Americans with Disabilities Act (ADA)/Section 504 Rehabilitation Act

Self-Evaluation

City of Encinitas/San Dieguito Water District 2019/2020



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Introduction

Under ADA Title II/Section 504, public agencies are prohibited from excluding or denying individuals with disabilities: services, programs, or activities and are asked to look at reasonable accommodations to meet these standards. The City and District do not discriminate on the basis of race, color, ethnic and national origin, sex, religion, age, veteran status or physical or mental disability in employment, its service programs or activities.

The City of Encinitas and San Dieguito Water District conducted a Self-Evaluation of its programs and services, administrative employment policies, and facilities on public property and developed a Self-Evaluation and Transition Plan which was adopted by Resolution 2013-41 in 2013 detailing the methods used to ensure compliance with ADA/Section 504 accessibility requirements.

The City/District recognizes that ADA/Section 504 compliance is an ongoing responsibility and are reviewing and updating the Self-Evaluation and Transition Plans in 2019.

Self-Evaluation

Overview

The intent of the ADA/Section 504 Self-Evaluation is to review the City's/District's public program, including facilities on public property in order to identify any obstacles or barriers to accessibility that need to be addressed. The general categories of items to be evaluated include: City Facilities, Programs, Services, Activities, Employment and identified barriers to accessibility (pedestrian mobility).

Process & Findings

In the progress and monitoring of the Transition Plan, the City/District performed an updated self-evaluation of its services, programs, activities, and facilities on ADA/Section 504 accessibility. Individual departments conducted a review of its programs, policies, and procedures to include a review of facilities for compliance with the current ADA/Section 504 regulations. When new capital improvements are undertaken, compliance with the current regulations are incorporated into the design of the project and modified as project progresses to construction to the most current standard. Contracts include non-discrimination language and mandatory compliance with ADA/Section 504 regulations.

The following charts have summarized the results of the Self-Evaluation: Programs, Services, Activities, Employment, Identified barriers to accessibility, and Facilities.

Summary of Programs/ Services/Activities and Employment programs.

Self-Evaluations were performed for the Programs/ Services, Activities and Employment services were evaluated for ADA/Section 504 accessibility with the following guidelines:

- To ensure programs are accessible to individuals with disabilities or to provide alternatives.
- To ensure communications with applicants, participants, and members of the public with disabilities provide equal access to individuals.
- Available use of auxiliary aids and services to afford an individual with a disability equal opportunity to participate in programs, or activities.
- Prioritize program accessibility assessment by public access to schools, hospitals, public meeting rooms, gathering centers and rehabilitation centers.

The following is the compiled results of the Programs/Services/Activities and Employment programs.

ADA/Section 504 Rehabilitation Act 1973 REQUIREMENTS	CITY COMPLIANCE
PROGRAMS/ SERVICES/ACTIVITIES	
Designate at least one employee to coordinate ADA/Section 504 compliance efforts.	The City has designated its Risk Department Manager as the ADA/Section 504 Coordinator for the City of Encinitas (City) and San Dieguito Water District (District). The City allocates resources for ADA staff training and coordinates ADA/Section 504 compliance with Department representatives and the public. The Risk Department Manager will be specifically identified on the City website as the initial point of contact for any ADA questions or grievances. See, The City of Encinitas Website (ADA/Section 504 Compliance Information section). See

		seminar conducted by an outside consultant regarding the construction and measurement of sidewalks and ramps for ADA compliance. The ADA Coordinator and additional City designated staff attend the National ADA Coordination Group training annually in San Diego. Each Department has a designated representative to review updates in the laws and work with the ADA/Section 504 Coordinator on an ongoing basis.
3.	Adopt and publish grievance procedures for prompt and equitable resolution.	Formal ADA/Section 504 Grievance Procedure was adopted by the City Council on April 26, 1995 with new updates adopted by Resolution 2011-36 on July 20, 2011 by City Council. The grievance forms and contact information are contained on the City website.
4.	Provide sufficient notice of ADA/Section 504 compliance to City/District programs, services, and activities to applicants, participants, beneficiaries, and other interested persons.	The City/District continue to publicize ADA/Section 504 compliance through notice on all applicable handbooks, manuals, program pamphlets, and other City/District sponsored public announcements and agendas both in hard copy format and on the City's website. Public contracts related to road and sidewalk design and construction contain specific provisions relating to ADA compliance. Public Notices and required signage are placed at City/District facilities and on the website.
5.	Ensure that individuals with disabilities are afforded the opportunity to participate as members of the City Council/ District Board of Directors or advisory boards/commissions.	The City/District provides reasonable accommodations and access for individuals with disabilities and provides for equal opportunity and access to programs, facilities, boards, and commissions. Reasonable accommodation requests are reviewed on a case by case basis along with Public Notice postings in facilities, announcements, and publications and on the website.

