



**EXECUTIVE SUMMARY OF THE CITY OF LAKELAND  
AMERICANS WITH DISABILITIES ACT/SECTION 504  
SELF-EVALUATION AND TRANSITION PLAN 2018-2019 UPDATE  
November 2019**



**City of Lakeland  
228 S. Massachusetts Ave.  
Lakeland, Florida 33801**

Prepared by:  
**DAC**  
Disability Access Consultants, LLC  
(800) 743-7067



## TABLE OF CONTENTS

<b>INTRODUCTION AND PURPOSE</b> .....	<b>1</b>
<b>BACKGROUND</b> .....	<b>1</b>
<b>CLASSIFICATION OF THE CITY OF LAKELAND</b> .....	<b>3</b>
<b>ABOUT THE CITY OF LAKELAND</b> .....	<b>3</b>
<b>DEPARTMENTAL ORGANIZATIONAL STRUCTURE</b> .....	<b>3</b>
<b>CITY OF LAKELAND ORGANIZATIONAL CHART</b> .....	<b>4</b>
<b>DIFFERENCES BETWEEN A SELF-EVALUATION AND TRANSITION PLAN</b> .....	<b>5</b>
<b>SELF-EVALUATION PLAN</b> .....	<b>5</b>
CITY OF LAKELAND ADA/504 SELF-EVALUATION AND TRANSITION PLAN .....	5
PRIOR ADA SELF-EVALUATION AND TRANSITION PLANS .....	5
UPDATED ADA SELF-EVALUATION AND TRANSITION PLAN .....	6
REGULAR SELF-EVALUATION AND TRANSITION PLAN UPDATES .....	6
SELF-EVALUATION METHODOLOGY AND FORMAT .....	6
<b>PUBLIC OUTREACH AND PUBLIC INPUT</b> .....	<b>7</b>
SURVEYS FOR INPUT BY THE PUBLIC, VOLUNTEERS AND STAFF .....	7
ADA OPEN HOUSES .....	8
<b>TRANSITION PLAN-IDENTIFICATION OF PHYSICAL BARRIERS</b> .....	<b>9</b>
REQUIREMENTS OF A TRANSITION PLAN .....	10
FINDINGS IN THE DACTRAK ACCESSIBILITY MANAGEMENT SYSTEM .....	11
<b>SELF-EVALUATION AND TRANSITION PLAN COMPONENTS</b> .....	<b>14</b>
DESIGNATED ADA COORDINATOR/SPECIALIST .....	14
FACILITIES AND PUBLIC RIGHT-OF-WAY (PROW) .....	15
LOCATION OF SELF-EVALUATION AND TRANSITION PLAN .....	16
<b>FINDINGS, SURVEY COMMENTS, AND RECOMMENDATIONS</b> .....	<b>16</b>
POLICIES AND PROCEDURES .....	17
DESIGNATION OF ADA COORDINATOR/SPECIALIST .....	17
POSTING AND DISSEMINATION OF RIGHTS .....	18
STATEMENT OF ACCOMMODATIONS ON PUBLIC NOTICES .....	18
ACCOMMODATIONS TO ACCESS PROGRAMS, SERVICES AND ACTIVITIES .....	19
ACCESS TO PROGRAMS, SERVICES AND ACTIVITIES .....	20
GRIEVANCE/UNIFORM COMPLAINT PROCEDURES .....	23
ELIGIBILITY CRITERIA .....	24
FEES AND SURCHARGES .....	25
EMERGENCY EVACUATION PROCEDURES .....	25
POLICIES FOR THE USE OF FACILITIES .....	26
LEASED FACILITIES .....	27

City of Lakeland ADA Self-Evaluation and Transition Plan Update

SELECTION OF CONTRACTORS AND CONTRACTED SERVICES..... 28

BUILDING AND CONSTRUCTION..... 29

MAINTENANCE OF ACCESSIBLE FEATURES ..... 31

PLANNING AND BUDGETING FOR ACCESSIBILITY ..... 32

STAFF TRAINING..... 34

NEW EMPLOYEES AND VOLUNTEER ORIENTATION ..... 36

APPROPRIATE TERMINOLOGY ..... 37

TICKETING ..... 38

EQUALLY EFFECTIVE COMMUNICATION..... 39

*Auxiliary Aids, Services, and Alternate Formats..... 39*

*Interpreter Services..... 40*

*Telecommunications Devices for the Deaf and Hard of Hearing..... 40*

*Assistive Listening Systems for the Deaf and Hard of Hearing ..... 41*

*Website Accessibility..... 42*

**PUBLIC OUTREACH AND PUBLIC INPUT .....43**

**CONCLUSION .....45**

APPENDIX A: FACILITIES, PARKS AND RECREATIONAL AREAS INSPECTED BY DAC..... 46

APPENDIX B: PUBLIC RIGHTS-OF-WAY INSPECTED BY DAC ..... 48

APPENDIX C: PUBLIC NOTICE AND POSTING..... 48

APPENDIX D: NONDISCRIMINATION AND RIGHTS NOTICE ..... 50

APPENDIX E: ADA GRIEVANCE PROCEDURE FORM & NONDISCRIMINATION FACT SHEET TITLE VI COMPLAINT FORM..... 55

APPENDIX G: PUBLIC INPUT POSTINGS AND NOTICES..... 58

APPENDIX H: SURVEYS COMMENTS..... 63

## Introduction and Purpose

In 2018 the City of Lakeland began updating its Americans with Disabilities Act and Section 504 Self-evaluation and Transition Plan records. This included a review of programs, services, activities, events, facilities, parks, trails, playgrounds, parking lots, athletic fields and other areas of City operations that affect persons with disabilities. Attention was paid to determining any potential discriminatory practices, policies or procedures that may exist. This report contains findings and recommendations based on the review of the City of Lakeland's public access by persons with disabilities, in regard to City programs, services and activities. Findings and recommendations are contained in this report, which is known as the Executive Summary of the City of Lakeland ADA/504 Self-evaluation and Transition Plan 2018-2019 Update. By completing the 2018-2019 ADA/504 Self-evaluation and Transition Plan, the City updates its compliance efforts.

The Executive Summary provides an overall summary and profile of findings and recommendations regarding not only potential physical barriers but barriers that may deny access to City of Lakeland programs, services and activities. More detailed components of the plan, such as the identification of the physical barriers in facilities, parks, other sites and in the public right-of-way are contained in the online, secure DACTrak accessibility management software.

The DACTrak software contains findings, recommendations for barrier removal, photographs of each barrier, estimated costs and code references. DACTrak provides the City with a valuable tool to implement, manage and document barrier removal with progress reports while updating the plan to keep it current. Custom reports and transition plan information can be generated from DACTrak to monitor and manage the implementation of the plan.

As programs and facilities have been added during the rapid growth of City of Lakeland, it is important that the City maintains compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 (Section 504). The City of Lakeland ADA/504 Self-evaluation and Transition plan is meant to be a self-regulated plan and by definition is meant to be a "living" and planning document for City of Lakeland to manage its long-term commitment to serving persons with disabilities. The ADA/504 Self-evaluation and Transition Plan (ADA/504 Plan) serves to demonstrate the ongoing compliance efforts by the City of Lakeland and provides a road map for ongoing compliance.

As evidenced by this study and update, the City is committed to complying with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, and other federal, state statutes and regulations to provide greater accessibility for persons with disabilities. The update further serves to demonstrate the ongoing compliance efforts by the City. The City has demonstrated a commitment from the highest level of leadership with coordination of compliance activities and involvement of persons with disabilities and methodologies for compliance procedures. As evidenced in the ADA/504 Report, the City understands that the ADA/504 Transition Plan is not a static document and requires ongoing implementation and periodic updates. To assist with the implementation of the ADA/504 Plan, the City has established an ADA Implementation Committee.

## Background

The ADA and Section 504 of the Rehabilitation Act requires state and local governments, such as city and county governments (referred to as public entities in this document) to ensure that their facilities, public rights-of-way, policies, procedures and practices are accessible and do not discriminate against persons with disabilities.

In addition to the Department of Justice (DOJ), the Federal Highway Administration (FHWA), Americans with Disabilities Act (ADA) and Section 504 all play an important role in ensuring that

pedestrians with disabilities have an equal opportunity to use the transportation system in an accessible and safe manner. The Florida Department of Transportation (FDOT) has authority for roads, sidewalks, curb ramps and intersections owned or maintained by FDOT.

As part of FHWA's regulatory responsibility under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (Section 504), the FHWA is required to ensure that recipients of Federal funding and state and local entities, such as the City of Lakeland, that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any highway transportation program, activity, service or benefit they provide to the general public; and to ensure that people with disabilities have equitable opportunities to use the public rights-of-way system. Furthermore, laws and regulations require accessible planning, design, and construction.

The ADA has five separate titles;

1. Title I: Employment
2. Title II: State and Local Government (owned by the public and open to the public)
3. Title III: Public Accommodations (privately owned and open to the public)
4. Title IV: Telecommunications
5. Title V: Miscellaneous Provisions

Title II entities are referred to as public entities and include city and county governments, school districts, special districts and other entities that are public.

The focus of the current City of Lakeland 2018-2019 updated ADA/504 Self-evaluation and Transition Plan (ADA/504 Plan) is on Title II of the ADA. Requirements of Title III, however, do overlap and integrate into the current study in cases where the City contracts with outside vendors or may hold events with Title III vendors, contractors and others that are privately owned businesses but open to the public. In the case of the City of Lakeland, events and activities may include Title III vendors and contractors that may be regulated by the City of Lakeland, such as with special event permits and joint activities. In addition, although the focus and purpose of the ADA/504 Plan is Title II, some components overlap some areas of employment.

Section 504 of the 1973 Rehabilitation Act (Public Law 93-112) prohibits discrimination on the basis of disability in federally assisted programs. Section 504 requirements for U.S. Department of Transportation (USDOT) administrations are covered under 49 CFR Part 27 (USDOT), Nondiscrimination on the Basis of Disability in Programs and Activities Receiving or Benefiting from Financial Assistance. The Americans with Disabilities Act (ADA, 1990, Public Law 101-336) is a broader civil rights law that prohibits discrimination against people with disabilities.

The Department of Justice (DOJ) has rulemaking authority and enforcement responsibility for Title II, while USDOT is legally obligated to implement compliance procedures relating to transportation, including those for highways, streets, and traffic management. The Federal Highway Administration (FHWA) Office of Civil Rights oversees the DOT requirements in these areas.

Recently, many policy updates were made to Title II regulations along with the 2010 updates to the ADA Standards for Accessible Design. A few examples of these policy updates and updated design areas include:

- Recreation areas such as play areas, fishing piers, boat docks, and golf courses
- Event ticketing policies
- Policies concerning other-power-driven mobility devices
- Service animals
- Specifications for video-remote-interpreting
- Website accessibility

## Classification of the City of Lakeland

The City of Lakeland is classified as a “public entity” pursuant to Title II of the Americans with Disabilities Act which applies to state and local governments. A public entity covered by Title II is defined as:

- 1) Any state or local government;
- 2) Any department, agency, special purpose district, or other instrumentality of a state or local government; or
- 3) Certain commuter authorities as well as Amtrak.

## About the City of Lakeland

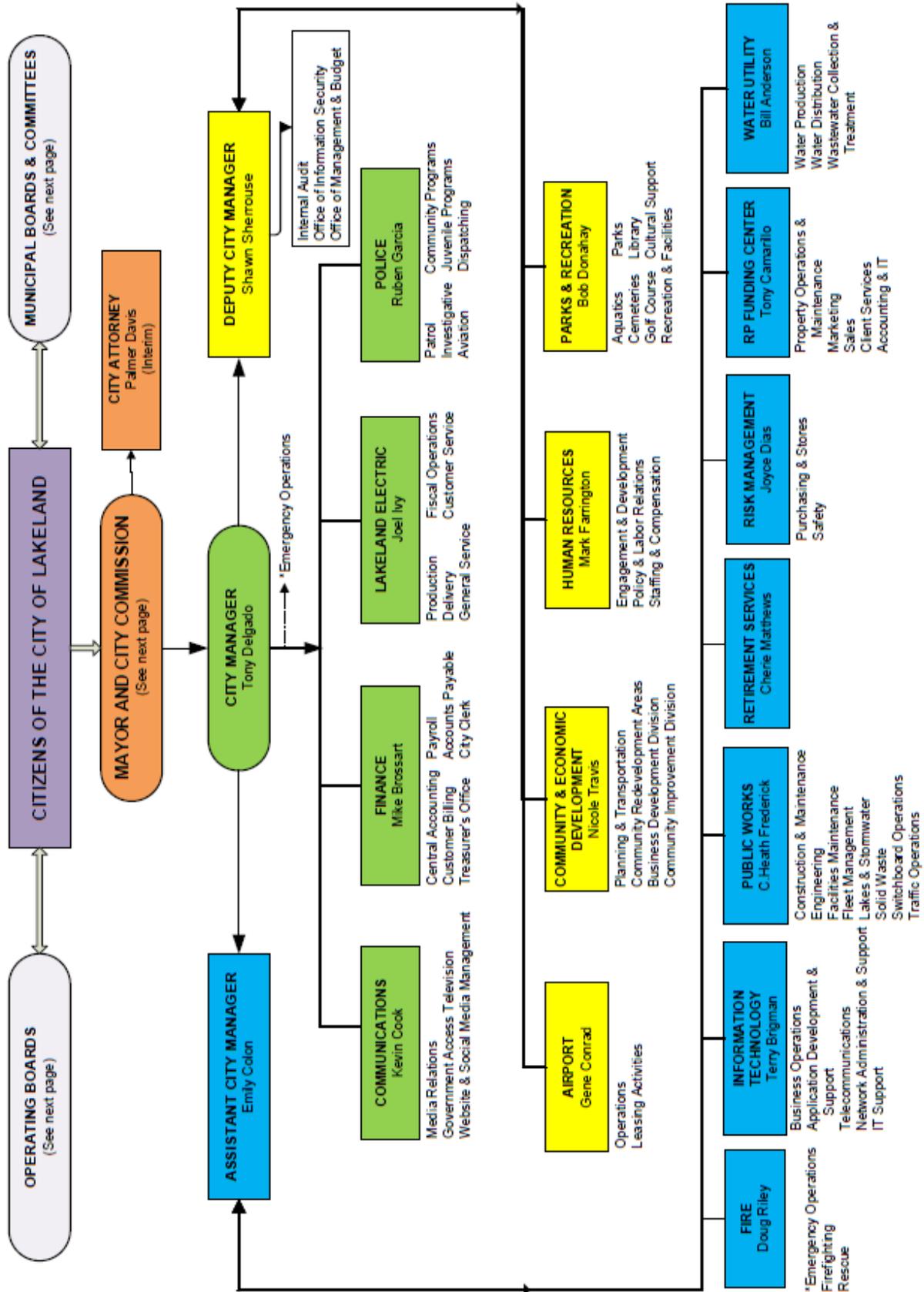
The City of Lakeland is located in Polk County, Florida, along I-4 between Tampa and Orlando. With a population just over 100,000, the City limits cover 74.4 square miles. Census data from the 2016 American Community Survey estimates the population’s median age at 40.3 years. The dominant feature in Lakeland is the City’s many lakes which serve as community focal points, providing scenic areas for recreation. The area is home to Southeastern University, Florida Polytechnic University, Polk State College's Lakeland campus, and Florida Southern College, which hosts the largest on-site collection of Frank Lloyd Wright architecture.

The City of Lakeland was incorporated on January 1, 1885 and utilizes a commission/manager form of government. The commission consists of seven members, including the mayor, elected at large. Lakeland’s largest employer is Publix Supermarkets, one of the largest regional grocery chains in the United States.

## Departmental Organizational Structure

City of Lakeland departments include:

- City Manager’s Office
- Communications
- Community & Economic Development
- Finance
- Human Resources
- Information Technology
- Internal Audit
- Lakeland Electric
- Lakeland Fire Department
- Lakeland Linder International Airport
- Lakeland Police Department
- Parks & Recreation
- Public Works
- Retirement Services
- Risk Management
- RP Funding Center
- Water Utilities



City of Lakeland Organizational Chart

## Differences Between a Self-Evaluation and Transition Plan

The self-evaluation component of the ADA/504 plan identifies any barriers or potential barriers for persons with disabilities and includes a review of policies, programs, activities, services and facilities. Barriers identified may include policies or procedures that may inadvertently discriminate against persons with disabilities. An example of a self-evaluation component that was reviewed is the City's website. The evaluation was to determine if changes are needed to make the website more accessible. Another example may be the use of inappropriate terminology such as the word "handicapped" instead of the term person with a disability. A key and required component of the self-evaluation is the opportunity for input by the public, organizations that represent persons with disabilities, City staff and other interested persons. The City conducted extensive and comprehensive public input activities using a variety of methodologies in order to incorporate comments into the overall content and prioritization of the plan. Results of the public outreach activities are discussed in the public outreach portion of this report. Detailed responses are included in the Appendix.

The transition plan assigns estimated dates for the removal of physical barriers identified in the plan as required by the ADA for public entities with more than 50 employees. As mentioned, the City is in the process of developing an implementation plan over time that will incorporate priorities identified by the public and staff, concerns or complaints, prevalence of use by persons with disabilities, current remodeling and construction projects, funding sources, resources and other variables related to the removal of physical barriers. The ADA Implementation Committee is currently developing a draft barrier removal implementation plan.

## SELF-EVALUATION PLAN

### City of Lakeland ADA/504 Self-Evaluation and Transition Plan

The City of Lakeland ADA/504 Self-evaluation and Transition Plan Update has been prepared by Disability Access Consultants, LLC (DAC), with the collaboration and assistance of City of Lakeland (City) staff and input by other interested individuals and community members. DAC was contracted to conduct a comprehensive survey of City buildings, parks, playgrounds, trails and public rights-of-way in addition to the policies, programs and activities. The goal of the City is that all potential physical and programmatic barriers for accessibility are identified and removed over time in accordance with the City of Lakeland ADA/504 Self-evaluation and Transition Plan Update.

To further the City's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, City of Lakeland is conducting an ADA/504 Self-evaluation of programs, services, activities. The ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by City of Lakeland and provides an updated framework for implementation. The current study also incorporates recent code changes, updates in accessibility standards and regulations in addition to accessibility trends.

### Prior ADA Self-Evaluation and Transition Plans

This study completed by DAC updates and/or augments selected accessibility surveys and studies which were conducted previously. In FY 2017 Kimley-Horn published an ADA Self-evaluation and Transition Plan for selected portions of City Public Rights-of-Way. Kimley-Horn evaluated 15 signalized intersections and 8 miles of sidewalk to prepare the report.

## **Updated ADA Self-Evaluation and Transition Plan**

To further the City's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the City contracted with Disability Access Consultants (DAC) to conduct an updated ADA/504 Self-evaluation of Public Rights-of-Way, facilities, programs, services, activities.

The current City of Lakeland ADA Title II Self-evaluation has been prepared by DAC, with the collaboration and assistance of City of Lakeland staff and input by other interested individuals, organizations that represent persons with disabilities and community members. DAC was contracted to conduct a comprehensive survey of City buildings, parks, and public rights-of-way. The goal of the City is that all potential physical and programmatic barriers for accessibility are identified and removed.

The updated ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the City and provides an updated framework for implementation. The current study also incorporates recent updates in the ADA, Florida Building Code, and accessibility trends.

## **Regular Self-Evaluation and Transition Plan Updates**

This ADA/504 plan is a living, on-going document and requires regular updates to keep it current. As the City understands the commitment for regular updates and annual reports, the City will continue to update its plan on an annual or more frequent basis. In its continuing efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the self-evaluation. The City's ADA Coordinator, designated as their ADA Specialist, is empowered with oversight responsibility for implementation of the requirements of the ADA, 504 and related accessibility standards and regulation.

The City also has the use of web-based, accessibility management software called DACTrak, to document and track the findings and the implementation of the plan, including progress reports.

As public input is important to develop and prioritize the plan, the City conducted public outreach as described in the public outreach portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable and realistic plan.

Future updates may also be necessitated by changes in the ADA, the Florida Building Code, Florida Department of Transportation (FDOT), Public Rights-of-Way Accessibility Guidelines (PROWAG), or the Manual on Uniform Traffic Control Devices (MUTCD).

## **Self-Evaluation Methodology and Format**

As part of the self-evaluation, a public entity should:

- 1) Identify all the public entity's programs, activities, services and their locations.
- 2) Review all the policies and practices that govern the administration of the public entity's programs, activities and services.

In addition, public entities are required to provide opportunities for public input on the self-evaluation and are strongly encouraged to consult with individuals with disabilities and organizations that represent them to assist in the self-evaluation process. Many individuals with disabilities have unique perspectives on a public entity's programs, activities, and services. For example, individuals with mobility impairments can readily identify barriers preventing their full enjoyment of the public entity's programs, activities, and services. Similarly, individuals with hearing impairments can identify the communication barriers that hamper participation in a public entity's programs, activities, and services.

Information collected during the self-evaluation process is reported by areas and categories, not individually by departments. This self-evaluation provides an overall summary and profile of findings and recommendations. Findings and recommendations for potential physical barriers are found in the web based DACTrak software program. DACTrak has photographs of barriers, GIS information, findings, recommendations, estimated costs and other information. Estimated costs are derived using a combination of factors including industry standards, regional adjustments and values reported by DAC clients. The costs entered into the software are estimated construction costs and are not fixed total project costs. Custom reports and transition plan information can be generated from DACTrak to monitor and manage the implementation of the plan.

## **Public Outreach and Public Input**

Multiple methods for soliciting input into the development of the City of Lakeland ADA Self-evaluation and Transition Plan were selected. Groups targeted included stakeholders from members of the public, organizations representing individuals with disabilities and staff.

Title II of the ADA/504 requires an opportunity for input into the self-evaluation process by individuals with disabilities, organizations representing individuals with disabilities and other interested individuals. Public entities, such as City of Lakeland, are required to provide opportunities for public input into the self-evaluation and are strongly encouraged to consult with individuals with disabilities and organizations that represent them to assist in the self-evaluation process. Many individuals with disabilities have unique perspectives on a public entity's programs, activities, and services. For example, individuals with mobility impairments can readily identify barriers preventing their full enjoyment of the public entity's programs, activities, and services. Similarly, individuals with hearing impairments can identify the communication barriers that hamper participation in a public entity's programs, activities, and services.

