise by you. Please note that this grievance procedure is for facilities, services and programs owned and/or operated by Thornton.

Your name (complainant): \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Numbers: Home \_\_\_\_\_ Work \_\_\_\_\_ Cell \_\_\_\_\_

Reason for grievance/complaint, or why you feel you have been discriminated against. Please be specific and provide as much information as possible (i.e. location, date, time, names, etc.).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Your signature \_\_\_\_\_

If you have questions about this form, please contact the ADA Coordinator at 303-538-7334 or email [adacoordinator@ThorntonCO.gov](mailto:adacoordinator@ThorntonCO.gov)

Please allow the city of Thornton 15 business days to investigate and respond to your complaint. City of Thornton administrative office hours are Monday through Friday, 8 a.m. to 5 p.m.

## APPENDIX T –SUMMARY OF WORK COMPLETED TOWARDS TRANSITION PLAN IMPLEMENTATION

### STATUS OF TRANSITION PLAN GOALS

GOAL DESCRIPTION	YEAR ADDED	YEAR ACCOMPLISHED	COMMENTS
Establish assessment criteria for future field evaluations of public ROW pedestrian facilities and classify high priority corridors throughout Thornton to identify barriers.	2021		
Perform field evaluations of publicly owned, leased, or operated parking lots and curb ramps to access publicly owned, leased, or operated parks and open spaces and Thornton facilities.	2021		
Finalize evaluation approach and perform evaluations on as many publicly accessible spaces within city owned, leased, or operated facilities as possible within the 2021 budget. Rank and prioritize issues according to the matrix and program as funding allows.	2021		
Develop formal guidance on pedestrian street crossing locations. Guidance should address maximum spacing between street crossings and criteria for pedestrian signals and pushbuttons.	2021		
Develop a ranking system to help prioritize and schedule implementation of accessibility improvements on pedestrian facilities along Thornton’s transportation network considering the level of severity of a barrier’s impact to accessibility while acknowledging fiscal constraints. The ranking system should consider the location, level of use by the public, proximity to public facilities and public transit, severity of barriers, geographic distribution, and/or cost.	2021		
Perform field evaluations on Carpenter Park and Northern Lights Park to identify and remove barriers. Develop an approach and schedule to evaluate the remaining Thornton parks in subsequent	2021		

years based on geography, park usage, unique play features, programs (i.e., festivals, events), funding and replacement schedule.			
Expand GIS database to capture park features (playground equipment, picnic tables, etc.), park types (dog park, baseball field, etc.), additional trail data such as pavement type, trail condition, and other features, and accessible parking spaces to help Thornton determine where funds should be directed to increase accessibility of the parks and trail systems.	2021		
Identify technical training opportunities and resources for different city departments.	2021		
Develop projected timeline for barrier removals to assist with making budgeting decisions	2021		
Develop ADA checklists to assist city staff with design review and construction oversight .	2021		
Examine current city engineering standard details and evaluate incorporation of PROWAG guidelines.	2021		
Dedicate and develop internal resources for ease of use and access to alternative forms of communication when requested by a person with a disability in a timely manner. This includes obtaining TTD/TTY phone lines or similar relay system.	2021		
Perform inventory on indoor permanent signage throughout city facilities to determine where Braille is present and replace signage which does not include Braille where required.	2021		
On all communications sent to the public inviting them to City-run meetings, open houses, events, etc., include standard language notifying those who require accommodations of who to contact, how to contact them, and the date by which requests should be made.	2021		
Create an ADA Coordinator position at Thornton whose main responsibility and	2021		

focus is related to ADA compliance, support and increasing accessibility.			

**SUMMARY OF BARRIERS REMOVED**

**FACILITIES**

Year	Barriers Removed/Spaces Updated (Each/SF)

**CURB RAMPS**

Year	# of Curb Ramps (Each)

**SIDEWALK**

Year	Sidewalk (LF)

**PEDESTRIAN PUSH BUTTONS**

<b>Year</b>	<b># of Push Buttons (Each)</b>

**PARK FACILITY**

<b>Year</b>	<b># of Barriers Removed (Each)</b>

**TRAILS**

<b>Year</b>	<b>Trail/# of Barriers Removed (LF/Each)</b>