6.	Ensure that communications with disabled applicants, participants and members of the public are equally effective as other public communications.	Incorporated into the programs and public meetings a TTY phone system, audio amplification system, zoom text and interpreters are available for the public, upon appropriate request. The City has provided Ubi Duo equipment (a device that facilitates simultaneous face-to-face communication) for the customer service counters located at: Civic Center, Community Center and Calle Magdalena locations. Requests for reasonable accommodations are reviewed on an ongoing basis. The City/District also have available an audio amplification system for public meetings both in the Community Center and Civic Center.
7.	Review all City/District services to ensure that individuals with disabilities may participate in and benefit from the services provided by the City/District.	See Item 18. City/District policy and procedures provide that individuals with disabilities participate in and benefit from City/District services, subject to feasibility and "readily accessible" standards. Public Notice of ADA/Section 504 compliance is provided at City/District facilities, announcements, publications, contracts and website.
8.	Review all City/District services, programs and activities to ensure that the most integrated setting appropriate to the needs of qualified individuals with disabilities are made available.	See Item 18. On an ongoing basis City/District reviews and ensures services, programs, and activities are readily accessible to individuals with disabilities, in the most feasible integrated setting. Notice to the public and procedures for accommodation requests are in place with grievance procedures and are included on website, facilities, announcements, publications and contracts.
9.	Ensure that an individual with disabilities is not denied the opportunity to participate in City/District programs or activities that are not separate or different.	See Item 18. On an ongoing basis City/District reviews and ensures services, programs, and activities are readily accessible to individuals with disabilities, in the most feasible integrated setting. The City/District reviews on an ongoing basis, accommodation requests of individuals to afford the opportunity to participate in programs or activities that are not separate or different. The City/District has adopted ADA/Section 504 Grievance Procedures for handling complaints

	and review accommodation requests on a case by case basis in compliance with ADA/Section 504.
10. Ensure that the actions of the City/District are based on facts applicable to individuals and not on presumptions as to what a class of individuals with disabilities can or cannot do.	Appropriate policies and procedures exist along with grievance procedures which provide ongoing access to City/District programs and facilities without presumptions consistent with applicable ADA/Section 504 regulations. These programs are integrated into daily operations.
11. Ensure that qualified individuals with disabilities are not limited from the enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving any aid, benefit, or service from the City/District.	See Item 18. On an ongoing basis City/District reviews and ensures services, programs, and activities are readily accessible to individuals with disabilities, in the most feasible integrated setting. The City/District reviews on an ongoing basis, accommodation requests of individuals to afford the opportunity to participate in programs or activities to provide equal access. The City/District has adopted ADA/Section 504 Grievance Procedures for handling complaints and review accommodation requests on a case by case basis in compliance with ADA/Section 504. City/District on an ongoing basis ensures individuals with disabilities are not discriminated against. Public notices, policies and procedures are posted at City/District facilities, website, and publications and in contractual agreements. Requests for reasonable accommodation are reviewed on a case by case basis.
12. Review processes for granting licenses to ensure that individuals with disabilities are not discriminated against by the City/District.	City business registration process adheres to non- discrimination policies and procedures. Accommodation requests are reviewed on an ongoing basis.
13. Reasonable modifications in policies, practices, or procedures must be made when necessary to avoid discrimination on the basis of disability.	On an ongoing basis, modifications to policies, practices, and procedures are made to meet current regulations and applicable laws to eliminate discrimination. Accommodation requests are reviewed on an ongoing basis.