### **Surveys for Input by the Public, Volunteers and Staff**

Surveys targeted towards community members, organizations representing persons with disabilities, as well as City staff were made available to enhance public input efforts to identify any programmatic barriers that may impact accessibility of City programs, services, and activities. Surveys were provided in multiple formats and Spanish including:

- An online fillable word document
- Hard copy printed versions in high traffic areas such as public service counters
- An electronic survey via an online link

Responses provided the City and DAC with insights into internal program operations and access for persons with disabilities. This report contains findings based on a review of responses and provides recommendations to ensure compliance. A complete version of survey comments, findings and recommendations can be found in the Appendix. Copies of the press releases, announcements, flyers and other public outreach documents are included in the Appendix.

In addition, community organizations representing individuals with disabilities and other interested community members were provided opportunities for input via in-person, open houses, by phone, email, in writing, or online. Surveys were made available online and in written format. The surveys included questions regarding interaction with City staff and programs, if there were any current complaints or problems, what information or resources organizations could provide that would assist the City and what general guidance or assistance organizations and community members could provide or suggest.

Actual comments from surveys can be found in the Appendix and have not been edited for spelling or grammar and are reported as stated on the survey form except that identifying information is not included in this document. It is important to note that some comments pertain to services that are

not provided by the City of Lakeland. For example, the City does not provide transportation services or emergency evacuation services.

### ADA Open Houses

Two ADA Open Houses were held on February 19, 2019 at the Lakeland Public Library at 100 Lake Morton Drive, Lakeland, FL 33801. In order to accommodate potential participants, a morning and an evening session was held. The morning Open House was held from 10:00 AM to 11:30 AM. The evening open house was held from 5:30 PM to 7:00 PM. Announcements of the open house were placed on the website and in other publications. Information and invitations were also sent to the Lakeland Alliance for Accessibility.

Large open house signs were posted outside on the routes to the open house to assist with directions to the open house. The large blue signs with the International Symbol of Accessibility (ISA) and directional arrows were posted on the routes near the open houses, in the parking lot and at the location of the open house.



Comprehensive planning was conducted prior to holding the open houses. The location of the open house, restrooms, tables, seating, materials and alternate formats were evaluated to ensure that the open house event was fully accessible. The open house was held in an accessible location at the Lakeland Public Library. The sign-in and welcome table was accessible and accommodated the required knee clearance and depth to allow participants to sign-in and access agendas. A clip board was also available for participants that were not able to sign-in at the table.



City staff were trained regarding accommodating persons with a variety of disabilities. The agendas were available in regular font, large font for low vision and copies were provided in Braille. A sign language interpreter was present in addition to the provision of Computer Aided Real-Time Transcription (CART) in order to transcribe the actual language and spoken words at the open house. As the speakers and participants talked, text was transcribed and projected onto the screen and the content from the open house was transcribed and available. The room provided for accessible seating areas. Seating for persons with disabilities using wheelchairs was clearly marked with a large blue and white floor decal with the International



Symbol of Accessibility (ISA) and smaller ISA decals on chairs with companion seating.

The agenda for the first ADA Open House included introductions, goals and objectives of City of Lakeland Open House, background of the ADA and followed by a request for input from the public. A PowerPoint was shown describing the activities conducted to provide the updated ADA/504 Self-evaluation and Transition Plan and the items surveyed regarding buildings, parks and other areas. The number of sidewalks, intersections and curb ramps were provided.

Participants were asked to provide comments regarding areas in need of accessibility and what they considered to be the highest priorities. Comments received were recorded in addition to being transcribed on the screen by the transcriptionist using the CART program.

Comments received from the ADA Open Houses will be incorporated into City of Lakeland ADA Self-evaluation and Transition Plan. A summary of general comments includes:

- Cracked sidewalks
- Pedestrian buttons at crosswalks are not on an accessible path
- Comments about some roads and sidewalks that are under the control of the Florida Department of Transportation (FDOT)-comments forwarded
- Obstructions in sidewalks
- Concern with safety of roundabouts
- Lack of an accessible path to picnic tables around the lake
- Parking at the library is on the side causing a concern due to safety
- Need accessible seating around Gandy Pool
- Mobility issues with decking
- Items placed on handrails causing handrail to be inaccessible
- Shaded areas should also be for accessible seating for persons with disabilities
- City staff should be trained to provide and maintain accessible paths of travel
- Bikes chained to handrails
- Gaps at railroad tracks at Curtis Peterson
- Staff driving City vehicles should follow all laws
- Need to provide more disability awareness for City staff
- Cross slopes too steep in some areas
- Ramps that do not have handrails on both sides
- Lack of handrails on ramp at City Hall
- Lack of audible signals at intersections
- Request for larger street signs for street signs or illuminated street names
- Concern regarding accessible parking at Housing Authority
- Need enforcement of accessible parking spaces
- Assisting with special needs or persons with disabilities in emergencies
- Accessibility and parking needs at the Chamber of Commerce
- Need more accessible areas around Lake Morton

A single one-page input form was available at the Open House in addition to hard copies of the more comprehensive surveys. Information regarding the surveys and the links online were discussed. Participants were encouraged to provide additional input by surveys, phone calls or emails.

## **TRANSITION PLAN-IDENTIFICATION OF PHYSICAL BARRIERS**

The ADA requires state and local governments to complete an ADA Transition Plan process to achieve program accessibility. The process results in a collection of data that collectively is referred to as the ADA Transition Plan. The term "Transition Plan" comes from the terminology in the 1990 Americans with Disabilities Act (ADA) that describes how public entities would be "transitioning" into compliance during the timelines of 1992 to 1995. The term Barrier Removal Plan – or Implementation Plan, is used in addition to the term Transition Plan. This is due to the fact that the three-year time period originally planned for public entities to transition into compliance has passed. Public entities are now actively working on implementing the removal of barriers, including structural and programmatic barriers.

The first step in the Transition Plan process includes conducting a Self-evaluation of facilities, policies, procedures, programs, services and activities. The second step includes developing a timeline for implementing the removal of barriers. It also includes a review of a public entity's

policies and procedures for each department and agency. This aspect of the process brings attention to modifications that need to be made based on potentially discriminatory language or practices.

The implementation/barrier removal aspect of the Transition Plan identifies the noncompliant barriers that may deny access to goods and services, the proposed method to remove the barrier, the identity of the responsible person to oversee the implementation of the plan and the projected schedule for barrier removal of "structural" barriers. The Self-evaluation aspect of the Transition Plan is done with the intent of focusing on structural and programmatic barriers that may deny access to programs services and activities.

### Requirements of a Transition Plan

To effectuate Title II of the ADA, Department of Justice regulation *28 CFR 35.150(d) Transition Plan* requires public entities with 50 or more employees to develop an ADA Transition Plan to review and identify physical barriers and steps needed to result in accessible programs when viewed in their entirety. Public entities must ensure that people with disabilities are not excluded from programs, activities and services because of inaccessible facilities. Each facility is not necessarily required to be accessible. A public entity's services, programs, or activities, when "viewed in their entirety," must be accessible. This standard is known as "program accessibility" and is a key requirement under Title II of the ADA.

A comprehensive Transition Plan should contain the following:

1. A list of the physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
  2. A detailed outline of the implementation methods to be utilized to remove these barriers and make the facilities accessible;
  3. The name of the official or officials responsible for the plan's implementation; and
  4. The projected schedule (estimated timelines) for taking the necessary steps to achieve compliance with Title II of the ADA.
- During the course of the development of the updated ADA/504 Plan, the City completed items 1-3 in the list of requirements for the Transition Plan, and already had part of item 4 in place in their Pavement Management Program. The Pavement Management Program is an annual schedule for road resurfacing, which includes reviewing curb ramp locations; either installing new ones or repairing existing ones. The projected schedule with estimated timelines will be further developed by the City's ADA Implementation Committee. The ADA Implementation Committee is comprised of representatives from multiple departments that collaborate on the most expeditious and cost-effective method to implement the ADA/504 plan. Committee members include representatives from departments that are most directly involved with the implementation of the plan.
  - Structural changes are not required where there are other feasible solutions such as moving a class to an accessible location when a person with a disability needs to be in an accessible location or having a librarian retrieve books from an upper story. However, structural changes leading to increased integration should be considered where feasible. Structural changes can include modifications to facilities and public rights-of way.
  - Where structural modifications are required to achieve program accessibility, a public entity with 50 or more employees must complete an Implementation Plan that provides for the removal of these barriers. Any structural modifications must be completed as expeditiously as possible.
  - The Historic Preservation Board of the City of Lakeland serves as the primary agency responsible for furthering historic preservation within the City. Design guidelines have been established by the City to provide guidance on compatible changes to and treatment of

existing historic district properties, as well as to assist in the development of sensitive new construction.

- In addition to physical barriers of facilities (i.e. buildings, parks), the ADA of 1990, Section 35.150, Existing Facilities, requires that the transition plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992.

For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, "curb ramps complying with Section 4.7 shall be provided wherever an accessible route crosses a curb." For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New Construction and Alterations, which states, "newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways."

Structural barriers of facilities and public rights-of-way are referenced in the self-evaluation data by site and are contained in detail in individualized transition/barrier removal reports of sites inspected. This data is contained in the DACTrak Accessibility Management System. It is important to note that some structural barriers may be addressed by using a programmatic methodology if they did not involve new construction or new remodeling and renovation.

### **Findings in the DACTrak Accessibility Management System**

Structural barriers of facilities are referenced in the transition plan by site and are contained in detail in individualized transition/barrier removal reports of sites inspected and are available in the DACTrak Accessibility Management System. It is important to note that some structural barriers may be addressed by using a programmatic methodology if they did not involve new construction or new remodeling and renovation. Estimated costs are derived using a combination of factors including industry standards, regional adjustments and values reported by DAC clients. The costs entered into the software are estimated construction costs and are not fixed total project costs. Comprehensive findings of noncompliant items are included in the DACTrak Accessibility Management System. Multiple types of reports can be generated from DACTrak.

- 49 facilities
- 42 parks
- 2,645 curb ramps
- 70 intersections
- 366 miles of City sidewalks

### **Categories of noncompliant findings on the following charts include:**

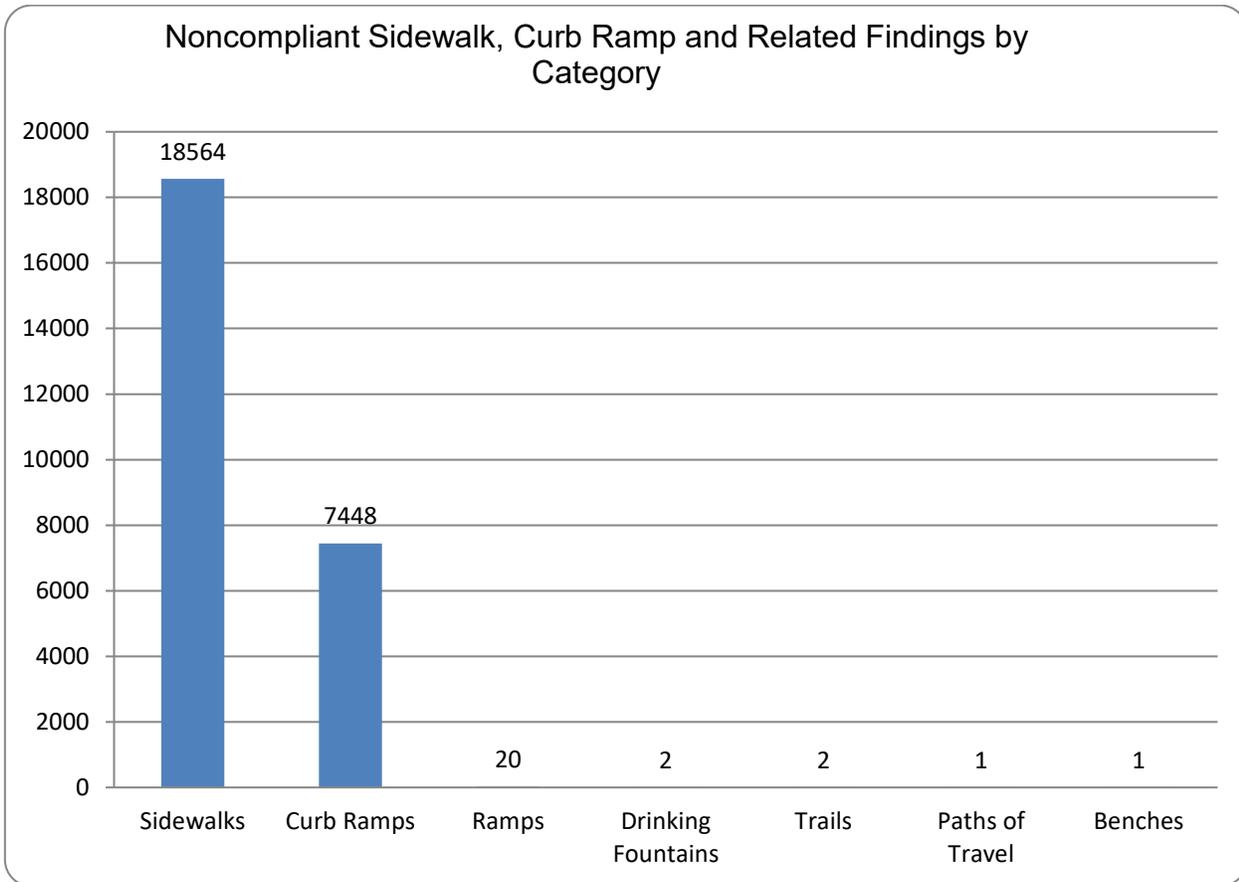
- Noncompliant Sidewalk, Curb Ramp and Related Findings
  - Sidewalks
  - Curb Ramps
  - Ramps
  - Drinking Fountains
  - Trails
  - Paths of Travel
  - Benches

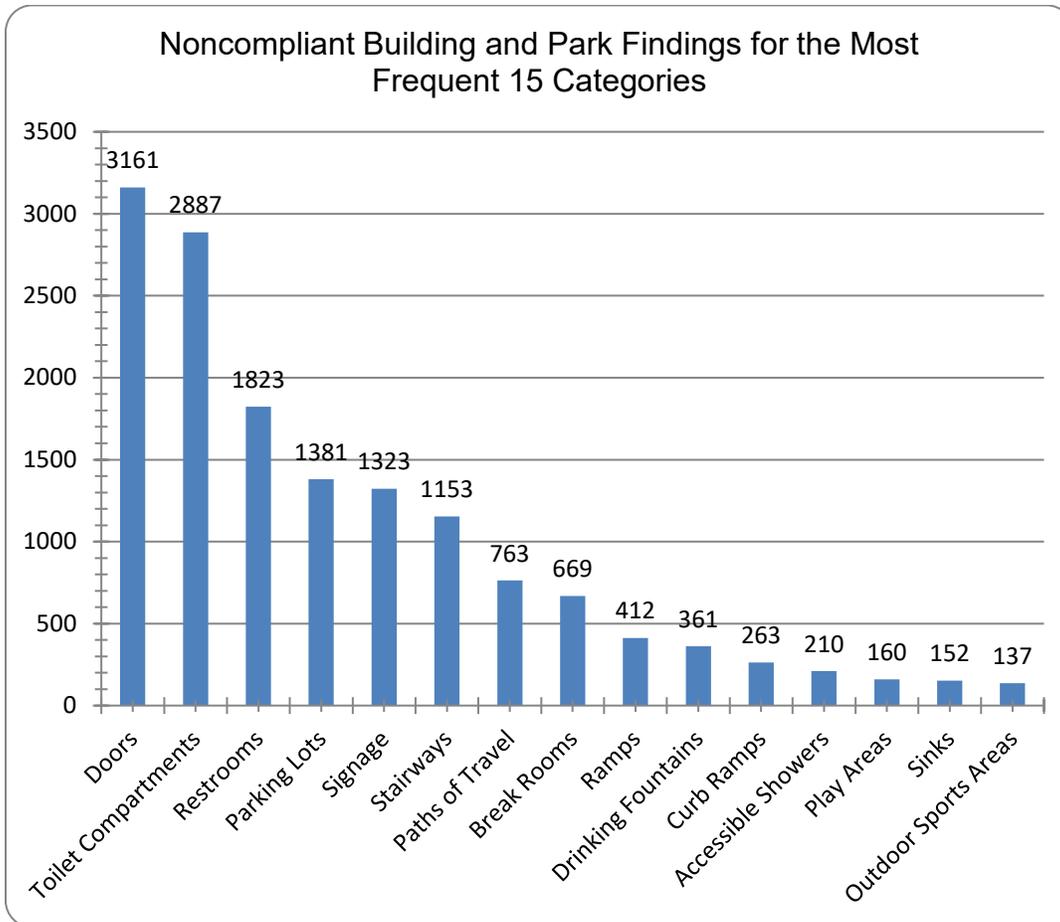
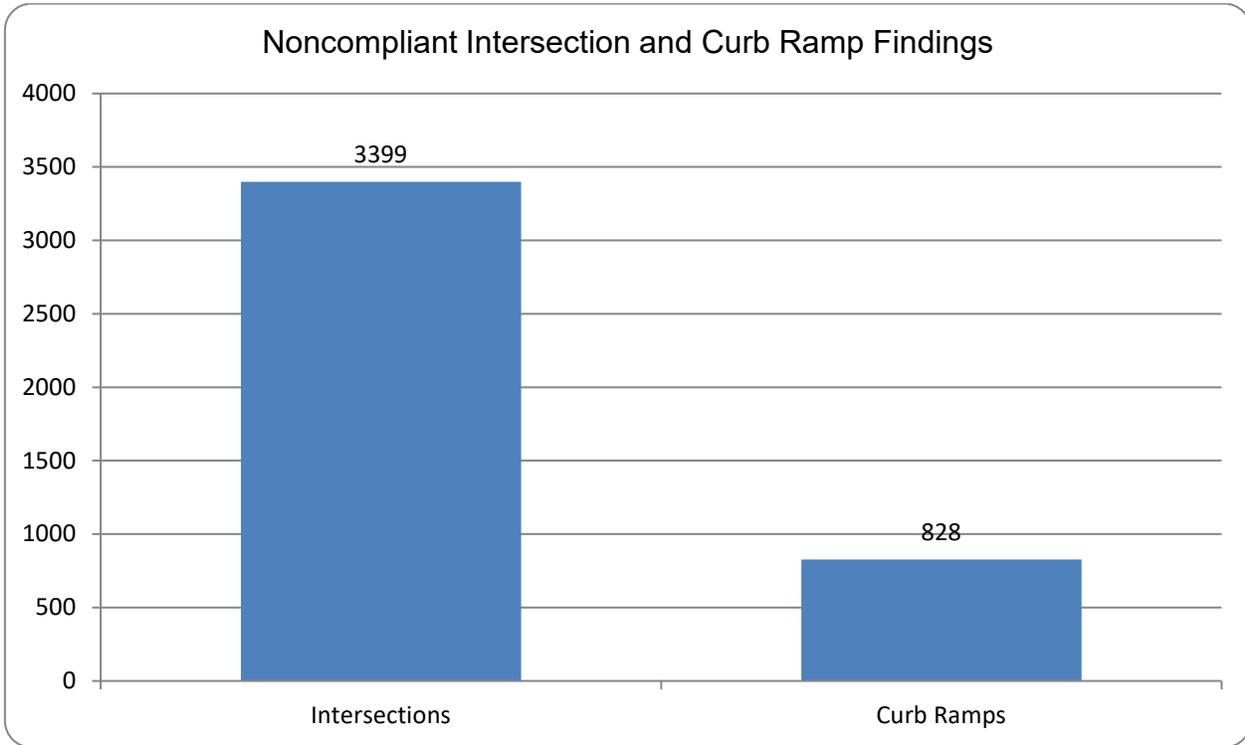
- Noncompliant Intersection Findings and Curb Ramps:

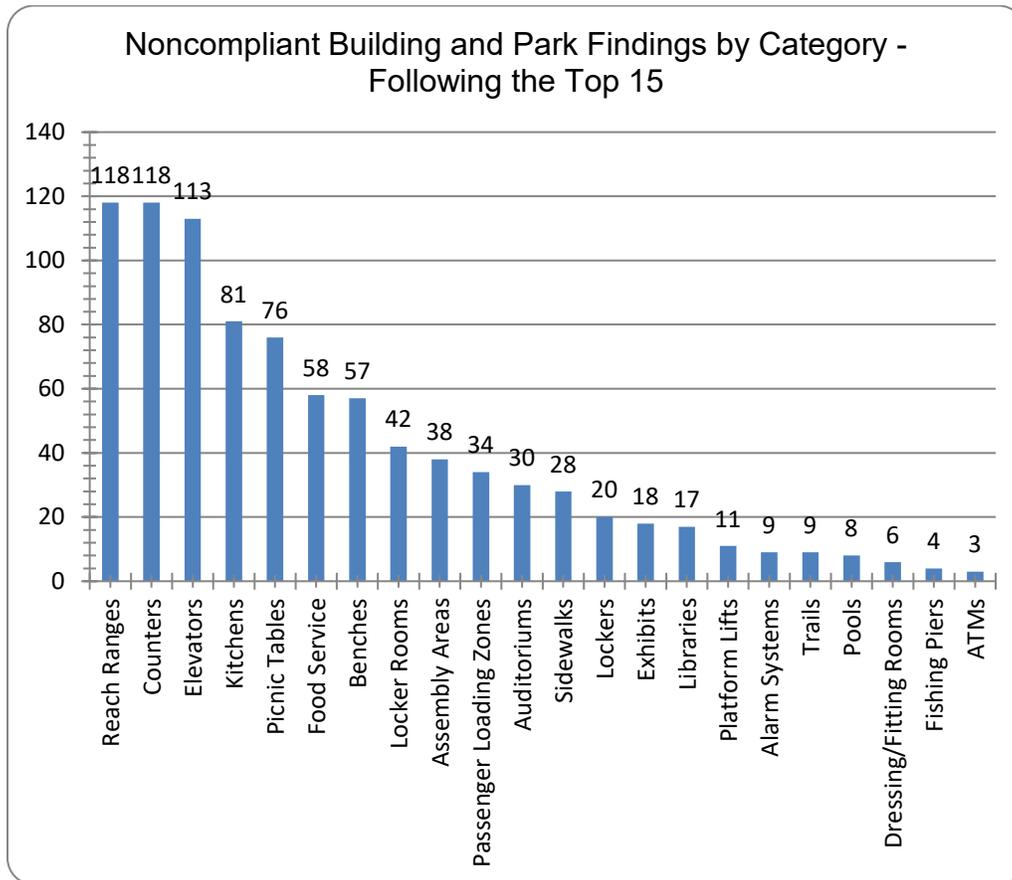
\*Note: intersections may have more than one finding per intersection, thus accounting for the total of 3,399 noncompliant findings. 70 intersections were surveyed.

- Noncompliant findings in Buildings and Parks:

- Top 15 by number of findings- the chart represents the top 15 categories of noncompliant findings and represents a count of noncompliant findings.
- Next 22 by number of findings- the next chart provides the number of findings by category for the next 22 categories and represents a count of noncompliant findings.







## SELF-EVALUATION AND TRANSITION PLAN COMPONENTS

### Designated ADA Coordinator/Specialist

Jenny Sykes serves in the ADA Coordinator role for the City of Lakeland and is designated as their ADA Specialist. The ADA Specialist provides centralized oversight and coordination of ADA and accessibility compliance efforts by city departments. As per ADA Section 35.150, the public entity is required to name the designated responsible person who will oversee the implementation of the transition plan. The address and contact information for the ADA specialist is:

Jenny Sykes, M.S., ADAC

ADA Specialist

228 S. Massachusetts Ave.

Lakeland, FL 33801-5086

Email: [Jenny.Sykes@lakelandgov.net](mailto:Jenny.Sykes@lakelandgov.net)

Phone: (863) 834-8444

Fax: (863) 834-8040

TTY/TDD: Local – (863) 834-8333 or 1-800-955-8771 or the Florida Relay Service 1-800-955-8770.

Requests for information from the ADA Specialist can be sent by email, phone, fax, mail, or TTY/TDD. Information is available in alternate formats upon request.

Requests for copies or information about the City of Lakeland’s ADA/504 Self-evaluation and Transition Plan can be obtained from the ADA Specialist. The City offers alternate methods and

accommodations (e.g., enlarged print, Braille) to provide access for reviewing and providing input on the City's plan.

### **Facilities and Public Right-of-Way (PROW)**

The City contracted with DAC to complete inspections of facilities, parks and public rights-of-way. Between May 2018 to April 2019 DAC completed inspections of:

- 49 facilities
- 42 parks
- 2,645 curb ramps
- 70 intersections
- 366 miles of City sidewalks

Structural barriers of facilities and PROW are referenced in the transition plan by site and are contained in detail in individualized Transition/Barrier Removal reports of sites inspected and are available from the ADA Specialist and in the DACTrak Accessibility Management System.

The inspection process was accomplished using a team of DAC accessibility specialists. DAC's staff are equipped with a variety of task specific measuring tools including but not limited to; tape measures, smart levels, door pressure gauges and pin gauges. DAC inspects the "as-is" field conditions and inputs the data into the DACTrak intake software and forms through the use of a PC tablet.

The evaluations identified physical barriers based on the 2010 ADA Standards for Accessible Design, proposed accessibility guidelines for pedestrian facilities in the Public Right-of-Way Accessibility Guidelines (PROWAG), and the Florida Building Code. Detailed measurements of the existing conditions, planning-level recommendations for removing the physical barriers, and photos of each facility were recorded during the evaluation process and were included in the facility reports.

The findings and recommendations for the City buildings, parks, parking lots, and PROW that were inspected have been exported into the DACTrak Accessibility Management Software. Different report formats can be printed from the DACTrak Accessibility Management Software provided by DAC. The DACTrak software program provides the City with an on-line, web-based tool to update its plan, document progress, estimate costs and schedule barrier removal. DACTrak allows the user to prioritize in a variety of methods.

Common issues along the PROW corridors may include excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches.

Recognizing that it is not feasible to immediately correct all accessibility deficiencies, the City of Lakeland is prioritizing its transition/barrier removal plan. As an example, considerations are given to facilities and PROW which are of high public use and/or of high use by persons with disabilities. Also, additional considerations are given to planned renovations and the severity of the barriers.

The City of Lakeland reserves the right to update their barrier removal priorities to allow flexibility in accommodating changes in programs, requests for reasonable accommodations, community requests, and fluctuations in funding resources.

The facility, parks, recreational sites, and public rights-of-way inspected are listed in the Appendix.

The inspection process was conducted by DAC using several teams of DAC accessibility specialists. A variety of measuring tools included tape measures, smart levels, door pressure gauges and profile

gauges. DAC recorded the "as-is" field measurements and entered the actual measurement and photographs using a tablet with the DACTrak intake software and forms.

The evaluations identified physical barriers based on the 2010 ADA Standards for Accessible Design and the Florida Building Code. Detailed measurements of the existing conditions, planning-level recommendations for removing the physical barriers, and photos of each facility were recorded during the evaluation process and were included in the facility reports.

The findings and recommendations for City buildings, parks, and parking lots that were inspected have been exported into the DACTrak Accessibility Management Software. Different report formats can be printed from the DACTrak Accessibility Management Software provided by DAC. The DACTrak software program provides the City with an on-line, web-based tool to update its plan, document progress, estimate costs and schedule barrier removal. DACTrak allows the user to prioritize in a variety of methods.

Structural barriers of facilities are referenced in the transition plan by site and are contained in detail in individualized Transition/Barrier Removal reports of sites inspected and are available from the ADA Specialist and in the DACTrak Accessibility Management System. DACTrak is a secure on-line system to allow for access by multiple users. Users are assigned an administrative or read only password.

Recognizing that it is not feasible to immediately correct all accessibility deficiencies, City of Lakeland is prioritizing its transition/barrier removal plan. An ADA Implementation Committee has been assembled and is analyzing the field data collected in order to prepare a proposed plan for the removal of barriers over time. As an example, considerations are given to facilities which are of high public use and/or of high use by persons with disabilities. Also, additional considerations are given to planned renovations and the severity of the barriers.

The City understands that the ADA Transition Plan is meant to and is designed to be fluid and flexible to accommodate changes in programs, funding resources, community requests. For example, dates may be moved earlier or later in the plan depending upon issues such as accessibility needs by the users, complaints, reasonable accommodation requests, planned projects, special initiatives or related issues that may change the priority and projected dates of barrier removal.

A complete list of facilities, parks, recreational sites surveyed by DAC is included in the Appendix in addition to public rights-of-way sidewalks, curb ramps, crosswalks, intersections and related areas. The findings, recommendations, photographs, GIS information and code requirements are included in the DACTrak online accessibility management software to assist the City with the implementation of the plan.

### **Location of Self-Evaluation and Transition Plan**

As mentioned previously, the ADA/504 Self-evaluation and Transition Plan data is maintained and made available for public inspection by the City's ADA Specialist, Jenny Sykes. The ADA/504 Self-evaluation and Transition Plan data is available in alternate formats, if requested.

### **Findings, Survey Comments, and Recommendations**

This section of the self-evaluation contains findings and recommendations by DAC about the extent to which City of Lakeland's policies and practices provide access to the City's programs, services and activities. The results from the ADA self-evaluation will demonstrate not only the commitment by the City to provide access to City programs, services and activities, but the overall compliance by the City.

Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the City of Lakeland's self-evaluation, which is detailed in the DACTrak Accessibility Management Program.

Access to the DACTrak reports is available from City's ADA Specialist. Each area reviewed for compliance is described followed by compliant or noncompliant findings. Recommendations to achieve or maintain compliance follow the findings.

### **Policies and Procedures**

A review of the City's policies, procedures, practices along with programs, services and activities was completed to search for apparent and perceived discriminatory practices.

Under the ADA, the City of Lakeland is required to "make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability." The City of Lakeland is required to do so in every situation, unless it can demonstrate "that making the modifications would fundamentally alter the nature of the service, program, or activity." [28 CFR § 35.130 (7)]

### **Designation of ADA Coordinator/Specialist**

The regulations implementing the ADA/504 require any public entity with fifty or more employees to designate at least one employee to coordinate ADA/504 compliance in accordance with 28 CFR §35.107(a). In addition, federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. Furthermore, in providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160.

## **FINDINGS**

### **Compliant:**

1. The City has a designated ADA Specialist to oversee the development, implementation and monitoring of the ADA/504 Self-evaluation and Transition Plan. Per the *Notice under the Americans with Disabilities Act* on the City's website, the City has designated Jenny Sykes as the ADA Specialist.
2. The identity of the ADA Specialist as well as the address, phone number, fax number, TTY number, and email address were noticed and posted on the City's website at the commencement of this study.

## **RECOMMENDATIONS**

### **Additional recommendations listed will maintain and enhance the requirements.**

1. Information regarding the identity of the City's ADA Specialist should continue to be provided to staff, posted at all City locations, incorporated into new employee orientation packets, and placed in frequently used publications, on the website and in staff and public directories.
2. It is recommended that the City continue to publish the name, address, e-mail address and phone numbers of the City of Lakeland ADA Specialist in appropriate public notices, brochures, pamphlets and other documents frequently distributed to the general public. Publications should also include a TDD/TYY and/or the Florida relay phone number.
3. Publications should be updated if the identity of the ADA Specialist changes or if more than one ADA Specialist is designated.

## Posting and Dissemination of Rights

All public entities are required to provide information to applicants, participants, beneficiaries, employees and other interested persons of the rights and protections afforded by Title II of the ADA (28 CFR §35.106). In providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160.

### **FINDINGS**

**The City meets the majority of the compliance requirements.**

#### **Compliant:**

1. A notice of the rights afforded individuals with disabilities and nondiscrimination statement, along with the method to request an accommodation and/or to file a complaint are posted on the City's website. A link to the City's Accessibility Statement is at the bottom of main City webpages.

### **RECOMMENDATIONS**

**Additional recommendations listed will maintain and enhance the requirements.**

1. Statements of nondiscrimination should be included on selected publications, brochures describing programs, requests for proposals/qualifications, facility use agreements, contracts, services and activities offered by the City, new employee materials, recruitment materials; publications and frequently used forms and documents.
2. The notice should include the name, title, address and phone numbers of the ADA Specialist. The notice should include a TDD/TTY number and/or Florida Relay number to ensure equally effective communication. Although not required, it is recommended that the notice include the e-mail address for the ADA Specialist.

## Statement of Accommodations on Public Notices

Statements of accommodations should be available on public notices, meeting agendas, and brochures about events provided by and/or sponsored by the City. The City is required to provide ADA information in alternative formats to ensure that that information is accessible to people with disabilities.

### **FINDINGS**

**The City meets the majority of compliance requirements.**

#### **Compliant examples:**

1. The Directory of Parks, Programs, and Special Events includes the statement: "Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity, should contact the office of Jenny Sykes, ADA Specialist 863-834-8444 as soon as possible but no later than 48 hours before the scheduled event or program."
2. Meeting agendas for the City Commission, Zoning Board of Adjustments and Appeals, Historic Preservation Board, Risk Management & Purchasing, Code Enforcement Board, Code Enforcement Board Hearing Officer; include the statement: "In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statutes, persons with disabilities needing special accommodation to participate in this proceeding, or those requiring language assistance (free of charge) should contact the City of Lakeland ADA Specialist, Jenny Sykes, no later than 48 hours prior to the proceeding, at (863) 834-8444, Email: Jenny.sykes@lakelandgov.net. If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or 1-800-955- 8771 (TDD-Telecommunications Device for the Deaf) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance."

3. A Planning & Zoning Board meeting agenda dated 10/16/2018 includes a statement of accommodation and is now compliant. Agendas prior to this date were found without a statement of accommodation.

**Overall significant compliance with a few exceptions noted:**

1. A posting of a 1/12/2019 Martin Luther King Jr. parade event on the City's website does not include an accommodation statement.
2. Upcoming events posted on the City's website such as the Tapestries Lakeland VIP Opening, ShredFest, Lakeland Christmas Parade: A Storybook Christmas; Red, White & KABOOM; Snowfest 2018; do not include an accommodation statement.
3. Online information of programs and classes offered by the Library does not include information on how to request an accommodation.
4. Red Light Camera Enforcement meeting agendas do not include a statement of accommodation.
5. The Access Lakeland Newsletter, a monthly publication, does not include a statement of accommodation.
6. The Lakeland Fire Department offers fire safety and community outreach programs. Application forms are available online. Statements of accommodation were not found.

**RECOMMENDATIONS**

1. It is recommended that a statement of accommodation be included on all postings of meetings, events and activities that are open to the public.

**Accommodations to Access Programs, Services and Activities**

The ADA/504 prohibits public entities from excluding persons with disabilities from programs, activities or services offered by the public entity. The law allows a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services and activities (28 CFR §35.150). Policies and procedures need to ensure that individuals with mobility impairments are provided access to public meetings. A public entity is required to ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of accessible services, activities, and facilities.

**FINDINGS**

**The City meets the majority of the compliance requirements.**

**Compliant:**

1. The "City of Lakeland Fact Sheet" states: "Reasonable Accommodation: The City of Lakeland encourages the public to make the City aware of any City facility, program, service, or activity that appears inaccessible to those who have disabilities. Furthermore, the City will provide reasonable accommodation to qualified persons with disabilities (free of charge) who wish to participate in City administered public events or, who require special assistance to access City facilities, programs, services or activities. Because providing a reasonable accommodation may require outside assistance, organizations, or resources, the City asks that any request be made with as much notice as possible, preferably 72 hours, but no later than 48 hours in advance of the event."
2. Human Resources is the point of contact for employment related ADA issues or accommodations. It is stated on the Human Resources web-page that persons with a disability whom require a reasonable accommodation to participate in the application or testing process: "You must notify Human Resources at 863.834.8798. Documentation of disability may be required. The City TDD phone number is 863.834.8333."
3. According to the City of Lakeland's website; The City of Lakeland Libraries offer assistive services and technologies to support access for persons with visual, physical, hearing or

speech disabilities to library materials, equipment and services. Assistive services and technologies offered include:

- a. Hearing loops.
- b. Computer stations with JAWS screen reader software, headphones and braille keyboard.
- c. Books and other materials by mail for persons who are unable to visit the library in person due to disability.
- d. Sensory Storytime program which includes stories and activities created for children on the autism spectrum or with sensory sensitivities.
- e. A Visual Support Story to help persons prepare and understand what to expect during their library visit.
- f. Sign language interpreters.
- g. Computers with Microsoft Windows Accessibility magnifier.

## **RECOMMENDATIONS**

### **Additional recommendations listed will maintain and enhance the requirements.**

1. Information about how to request accommodations should appear on all public notices and announcements including special events. Information should be disseminated to all departments and divisions regarding the statement for accommodations requirement.
2. The City should continue to provide training for new staff and volunteers regarding accommodations for individuals with disabilities. All staff, and in particular frontline staff such as receptionists and staff with high public contact, should continue to receive training on interacting and accommodating individuals with disabilities.
3. The City should continue to offer technology, programs and activities which support persons with disabilities such as those offered at the City of Lakeland Libraries.
4. A form for requesting accommodations on the City website would be a welcome addition. Such a form should also be available in alternate formats. The ADA Specialist should maintain records of requests, concern and comments and the status and method to resolve the concerns.
5. Establish a procedure for undue burden. If a conclusion is reached that any particular accommodation would result in undue burden to the City of Lakeland, that decision must be made and the reasons documented by the head of the City. The test for being unduly burdensome is the proportion of the cost for accessibility improvements compared to the City's overall budget, and not simply the project cost. If a conclusion of undue burden is reached and documented, the City will need to take alternate actions to ensure that persons with disabilities receive the benefits or services provided.

### **Access to Programs, Services and Activities**

A public entity may not adopt official policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have a discriminatory effect (28 CFR §35.130(b)(3)). All Title II entities must ensure that all public meetings and events sponsored are readily accessible to persons with disabilities. Policies and procedures need to ensure that individuals with mobility impairments are provided access to public meetings.

## **FINDINGS**

**Overall compliance: The City clearly demonstrates compliance activities throughout the City which in general exceed compliance activities seen in most similar size city governments. Information to request accommodations to have access to programs, services and activities of the City are readily available on the City's website and in the A-Z Service Directory on the City's website.**

Compliant examples of accessibility for persons with disabilities include:

1. Persons may register for classes, programs, camps, and activities online.
2. The City has a webpage devoted to information on service animals.
3. The City participates in events such as the Deaf Expo, which provide opportunities for the community to learn about services available to persons with disabilities.
4. The City has enhanced accessibility to their Christmas parade by creating an accessible viewing area for persons with wheelchairs and their families. The area includes accessible parking and toilet facilities.
5. The City has established special proclamations such as the Americans with Disabilities Act Day to celebrate the contributions individuals with disabilities have made to the community.
6. The City has an inclusive playground, Common Ground, where children of varying abilities can play together side-by-side.
7. City Commission meetings are available live online and on TV. The meetings are recorded and may also be viewed or downloaded after a meeting has occurred.
8. The City maintains an extensive Social Media presence to keep residents informed including Facebook, Twitter, Instagram, Snapchat, and Nextdoor. Access Lakeland Live is a monthly Facebook Live show which takes place once a month and is recorded and archived as well.
9. Website information on accessible swimming pools includes:
  - a. Gandy Pool features an accessible ramp at 0-depth and that a hydraulic lift chair is provided.
  - b. Simpson Pool features a hydraulic lift chair
10. According to the City's website, persons with a disabled parking permit may park downtown in a "Disabled" space for any length of time at no charge. Vehicles with a disabled parking permit parked in a timed "general" space, may park for free, for up to double the posted time. The City has an online mapping application that shows the location of accessible parking spaces.
11. The City has a 1.2-acre botanical garden, Hollis Garden, that is accessible to all and admission is free.
12. City municipal Code Sec. 86-34 requires garbage carts or recycling carts not be placed on sidewalks, streets or other locations where interference with public travel may occur.
13. City Municipal Code Sec. 90-1 requires objects, obstructions and structures not be placed within the public right-of-way. The Code further states the Public Works Director may authorize the temporary or periodic placement of objects and/or merchandise for sale within the sidewalk area of the public right-of-way and, incidental thereto, and may require a written hold harmless agreement and impose such other reasonable conditions as may be necessary.
14. City Municipal Code Sec. 98-10 states it shall be unlawful for any person except pedestrians wholly or partially blind to carry or use on the public streets of the City any cane or walking stick which is white in color or white with red end. Any driver of a vehicle or any pedestrian who is not partially or totally blind, who approaches or comes in contact with a person partially or totally blind carrying a cane or walking stick which is white in color or white with a red end, is required to immediately come to a full stop and take such precautions before proceeding as may be necessary to avoid accident or injury to the person carrying the cane or stick.
15. The City of Lakeland Land Development Code regulating sidewalk cafes allows permits to be issued dependent on permit procedures. A partial listing of the procedures includes:
  - a. A review, or cause to be reviewed, the application and all supporting documentation to determine the effect of the sidewalk cafe on the free passage of vehicular and pedestrian traffic and the effects on maintenance, public order and public safety within the right-of-way.
  - b. No sidewalk cafe shall be permitted within five feet from the curb line if a parking area is adjacent to the curb line and no sidewalk cafe shall be permitted within seven

- feet from the curb line if a traffic lane is adjacent to the curb line. No such permit shall authorize the use or obstruction of a sidewalk located within the triangular area at the intersection of two sidewalks.
- c. All site furnishings and enclosures installed by the applicant shall maintain a minimum four feet clear sidewalk or walkway width for pedestrian travel. Such clearance shall be maintained between the edge of the sidewalk café and any fire hydrant.
16. City Municipal Code Sec. 98-37 states the penalty for misuse of accessible parking spaces to be \$250 if paid within 30 days.
  17. Public record requests may be submitted via online, phone, or in person.
  18. The Lakeland Police Department has established a 12-page directive to furnish guidance to the Department in providing police services to persons with disabilities and in complying with the ADA. It is the policy of the Department to afford persons with disabilities the same access to programs, services, and employment opportunities that is provided to all citizens including but not limited to services such as first responder recognition of the nature and characteristics of various disabilities and appropriate physical and emotional support for persons with disabilities. Examples in the directive include, but are not limited to:
    - a. Recognition of symptoms and appropriate medical and emotional support for people experiencing seizures;
    - b. Sensitivity to and appropriate physical support for people who are mobility challenged;
    - c. Rapid access to interpreters for people with hearing and/or speech disabilities who need to communicate with police personnel;
    - d. 24-hour access to professional support systems for people with mental disabilities;
    - e. Access to police information, programs, and publications for people who have impaired vision or hearing;
    - f. Recognition of the difference between characteristics common to certain disabilities (such as epilepsy, diabetes, and deafness) and those associated with antisocial or criminal behavior or reaction to alcohol or drug abuse; and,
    - g. Other accommodations to ensure service and access to all people with visual, mental, emotional or medical disabilities, including "invisible" disabilities such as diabetes, epilepsy, multiple sclerosis, loss of hearing and others.

## **RECOMMENDATIONS**

### **Additional recommendations listed will maintain and enhance the requirements.**

1. Continue to disseminate information in a variety of locations and formats to enhance the access to programs, services and activities.
2. The ADA Specialist should continue to monitor and receive information regarding concerns or issues about access to programs, services and activities and take the appropriate action regarding any potential discriminatory practices for persons with disabilities.
3. The City should assure methods for submitting information are not restricted to a single means. For instance, if online registration is required, alternate methods such as in person and/or mail should also be available. The online registration should also be accessible for persons with disabilities.
4. The City should continue to provide programs, services and activities which include and support individuals with disabilities.
5. The City should consider utilizing a checklist for staff to review when sponsoring special events including but not limited to indoor and outdoor concerts, festivals, fairs, town hall meeting, luncheons, and ceremonies that are held on City property or at other sites. Such a checklist would inform staff of their responsibilities under the ADA. DAC can assist the City with this checklist and efforts.

6. Special event permit applications, policies, and procedures should designate responsibilities for accessibility and nondiscrimination requirements.
7. Training should continue to be provided regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.
8. Meetings and events open to the public should continue to be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.
9. Online information describing facilities should include information on accessible features and elements of the site. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the website. Indicating accessible paths of travel and accessible entrances also provides valuable information for individuals with disabilities. A contact number and email address should be provided for additional assistance.
10. The City should enhance policy language regulating mobile food vendors to ensure they are located on an accessible site and on an accessible route.
11. City Municipal Codes regulating the transaction of business in public parks and recreation facilities should be expanded to include requirements for non-discrimination and accessibility.
12. City Municipal Codes regulating taxicabs should include provisions for accessible taxicabs.
13. The City should investigate possibilities for providing accessible golf carts.
14. Sidewalk sign permitting checklists should be enhanced to ensure post mounted signs comply with ADA requirements for protruding objects. The City has a sidewalk sign permit submittal checklist which requires a site plan showing the location of the sign. Signs are allowed to be placed on sidewalks that are a minimum of 10 feet in width and allow for 5 feet minimum unrestricted pedestrian movement area of the sidewalk. The maximum sidewalk sign height allowed is four feet and the minimum height is three feet. Stipulations for post mounted protruding objects should be identified in the checklist.
15. Website information regarding the Cleveland Heights Golf Course should indicate if accessible golf carts are available.
16. The City Municipal Code regulating the transaction of business in public parks and recreation facilities should include provisions for accessibility.
17. The City requires mobile food vendors to have a permit in order to conduct business within the City. Accessibility requirements for mobile food vendors should be included.
18. The City has a Special Event Permit Application policy and procedure. The policy and procedures should address accessibility requirements for nondiscrimination, accessible parking, accessible toilet facilities and other event amenities.
19. City Municipal Code Chapter 106 – Vehicles for Hire regulating taxicabs should include provisions for accessibility.