14. Prohibit discrimination on the basis given of an individual's known relationship or association with an individual with a disability is prohibited.	The City/District does not discriminate on the basis of an individual's association with an individual with a disability. Policies are in place that prohibit discrimination and requires compliance with ADA/Section 504 regulations.
15. Ensure that the appropriate auxiliary aids and services are furnished when necessary to provide an individual with a disability an equal opportunity to participate in and enjoy the benefits of the City/District services, programs, and activities.	Incorporated into the programs and public meetings a TTY phone system, audio amplification system, zoom text and signers/interpreters are available for the public, upon appropriate request. Accommodation requests are reviewed on an ongoing basis. The City/District also have available an audio amplification system for public meetings both in the Community Center and Civic Center. The City has provided Ubi Duo equipment (a device that facilitates simultaneous face-to-face communication) for the customer service counters located at: Civic Center, Community Center and Calle Magdalena locations. Policies for Service Animals are in place and posted on the City website. Programs and services are accessible by review on an ongoing basis. Notification is provided to advise public accommodation requests will be reviewed on a case by case basis. Grievance procedures have been adopted to resolve any unresolved complaints.
16. Notice to the Public on ADA/Section 504	Notice to the public has been adopted and is in compliance with ADA/Section 504 is currently posted in all facilities and on the city's website.
17. As of July 1, 2010, the new regulations require the City to provide CASp certified building official information to assist citizens and businesses with voluntary request for a CASp review.	The Building Official in the Development Services Department has in place the CASp program. Currently the Building Official is CASp certified and coordinates with the public upon request.

18. Examine each program to determine whether any physical barriers to access exist and identify structural changes or identify alternates.

Under Title II of the ADA, each City/District facility or part of a facility that is built or altered after 1992 must be readily accessible to and useable by persons with disabilities. The ADA standards for existing facilities provide that 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 and useable by individuals with disabilities. This includes providing meaningful program access. The City of Encinitas was founded in 1986 and portions of its facilities, such as streets, sidewalks and other facilities predate 1992. As to those pre-1992 facilities, where alterations are made, the City evaluates and, where feasible and readily achievable, it includes ADA alterations as it develops and updates facilities (i.e. ADA compliant ramps and signage in order to provide program access). New facilities designed and constructed since 1992, such as the City Library, Senior Center, Fire Stations, parks, etc., have incorporated ADA designs and requirements. On an ongoing basis the City/District's evaluate operations, facilities and programs to maintain accessibility under ADA/Section 504 compliance.

19. Ensure that all facility construction or alteration after January 26, 1992 and continued updates of the regulations (most recent 2010) conform to the most current ADA/Section 504 designated standards.

See above, item 18. The City/District incorporates into design stage facility construction and alterations for continued compliance with the current ADA/Section 504 standards. ADA/Section 504 compliance language has been added to the basic construction contracts. The building and engineering departments have participated in training conducted by an outside consultant regarding the construction and measurement of sidewalks and ramps for ADA compliance. Plan reviews of public facility improvements include appropriate ADA/Section 504 compliance for public access. Selected staff in Engineering participates in training for a week at the ADA Coordinators annual training conference.

EMPLOYMENT - TITLE I	
20. Ensure that all employment policies do not discriminate to applicants and employees with disabilities.	Employment policies prohibit discrimination against individuals with disabilities. The Personnel Rules and Policies include specific language prohibiting discrimination against individuals with disabilities. Policies are reviewed on an ongoing basis.
21. Ensure that employment practices do not limit, segregate, or classify job applicants or employees in an adverse manner due to the disability of the employee or applicant.	Employment practices ensure adherence to non-discriminatory practices for individuals with disabilities. Accommodation requests are reviewed on a case by case basis. City conducts an interactive process for employees requesting job accommodations. The City/District and its personnel practices are in compliance with ADA/Section 504.
22. Ensure that all City/District contractual relationships, including labor unions, employment agencies, organizations that provide benefits, services, etc. do not discriminate against individuals with disabilities.	Contracts, MOU's, and benefits do include non-discrimination language prohibiting discrimination in compliance with ADA/Section 504 regulations.
23. Ensure that all job classifications do not contain standards or criteria that discriminate on the basis of disability.	Job classifications are reviewed on an ongoing basis to assure job standards, physical requirements of the essential job functions and criteria are related to specific job qualifications. Essential job functions are called out in each Job Description. Accommodation requests are reviewed on an ongoing basis. Interactive processes take place on as needed basis and is incorporated into normal course of business.