### **Grievance/Uniform Complaint Procedures**

A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and fulfill its responsibilities under Title II, including the investigation of complaints. A public entity shall make available the name, office address, and telephone number of any designated employee. In addition, the public entity must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by Title II.

## **FINDINGS**

### **Compliant:**

1. The City has recently updated its grievance forms and procedures.
2. The City has formal and informal means to submit a grievance. Informal complaints or inquiries may be submitted via the online Citizens Action Center where a person selects an ADA/Accessibility category, the type of ADA/Accessibility inquiry, (i.e., accommodation request, sidewalks, facilities, curb ramps, other), and then the location and detailed description of the complaint or inquiry. Persons wishing to submit a formal complaint may complete a grievance form which is available online. Access to the grievance procedure and form are readily found on the City's website in various locations.
3. The formal policy and procedure include the name and contact information for the ADA Specialist. The procedure contains information with options for a grievant to initiate a complaint in writing and submit it by mail or email. Alternate formats are available by contacting the City's ADA Specialist.
4. The availability of the grievance form and procedures allow for user input and ensures the City receives the needed information to investigate and resolve a complaint within the stated timelines.
5. A copy of the grievance procedure and form may be found in the appendix section of this report.
6. The City also has a form for submitting Title VI complaints of discrimination.

## **RECOMMENDATIONS**

### **Additional recommendations listed will maintain and enhance the requirements.**

1. The City should continue to make efforts to inform staff and the public of the existence of the City's ADA/504 Specialist, grievance procedures, the steps for handling grievances, and the City policies for remediation of grievances.
2. Grievance procedures should be a part of the new employee orientation packet. Grievance procedures should be distributed to all Department heads and Accessibility Liaisons.
3. A method to collect data and collect a profile of complaints should be developed if not already. The status of the complaint and the time from complaint to resolution should be documented to assist with interventions and staff development to reduce or eliminate repeated complaints. DAC will collaborate with the City to enhance this process.
4. The City might consider the centralization of complaint handling to assist with the tracking of complaint resolution. A centralized database and analysis of types and locations of complaints may also assist with developing profiles to assist with targeting quality control and training measures. Centralized record keeping of such information will help the City to regularly update its compliance efforts, and plan for additional compliance implementation for training and budget considerations. In addition, the ADA Specialist or designated staff can develop updated reports based on a profile of concerns or complaints to determine the needs for proposed training materials, agenda items, and proposed budget expenditures.
5. Procedures should continue to be developed, implemented and institutionalized to provide consistency for complaint resolution and record keeping.

### **Eligibility Criteria**

Public entities cannot use eligibility criteria that tend to exclude or screen out persons with disabilities (28 CFR §35.130(b)(8)).

## **FINDINGS**

### **Compliant: No discriminatory practices were noted.**

1. The City allows citizens interested in serving on advisory boards and committees to apply by completing a form and submitting it via mail, email, or fax detailing their interest.

2. The Lakeland Police Department has rules and procedures for recruitment of new members to the Department which include equal employment opportunities regardless of physical impairment.

## **RECOMMENDATIONS**

### **Additional recommendations listed will maintain and enhance the requirements.**

1. The Lakeland Police Department's nondiscrimination clause for employment should be expanded to include disability. Information on the availability of accommodations during the application process should also be added.
2. Program eligibility criteria should continue to be periodically reviewed as policies are drafted or modified to ensure that eligibility criteria do not put additional burdens or requirements on individuals with disabilities.
3. The City should continue to ensure that all eligibility criteria allow for accommodations for individuals with disabilities.
4. The City may want to initiate a discussion with Polk County Emergency Management and Polk County Transit Services officials to ensure citizens with sensory disabilities or impairments are eligible for transportation to a shelter during an emergency.

## **Fees and Surcharges**

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services or activities accessible to persons with disabilities in accordance with 28 CFR §35.130.

## **FINDINGS**

### **Compliant**

1. The City of Lakeland ADA/504 Notice does include information stating it will not place a surcharge on an individual with a disability or any group of 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.

## **RECOMMENDATIONS**

### **Additional recommendation listed to maintain and enhance the requirements.**

1. The ADA Specialist should randomly review policies and practices for consistency and to ensure that fees and surcharges are not charged to individuals with disabilities that are not charged to individuals without disabilities.

## **Emergency Evacuation Procedures**

The City of Lakeland is in Polk County. Polk County manages the emergency evacuation procedures and therefore findings are specific to additional activities provided by the City of Lakeland.

## **FINDINGS**

### **Compliant: Additional activities are provided by the City of Lakeland that augment the activities of Polk County, who is the primary agency in charge of emergency evacuation procedures.**

1. The City of Lakeland posts emergency information including important phone numbers, website links, emergency broadcasting stations, checklists, and guides on its website.
2. It is policy as noted in the City's Municipal Code Sec. 26-5 that the City of Lakeland upon the declaration of a state of emergency, the City manager shall post a written notice of such declaration upon the main bulletin board in the City Hall, and shall notify by telephone each newspaper of general circulation within the City, at least two television stations and at least three radio stations broadcasting in the County. When practicable, the City Manager shall

also cause the written notice to be published, in its entirety, at least four days each week in a newspaper of general circulation in the City until the state of emergency is declared to be terminated.

3. The Public Works Standard Operating Procedures & Policies includes guidelines for ensuring all employees are trained in emergency response. The Public Works Department conducts annual training on emergency response. Supervisory personnel are required to complete online National Incident Management System training. The City of Lakeland's Safety Manager is responsible for coordinating and conducting emergency exercises/drills which involve all Departments within the City of Lakeland and coordinated with Polk County. The City of Lakeland maintains an Emergency Operations Plan which is part of the Polk County Comprehensive Emergency Management Plan.
4. Under emergency, City staff communicates with the public through the use of reverse 911, official media reports, public information officers, social media, and face-to-face interaction as necessary to notify and update the public during unplanned events and area impacts from emergency operations.
5. Online information regarding the RP Funding Center states: "Staff members are trained in emergency preparedness and evacuation procedures. Employees will assist patrons with disabilities to safety. In the event of an emergency evacuation, please follow the direction of RP Funding Center staff members to exit the facility in a safe manner."

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should make sure that evacuation routes and procedures continue to be posted at all City sites in accordance with ADA/504 regulations. All staff should be made aware of the location of the posted evacuation routes within their facilities. The City should develop procedures and a mechanism to monitor the posting of emergency evacuation routes and procedures.
2. Specific guidance for complying with Title II of the ADA in the preparation of evacuation plans and procedures may be found in Chapter VII of the ADA Best Practices Tool Kit for State and Local Governments <https://www.ada.gov/pcatoolkit/toolkitmain.htm>.

## **Policies for the Use of Facilities**

Review policies and procedures to ensure that persons with disabilities are not discriminated in the reservation process.

## **FINDINGS**

### **Compliant:**

1. The City of Lakeland requires a special event permit for groups requesting to use public property within the City limits of Lakeland for planned activities or events such as a block party, parade, race festival, etc. Permits are obtained from the City of Lakeland Police Department and may require additional authorizations from the City of Lakeland. Applications may be submitted by mail or in person. If the event or activity includes the use of a City park, applicants must contact the Parks and Recreation Division by phone. The application package is being updated to address provisions for accessibility or nondiscrimination.
2. Website information on accessible swimming pools includes:
  - a. Gandy Pool features an accessible ramp at 0-depth and that a hydraulic lift chair is provided.
  - b. Simpson Pool features a hydraulic lift chair
3. Se7en Wetlands park rules prohibit horses and all pets.
4. A Lakeland Parks and Recreation Department contract employee agreement for the use of the Kelly Recreation facility includes the following clause: "This Agreement is specifically conditioned upon Instructor continuing to run its program in such a manner that instruction

is open to all eligible persons who wish to participate regardless of ability, sex, religion, or race.”

5. Information posted on the City’s website regarding the Red, White & KABOOM event states: “There will be restroom stations throughout the event, and ADA accessible restrooms will be available at all stations.”

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should consider the development of a facility use policy which includes a nondiscrimination clause. The inclusion of nondiscriminatory language in policy and on forms would help ensure that outside groups and organizations would agree to abide by all applicable local, state and federal laws and City policy regarding nondiscriminatory practices during the utilization of City facilities.
  - a. As an example, such policies should also mention that service animals are allowed in parks and facilities where pets are prohibited, as appropriate.
  - b. Another example would be language stating the facility user may not discriminate on the basis of disability.
2. Application forms should be available in alternate formats and online.
3. It would be beneficial to persons with disabilities if information on accessible routes and maps, accessible parking locations, restrooms, and wayfinding was available for all facilities on the City's web-site.
4. All contracts, rental, special event, and use agreements should inform and acknowledge the provisions, requirements, and responsibilities of the Americans with Disabilities Act.
5. Reservation and rental information should include information on amenities such as accessible parking, elevators, and restrooms.
6. Library meeting and training room policies do not address provisions for accessibility or non-discrimination. Applications for the use of rooms may be made in person, by phone or online.
7. Policies addressing accessibility and nondiscrimination in facility use agreements should be added to the Risk Management Manual.
8. Facilities rental agreements between the City of Lakeland and representatives of the food truck rally should have provisions for accessibility and nondiscrimination.

### **Leased Facilities**

Under Title II of the ADA, the City is responsible for providing access to its programs, services and activities in both owned and leased facilities.

## **FINDINGS**

### **Overall compliant with the exception of some additional language to be added:**

1. A review of a 2009 sub-lease agreement between the City of Lakeland and a private corporation did not reveal specific covenants regarding nondiscrimination or responsibilities detailing accessibility to the facility.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should review the accessibility of sites that may be leased in the future prior to engaging in a lease and establish a procedure for a pre-lease inspection.
2. If the City decides to lease space, a building inspector should conduct or have a designee or consultant conduct a field inspection of the prospective building to assess the building for a general, functional level of accessibility. The ADA Specialist could utilize an abbreviated checklist to determine general accessibility of facilities that the City is considering leasing. A more comprehensive inspection could be conducted if the initial review appears to be favorable.
3. All lease and joint use agreements should inform and acknowledge the provisions, requirements, and responsibilities of the Americans with Disabilities Act.

### **Selection of Contractors and Contracted Services**

Public entities cannot use contract procurement criteria that discriminate against persons with disabilities in accordance with 28 CFR 35.130. Nor may public entities “contract away” their obligations to provide full and equal enjoyment of goods and services. Contractors should be held to the same nondiscrimination rules that apply to public entity employees.

## **FINDINGS**

### **Partial Compliance: some compliance activities noted, but some additional recommendations are provided.**

#### **Compliant:**

1. The City of Lakeland Purchasing Manual states that bidders are expected to be familiar with Federal laws such as the ADA and that nonfamiliarity does not relieve bidders from compliance responsibilities.
2. According to the City of Lakeland’s fact sheet, the City has a Disadvantaged Business Enterprise program with objectives to ensure nondiscrimination in the award and administration of contracts, to help remove barriers to participation, and create a level playing field. The program requires the City of Lakeland and its consultants to take all necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of the City of Lakeland in a non-discriminatory environment; and to require its consultants to not discriminate on the basis of race, color, national origin, disability or sex in the award and performance of its contracts.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should continue to monitor use of standard agreements, contracts, and leases by all City departments. It is recommended that the City consider one or more of these avenues to maintain compliance when contracting for services or when leasing facilities:
  - Include nondiscrimination requirements in new requests for proposals.
  - Review and update contracts and leases when they are negotiated, revised or renewed and incorporate nondiscrimination clauses as necessary.
2. The City should consider adding ADA accessibility language into pre-proposal conference directions and information.
3. Purchasing and risk management policies should be enhanced to include nondiscrimination and accessibility requirements.
4. Nondiscrimination clauses should be added to policies, procedures and contracts.

## Building and Construction

Review building and construction policies to ensure that the construction of each new facility or part of a facility, or the alteration of existing facilities after January 26, 1992, conforms to the standards designated under the Title II of the ADA regulation.

### FINDINGS

**Compliant overall except for procedures and practices for oversight of remodeling and new construction. As evidenced by the findings, the City has made a commitment to improve accessibility by its ongoing efforts to improve accessibility by adding accessible features and removing barriers to accessibility. The City has a comprehensive Public Works Manual with accessible standards and operating procedures that describes procedures for remodeling and new construction. The City continues to add accessible features to areas in the City to improve accessibility for persons with disabilities, such as the accessible modifications at Lake Morton.**

#### Compliant activities include:

1. The City has made modifications to many areas in the City to improve access for persons with disabilities. For example, Lake Morton is a high use area in which two accessible viewing areas were added. Concrete pads, walkways and accessible tables were added on Lake Morton Drive at East Walnut Street and on Lake Morton drive at Kentucky Avenue.
2. The City of Lakeland's Public Works Standards Operating Procedures & Policies manual states that all new facilities and alterations be designed in accordance with the ADA Standards for Accessible Design. Registered Professional Engineers and design professionals are utilized to ensure proper procedures and methods are used on projects. Public Works retains the services of consultant engineering firms as necessary.
3. The Public Works Department has adopted the Guidelines for Accessible Public Rights-of-Way issued by the U.S. Access Board (PROWAG).
4. Traffic Operations uses the Manual on Uniform Traffic Control Devices (MUTCD) to establish minimum criteria.
5. Project scoping is conducted by the Public Works Department.
6. Chapter 33 of the Public Works Practices Manual requires proposed transit shelters and transit stop enhancements be reviewed by the Engineering Division as part of the site plan review process and that they be ADA compliant.
7. Chapter 34 of the Public Works Practices Manual requires policy and procedure for designating persons with disabilities or persons with limited mobility parking zones adjacent to residential property be adopted. Currently, the Manual only addresses parking for persons with disabilities in residential multi-family complexes and commercial/private business lots. The Manual is now being updated to include provisions for residential on-street parking for persons with disabilities. Requests for on-street parking will also be reviewed by the Economic and Community Development Department.
8. The Public Works Department incorporates the provisions of the Florida Department of Transportation's *Manual of Uniform Minimum Standards for Design, Construction and Maintenance for Streets and Highways* (commonly known as the "Florida Greenbook") with regard to all relevant aspects in the design, maintenance and construction of its City street system.
9. It is practice for the Public Works Department to inspect construction activities using both internal and external personnel to confirm projects are built in accordance with applicable standards and specifications.
10. The Engineering Division administers and coordinates work zone management for all private construction, Capital Improvement Program projects and maintenance related projects. Traffic control plans detailing proper delineation of traffic are required.

11. The City of Lakeland Risk Management Manual includes policy and procedures which require departments responsible for project construction to transmit copies of conceptual drawings, plans, or specifications to the Office of Risk Management. The Risk Management Safety Manager reviews the documents and processes them for further review, correction, and/or approval.
12. The Secretary of the Interior's Standards for Rehabilitation are used as the basis and reference for Lakeland's Historic Design Guidelines. A Certificate of Review is granted if proposals are consistent with the Design Guidelines and must be granted prior to the issuance of building and demolition permits. Accessibility to certain historic structures is required by three specific federal laws: The Architectural Barriers Act of 1968, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990.
13. According to the City's website, the City's Building Inspection Division facilitates the permit application process for construction. After a permit application is received, one or more plans examiners reviews the plans to ensure compliance with applicable codes and ordinances. In completing their reviews, the reviewers provide comments or feedback on various parts of the plans submitted and may require corrections before the plans and permit can be approved. As work progresses, inspections are scheduled and completed. When all work is completed and verified with all inspections approved, a Certificate of Occupancy or Certificate of Completion is issued by the City. Internal policies and procedures focusing on the review of design and construction activities specific to ADA compliance and Accessibility compliance should be added.
14. A review of the City of Lakeland Land Development Code was conducted with the following findings:
  - a. Residential developments are required to provide internal Americans with Disabilities Act (ADA) compliant pedestrian connectivity within the development with special emphasis on access to on-site recreational amenities, trails, clubhouses and open spaces.
  - b. Transit stops are to be designed in accordance with the Engineering Standards Manual and comply with Americans with Disabilities Act (ADA) standards.
  - c. The minimum number of accessible parking spaces in off-street parking facilities is required as set forth in applicable building codes. Accessible parking spaces are to be designed and identified in accordance with applicable building codes.
  - d. Curbing or wheel stops are required to prevent vehicle overhang of sidewalks.
15. A review of the City of Lakeland Engineering Standards Manual resulted in the following findings:
  - a. During the site plan review process, existing driveways or curb cuts to be abandoned or no longer used, are to be shown and appropriate details included for removal and reconstruction of any sidewalks, curb, or roadway repairs along the roadway frontage as necessary to meet current ADA standards. Private driveways being constructed to, or removed from the State Highway System, County Road System, or City Road System require approval from the respective governing agency. Any work in the ROW requires a Right of Way Use Permit on City streets and any other required permits on County and State Roads shall be available for review by the Public Works Inspector prior to the beginning of work.
  - b. Curb ramps require a yellow detectable warning surface.
  - c. All signage identifying accessible parking must include a supplemental fine.
  - d. Pedestrian crossing signals are to be LED countdown type.
  - e. Pedestrian crossing push buttons installed within the City of Lakeland are to meet the guidelines of the Americans with Disabilities Act (ADA) requirements for Accessible Pedestrian Station (APS) and shall be installed as per the Manual on Uniform Traffic Control Devices (MUTCD) Section 4E.

16. According to the City's website, any work within the City of Lakeland right-of-way of any nature, including road or sidewalk closures, require a Right-of-Way Use Permit through the Public Works Engineering Division, prior to commencement of any work. A "Maintenance of Traffic Plan" is required for all traffic detours, lane closures and/or construction work within City rights-of-way.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. Due to the findings of the review of new construction and remodeling, the City should enhance their oversight of projects to ensure that remodeling and new construction meet applicable accessibility standards.
2. The City should review policies, practices and procedures to review remodeling and construction activities to ensure that they meet the applicable accessibility standards.
3. The City should ensure that accessibility inspections are conducted as work progresses and is completed.
4. It is recommended that the City contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements of the Americans with Disabilities Act Standards (ADA) and the Florida Building Code.
5. Language in contracts with outside vendors should state that work will be performed with all applicable state and federal accessibility standards and regulations.
6. The City of Lakeland should ensure that contractors are informed when performing construction activities adjacent to or within the public right-of-way that accessible and safe pedestrian routes must be maintained throughout the project. Information on alternate accessible pedestrian routes and detours should be posted on the City's website, as well as at the site during construction.
7. Procedures should be established to ensure alteration projects which affect usability of facilities containing a primary function; that the path of travel to the altered area including restrooms, telephones, and drinking fountains serving the altered area be brought into compliance with ADA Standards to the extent of 20% of the cost of the alteration.
8. The City may consider offering classes or training sessions on PROWAG and the ADA to architects, engineers, consultants, and contractors who perform work for them. Requiring such training activities be mandatory is another consideration.

### **Maintenance of Accessible Features**

The ADA requires public entities to maintain their accessible features and elements in accordance with 35.133. For example, striping of accessible parking access aisles would need to be repainted if worn or not visible. Another example is equipment that provides accessibility such as elevators that provide vertical access.

## **FINDINGS**

**The City demonstrates overall compliance with the requirement for maintenance of accessible features as evidenced by the findings.**

### **Compliant:**

1. The City has an online action request form (Citizens Action Center) to report items such as a sidewalk in need of repair, intersection sight obstructions, crossing signal problems, and any other concerns.
2. The City's Right-of-Way Management Program consists of maintenance crews to keep the right-of-way along the street clean and safe for both vehicular and pedestrian traffic. Signs are being updated to the latest standards for both text height and visibility with improved reflective sheeting.

3. Traffic Operations provides maintenance of traffic signals, traffic signs and traffic studies throughout the City of Lakeland.
4. The Facilities Maintenance Division provides maintenance, construction, janitorial, safety and fire suppression system support services for facilities.
5. Procedures are established to ensure that maintenance and operations personnel are involved in planning and design of infrastructure projects and services.
6. The City of Lakeland's Public Works Standards Operating Procedures & Policies manual requires existing buildings and entry pathways requiring improvements be identified. The Public Works Department manages various inventories to track assets and their conditions including sidewalk and curb ramps in compliance with the ADA.
7. It is policy in the City of Lakeland's Public Works Standards Operating Procedures & Policies manual that the Public Works Facilities Maintenance Division conduct an annual condition assessment of all facilities consisting of a general overview of the interior and exterior of the facility with the intent of identifying needed repairs or infrastructure upgrades.
8. City of Lakeland Public Works guidelines require sidewalk and curb ramps be inspected once every three years. An annual sidewalk repair and replacement program is developed such that non-compliant ADA ramps and sidewalks on resurfacing projects are given the highest priority. Remaining funds are distributed by zones and the work is performed according to condition ratings.
9. The Traffic Operations Division inspects signs and signals on an annual basis.
10. It is City policy that maintenance standards be determined for parking lots and structures. Guidelines include quarterly inspections and for needed repairs to be reported to the Construction & Maintenance Division.
11. The Public Works Practices Manual states: "In accordance with the Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the ADA requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing, ADA compliant curb ramps will be provided where street level pedestrian walkways cross curbs whenever streets, roadways, or highways are altered. Alterations include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale."

## **RECOMMENDATIONS**

**None**

### **Planning and Budgeting for Accessibility**

There is not a specific requirement in the ADA/504 for planning and budgeting for barrier removal. There is a requirement for public entities to incorporate a projected schedule for barrier removal into the transition plan. A public entity that is budgeting or seeking funds to use for ADA/504 barrier removal and to improve access to programs, services and activities shows intent to implement the transition plan.

## **FINDINGS**

### **The City demonstrates planning and budgeting activities related to improving accessibility.**

#### **Compliant:**

1. The Public Works Assistant Director provided clear documentation of short and long-term planning and budgeting for accessibility initiatives.
2. One of the strategies listed in the City's FY 2018 Budget is to provide diverse recreational events, accessible parks, libraries and entertainment venues.
3. The City has either completed or is currently working on several projects to help improve accessibility throughout the City. Projects found on the City's website include:
  - a. Hearing loop installed in the Main Library Meeting Room.
  - b. New ADA Chair Lift for the Gandy Pool.
  - c. An accessible ramp at the Golf course behind the 1A tee box.
  - d. 132 curb ramps brought into compliance when streets, roads, or highways are altered through resurfacing as part of an annual resurfacing program.
  - e. Installation of an additional access ramp in the parking lot behind City Hall. The access ramp shortened the distance individuals with mobility challenges must travel to access the building.
  - f. The City added two accessible viewing areas that are available to individuals with wheelchairs and walkers at Lake Morton.
  - g. Reconstruction of curb ramps and sidewalk along both sides of Lime Street between Sikes Blvd and Lake Beulah Drive.
4. The City's FY 2018 Budget reflects:
  - a. \$140,000 for special ADA compliance projects.
  - b. \$794,992 for sidewalk repairs and replacement.
  - c. \$10,000 for a Traffic Operations ADA restroom renovation.
  - d. \$90,000 for transportation ADA compliance and Admin Services.
  - e. \$400,000 for ADA compliance in the Public Improvement Fund.
5. Future City Capital Improvement Plans include budgeting:
  - a. \$85,000 for ADA seating upgrades at Peterson Park (2022)
  - b. Approximately \$100,000 - \$120,000 annually for ADA compliance (2019 – 2027)
  - c. Lakeland Electric ADA building modifications \$750,000 (FY19 – FY20)
6. The City has budgeted nearly \$9 million of local funds for sidewalk projects between FY 2010-2019, \$7.6 million of which is programmed for sidewalk repair, replacement and ADA compliance upgrades. In addition, street improvements are programmed that will incorporate sidewalks into their designs. Future sidewalk prioritization cycles focus on linkages to transit routes with headways of 30 minutes or less.
7. The Polk County Board of County Commissioners has historically programmed about \$250,000 annually for sidewalk improvements on County roadways, some of which are in the Lakeland Area.
8. In concert with the City's strategic goals, the Public Works 2016-2017 strategic plan includes goals and directional outcomes for the implementation of the ADA Transition Plan.
9. The Lakeland Alliance for Accessibility has provided valuable information related to accessibility to assist the City and holds regularly scheduled meetings to solicit feedback.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should continue to develop methods and procedures to update and maintain a current plan, budget funds, schedule, implement, document, and monitor barrier removal

activities. Funds should continue to be allocated for ADA projects and removal of ADA/504 barriers to accessibility, in addition to components of the PROWAG and the Manual on Uniform Traffic Control Devices (MUTCD). The City should continue to develop a method to maintain an ongoing barrier removal implementation plan and document the City's progress, initiatives and funds expended.

2. The ADA Specialist, or designated staff, should be empowered with the authority to make recommendations and monitor the current City ADA/504 Self-Evaluation and Transition Plan.
3. In addition to the removal of structural barriers, departments should consider budgeting for accessibility items, especially in the area of communication, such as TTY/TDD's and alternate formats. The City should be prepared to assist departments with planning and budgeting for selected accommodations, such as large print, Braille materials and other alternate formats.
4. The City should continue to work with the County to include considerations for partnering to accomplish accessible connections to transit and other opportunities for increasing accessibility.

### **Staff Training**

Although formal training is not required by the ADA and Section 504, staff are required to know how to assist persons with disabilities. Therefore, training regarding the requirements of the ADA and Section 504 is strongly recommended. Staff that understand the requirements of the ADA and how to assist persons with disabilities are empowered to provide services to all stakeholders in a nondiscriminatory manner.

On-going compliance with the ADA is a process that occurs over time using an understanding of the ADA, responsibilities of City employees, appropriate terminology and specific methods to assist persons with disabilities. A simple and easy to achieve compliance method is understanding and using appropriate terminology that provides information in a positive and nondiscriminatory manner. For example, the use of the term "handicapped" is not acceptable and the term "persons with disabilities" should be used instead. Another example of appropriate terminology is using the description of "person using a wheelchair" and not using the term "wheelchair bound."

### **FINDINGS**

#### **Compliant:**

1. The City of Lakeland embraced the need to provide staff development for city staff as a method to continue to provide programs, services and activities for all stakeholders and users.
2. The City has provided extensive off-site training to their full-time ADA Specialist on an ongoing basis. Jenny Sykes is the ADA Specialist who serves in the role of the ADA Coordinator.
3. DAC was asked by City to develop and offer four comprehensive training courses for staff.
4. Courses were designed to address individual needs by staff areas of responsibility. For example, a course regarding compliance for facilities was designed to meet the needs of Public Works, maintenance and related staff and included federal and state accessibility codes and standards. Training courses were provided onsite. Course topics included:
  - Requirements of the ADA
  - Identity and Role of the ADA Coordinator
  - ADA Liaisons
  - Grievance Policy and Procedures
  - Required Policy and Procedures
  - Accessible Facilities, Public Rights-of-Way and Meeting Locations
  - Requirements for Leased Sites
  - Accessible Programs, Services, Activities and Special Events

- Requests for Accommodations
- Service Animals
- Effective Communication and Website Accessibility
- Appropriate Terminology and Etiquette
- Maintenance of accessible Features
- Monitoring and Updates of the City's Transition Plan for Ongoing Compliance
- Legal Authorities
- Accessibility Standards
- Settlement Agreements
- Curb Ramps, Landings, Ramps, Crosswalks, Sidewalks
- Tripping Hazards
- Changes in Elevation
- Protruding Objects
- Vertical Clearances
- Grates and Railroad Tracks
- Signage and Symbols
- Pedestrian Routes
- Access from the Public Right-of-Way
- Medians and Islands
- Handrails
- Warning Curb and Guard
- Detectable Warning Surface
- Bus Stops and Transit Areas
- Off-Street and On-Street Parking
- Temporary Traffic Control
- Driveways
- APS Pedestrian Push Buttons
- Implementing your ADA Transition Plan
- Laws, Regulations and Standards
- Title II and Title III
- Comparison and Application of Federal and State Standards
- Existing vs. New Buildings
- Technical Infeasibility
- Alterations vs. New Construction
- Safe Harbor
- Historical Buildings
- Floor and Ground Surfaces
- Openings
- Turning Space and Maneuvering Clearance
- Knee Clearance
- Reach Ranges
- Operable Parts
- Accessible Routes and Walking Surfaces
- Doors, Doorways and Gates
- Elevators & Platform Lifts
- Parking
- Passenger Loading Zones
- Stairs
- Handrails
- Drinking Fountains
- Toilet and Bathing Rooms

- Telephones
  - Wheelchair Spaces
  - Seating and Lines of Sight
  - Electric Vehicle Charging Stations
  - Dining and Work Surfaces
  - Benches
  - Check-out Areas/Sales and Service Counters
  - Boat Slips
  - Fishing Piers and Platforms
  - Outdoor Areas and Trails
  - Play Areas
  - Swimming Pools, Wading Pools and Spas
5. Courses offered included:
- Accessibility in Facilities: Accessibility Standards and Regulations (4-hour session)
  - Accessibility in the Public Rights-of-Way (PROW): Sidewalks, Curb Ramps, Intersections, Bus Shelters, and Street Furniture (3-hour session)
  - ADA Self-evaluation and Transition Plan: Executive Leadership Presentation (1.5-hour session)

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. The City should continue to provide ongoing training regarding the ADA, Section 504 and related accessibility regulations and standards. Courses offered may be similar to that provided by the City in 2018 regarding related civil rights legislation and requirements for facilities, parks, outdoor recreational sites, PROW, programs, services and activities of the City.
2. The City should provide staff training in additional formats other than a classroom session such as on-line courses. Training methodologies could include videos that are captioned that could be viewed on-line or available to be checked out by departments or individuals.
3. Additional training videos should be purchased and maintained for checkout, or borrowed from a variety of agencies, such as the Department of Rehabilitation. The US Access Board also has training materials available in addition to the Southeast ADA Center.
4. Handouts and training materials should be prepared, if needed, in alternate accessible formats.
5. The ADA Specialist should continue to provide or coordinate additional ADA/Section 504 training to all management and staff who have regular contact with the public.

## **New Employees and Volunteer Orientation**

It is unlawful to discriminate against a qualified applicant based on disability in any aspect of employment including application, interviewing, testing, hiring, evaluation, compensation, benefits, promotion, discipline, and termination.

## **FINDINGS**

### **Compliant:**

1. Current job opportunities are posted on the City's website. Prospective employees may apply online. Persons with a disability whom require an accommodation to participate in the application or testing process are to contact Human Resources by phone or TTY.
2. Persons may complete an online "Job Interest Card" to receive email notifications when employment opportunities of particular interest become available.
3. The Public Works Standard Operation Procedures & Policies manual includes policy for ADA compliance and nondiscrimination. The manual states that the City provides reasonable accommodations for employment of all qualified candidates.

## RECOMMENDATIONS

### Additional recommendations listed to maintain and enhance the requirements.

1. The City should include and maintain information as to the identity, title, address, phone number and e-mail address of the ADA Specialist in new employee orientation and volunteer information.
2. The City should be consistent with including a statement of accommodation and nondiscrimination in its information, applications and policies.
3. Information on job qualifications and duties should include information that reasonable accommodations are available.
4. The City should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and 504. Materials could also be offered on providing accommodations for individuals with disabilities.
5. The City's new hire packet should describe the general procedure for filing a grievance of any kind.
6. Job description qualifications and duties should provide information that reasonable accommodations are available.
7. Persons wishing to volunteer for Lakeland City Baseball may submit applications online. A nondiscrimination or accommodation statement should be added.
8. Policies for participating in community service volunteer programs conducted by the Lakeland Police Department should indicate a nondiscrimination or accommodation policy.

### Appropriate Terminology

Review of public entity's written and audio-visual materials to ensure that individuals with disabilities are not portrayed in an offensive or demeaning manner. The use of the word handicapped is not acceptable. Persons with disabilities or individuals with disabilities is the preferred term using person first language. Disabled person is preferred over the term handicapped, but it is better to use the term person with a disability to use person first language.

## FINDINGS

### Partial Compliance:

1. Sections of the City of Lakeland Municipal code include language such as "accessible to the handicapped", "disabled persons", "disabled Veterans".
2. The City of Lakeland Public Works Practices Manual includes references to "disabled persons".
3. The City's 2020 Comprehensive Plan includes references to "handicapped citizens", "accommodations for handicapped", "disabled patrons", "improvements for the disabled", "disabled children".
4. The City's website includes references to "Disabled Veterans".

## RECOMMENDATIONS

### Additional recommendations listed to maintain and enhance the requirements.

1. The words "individuals with disabilities" or "persons with disabilities" should replace "handicapped". The term "disabled person" should also be avoided.
2. Information regarding acceptable terminology in "person first language" should also be provided to staff.
3. Publications should be updated as they are reprinted. All departments should review all audio, visual, and print materials to ensure demeaning stereotypes and outdated language are not contained in publications.
4. A training session or guide on disability etiquette to be distributed to staff is suggested.

## Ticketing

Ticketing policies and practices of public entities for events that have seating are subject to Title II of the ADA nondiscrimination provisions. A public entity that sells tickets for events shall modify its policies, practices, or procedures to ensure that individuals with disabilities have an equal opportunity to purchase tickets for accessible seating.

### FINDINGS

#### Compliant:

1. Seating charts for the RP Funding Center include designated accessible seating locations for the following event types:
  - a. Lakeland Magic Basketball
  - b. Concerts – End Stage
  - c. Concerts – Half House
  - d. Open Floor
  - e. Rodeo – Full House
  - f. Arena Soccer
  - g. Wrestling – Full House
  - h. Wrestling – Half House
  - i. Youkey Theatre
  - j. Florida Tarpons Football
2. Lakeland Community Theatre seating charts include designated accessible seating locations.
3. Accessibility information posted online regarding the RP Funding Center states:
  - a. For special accommodations and specific questions, please call 863-834-8100.
  - b. Accessible seating for patrons with disabilities and a companion is available for all shows on a first-come, first serve basis. Please indicate when purchasing tickets if you require accessible seating.
  - c. There are numerous areas of disabled parking around the facility. There are assigned parking areas for those with disabilities in the Red and Green lots on each side of the Arena, as well as the Blue parking lot for Theatre events. For events in the Arena, Exhibit Hall and Sikes Conference Center, please use the North Parking Lot and Entrance #2 at ground level. It provides the easiest wheelchair and mobility scooter access. Youkey Theatre events use the East Lot and handicap ramp. In the event of inclement weather, all four entrances to the RP Funding Center may be used as drop-off/pick-up locations.
  - d. Properly restrained service animals are permitted to assist persons with disabilities requiring their services.
  - e. All restrooms are accessible to persons with disabilities and have baby changing stations.
4. The RP Funding Center Box Office webpage states accessible seats are available in all price levels and that companion seating tickets may be purchased with each accessible seating ticket.

### RECOMMENDATIONS

#### Additional recommendations listed to maintain and enhance the requirements.

1. The City's ADA Specialist should continue to monitor City sponsored events which include the purchase of tickets for seating continue to allow for accessible seating.
2. Facilities with seating areas located on non-accessible circulation pathways should be given extra attention to assure that the public is aware that accessible seating locations are available.
3. When using venues not owned by the City, the City should verify accessibility ahead of leasing or renting such facilities.

## Equally Effective Communication

Public entities must ensure that applicants, participants and members of the public with disabilities have communication access that is equally effective as that provided to persons without disabilities (28 CFR §35.160(a)). The following is a review of policies to ensure communication with applicants, participants, and members of the public with disabilities is in a manner that is as effective as its communications with others.

### Auxiliary Aids, Services, and Alternate Formats

A review of policies to ensure they include provisions for readers for individuals with visual impairments; interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments; and amanuenses (e.g., note takers) for individuals with manual impairments. Information regarding programs, services and activities should be available in alternate formats to assist individuals with disabilities and include information on how to request an accommodation. Statements of accommodations should inform persons with disabilities that alternate formats are available.

## FINDINGS

### Compliant:

1. The City of Lakeland website states: "If an accommodation, auxiliary aid or service is needed for effective communication (free of charge), or a modification of policies or procedures to participate in a City program, service, or activity please contact the ADA Specialist, Jenny Sykes, at [863.834.8444](tel:863.834.8444) or [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net). Any request should be made with as much notice as possible, preferably 72 hours, but no later than 48 hours in advance of the event."
2. The Directory of Parks, Programs, and Special Events includes the statement: "Anyone who requires an auxiliary aid or service (free of charge) for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity, should contact the office of Jenny Sykes, ADA Specialist 863-834-8444 as soon as possible but no later than 48 hours before the scheduled event or program."
3. Access to information informing of upcoming meetings, agendas and minutes is significantly enhanced due to the City providing City documents online.
4. City of Lakeland libraries offer auxiliary aids, services, and alternate formats such as computer stations with JAWS screen reader software, headphones and braille keyboard; books and other materials by mail, and computers with Microsoft Windows Accessibility magnifier.

## RECOMMENDATIONS

### Additional recommendations listed to maintain and enhance the requirements.

1. Persons with disabilities will not participate in City sponsored programs, services, or activities if they don't understand what is being communicated. Information on the availability of auxiliary aids, services, and alternate formats should be included in departmental policies, procedures, and guidelines.
2. Where equipment is used as part of a public entity's program, activity, or service, an assessment should be made to ensure that the equipment is usable by individuals with disabilities, particularly individuals with hearing, visual, and manual impairments. In addition, a public entity should have policies in place to ensure that its equipment is maintained in operable working order.
3. Determine whether employees and officials know how to arrange for auxiliary aids, services, and alternate formats such as sign language interpreters, material in Braille and assistive listening systems; to ensure that communication with people with disabilities is as effective as others.

4. Information regarding programs, services and activities should be available in alternate formats to assist individuals with disabilities and include information on how to request an accommodation.
5. Meeting agenda statements and postings of accommodation should be expanded to inform of the availability of alternate formats.
6. Application processes should be designed so persons with disabilities are not excluded from applying because of the availability of only one particular type of application process. Alternate formats should be available as part of the process.
7. The City may consider a method to centralize a department which would provide documents and materials in alternate accessible formats. A centralized approach to developing and maintaining alternate accessible formats may be more cost effective and timely.
8. Procedures should be put in place for the development of accessible alternate formats to constituents. The City should produce accessible alternate formats for high use areas where the probability for a request for an alternate format is high. Examples include provision of audiocassettes, large print, information sent via e-mail, screen readers, Braille, and pictograms.
9. It is recommended that the City consider contracting out selected services to organizations which have the ability to develop Braille documents for brochures, pamphlets, applications, documents and other public information written in text.
10. Online public notices informing of City events and information should have a statement of accommodations which includes who to contact for an accommodation.
11. Meeting agendas should reference the availability of alternate formats.
12. The City ADA Nondiscrimination Notice should reference policy specific to alternate formats.
13. City Commission meetings are available live online and are recorded for later viewing. Audio content should include captioning.

### Interpreter Services

Sign language interpreters should be provided as determined through the request for accommodation process or in circumstances where an interpreter is known to be required. Sign language interpreters should be available for large public events where a need is anticipated.

### FINDINGS

**Compliant: Interpreter services are available and methods are available to request sign language interpreters.**

1. The Lakeland Library notes on its web page that it provides sign language interpreters.
2. The A-Z Service Directory on the City's website provides for easy to access information about services to accommodate persons with disabilities and provides information as to how to request such services.

### RECOMMENDATIONS

**Additional recommendations listed to maintain and enhance the requirements.**

1. All notices for public input should include information on the availability of interpreter services.
2. Interpreters should be provided as determined through a request for accommodation process or in circumstances where an interpreter is known to be required.
3. The City must ensure that those individuals utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.
4. The City may consider the use of a video relay interpreter system to augment contracts and arrangements for interpreters.

### Telecommunications Devices for the Deaf and Hard of Hearing

If a public entity communicates with applicants and beneficiaries by telephone, it should ensure that TDD's or equally effective telecommunication systems are used to communicate with individuals with

impaired hearing or speech. If a public entity provides telephone emergency services, it should review its policies to ensure direct access to individuals who use TDD's/TTY's and computer modems.

## **FINDINGS**

### **Compliant:**

1. The Library "Contact Us" webpage includes a TDD number.
2. The City of Lakeland Fact Sheet on non-discrimination and accessibility includes a TDD number.
3. Grievance procedures and grievance forms contain a TDD contact number.
4. The Lakeland Police Department Public Safety Communications Center has established comprehensive standard operating procedures for processing TTY calls and testing equipment.
5. The Lakeland Police Department has adopted policy for receiving silent 911 calls to include determining if the caller was attempting to seek assistance using a TTY device.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. When a public entity uses an automated-attendant system, including, but not limited to, voicemail and messaging, or an interactive voice response system, for receiving and directing incoming telephone calls, that system must provide effective real-time communication with individuals using auxiliary aids and services, including TTYs and all forms of FCC-approved telecommunications relay systems, including Internet-based relay systems.
2. Publication of all TDD/TTY numbers must be provided in program literature, in phone directories and on selected publications.

### **Assistive Listening Systems for the Deaf and Hard of Hearing**

Assistive listening systems are required in assembly spaces where audible communication is integral to the use of the space. Signs are to be provided informing patrons of the availability of the assistive listening systems.

## **FINDINGS**

### **Compliant:**

1. Persons attending Youkey Theatre performances at the RP Funding Center may obtain assistive listening devices on a first come, first served basis by contacting Guest Services.
2. The Lakeland Public Library main meeting room is equipped with an inductive hearing loop system.
3. The main Lakeland Public Library, the Larry Jackson Library and the E-Library have portable induction hearing loop systems available at the customer desk.
4. The City Hall Commissioner's Chamber is equipped with an inductive hearing loop system.

## **RECOMMENDATIONS**

### **Additional recommendations listed to maintain and enhance the requirements.**

1. Assistive listening systems should be readily available in assembly areas where audible communication is integral to the use of the space.
2. Signs should be posted in a prominent place at or near the assembly area entrance stating "Assistive-Listening System Available" and include the International Symbol of Access for Hearing Loss.

## Website Accessibility

People with disabilities also rely on the internet. Individuals who are Blind or have difficulty reading print employ screen access software that reads the code of a website and then renders it in whatever format is accessible to that person (speech, refreshable braille, etc.). Deaf users rely on captioning of aural (sound or spoken) content. Users with limited manual dexterity or motion use dictation software to give commands instead of mouse and keyboard control.

The World Wide Web Consortium (W3C) sets the main international standards for the World Wide Web and its accessibility. W3C created the Web Content Accessibility Guidelines (WCAG 2.0) which require specific techniques for compliance. An updated version (WCAG 2.1) of the guidelines was published on June 5<sup>th</sup>, 2018. The updates are mainly related to mobile devices, disabilities that affect vision and cognitive function, criteria addressing text spacing, and criteria addressing timeouts and animations from interactions.

There are three levels of WCAG 2.0 website accessibility recognized by the World Wide Web Consortium (W3C).

1. Level A is the minimum level of conformance with the fewest requirements. A couple examples of Level A requirements are that all non-text components such as images include an alternative text component and that captions are provided for all prerecorded audio content.
2. Level AA compliance must satisfy all of the Level A requirements and additional criteria such as providing captions for all live broadcasted audio content.
3. Level AAA satisfies all Level A and Level AA criteria as well as additional requirements such as providing sign language interpretation for all prerecorded audio content.

Websites for Title II of the ADA entities such as the City of Lakeland are strongly encouraged to comply with WCAG 2.0 Level AA.

## FINDINGS

### Compliant:

1. The City has a website accessibility statement on their website.
2. Several videos posted on the City's website were reviewed (Lakeland Airport, Lakes & Stormwater, Igniting Change: Women in the Fire Service) which included captioning to provide access to people who are deaf or hard of hearing.
3. Contact information for reporting website accessibility concerns and/or suggestions for improving accessibility and usability of the website is posted on the City's website. The contact information includes an email address, mailing address, phone number, TDD number, and the Florida Relay Service number.
4. DAC conducted a comprehensive accessibility review of the City of Lakeland's website including the City of Lakeland Home Page and major links and sub-links from the Home Page. The findings have been submitted as a separate report. The review was performed using the WAVE Web Accessibility Evaluation Tool Chrome Extension and checked for compliance with WCAG 2.0 AA standards. The review covered the evaluation of 60 individual web pages and did not cover all pages published on the City of Lakeland's website. Links to external sites and web pages were not evaluated. Some of the errors reported may be consistent throughout the site because of using the same element or feature on various pages. In such cases, it is possible a large number of errors may be easily corrected by simply correcting a single element that repeats itself throughout the site. The majority of errors reported by the evaluation tool included empty links and low contrast. Currently, the City is working with a website accessibility service to correct any errors, and to maintain continuous monitoring of the website for accessibility.