24. Ensure that all job testing and selection criteria are job-related and do not discriminate against individuals with disabilities.	Testing and selection criteria continue to be reviewed on an ongoing basis for adherence with the ADA/Section 504 regulations and job relation. Employment announcements contain ADA/Section 504 accommodation language and public notice. Accommodations are reviewed on a case by case basis for reasonable accommodations when applicable.
25. Ensure hiring procedures (applying, testing and interviewing for a job) are carried out at accessible locations, using accessible formats such as a reader, tactile information, Braille, audio for vision impaired, written materials and sign language interpreters for hearing impaired.	City/District facilities utilized for testing and interviewing are accessible. Job announcements provide notification of our non-discrimination practices and their ability to make accommodation requests. Accommodation requests are reviewed on a case by case basis in compliance with ADA/Section 504 regulations.
26. Review employment application forms to eliminate questions regarding an individual's disability.	The City/District's job application forms do not ask physical disability questions. It does ask whether applicant can perform the essential job functions of that specific job with or without accommodations. The applications include appropriate notice of non-discrimination language and to report requests for reasonable accommodation.
27. Post equal employment opportunity notices in an accessible format (e.g., in large print)	The City uses a web based (NeoGov) application process which accesses resources commonly found within standard web browsers including display and readability features and sound and speech assistance. Accommodation request are reviewed on an ongoing basis. Public Notice of ADA/Section 504 compliance is provided at all City/District facilities and website.
28. Provide sufficient notice of ADA/Section 504 compliance to City/District for employment, in administration of testing and preemployment medical examinations practices that do not discriminate against persons with disabilities.	The City/District continue to publicize ADA/Section 504 compliance through notice on all applicable handbooks, manuals, job recruitments both in hard copy format and on the City's website.

Summary of Facilities Accessibility Review

The City/District performed an accessibility evaluation of its building facilities, and related parking lots/areas, based on disability parking, entrance accessibility, restroom accessibility, signage, communications, counter accessibility and paths of access.

The following table is a summary of assessed City/District facilities:

SUMMARY OF FACILITIES ACCESSIBILITY	ADA ACCESSIBILITY
CITY/DISTRICT BUILDINGS	
<u>Civic Center</u> – The Civic Center was built in 1992, in 2015 a sewer renovation project which included bathrooms and kitchens remodel to ADA accessible standards was performed.	ADA accessible:
	has been purchased that meets the dimensions for wheelchair accessibility; this item is resolved and no longer on the Transition Plan.
Public Works – Calle Magdalena – The Public Works building was	ADA accessible:
built in 1980 and remodeled in 2008 to include ADA accessible	Building
standards.	Restrooms Dedictors
	ParkingPaths of Access
<u>Wastewater Collection</u> – The Wastewater Collection building is not ADA accessible and not used for public access.	No public access.
	Not ADA accessible.
	Alternative locations-

	Public Works – Calle Magdalena, is the alternate building used for meetings and public accessibility and ADA accessible.
Community/Senior Center — The Community/Senior center building was built in 2001. A CASp evaluation has been completed for changes to the disability parking for ADA accessibility. This project has been added to the Transition Plan, construction to begin Fall 2019	ADA accessible: • Building • Restrooms • Parking • Paths of Access Accessible parking and restriping construction Fall of 2019, see Transition item #2.
Encinitas Community Library – The Library was built in 2007 to include ADA accessible standards.	ADA accessible: Building Restrooms Parking Paths of Access
FIRE STATIONS	
Fire Station #1 – Built in 1957	Not ADA accessible. No public access. Public meetings held at other alternate locations.
	Alternative locations - For public access meetings and tours use alternate ADA accessible locations: Fire Station #2, Fire Station #3 and Fire Station #5.
Fire Station #2 – Built in 2013	ADA accessible: Building Restrooms Parking Paths of Access
Fire Station #3 – Built in 2010	First Floor ADA accessible:

	 Building Restrooms Parking Paths of Access Second Floor not accessible (no public access) no elevator to second floor due to fire House Residential Exemption.
	Alternative - For public access meetings and tours use first floor or alternate ADA accessible locations: Fire Station #2, Fire Station #3 and Fire Station #5.
Fire Station #4 — Built in 1979	ADA accessible: Restrooms Parking Not ADA accessible. Paths of Access (front door entrance not accessible due to threshold lip)
	Alternative - For public access meetings and tours use alternate ADA accessible locations: Fire Station#2, Fire Station#3 and Fire#5.
Fire Station #5 – Built in 2000	ADA accessible: Building Restrooms Parking Paths of Access
Fire Station #6 — Auxiliary location.	Not ADA accessible. No public access. Public meetings held at other alternate locations. <u>Alternative -</u>