**Not Compliant:**

1. Video and audio files of City Commission meetings do not have written caption of spoken communication to provide access to people who are deaf or hard of hearing.

**RECOMMENDATIONS**

**Additional recommendations listed to maintain and enhance the requirements.**

1. As many people have turned to the internet as a primary source of information on programs, services, activities, and events, the City's website has increased importance as a communications tool. It is important the City's website be as accessible as it can be for all community members and visitors. The City should continue with the development of procedures for increasing accessibility to their website in order that people with low vision or whom are blind (and use screen readers) have access to City information. Establishing accessibility requirements and training opportunities for those responsible for creating and editing City web pages is suggested to assist with mitigating future concerns.
2. A written plan establishing procedures and timeframes for making all website content accessible should be developed. Procedures should be developed to ensure that content is not added to the City's website until it has been made accessible.
3. It is recommended that progress and efforts made towards increased accessibility of the City's website continue to be documented by logging significant improvements made and when they were accomplished.
4. Procedures should be established for providing captioning of audio/video files of City Commission meetings.
5. In-house and contractor staff who create web content or post it on the City's website should be provided with copies of the Department of Justice's technical assistance document "Accessibility of State and Local Government Websites to People with Disabilities" (<https://www.ada.gov/websites2.htm>).

## Public Outreach and Public Input

Title II of the ADA/504 requires opportunity for input into the self-evaluation process by individuals with disabilities, organizations representing individuals with disabilities and other interested individuals.

**FINDINGS**

**The City not only met all the requirements for public outreach and public comments but went well beyond the requirements and provided many methods for public outreach and comments in order to provide opportunities for input into the plan. The City process for public outreach is exemplary and can serve as a model for other city governments.**

**Compliant:**

The City of Lakeland conducted extensive public outreach activities and provided multiple opportunities for public input into the development of the plan. In order to provide opportunities for all, several methods were used for public input. The methods for public input included alternate formats for persons with disabilities, multiple venues and additional languages.

Online methods were provided for public input in the form of online surveys in addition to hard copy surveys. The website provides not only an opportunity for public comment into the development of the plan, but also provides methods for ongoing input by the community and staff. The ADA information and links on the website serve as an easy to use method to collect information, provide information to the City, request reasonable accommodations, contact the ADA Specialist and provide other input.

Two open houses were held, one during the day and one in the evening to provide additional venues for public input. In addition, City Accessibility Liaisons were provided the opportunity to provide input from the public as comments were received from the community and other stakeholders.

1. The Lakeland Alliance for Accessibility provides ongoing input to the City.
2. The City of Lakeland established a group of Accessibility Liaisons to represent City-wide staff in each department and serve as point persons during the self-evaluation process.
3. The current structure of the designation of Accessibility Liaisons provides for improved and timely communication regarding accessibility efforts and needs.
4. The City of Lakeland utilizes a Citizens Academy program for the purpose of familiarizing citizens with Lakeland's City government. According to the City's website, the program includes the function of City departments, explains the relationship between the City Commission and City Administration, allows an overview of the budgetary process and provides an outlet for citizen input. The Citizens Academy is an interactive program that is open and free to anyone interested.
5. Suggestions to enhance accessibility for citizens and visitors can be made by going to the "Take Action" portion of the City's website.
6. The Public Works Department collects project scoping data through citizen requests and petitions, neighborhood public meetings, among other considerations.
7. The City began advertising for public input on its self-evaluation process in January 2019. Notices were posted on the City website informing of the availability of surveys online or in print form. Alternate formats were made available by contacting the City's ADA Specialist. A copy of the notice is in Section VI Appendices of this report.
8. The City targeted three groups, along with the general public to provide their public input:
  - a. Program and Facility users of the City's program, services and facilities
  - b. Community organizations that represent persons with disabilities that may use the City facilities and services
  - c. City staff

## **RECOMMENDATIONS**

**No recommendations for compliance with the requirements, as the requirements were met and exceeded the required methods for public input. The recommendations listed are made regarding maintenance and sustainability.**

1. As the City will always benefit from ongoing interaction with the public regarding accessibility, organizations representing individuals with disabilities and areas with an increased population of individuals with disabilities could be targeted for input regarding additional methods to disseminate information regarding programs, services and activities of the City.
2. It is suggested the City maintain its current network of Accessibility Liaisons from within each of its departments to make it easier for members of the community to identify someone to assist with answering questions about potential disability discrimination.
3. It is recommended the City consider developing and publishing accessibility progress reports on its website. Such reports could include information on the number of newly constructed curb ramps, funding sources and the amount of funding expended towards accessibility improvements, efforts to obtain external funding, a summary of requests/complaints received and resolved, targeted goals, efforts towards community outreach, facility improvement projects large and small, and other information relative to the long-term progress of the ADA Self-evaluation and Transition Plan.
4. Another recommendation is that the City utilize their website to create a one-stop portal for accessibility by expanding their current ADA web page to host all accessibility related information. Suggestions include information related to pedestrian accessibility, Transition

Plan status, links to relative policies and procedures, means to file a complaint or submit suggestions, links to ADA laws and regulations, City design standards and procedures for accessibility, information on facility accessibility, accessible routes and maps, accessible parking locations, wayfinding, emergency evacuation plans and procedures for persons with disabilities, etc. Compiling this information into a centralized location allows for undemanding education of the public and employees and facilitates the communication of information with persons who have disabilities.

5. The City should consider including additional pictures and references to individuals with disabilities in publications, brochures and materials.
6. In City publications, areas or services that are accessible should be indicated with descriptive text and the International Symbol of Accessibility (ISA). For example, accessible restrooms and routes can be designated on the website, on maps and in publications.
7. The ADA/504 does not require staff or teams to directly participate with organizations representing persons with disabilities, however, opportunities to network and develop collaborative partnerships with individuals and organizations representing persons with disabilities are available to ensure that current and future programs, services and activities are accessible. The City may want to enhance public engagement opportunities by inviting more persons with disabilities to serve on committees and advisory boards.
8. It is recommended that the City of Lakeland maintain a continuing outreach component to obtain input and inform the public on the progress made under the ADA Transition Plan.

## Conclusion

As evidenced by this study and update, the City of Lakeland is committed to complying with the tenets of Title II of the ADA, Section 504, and other federal, state statutes and regulations to provide access for persons with disabilities. The 2019 update further serves to demonstrate the ongoing compliance efforts by the City. This updated Self-Evaluation and Transition plan is meant to be a self-regulated plan and by definition is meant to be a “living” and planning document for the City to manage its long-term commitment to serving persons with disabilities. The City of Lakeland understands that the ADA/Section 504 compliance plan is not a static document, and requires ongoing evaluation, implementation, updates and documentation.

The City of Lakeland has demonstrated its core commitment to enhance its accessibility to city programs, services and activities as evidenced by the results of the updated 2018 ADA/504 Self-evaluation and Transition/barrier removal plan. As the city recognizes that compliance with the ADA is not a “one-time” event and requires strategic planning and an ongoing commitment to provide equal access to its programs, services and activities to maintain and enhance compliance with the requirements of the ADA, the City has established an ADA Implementation Committee. The City of Lakeland’s commitment is evident throughout the organization and is demonstrated by the results of the updated 2018 ADA/504 Self-evaluation and Transition/barrier removal plan.

The findings from the 2018-2019 ADA/504 Self-evaluation and Transition Plan update clearly demonstrate the City of Lakeland’s compliance initiatives.

In order to enhance compliance for persons with disabilities in an expeditious and cost-effective manner, the City has formed an ADA Implementation Committee. The committee is carefully examining the findings from the City of Lakeland ADA/504 2018-2019 Self-evaluation and Transition Plan Update in order to develop an ongoing, comprehensive and cost-effective plan to enhance compliance over time. The ADA Implementation Committee is currently prioritizing the barriers identified to develop a strategic plan for implementation. Implementation of the recommendations in the self-evaluation and transition plan will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

The City recognizes that persons with disabilities are better served and able to participate in the community if the facilities and public rights-of-way are accessible because it is easier for them to gain access to the programs and services of the City.

## Appendices

### Appendix A: Facilities, Parks and Recreational Areas Inspected by DAC

As required by the ADA, the City's Transition Plan includes surveys of City owned and leased; buildings, facilities, parks and recreational areas to identify any elements that may be a barrier to access per Federal or State accessibility code. Surveys were conducted for the following facilities:

<b>Facilities, Parks &amp; Recreational Areas</b>	<b>Address</b>
<b>LIBRARY</b>	100 LAKE MORTON DRIVE
<b>CITY HALL &amp; ANNEX</b>	228 SOUTH MASSACHUSETTS AVENUE
<b>TOWN CENTER (Leased)</b>	989 E MEMORIAL BOULEVARD
<b>E-LIBRARY</b>	4740 S FLORIDA AVENUE
<b>CITY HALL PARKING GARAGE</b>	228 SOUTH MASSACHUSETTS AVENUE
<b>LAKELAND ELECTRIC TRAINING FACILITY</b>	2727 CENTURION DR
<b>LAKELAND ELECTRIC</b>	501 E LEMON ST
<b>SOUTHWEST COMPLEX</b>	144 WEST HIGHLAND STREET
<b>LAKE HUNTER SHORE AND BOAT RAMP</b>	650 SIKES BLVD
<b>WEBSTER PARK</b>	1235 N WEBSTER
<b>SERTOMA PARK</b>	1800 E MEMORIAL BLVD
<b>WASHINGTON PARK</b>	301 W SEVENTH ST
<b>SEVENTH ST PARK</b>	1500 W SEVENTH ST
<b>LAKE HOLLINGSWORTH</b>	920 LAKE HOLLINGSWORTH DR
<b>LAKE SOMERSET PARK</b>	3100 NEW JERSEY ROAD
<b>WEST SIDE PARK</b>	1800 WEST OAKHILL STREET
<b>WOODLAKE PARK</b>	3415 NEW JERSEY ROAD
<b>GLENDALE PARK</b>	1937 GLENDALE ST
<b>LAKE MORTON SHORE</b>	LAKE MORTON DR
<b>LEMON STREET PROMENADE</b>	LEMON ST
<b>PETERSON PARK</b>	3700 CLEVELAND HEIGHTS BOULEVARD
<b>LAKE MIRROR CENTER</b>	121 SOUTH LAKE AVENUE
<b>LARSEN POWER PLANT</b>	2002 E HWY 92
<b>MCINTOSH POWER PLANT</b>	3030 E LAKE PARKER DR
<b>LAKE MIRROR CENTER</b>	707 EAST LEMON STREET
<b>LAKE BEULAH</b>	LAKE BEULAH DR
<b>LAKE MIRROR COMMUNITY PARK</b>	S LAKE AVE
<b>SIMPSON PARK</b>	1725 MARTIN LUTHER KING JR AVE
<b>BARNETT PARK</b>	702 EAST ORANGE STREET
<b>HOLLIS GARDEN</b>	702 E ORANGE ST
<b>COLEMAN-BUSH BUILDING</b>	1104 N.MARTIN LUTHER KING JR AVE
<b>JACKSON PARK</b>	1130 MARTIN LUTHER KING JR
<b>LAKE CRAGO PARK</b>	525 LAKELAND HILLS BLVD
<b>BICENTENIAL ROSE GARDEN</b>	12 LAKE BEULAH DR
<b>VETERANS PARK</b>	12 LAKE BEULAH DR
<b>FLETCHER PARK</b>	800 US 98 SOUTH

City of Lakeland ADA Self-Evaluation and Transition Plan Update

<b>TIGERTOWN</b>	2000 GILMORE AVE
<b>JOKER MARCHANT STADIUM/PUBLIX FIELD</b>	2301 LAKELAND HILLS BOULEVARD
<b>TIGERTOWN</b>	2210 NORTH LAKE AVENUE
<b>FIRE DEPARTMENT TRAINING CENTER</b>	901 GRANADA ST
<b>PARKER ST PARK</b>	505 E PARKER ST
<b>NORTH LAKE WIRE PARK</b>	725 MARTIN LITHER KING JR AVE
<b>MIAMI PARK</b>	226 OCONEE ST
<b>LAKE HORNEY SHORE</b>	LAKE HORNEY DR
<b>LAKE BONNETT SHORE</b>	BRUNELL PKWY
<b>KRYGER PARK</b>	1025 MASSACHUSETTS AVE
<b>INTERLACHEN PARK</b>	200-500 INTERLACHEN PKWY
<b>HORNEY PARK</b>	205 E POINSETTIA
<b>HERITAGE PARK</b>	ORANGE ST AND KENTUCKY ST
<b>HANDLEY PARK</b>	1419 PHYLLIS ST
<b>GOLCONDA PARK</b>	GOLCONDA AND PARKER ST
<b>ELVA RATH PARK</b>	20 LAKE MORTON DR
<b>DRANE PARK</b>	801 S FRANKLIN
<b>PUBLIC WORKS (Construction &amp; Maintenance)</b>	407 FAIRWAY AVENUE
<b>PARKING GARAGE</b>	309 EAST ORANGE STREET
<b>MORLOCK NURSERY</b>	4620 US 98 SOUTH
<b>OAK HILL CEMETERY</b>	4620 US 98 SOUTH
<b>CLEVELAND HEIGHTS GOLF &amp; COUNTRY CLUB</b>	2900 BUCKINGHAM AVENUE
<b>FREEDOM PARK</b>	300 N FLORIDA AVE
<b>CRYSTAL GROVE PARK</b>	1661 CRYSTAL GROVE DR
<b>MAGNOLIA BUILDING</b>	702 E ORANGE ST
<b>PEGGY BROWN CENTER</b>	215 S LAKE AVE
<b>CYPRESS YOUTH SPORTS CENTER</b>	2125 EDGEWOOD DRIVE S
<b>DOBBINS PARK</b>	514 ARIANA STREET
<b>MUNN PARK</b>	210 E MAIN ST
<b>OXFORD LUMBER BUILDING</b>	530 WEST MAIN STREET
<b>LAKELAND LINDER AIRPORT TERMINAL</b>	3900 DON EMERSON DRIVE
<b>POLICE TRAINING FACILITY</b>	3131 CENTURION DRIVE
<b>LAKE PARKER PARK</b>	910 EAST GRANADA STREET
<b>THOMAS R SHAW OUTDOOR RECREATION</b>	802 E ROBSON RD
<b>RP FUNDING CENTER</b>	701 W. LIME ST.
<b>PURCHASING/CENTRAL STORES</b>	1140 EAST PARKER
<b>LAKE VIEW CEMETERY</b>	1002 EAST PARKER STREET
<b>FLEET MANAGEMENT</b>	502 NORTH EVELYN AVENUE
<b>PUBLIC WORKS (Traffic Operations)</b>	834 EAST ROSE STREET
<b>SOLID WASTE MANAGEMENT</b>	501 EVELYN AVENUE
<b>CIVIL SERVICE &amp; RISK MANAGEMENT</b>	500/520 NORTH LAKE PARKER AVENUE
<b>MAIN STREET PARKING GARAGE</b>	314 MAIN STREET
<b>FACILITIES CONSTRUCTION</b>	900 EAST ROSE STREET
<b>CHAMBER OF COMMERCE</b>	410 LAKE MORTON DRIVE
<b>AMTRACK STATION</b>	600 LAKE MIRROR DRIVE
<b>FIRE STATION #7</b>	3150 DRANEFIELD RD
<b>FIRE STATION #6</b>	5050 STATE ROAD 33 NORTH
<b>FIRE STATION #5</b>	3101 LAKELAND-HIGHLANDS ROAD
<b>FIRE STATION #4</b>	215 NORTH BRUNNEL PARKWAY

<b>FIRE STATION #3</b>	110 WEST BELLA VISTA
<b>FIRE STATION #2</b>	2104 SOUTH FLORIDA AVENUE
<b>FIRE STATION #1/Administration</b>	701 E MAIN STREET
<b>EDGEWOOD PARK</b>	1000 EAST EDGEWOOD DRIVE
<b>COMMON GROUNDS PARK</b>	1000 S EDGEWOOD DRIVE
<b>LAKE RIDGE COMMUNITY CENTER</b>	325 WEST 2ND STREET
<b>LARRY R JACKSON BRANCH LIBRARY</b>	1700 NORTH FLORIDA AVENUE
<b>KELLY RECREATION COMPLEX</b>	404 IMPERIAL BOULEVARD
<b>GANDY POOL</b>	404 IMPERIAL BOULEVARD

### Appendix B: Public Rights-of-Way Inspected by DAC

DAC surveyed selected areas of the public rights-of-way as requested by the City of Lakeland. Areas surveyed included City of Lakeland owned sidewalks, curb ramps, cross walks and intersections. This did not include areas of the public right-of-way owned or under the control of the Florida Department of Transportation (FDOT) or Polk County.

A complete list of public rights-of-way inspected for compliance are contained in the DACTrak Accessibility Management System. Specific findings and recommendations are contained in the DACTrak accessibility software management system.

### Appendix C: Public Notice and Posting

Section 504 of the Rehabilitation Act of 1973 (504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate persons with disabilities and ensure that their needs are equitably represented in its programs, services and activities.

The City of Lakeland will make every effort to ensure that its facilities, programs, services and activities are accessible to individuals with disabilities. The City of Lakeland will make every effort to ensure that its advisory committees, public involvement activities, and all other programs, services and activities include representation by the disabled community and disability service groups.

Reasonable Accommodation: The City of Lakeland encourages the public to report any facility, program, service, or activity that appears inaccessible to those who are disabled. Furthermore, the City will provide reasonable accommodation (free of charge) to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization, or resources, the City asks that requests be made at least seven (7) calendar days prior to the need for accommodation.

Questions, concerns, comments, or requests for accommodation should be made to the following City of Lakeland’s ADA Coordinator or Employment Counsel (for City Employees):

**For the General Public:**  
**Jenny Sykes, M.S./ADAC**  
**ADA Specialist – Accessibility Services**  
 228 S. Massachusetts Avenue  
 Lakeland, FL 33801-5086  
 Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)

Phone: (863) 834-8444

Fax: (863) 834-8040

If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or (800) 955-8771 (TDD- Telecommunications Device for the Deaf) or the Florida Relay Service Number (800) 955-8770 (VOICE), for assistance

**For City of Lakeland Employees:**

**Geli Eldemire, Esquire, SPHR, SHRM-SCP**

**Employment Counsel – HR Policy and Labor Relations**

228 S. Massachusetts Avenue Lakeland, FL 33801-5086

Email: geli.eldemire@lakelandgov.net

Phone: (863) 834-5066

Fax: (863) 834-6004

**If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or 1-800-955-8771 (TDD- Telecommunications Device for the Deaf) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance.**

**Appendix D: Nondiscrimination and Rights Notice**

**TITLE VI/Nondiscrimination Policy and Plan**

***For Sub-Recipients in the Local Agency Program (LAP)***

CITY OF LAKELAND, FLORIDA

**POLICY STATEMENT:**

The City of Lakeland, Florida, a municipal corporation, values diversity and welcomes input from all interested parties, regardless of cultural identity, background, or income level. Moreover, the City of Lakeland believes that the best programs and services result from careful consideration of the needs of all of its communities and when those communities are involved in the transportation decision making process. Thus, the City of Lakeland does not tolerate discrimination of any of its programs, services or activities. Pursuant to title VI of the Civil Rights Act of 1964 and other federal and state authorities, the City of Lakeland will not exclude participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age, disability, religion, income or family status.

**COMPLAINT PROCEDURES:**

The City of Lakeland has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been subjected to discrimination based upon race, color, national origin, sex, religion, age, disability or family or income status in any of the City of Lakeland's programs, services, or activities may file a complaint with the City of Lakeland's Title VI/Nondiscrimination Coordinator:

Emily Colon, Assistant City Manager and Title VI/Nondiscrimination Coordinator

228 S. Massachusetts Ave.

Lakeland, Florida 33801-5086

Email: [Emily.Colon@lakelandgov.net](mailto:Emily.Colon@lakelandgov.net)

Phone: (863) 834-6006; Fax: (863) 834-8402

If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or 1-800-955-8771– (TDD-Telecommunications Device for the Deaf) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance.

If possible, the complaint should be submitted in writing and contain the identity of the complainant; the basis for the allegations (i.e., race, color, national origin, sex, religion, age, disability or family status); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, the complainant should contact the City of Lakeland's Title VI/Nondiscrimination Coordinator for assistance. (*Refer to "Exhibit 1" City of Lakeland Title VI/Nondiscrimination Plan – Complaint of Discrimination Form*).

The Title City's VI/Nondiscrimination Coordinator will respond to the complaint within thirty (30) calendar days and will take reasonable steps to resolve the matter. Should the City of Lakeland be unable to satisfactorily resolve the complaint, the City's Title VI/Nondiscrimination Coordinator will forward the complaint, along with a record of its disposition to the appropriate District of the Florida Department of Transportation (FDOT).

The City's Title VI/Nondiscrimination Coordinator has "easy access" to the City Manager (or Chief Executive Officer) and is not required to obtain management or other approval to discuss discrimination issues with the City Manager. However, should the complainant be unable or unwilling

to complain to the City of Lakeland, the written complaint may be submitted directly to Florida Department of Transportation (FDOT). FDOT will serve as a clearing house, forwarding the complaint to the appropriate state or federal agency:

Florida Department of Transportation  
Equal Opportunity Office  
ATTN: Title VI Complaint Processing  
605 Suwannee Street MS 65  
Tallahassee, FL 32399

**ADA/504 STATEMENT:**

Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their needs are equitably represented in transportation programs, services and activities.

The City of Lakeland will make every effort to ensure that its facilities, programs, services and activities are accessible to those with disabilities. The City of Lakeland will make every effort to ensure that its advisory committees, public involvement activities, and all other programs, services and activities include representation by the disabled community and disability service groups.

The City of Lakeland encourages the public to report any facility, program, service, or activity that appears inaccessible to those who are disabled. Furthermore, the City will provide reasonable accommodation (free of charge) to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization, or resources, the City asks that requests be made at least seven (7) calendar days prior to the need for accommodation.

Questions, concerns, comments, or requests for accommodation should be made to the following City of Lakeland's ADA Coordinator or Employment Counsel (for City Employees):

For the General Public:

Jenny Sykes, M.S./ADAC  
ADA Specialist – Accessibility Services  
228 S. Massachusetts Avenue  
Lakeland, FL 33801-5086  
Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)  
Phone: (863) 834-8444  
Fax: (863) 834-8040

If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or (800) 955-8771 (TDD- Telecommunications Device for the Deaf) or the Florida Relay Service Number (800) 955-8770 (VOICE), for assistance.

For City of Lakeland Employees:

Geli Eldemire, Esquire, SPHR, SHRM-SCP  
Employment Counsel – HR Policy and Labor  
Relations  
228 S. Massachusetts Avenue  
Lakeland, FL 33801-5086  
Email: [geli.eldemire@lakelandgov.net](mailto:geli.eldemire@lakelandgov.net)  
Phone: (863) 834-5066  
Fax: (863) 834-6004

If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or (800) 955-8771 (TDD- Telecommunications Device for the Deaf) or the Florida Relay Service Number (800) 955-8770 (VOICE), for assistance.

### **LIMITED ENGLISH PROFICIENCY (LEP) GUIDANCE:**

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and US Department of Transportation (DOT) require federal aid recipients to take responsible steps to ensure meaningful access to programs, services and activities by those who do not speak English proficiently. Please refer to the City of Lakeland's Limited English Proficiency Plan located on the City of Lakeland website: [www.lakelandgov.net](http://www.lakelandgov.net).

**Attention City Staff:** The following statement shall appear on all publicly noticed City of Lakeland meeting notices and advertisements (i.e. City Commission meeting notices, bid notices, boards and committee notices, etc.):

In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statutes, persons with disabilities needing special accommodation to participate in this proceeding, or those requiring language assistance (*free of charge*) should contact the City of Lakeland ADA Specialist, no later than forty-eight (48) hours prior to the proceeding, at (863) 834-8447, Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net). **If hearing impaired**, please contact the **TDD numbers**: Local – (863) 834-8333 or 1-800-955-8771 (TDD-Telecommunications Device for the Deaf) or the **Florida Relay Service** Number 1-800-955-8770 (VOICE), for assistance.

### **PUBLIC INVOLVEMENT:**

In order to plan for efficient, effective, safe, equitable and reliable transportation systems, the City of Lakeland must have the input of its public. The City spends extensive staff and financial resources in furtherance of this goal and strongly encourages the participation of the entire community. The City holds a number of transportation meetings, workshops and other events designed to gather public input on project planning and construction. Further, the City attends and participates in other community events to promote its services to the public.

Finally, the City is constantly seeking ways of measuring the effectiveness of its public involvement. Persons wishing to request special presentations by the City of Lakeland, volunteer in any of its activities or offer suggestions for improvement of City public involvement may contact:

Emily Colon, Assistant City Manager and Title VI/Nondiscrimination Coordinator

228 S. Massachusetts Ave.

Lakeland, Florida 33801-5086

Email: [Emily.Colon@lakelandgov.net](mailto:Emily.Colon@lakelandgov.net)

Phone: (863) 834-6006; Fax: (863) 834-8402

If hearing impaired, please contact the TDD numbers: Local – (863) 834-8333 or (800) 955-8771 (TDD- Telecommunications Device for the Deaf) or the Florida Relay Service Number (800) 955-8770 (VOICE), for assistance.

### **DATA COLLECTION:**

Federal Highway Administration regulations require federal-aid recipients to collect racial, ethnic, and other similar demographic data on beneficiaries of or those affected by transportation programs, services and activities. The City of Lakeland accomplishes this through the use of census data, American Community Survey reports, Environmental Screening Tools (EST), drive and ridership surveys, its Community Development Department and other methods. From time to time, the City may find it necessary to request voluntary identification of certain racial, ethnic or other data from those who participate in its public involvement events. This information assists the City with

improving its targeted outreach and measures of effectiveness. Self-identification of personal data to the City will always be voluntary and anonymous. Moreover, the City will not release or otherwise use this data in any manner inconsistent with the federal regulations.

**ASSURANCES:**

Every three (3) years, or commensurate with a change in City of Lakeland executive leadership, the City must certify to FHWA and FDOT that its programs, services and activities are being conducted in a nondiscriminatory manner. These certifications are termed “assurances” and serve two important purposes. First, they document the City’s commitment to nondiscrimination and equitable service to its community. Second, they serve as a legally enforceable agreement by which the City of Lakeland may be held liable for breach. The public may view the annual assurance on the City of Lakeland’s website or by visiting the City of Lakeland Public Works Department Director’s Office, 228 S. Massachusetts Avenue, Lakeland, Florida, 33801-5086.

**CITY OF LAKELAND, FLORIDA**

By: \_\_\_\_\_

Anthony Delgado, City Manager

\_\_\_\_\_

Date:

*Updated: 10/22/19*

Distribution: All City of Lakeland Department Directors and Assistant Department Directors  
City Attorneys  
City Clerk  
Communications Department (for Website posting)  
Emily Colon, Assistant City Manager and Title VI/Nondiscrimination Coordinator  
Geli Eldemire, Esquire, SPHR, SHRM-SCP, Employment Counsel – HR Policy and Labor Relations  
Jenny Sykes, M.S./ADAC, ADA Specialist – Accessibility Services

**TITLE VI / Nondiscrimination Plan**  
**Complaint of Discrimination**

Complainant Name:

Complainant Address:

Complainant Phone Number:

Complainant Representative Name, Address, Phone Number and Relationship (e.g. friend, attorney, parent, etc.):

Name and Address of Agency, Institution, or Department Whom You Allege Discrimination Against You:

Name(s) of Individual(s) Whom You Allege Discrimination Against You (if known):

Discrimination Because Of:

Race

Retaliation

Sex

National Origin

Income Status

Disability

Color

Other

Age

Date of Alleged Discrimination:

Please list the name(s) and phone number(s) of any person, if known, that the City of Lakeland could contact for additional information or support or clarify your allegation(s):

Please explain, as clearly as possible, how, why, when and where you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Additional pages may be attached if needed.

Complaint(s) or Complainant(s) Representative Signature:

Date of Signature:

## Appendix E: ADA Grievance Procedure Form & Nondiscrimination Fact Sheet Title VI Complaint Form



### Grievance Procedure under the Americans with Disabilities Act

City of Lakeland, Florida

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act (ADA) of 1990. It may be used by anyone who wishes to file a grievance alleging an ADA violation and/or discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City. This Grievance Procedure does not apply to grievances relating to employment by the City of Lakeland.

The grievance should be in writing and contain information about the alleged ADA violation and/or discrimination; such as name, address, phone number of grievant and location, date, and description of the problem. A copy of the [grievance form](#) can be downloaded. Upon request, alternative means of filing a grievance will be made available for persons with disabilities.

The grievance should be submitted by the grievant or their designee as soon as possible but no later than sixty (60) calendar days after the alleged ADA violation and/or discrimination to:

Jenny Sykes, M.S., ADA.C  
ADA Specialist  
228 S. Massachusetts Ave.  
Lakeland, Florida 33801  
Voice Phone: (863) 834-8444  
Fax: (863) 834-8040  
Email: [Jenny.Sykes@lakelandgov.net](mailto:Jenny.Sykes@lakelandgov.net)

If hearing impaired, please contact the TDD numbers: Local (863) 834-8333 or 1-800-955-8771 (TDD-Telecommunications Device for the Deaf) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance.

Within fifteen (15) business days after receipt of the grievance, the City ADA Specialist or designee will acknowledge receipt of the grievance and take reasonable steps to resolve the matter. Within twenty (20) business days of the acknowledgement, the City ADA Specialist or designee will provide a response to the grievant. The response will clarify the position of the City of Lakeland and offer options for substantive resolution of the grievance. The grievant can request a written response or alternative format.

If the response by the City ADA Specialist or her designee does not satisfactorily resolve the issue, the grievant or their designee may appeal the decision to the Assistant Director of Public Works within fifteen (15) business days after receipt of the response.

Should the City of Lakeland be unable to satisfactorily resolve the grievance, the City's ADA Specialist or designee will forward the grievance, along with a record of its' disposition, to the appropriate District of the Florida Department of Transportation (FDOT).

All grievances received by the City ADA Specialist or designee, appeals to the Assistant Director of Public Works or designee, and responses from these two (2) offices will be retained by the City for at least three (3) years.

Revision 7.23.2019

## Appendix F: ADA-504 Grievance Form



### Grievance Form

City of Lakeland, Florida

#### Instructions

Please complete and sign this form and email, fax or mail it to the city within 60 calendar days of any incident to the City of Lakeland ADA Specialist:

Jenny Sykes

228 S. Massachusetts Ave.

Lakeland, FL 33801

Email: [Jenny.Sykes@lakelandgov.net](mailto:Jenny.Sykes@lakelandgov.net)

Voice Phone: (863) 834-8444

Fax: (863) 834-8040

TTY/TDD: (863) 834-8333 or (800) 955-8771 or (800) 955-8770 Florida Relay Service Number (VOICE)

Attach additional pages if necessary.

#### Details of the Complaint or Incident

Type of Grievance (select all that apply)

Accommodation Request

Program/Service

Facility Accessibility

Other

#### Reporting Individual Contact Information

Full Name:

Address:

City, State, Zip Code:

Phone:

Email Address:

Authorized Representative of Reporting Individual (if any)

Full Name:

Address:

City, State, Zip Code:

Phone:

Email:

Date/Time of the Incident:

Department/Facility/Location of the Incident:

Describe the incident/complaint with enough detail so the nature of the grievance can be understood.

Have attempts been made to resolve the complaint through a City Department? If yes, please describe the efforts that have been made.

Remedy Sought: What action do you want taken?

X

---

Signature / Date

Revision 7.23.2019

## Appendix G: Public Input Postings and Notices



### ADA Transition Plan Public Input Open Houses on February 19, 2019

The City of Lakeland is updating our Americans with Disabilities Act Transition Plan.

Public input open houses will be held on February 19, 2019. The City invites all interested persons, including individuals with disabilities or organizations representing individuals with disabilities to participate in the updating of the transition plan.

#### Public Open House Meetings

Date: February 19, 2019  
Location: Lakeland Public Library  
100 Lake Morton Drive  
Lakeland, FL 33801  
Meeting Time #1: 10:00AM to 11:30AM  
Meeting Time #2: 5:30PM to 7:00PM



#### City of Lakeland ADA Specialist

Jenny Sykes  
225 S Massachusetts Avenue  
Lakeland, FL 33801  
Phone: (863) 834-8444  
Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)

Information about the public input open houses is also available on the city's website at <https://www.lakelandgov.net/publicworks>

Public participation is solicited without regard to race, color, religion, sex, age, national origin, disability, or family status. Anyone requiring special accommodations pursuant to the Americans with Disabilities Act of 1990 or persons that require translation services (free of charge) for participation in the meeting should contact the City ADA Specialist, Jenny Sykes at (863) 834-8444, by Florida Relay at 711, or by email to [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net). Because providing a reasonable accommodation may require outside assistance, organizations, or resources, the City asks that any request be made with as much notice as possible, preferably five (5) business days prior to the event, but no later than two (2) business days prior to the event.

**PUBLIC INPUT OPEN HOUSE AGENDA**

**February 19, 2019**

**10:00 AM to 11:30 AM**

Project: Self-Evaluation and Transition Plan

Location: Lakeland Public Library  
100 Lake Morton Drive  
Lakeland, FL 33801

- 1. Introductions**
- 2. Goals and Objectives**
- 3. Background on ADA**
- 4. ADA Transition Plans**
- 5. Self-Evaluation Status**
- 6. Next Steps**
- 7. Public Input**

Jenny Sykes  
City of Lakeland ADA Specialist  
228 S. Massachusetts Ave.  
Lakeland, Florida 33801

Phone: (863) 834-8444  
TTY/TDD: (863) 834-8333 or 1-800-955-8771  
Florida Relay Service Number (VOICE): 1-800-955-8770  
Fax: (863) 834-8040  
Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)

**PRESS RELEASE: FOR IMMEDIATE RELEASE**

**Project Contact:**

Jenny Sykes, M.S., ADA.C

City of Lakeland ADA Specialist

Phone: 863-834-8444

Email: [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)

**Public Input Open House Notice: ADA Transition Plan Update Project**

The City of Lakeland will hold two Public Input Open House meeting to review the update to the City's ADA Transition Plan. The meetings will be held on Tuesday February 19, 2019. The first meeting will be from 10:00 a.m. - 11:30 a.m., the second meeting will be from 5:30 p.m. - 7:00 p.m. Both meetings will be held at the Lakeland Public Library, 100 Lake Morton Drive, Lakeland, FL 33801. Disability Access Consultants, LLC (DAC) staff will provide a presentation about the project. City staff will also be available to discuss the project, receive input and answer questions.

The City retained Disability Access Consultants, LLC to conduct a City-wide ADA Accessibility evaluation of the City's public rights-of-way, facilities, programs and services. The public meetings are being held to present the findings of (DAC). The City is seeking feedback from members of the community with disabilities, elected and appointed officials, property owners/tenants, business owners/operators, and other interested parties. The feedback will be used to assist the City in the prioritization of accessibility improvements.

Public participation is solicited without regard to race, color, religion, sex, age, national origin, disability, or family status. Anyone requiring special accommodations pursuant to the Americans with Disabilities Act of 1990 or persons that require translation services (free of charge) for participation in the meeting should contact the City ADA Specialist, Jenny Sykes at (863) 834-8444, by Florida Relay at 711, or by email to [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net). Because providing a reasonable accommodation may require outside assistance, organizations, or resources, the City asks that any request be made with as much notice as possible, preferably five (5) business days prior to the event, but no later than two (2) business days prior to the event.

Information about the ADA Transition Plan may be obtained by contacting the City's ADA Specialist, Jenny Sykes.

**Agenda Topics for the Lakeland Alliance for Accessibility  
November 15, 2018**

Overview of the ADA Self-evaluation and Transition Plan Update for the City of Lakeland

Brief overview of the ADA project

Project activities completed

Next steps

Public input

Access to programs services and activities

Policies and procedures

Comments and suggestions by the Lakeland Alliance for Accessibility

Public input for the ADA Self-evaluation and Transition Plan for the City of Lakeland

Access to programs, services and activities of the City of Lakeland

City Policies

Special events

Other comments and suggestions



**Public Comment Form**

**Optional Contact Information:**

First Name \_\_\_\_\_ Last Name \_\_\_\_\_ Date \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_

Phone \_\_\_\_\_ E-mail address \_\_\_\_\_

Please contact me for more information

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

Please leave this form on the table as you exit or with a presenter at the Open House. You may also return comments to the City of Lakeland or Disability Access Consultants (DAC) using the contact information below. Additional survey forms, including an online form, are available for your input.

Jenny Sykes, ADA Coordinator  
City of Lakeland  
228 S Massachusetts Avenue  
Lakeland, FL 33801  
By email to [jenny.sykes@lakelandgov.net](mailto:jenny.sykes@lakelandgov.net)  
By phone at (863) 834-8444

[Thank you for your input!](#)

## Appendix H: Surveys Comments

Please note: Although the City of Lakeland does not operate transportation services, responses regarding transportation services were not removed from surveys. The surveys report comments received from the public.

Surveys were available online and were also available by completing hard copies. Survey results are reported by types of surveys and by the type of respondents.

### Surveys include:

**Management-hard copies**

**Volunteers-hard copies**

**Public- Online**

**Survey Comments from Accessibility Liaisons**

**The following comments were received form City of Lakeland Accessibility Liaisons.**

**The Accessibility Liaisons represent various departments within the City. Five (5) Accessibility Liaisons provided input.**

**Q2** What role most adequately describes your association with the City of Lakeland and the representation you are providing?

Department/Division Head, Director, Manager, Chief Officer

Staff member full or part-time - responsible for administering a program, service or activity

Department/Division Head, Director, Manager, Chief Officer

City Accessibility liaison

City Accessibility liaison

**Q3** The following departments/divisions within the City of Lakeland have been identified. Please check which department or division you primarily work or volunteer for.

Lakeland Police Department

Community & Economic Development

Public Works

Purchasing

Lakeland Linder International Airport

**Q4** Please describe the services, programs, events or activities your department/division offers including those provided to the public. (i.e. Human Resources provides employment support to all city departments. The office coordinates employee recruitment and hiring and provides ongoing salary and benefits support to employees. The office works to promote positive

employee and labor relations, competitive salary and benefits, to minimize potential losses through a comprehensive risk management program). If non-applicable, please move on to the next question.

Police Department- Full-service agency operating 24/7/365

The building department reviews building plans for ADA requirements. The building department also inspects buildings for ADA Compliance

Fleet Management- provides City vehicle and equipment purchase, maintenance, fueling, disposal, and related services for vehicle-related mission support.

Purchasing provides the support and service to all COL departments to

properly purchase products and services from the most fair and responsible supplier partners by process of Quotes, Request for Proposals, Sealed Bids and Annual Contracts.

We have special services, performing field trips to the public to educate people on the\_ public impact the airport has on the community. We have over 1 million square feet of leased space on the airport and we work as a property management group for those spaces.

**Q5** Does your role require interaction with the public?

4 responded Yes

1 responded No

**Q6** Have you received training or information regarding the requirements of the Americans with Disabilities Act?

5 responded Yes

**Q7** Have you received training on providing services or activities for persons with disabilities?

2 responded Yes

3 responded No

**Q8** Are you aware of any specific concerns, complaints or problems regarding access for persons with disabilities to any of the programs, services or activities provided by the City of Lakeland?

3 responded No

Yes - Fleet Management facility has adequate access for the physically disabled to first floor office areas, break area, and restroom. Access for the physically disabled, to those whose mobility is limited to wheelchair use or similar is unavailable for the second floor.

Yes - No access to Purchasing bid room when the elevator was down for months at a time. There were only stairs available while the elevator was out. No one confined to a wheelchair or walker would have been able to access the upstairs where the bid room and restrooms are.

**Q9** Do you know who the designated ADA Specialist is for the City of Lakeland?

5 responded Jennie Sykes

**Q10** Do any programs, services, or activities have eligibility requirements for participation? Please check all that apply:

Programs, services, and activities do not have eligibility requirements for Participation;

Physical fitness standards;

Mental fitness standards;

Testing requirements;

Performance requirements;

Safety standards;

Other- please describe: Background checks through FDLE and FBI systems

Testing Requirements;

Safety standards

Physical fitness standards;

Safety standards;

Other -Please describe: Technician positions have fitness standards for lifting weight and mobility

Don't know

Program, services, and activities do not have eligibility requirements for participation;

Testing requirements;

Performance requirements;

Safety standards;

Don't know

**Q11** How does the program ensure that policies with eligibility requirements do not discriminate against persons with disabilities?

If the persons meet the requirements and request an accommodation, we try

to work through it. Such as a hearing-impaired citizen that attended our Citizens Police Academy was provided an interpreter for the whole 16-week event that occurred once a week.

Coordination with Human Resources

Fleet Management complies with city policy and direction with regard to persons with disabilities within the limitations of our environment.

No Response

Don't know

**Q12** Is there a formal policy in place to respond to requests from the general public for sign language, oral and cued speech interpreters, or other modifications to the program to allow persons with disabilities to participate?

2 responded Yes

2 responded No

Don't know

**Q13** Does the program have standard operating procedures in place to include persons with disabilities? For example, allowing a service animal into a facility, allowing someone to bring a personal attendant with them to a class, or moving a class or activity to an accessible location.

Yes - It is known by our members to assist and provide whatever customer service we can to assist.

Yes - City Hall Policies

No

Don't know

Yes - Each case is worked on an individual basis to make sure the City takes care of everyone no matter what their disability.

**Q14** Have program staff been trained on the correct procedures to follow when a person requests an interpreter?

Yes

No formal training, but they have an understanding of how to interact based on police academy training.

2 responded Don't know

No

Yes - Always best to get in touch with our ADA specialist and she will see to it that the request is met.

**Q15** How much notice is required to provide an accommodation request for an interpreter?

4 responded Don't know

24 hours or less (not including weekends/holidays)

**Q16** Does the department/division track accessibility requests?

Yes - please list how many requests have been received in the past 12 - 36

months and what the requests were for: We can if needed, but to our knowledge the citizen police academy example was the only formal request. We have some on occasion when responding to calls such as a hearing impaired subject involved in a car crash.

2 responded Don't know

2 responded No

We have received one (1) request for an interpreter to assist hearing impaired citizens of Lakeland with an "Open to the Public" program on Emergency Management prior to the beginning of Hurricane

Season. This program was set up to educate the public on access and procedures to help them through an emergency situation in the case of a Hurricane. This workshop/presentation included one of our tenants - NOAA - showing their participation and results received during Hurricane Season.

**Q17** Does the program charge an additional fee for modifying the program for a person with disabilities?

2 responded No

2 responded Don't know

1 responded Not applicable

**Q18** Are there any hard copy or digital forms required for admission or participation in the program (i.e. tests, applications, registration forms, etc.)?

Yes - We required identification from them to prove who they are and there is an application he/she has to complete. I would have to check on this for question #19.

3 responded: Don't know

1 Responded: No

**Q19** Do the forms contain a notice that the city does not discriminate against persons with disabilities?

4 responded: No Response

1 responded: Don't know

**Q20** Is an interview required prior to an applicant's admission to the program?

Yes - please describe the selection criteria used in the interview: It verifies what is asked on the application.

2 responded: Don't know

2 responded: Not applicable

**Q21** Does the department/division ensure persons with disabilities are allowed the opportunity to participate as members of any program associated advisory boards and/or committees?

2 responded: Yes

2 responded: Don't know

1 responded: Not applicable

**Q22** Are you aware of any persons with disabilities currently serving on any of the department/division advisory boards or committees?

1 responded: No

5 responded: Don't know

**Q23** Does the department/division offer any exemplary programs, services, activities or events for persons with disabilities?

2 responded: Not applicable

3 responded: No or none that I am aware of

**Q24** Is a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement available and posted for program participants who may be persons with disabilities?

Yes - I would have to double, but I believe it is posted in the building. Would have to confirm this for # 25

3 responded: Don't know

1 responded: No Response

**Q25** Does the nondiscrimination statement include information about the city's ADA Specialist and How to contact them or file a grievance?

4 responded: No Response

1 responded: No

**Q26** Are department/division staff familiar with the city's ADA grievance/complaint procedures for persons with disabilities?

2 responded: Yes

2 responded: Don't know

1 responded: No

**Q27** Do department/division notifications of public meetings, hearings, interviews, agendas, meeting minutes and conferences state the availability of accommodations to participants with disabilities, and how to request such aids and accommodations?

2 responded: Yes - please describe how the notifications are made and how much

advance notice is required for requesting an accommodation: Email, social media, posting in the building. All notifications on the City website are ADA compliant, however I have no idea how much advance notice is required for accommodation requests.

1 responded: The department/division does not provide notifications of public meetings

1 responded: not applicable

1 responded: Don't know

**Q28** Is there a formal policy and/or procedure in place to respond to requests from the general public for note takers, computer-assisted real time transcription services, and other auxiliary aids and services for providing effective communication?