	For public access meetings and tours use alternate ADA accessible locations: Fire Station #2, Fire Station #3 and Fire Station #5.
PARKS:	
Encinitas Community Park	ADA accessible: Parking Paths of Access Playground equipment Restrooms
Cottonwood Creek	ADA accessible:
Oakcrest Park	ADA accessible: Parking Paths of Access Playground equipment Restrooms
Cardiff Sports Park	ADA accessible:
Paul Ecke Sports Park	ADA accessible: Parking Paths of Access Playground equipment Restrooms

Leo Mullen Sports Park	ADA accessible: Parking Paths of Access Playground equipment Restrooms Soccer field not accessible due to natural topography. Alternative:
	Alternate soccer field access is Cardiff Sports Park or Paul Ecke Sports Park.
Glen Park	ADA accessible: • Restrooms
	ADA not accessible: • Parking • Paths of Access
	Playground equipmentScout House Building
	Review of disability parking requested due to slope. See Transition Plan item #1. CASp study performed, improvements identified on Transition Plan pending funding. See alternative parks site that are accessible.
Encinitas Viewpoint Park	ADA accessible: • Playground equipment
	Alternative - Parking and restrooms are located at the Library which provides pathway and access into the park. The Library has ADA accessible parking and restrooms.

Mildred McPherson Park	 ADA Accessible: Playground equipment, accessible pathway with resilient surface to playground. Basketball Court accessible with hard surface pathway to courts.
	Alternative: Parking is on street and no restrooms provided. Access to park not accessible due to natural hilly topography. Nearest Alternate Park for accessible use is Encinitas Community Park or Cottonwood Creek Park.
Orpheus Park	 ADA Accessible: Playground equipment, accessible pathway with resilient surface to playground. Accessible pathway throughout park with signage. Parking is on street and no restrooms provided.
Leucadia Oaks	 ADA Accessible: Playground equipment, accessible pathway with resilient surface to playground. Skate feature accessible Basketball Courts accessible with hard surface pathway to courts. Parking is on street and no restrooms provided.

Wiro Park	 ADA Accessible: Playground equipment, accessible pathway with resilient surface to playground.
Little Oaks Equestrian Park	Alternative: Parking is on street and no restrooms provided. Access to park not accessible due to natural topography. Nearest Alternate Park for accessible use is Scott Valley Park or Oakcrest Park. Not ADA Accessible.
Las Verdes Park	 ADA Accessible: Playground equipment, with accessible pathway with resilient surface to playground Gazebo with accessible tables and pathways
	Alternative: Parking is on street and no restrooms provided. Access to park not accessible due to natural topography. Nearest Alternate Park for accessible use Cottonwood Creek or Oakcrest Park.
Sun Vista Park	 ADA Accessible: Playground equipment, with accessible pathway with resilient surface to playground Gazebo with accessible tables and pathways
	Alternative: Parking is on street and no restrooms provided. Access to park not accessible due to natural topography. Nearest Alternate Park for accessible use Scott Valley Park.

Scott Valley Park	 ADA Accessible: Playground Equipment, accessible pathway with resilient surface to playground. Basketball Court accessible with hard surface pathway to courts. Volleyball Courts – sand not accessible for play, but accessible path of travel for spectators. Park has accessible pathways. Parking is on street and no restrooms provided.
Hawk View Park	ADA Accessible: • Playground equipment, with accessible pathway with resilient surface to playground. • Gazebo with accessible tables and pathways Alternative: Parking is on street and no restrooms provided. Access to park not accessible due to natural topography. Nearest Alternate Park for accessible use Leucadia Oaks Park.
BEACHES:	
Moonlight Beach Park	 ADA accessible: Parking Paths of Access Playground equipment Restrooms Beach accessible with roller chair for disability access to beach.

Swami's Beach Access	ADA accessible: Parking Paths of Access Restrooms Alternative: No beach access, due to cliff and stairs, use alternate beach access at Moonlight Beach Park.
D Street Beach Access	Not ADA Accessible. Stairway on cliff. Alternative: No public restrooms and no beach access, stairs only. On street parking provided, use alternate beach access at Moonlight Beach Park.
Stone Steps Beach Access	Not ADA Accessible. Stairway on cliff. Alternative: No public restrooms and no beach access, stairs only. On street parking provided, use alternate beach access at Moonlight Beach Park.
Beacon's Beach	Not ADA Accessible. Path down bluff. Accessible ADA parking provided. Alternative: No public restrooms and no ADA beach access due to natural hilly topography. Use alternate beach access at Moonlight Beach Park.

Grandview Beach Access	Not ADA Accessible. Stairway on cliff.
	Alternative: No public restrooms and no beach access, due to cliff and stairs. On street parking provided, use alternate beach access at Moonlight Beach Park.
BLUFF VIEWPOINTS:	
E Street Viewpoint	Unimproved. On cliff viewpoint only. Not ADA Accessible. No restrooms and no beach access.
	Alternative: On street parking provided. Use alternate beach access at Moonlight Beach Park.
I Street Viewpoint	ADA Accessible. • Tables/benches.
	Alternative: No public restrooms and no beach access. No ingress/egress to park due to natural topography. On street parking provided, use alternate beach access at Moonlight Beach Park.
H Street Viewpoint	ADA Accessible – • Tables/Benches. • Paths of access.
	Alternative: No public restrooms and no beach access, (cliff viewpoint) on street parking provided, use alternate beach access at Moonlight Beach Park.

J Street Viewpoint	ADA Accessible — • Tables/Benches. • Paths of access from Sea Lane. Alternative: No public restrooms and no beach access (cliff viewpoint), on street parking provided, use alternate beach access at Moonlight Beach Park.
N. El Portal Viewpoint	ADA Accessible – • Bench Alternative: No public restrooms and no beach access (cliff viewpoint), on street parking provided, use alternate beach access at Moonlight Beach Park.
Rosetta Viewpoint	ADA Accessible — • Bench. Alternative: No public restrooms and no beach access, on street parking provided, use alternate beach access at Moonlight Beach Park.
TRAILS:	
Encinitas Ranch Trails	Not ADA Accessible
Village Park Trail & Off-leash dog area	Not ADA Accessible
Manchester Preserve Trails	Not ADA Accessible
Olivenhain Trails	Not ADA Accessible

Summary of Identified Barriers to Access

The Self-Evaluation completed in 2018 identified barriers to accessibility in facilities and some programs. A summary of these items and outline of the work to be done are reflected in the chart below.

BARRIERS TO ACCESS IDENTIFIED – FACILITIES SUMMARY:	ADDITIONAL WORK TO BE DONE:
1. Community Center – Disability Parking – ADA path of travel will be updated in 2019, see Item #2 in Transition Plan.	ADA path of travel/new parking stalls under design and contractor providing quote to construct new stalls and path of travel, this is in the Transition Plan. This project is scheduled for Fall 2019.
2. Ensure that all facility construction or alteration after January 26, 1992 and continued updates of the regulations (most recent 2010) conform to the most current ADA/Section 504 designated standards.	Future identified construction or alternation projects are listed on the Transition plan.
3. Glen Park – Disability Parking – slope evaluation	Identified for slope evaluation of disability parking. Will be evaluated for parking and access in 2019.
4. City Website	Under continuous evaluation. Continued review by staff content updaters to ensure accessible content. Global or coderelated accessibility issues identified on website will be tasked to web developer consultants as budget allows.

The above identified barriers to accessibility have been added to the Transition Plan.

The City/District has compiled both the accessibility barriers identified in the Self-Evaluation along with accessible capital improvement projects incorporating ADA accessible features into the draft Transition Plan. Please see draft Transition Plan for a listing of identified barriers to accessibility.

Public Outreach:

This draft Self-Evaluation will be available for public review in September/October 2019 with final adoption in November/December 2019.

Designation of Responsibility:

For questions/comments regarding the draft Self-Evaluation Plan, The City/District has designated the following person to serve as ADA Transition Plan Implementation Coordinator, to monitor the progress and manage review and updates of this document:

Name: Jace Schwarm Job Title: Risk Department Manager

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