1 responded: No

1 responded: Not applicable

2 responded: Don't know

1 responded: Yes

**Q29** Does the department/division have printed materials (i.e. forms, newsletters, brochures, calendars, fact sheets) that are made available to the public?

2 responded: Yes

Police has all sorts of literature available from crime victim to crime prevention to complaints.

Information sheets on space we have available on the airport, sheets for marketing giving statistics about the airport

1 responded: No

1 responded: Not applicable

1 responded: Don't know

**Q30** Who manages the printed materials?

3 responded: Printed materials are managed centrally

2 responded: Don't know

1 responded: no response

**Q31** Is there a formal policy and/or procedure in place to respond to requests from the general public for alternate document formats, i.e. enlarged print or Braille, of the printed materials that are made to the public?

2 responded: No

3 responded: don't know

**Q32** What types of accessible alternate document formats does the department/division make available for persons with disabilities when requested?

Enlarged print, Electronic copy (for use with a screen reader), Email (i.e. sending a document directly to a person who cannot access it on the web or in person);

2 responded: Don't know

Not applicable

1 responded: we have never had a request until this past year and their request was to the City.

**Q33** How much notice is required to provide the alternate document formats?

More than 1 week

2 responded: no Response

2 responded: Don't know - have not completed such a request

**Q34** Does the department/division track accessibility requests for alternate formats of printed material?

Yes - please list how many requests have been received in the past

- 36 months and what the requests were for: We could, but to my knowledge have not had this request yet.

2 responded: No Response

1 responded: No

1 responded: Don't know

**Q35** Does the department/division charge an additional fee for providing materials in alternative formats for persons with disabilities?

3 responded: No

2 responded: No Response

**Q36** Does the department/division periodically include images of persons with disabilities in their printed materials and publications?

4 responded: Not applicable

1 responded: image of persons with disabilities are not included

**Q37** Does the department/division produce audiovisual, (film, videotape, television, digital) presentations, or website demonstrations/webinars for the public or provide these types presentations to the public?

1 responded: Yes

3 responded: No

1 responded: Don't know

**Q38** Is there a formal policy and/or procedure in place to respond to requests from the general public for accessible audiovisual, televised or online presentations provided to the public?

3 responded: No

1 responded: Don't know

1 responded: No Response

**Q39** What types of accessible audiovisual, televised or online presentation formats does the department/division make available when requested?

1 responded: The department/division does not provide alternative format. Most all of our media is through social media, but we could make what we have available when requested.

1 responded: Don't know

1 responded: The department/division does not provide alternative formats

1 responded: No Response

1 responded: The airport is willing to work with any requests; however, no requests to date.

**Q40** How much notice is required to provide the accessible presentation formats?

1 responded: More than 1 week

1 responded: 24 hours or less (not including weekends/holidays)

2 responded: No Response

1 responded: Don't know

**Q41** Does the department/division track accessibility requests for accessible presentation formats?

1 responded: Yes - We could but have not had this request that I know of.

1 responded: Don't know

2 responded: No Response

1 responded: No

**Q42** Does the department/division charge an additional fee for providing presentations in accessible formats for persons with disabilities?

2 responded: No

1 responded: Don't know

2 responded: No responded

**Q43** Does the department/division's audiovisual presentations periodically include portrayals of persons with disabilities?

3 responded: Not applicable

2 responded: No Response

**Q44** Does the department/division provide information about its programs, services, or activities on the website?

4 responded: Yes

1 responded: No

**Q45** Briefly describe the information provided on the website.

crime prevention, crime stats, complaint/commendation form, etc.

Procedures, Permits, Forms, Etc.

No Response

The Purchasing and Central Stores Division of the City of Lakeland is

responsible for the procurement of materials, supplies, equipment, and provide the very best service to the public and services at the lowest possible cost consistent with the quality needed to the primary objectives of the Purchasing Division are to obtain maximum quality, value, and service; and our goal is the promotion of fair dealings with you that will result in obtaining the maximum value for each dollar of expenditure.

website: [www.Lakelandairport.com](http://www.Lakelandairport.com)

**Q46** Does the department/division web page(s) include information about the accessibility of its programs, services, and activities (parking, bathrooms, assistive listening devices, sign language interpreters, Braille, etc.)?

1 responded: Yes- I believe so but would have to check with Robin Tillett.

1 responded: Don't know

1 responded: No Response

2 responded: No

**Q47** Who manages the information regarding the department/division facilities, programs, activities and services provided on the website?

2 responded: The department/division manages the web page(s) content

1 responded: Web page(s) content is managed centrally by the communications.

1 responded: No Response

1 responded: Don't know

**Q48** Are you affiliated with the central department responsible for web page content?

2 responded: No

3 responded: No response

**Q49** Do you have responsibility for creating web page content?

3 responded: No

2 responded: No Response

**Q50** Are staff members who are responsible for web page content knowledgeable and trained on website accessibility requirements?

2 responded: Yes

3 responded: No Response

**Q51** Does the website home page include easily located information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services and information?

2 responded: Yes

3 responded: No response

**Q52** Do all links have a text description that can be read by a screen reader (not just a graphic or "click here")?

1 responded: Yes

3 responded: No Response

1 responded: Don't know

**Q53** Do all the photographs, maps, graphics and other images on the web pages currently have HTML tags (such as an "alt" tag or a long description tag) with text equivalents of the material being visually conveyed?

1 responded: Don't know

2 responded: No Response

1 responded: No

**Q54** Are all the documents posted on the web pages available in HTML or other text-based format (for example, rich text format (RTF) or word processing format), even if they are also provided in another format, such as Portable Document Format (PDF)?

2 responded: Don't know

3 responded: No Response

**Q55** If a web page has data charts or tables, is HTML used to associate all data cells with column and row identifiers?

1 responded: Don't know

4 responded: No Response

**Q56** Do all video files available on the department's/division's web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?

1 responded: Don't know

4 responded: No Response

**Q57** Do all video files on the web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?

1 responded: Don't know

4 responded: No Response

**Q58** Does the top of each page with navigation links have a "skip navigation" link? This is a feature which directs screen readers to bypass the row of navigation links and start at the web page content, thus enabling people who use screen readers to avoid having to listen to all the links each time they move to a new page.

1 responded: Don't know

4 responded: No Response

**Q59** Is the web page content regularly (at least annually) tested for accessibility to ensure it is usable by persons with disabilities, including those who use text to speech browsers?

1 responded: Don't know; staff is working with City Hall Communications to ensure the LPD website is up to date with the new changes discussed at a recent meeting in Jan 2019.

4 responded: No Response

**Q60** Is there a formal policy established to ensure the web pages will be accessible?

1 responded: Don't know

4 responded: No Response

**Q61** Is the policy posted on the website where it can be easily located?

1 responded: Don't know

4 responded: No Response

**Q62** Is there a standard operating procedure in place to ensure that new and modified web pages and content are accessible?

1 responded: Don't know

4 responded: No Response

**Q63** Do in-house staff and/or contractors responsible for web page content development receive training on the guidelines for website accessibility?

1 responded: Yes

1 responded: No

3 responded: No Response

**Q64** Does the department/division main public access number have an automated phone menu service (i.e. press 1 for..., press 2 for...)?

2 responded: Don't know

1 responded: No Response

2 responded: No

**Q65** Does the system offer a simple, 1-step way for a caller to bypass the menu and speak directly with a staff person during regular business hours?

2 responded: Don't know

1 responded: No Response

1 responded: No

1 responded: Yes

**Q66** What tools does the department/division use to communicate by phone with people with speech or hearing difficulties?

1 responded: Don't know

1 responded: No Response

1 responded: No

1 responded: Don't know

1 responded: Third-party "relay" system where a trained operator facilitates a conversation between staff and the caller

**Q67** Does the department/division publish the city's (text telephone) relay service in all materials where a phone number is listed?

2 responded: Don't know

2 responded: No

1 responded: No Response

**Q68** If a third-party "relay" system is used, does department/division staff receive training on how to place a relay, call as well as receive one?

2 responded: Don't know

2 responded: No

1 responded: No Response

**Q69** Does the department/division allow members of the public to use electronic equipment such as copy machines, kiosks or computers?

1 responded: Yes

1 responded: Don't know

3 responded: No

**Q70** Does the department/division ensure that the electronic equipment is accessible to and usable by persons with disabilities? For example, is a public computer provided on a lowered counter or in an accessible workstation?

2 responded: Yes

We would if we had these accessible to the public for their use.

Our computer is not completely Public; however our computer for airport badge training is at a lower level and has headphones to listen through.

1 responded: Don't know

1 responded: No Response

1 responded: No

**Q71** Are auxiliary aids (such as a movable light source, adjustable worktable levels, paper and pen, magnifying glass, etc.) provided to assist persons with disabilities?

2 responded: Yes

I am sure we could if it was needed and requested.

I have been temporarily disabled - walked with a walker and/or knee walker - and was accommodated.

2 responded: Don't know

1 responded: No

**Q72** Is purchasing of equipment and software managed centrally, departmentally, or both?

4 responded: Both

Centrally: COL Purchasing Department

**Q73** Are policies and procedures in place to assure the purchase of accessible products where required?

3 responded: Don't know

1 responded: No

1 responded: Yes - We would order what we needed

**Q74** Does the department/division hold public meetings, events, hearings or conferences?

3 responded: Don't know

1 responded: No

1 responded: Yes

**Q75** Does the department/division require that public meetings and conferences be held in accessible locations?

3 responded: Yes

1 responded: No

1 responded: Don't know

**Q76** Do all printed or electronic materials about department/division sponsored/hosted public events, public meetings, or public appearances by and with city officials include instructions about how to request accommodations?

3 responded: Don't know

1 responded: Not applicable

1 responded: No

**Q77** What types of accommodations can the department/division provide to the public when requested?

American Sign Language interpreters;

Call-in/speakerphone capability during meetings;

Large print;

1 responded: Not applicable

2 responded: No Response

Other - Whatever we could achieve by calling the ADA Specialist with the City of Lakeland.

**Q78** Are Assistive listening devices or systems available for public meetings?

2 responded: No

3 responded: Don't know

**Q79** Does the department/division charge an additional fee for providing accommodations for persons with disabilities?

3 responded: No

2 responded: Don't know

**Q80** Does the department/division provide transportation to volunteers, visitors, or students?

3 responded: No

2 responded: Don't know

**Q81** Does the department/division have procedures to make transportation accessible to persons who have visual, hearing, mobility and learning disabilities?

2 responded: No

1 responded: Don't know

2 responded: No Response

**Q82** Does the department/division provide facility tours or organize trips for members of the public or students?

Yes - Field trips to the station occur and we use the elevators for those that cannot take the steps.

Yes -Tours only as field trips organized by others

2 responded: No

1 responded: Don't know

**Q83** Does the department/division have procedures to make sure facility tours or trips for members of the public are accessible to persons who have visual, hearing, mobility and learning disabilities?

1 responded: No,

2 responded: Don't know

2 responded: Not applicable

**Q84** Does the department/division hire consultants or contractors?

5 responded: Yes

**Q85** Are consultants, contractors or vendors who bid on capital projects or other contractual work requested to sign a statement of their intent to comply with the ADA and all applicable accessibility standards?

Yes - That would go through Fiscal and purchasing.

4 responded: Don't know

**Q86** Does department/division staff monitor consultants, contractors, or vendors to ensure equal participation of persons with disabilities?

4 responded: Don't know

1 responded: No

**Q87** When selecting contractors or vendors, does the department/division use criteria that does not discriminate based on ability?

4 responded: Don't know

1 responded: Yes - Per FAA and FDOT guidelines.

**Q88** Do department/division staff have an evacuation plan or procedures in place that describes how to evacuate persons with disabilities from a facility during an emergency?

Yes - We are part of a citywide EOC and these folks would be evacuated by the County EOC to Special Needs Shelters first.

3 responded: Don't know

1 responded: Not applicable

**Q89** Is the evacuation route and/or instructions posted in a visible and accessible area of each floor in all facilities used by the department/division?

1 responded: No

1 responded: Don't know

1 responded: Not applicable

2 responded: Yes

**Q90** Is there staff at each department/division facility trained to carry out the instructions of the evacuation plan or procedures?

2 responded: Yes

We are citywide, so our evacuation is completely different in a time of crisis.

Imbedded in annual safety training here by Risk Management staff

2 responded: Don't know

1 responded: No

**Q91** Is there staff available whom have had training in American Sign Language or other means of communicating in emergency situations with people who have hearing or speech difficulties?

2 responded: Yes

1. Ofc Eric Mathers

I have had training in ASL and in an emergency situation could muddle through.

2 responded: Don't know

1 responded: No

**Q92** Does the department/division host any private or public special events on public property?

2 responded: Yes

Promotion and gradual ceremonies

We have airport advisory board meetings, we have an Aviation Dinner every year during SNF

2 responded: Don't know

1 responded: No

**Q93** Do department/division staff notify both private entities and staff of their obligations to facilitate participation of persons with disabilities in special events or private events held on public property?

4 responded: Don't know

1 responded: No

**Q94** Are there policies and procedures in place for any events which you may sell tickets to with regards to accessible seating?

3 responded: We do not sell tickets to any events

1 responded: Don't know

1 responded: No

**Q95** Are department/division staff who have contact with the public informed of the department's obligations and policies that enables persons with disabilities to participate in the program?

Yes - On the Job training and working with the person to see what assistance they need.

3 responded: Don't know

1 responded: Not applicable

**Q96** Do department/division staff having contact with the public receive training on interacting with persons with disabilities?

Yes – staff training is provided. Usually on Power DMS

3 responded: Don't know

1 responded: Not applicable

**Q97** Is there department/division staff whom would be able to provide better customer service if they had training in American Sign Language (ASL) or other means of communicating with people who have hearing or speech difficulties?

1 responded: No

3 responded: Don't know

1 responded: Not applicable

Responded: Yes - please list staff/positions which would benefit from additional training: Our Dept is small, so just having one person trained would be a great help.

**Q98** Would other training or technical assistance services be helpful to department/division staff such as (check all that apply):

Other - We would most likely follow city recommendations on ADA and do what is needed to make it work.

How to work with persons with disabilities;

Legal requirements;

How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.)

Not applicable

Legal requirements

Developing policies and procedures;

How to work with persons with disabilities;

Legal requirements;

How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.);

How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

**Q99** List all facilities, or portions of facilities, used by your department/division. For each facility, designate the type of activities (i.e. employee workspace, classroom/learning space, meetings & conferences, retail, customer interaction) for which it is used.

We are a citywide department with patrol cars, classrooms, training center, police station, etc.

Conference Rooms- Meetings;

Plans Room- Meetings

Fleet Management facility and fuel station;

Vehicle fueling;

Vehicle maintenance;

Vehicle parts management;

Fleet Management administration

Purchasing Bid Room - bid openings, meetings and gatherings;

Employee Workspace/Offices;

Purchasing Break Room;

Purchasing Restrooms

Employee workspace, classroom/learning space, meetings in conference room space.

When we had scheduled flight service there were wheelchairs to accommodate customers.

**Q100** Do department/division facilities have provisions for accessible seating at public meetings, events, classes, etc. for persons with mobility difficulties?

2 responded: Yes

2 responded: Don't know

1 responded: Not applicable

**Q101** Are you aware of any areas or elements of the facilities which the department/division utilizes which are not accessible to persons with disabilities?

2 responded: Yes

We have secured areas in our building due to the sensitive nature of what we deal with. Unless the person with a disability, there is a highly likely chance other would not be in these restricted areas.

Second floor of the Fleet facility is not accessible to persons whose mobility is limited to wheelchair or similar

2 responded: No

1 responded: No Response

**Q102** Has the department/division received requests to improve facility accessibility in the past years?

Yes - We are in a remodel of our 25-year-old building right now and upgrades are being made to be ADA compliant.

2 responded: Don't know

2 responded: No

**Q103** Is the department/division responsible for the maintenance of any facilities, parks, parking lots, streets, sidewalks or landscaping?

3 responded: No

1 responded: Don't know

Yes - We maintain most of our buildings in one way or another.

Some we only do certain maintenance items and others we even do the cleaning. These are dependent on the tenant's lease content.

**Q104** Are there any procedures in place for monitoring and/or maintaining accessible features (i.e. adjusting door closer speed, repainting accessible parking spaces, repairing uneven curb cuts and sidewalks, trimming trees and hedges encroaching into a sidewalk, etc.)?

2 responded: Yes

Our Fleet and Facilities Manager monitors this and completes work orders when he observes an issue or is informed of one.

we have specific work order system for all items. Whether they are an ADA work order or other.

3 responded: Don't know

**Q105** Does the department/division rent or lease facilities or space to individuals, groups or organizations?

3 responded: No

1 responded: Not applicable

1 responded: Yes

**Q106** Do you have input or involvement with design and construction activities for new or altered space?

3 responded: No

Yes - Within the Fleet facility, I have involvement with changes additions, improvements.

**Q107** Are there procedures and/or standards in place which ensure accessibility compliance and best practices are incorporated into design and construction activities?

1 responded: Yes - The ADA rep for the city can assist in this request when needed.

4 responded: Don't know

**Q108** Does the city plan and budget for improving accessibility to its facilities (i.e. buildings, parks, sidewalks, street crossings, parking lots)?

2 responded: Yes

Working with DAC now to assess what improvements need to be made in order to begin to budget for future years improvements

I am not as involved now; however, have been very involved in the past. We contract to build Hangars, modify and upgrade taxiways on the airfield; sometimes remodel existing space like an office renovation.

1 responded: Don't know

1 responded: Not applicable

**Q109** What do you feel should be the highest priority of the City of Lakeland to improve accessibility for persons with disabilities?

2 responded: No Response

Bathrooms

Improve existing facilities and infrastructure

The first priority should be the highest volume public access locations and facilities.

**Survey Comments from Management**

**Twelve (12) hard copy surveys were received from management.**

**Q2** What role most adequately describes your association with the City of Lakeland and the representation you are providing?

Staff member full or part-time - responsible for administering a program,  
service or activity

Department/Division Head, Director, Manager, Chief Officer

Department/Division Head, Director, Manager, Chief Officer

Staff member full or part-time - responsible for administering a program,  
service or activity

Department/Division Head, Director, Manager, Chief Officer

City Accessibility liaison

Department/Division Head, Director, Manager, Chief Officer

City Accessibility liaison

**Q3** The following departments/divisions within the City of Lakeland have been identified. Please check which department or division you primarily work or volunteer for.

Lakeland Electric

Parks & Recreation

RP Funding Center

Finance

Lakeland Fire Department

Parks & Recreation

Water Utilities

Finance

Finance

Information Technology

Lakeland Police Department

Public Works

**Q4** Please describe the services, programs, events or activities your department/division offers including those provided to the public. (i.e. Human Resources provides employment support to all city departments. The office coordinates employee recruitment and hiring and provides ongoing salary and benefits support to employees. The office works to promote positive employee and labor relations, competitive salary and benefits, to minimize potential losses through a comprehensive risk management program). If non-applicable, please move on to the next question.

Of the 12 total respondents:

2 or 16.66% had no response

Provide citizens and funeral homes with the planning of burials. Assist citizens with location of graves

Entertainment and Event venue for the City of Lakeland

Finance handles the City of Lakeland's budgeting and financial reporting.

Emergency Response to fires, emergency medical calls and all other request for service. Public Education programs, fire safety and awareness, etc.

Fire department events such as an Annual Open House, Station Tours and Trunk or Treat. Leadership Lakeland and Citizen's Academy

Quality of life by providing quality open spaces, recreational areas and right of ways

Suppling potable water to the citizens of Lakeland and surrounding area

Payroll provides support for employees and retirees with regard to their earnings and benefits. Key members \_provide reporting and technical support as needed both internally and externally. At least once annually we hold a timekeepers conference event to engage, refresh training, and solicit feedback for/from the city timekeeping staff. We periodically hold training sessions for other business areas in the use of functionality such as Query Manager. We participate heavily in the Open Enrollment event each calendar year.

The Department of Information Technology provides I/T development and support for all City business functions including the Electric and Water Utilities, Police, Fire, Public Works, Finance, Human Resources, Community Development, Parks and Recreation, Internal Audit, Risk Management, Purchasing, Communications, The Lakeland Linder Regional Airport and The RP Funding Center.

Provide law enforcement service for the incorporated city limits of Lakeland. We offer events and programs to public, such as open house and Citizen Police Academy. The Traffic Operations Division maintains all the traffic signs and signals within the city limits. We work directly with the general public regarding requests for traffic calming, traffic signs or pavement markings. We provide road closures for special events and coordinate with other municipalities and governmental agencies to help address issues of mutual concerns including traffic and pedestrian safety. We also are grouped with the Parking System and have responsibility for the maintenance of the City's parking garages and off-street lots.

**Q5** Does your role require interaction with the public?

Of the 12 total respondents:

7 or 58.33% responded yes

5 or 41.66% responded no

**Q6** Have you received training or information regarding the requirements of the Americans with Disabilities Act?

Of the 12 total respondents:

8 or 66.66% responded yes

4 or 33.33% responded no

**Q7** Have you received training on providing services or activities for persons with disabilities?

Of the 12 total respondents:

5 or 41.66% responded yes

6 or 50% responded no

1 or 8.33% responded Not applicable

**Q8** Are you aware of any specific concerns, complaints or problems regarding access for persons with disabilities to any of the programs, services or activities provided by the City of Lakeland?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please describe: Handicap Parking on occasion

Yes -please describe: I am aware of the current activities being Undertaken by the City of Lakeland to resolve all known issues. In IT we are

involved in ensuring our websites and mobile applications are compliant.

Yes - please describe: ADA accessibility within our restroom facilities is currently being addressed through upgrades and remodeling.

9 or 75% responded no.

**Q9** Do you know who the designated ADA Specialist is for the City of Lakeland?

Of the 12 total respondents:

11 or 91.66% responded yes with an answer of Jennifer Sykes.

1 or 8.33% responded no

No – I have not had a need or reason to seek out this person.

**Q10** Do any programs, services, or activities have eligibility requirements for participation? Please check all that apply:

Of the 12 total respondents:

2 Or 16.66% responded they did not know

5 or 41.66% responded they are not applicable

Physical fitness standards; Performance requirements; Safety standards

Performance requirements; Safety standards

Other- please describe: web and mobile applications

Programs, services, and activities do not have eligibility requirements for participation

Safety standards

**Q11** How does the program ensure that policies with eligibility requirements do not discriminate against persons with disabilities?

Of the 12 total respondents:

6 or 50% had no response

2 or 16.66% responded they are not applicable

Other than access, none developed.

The requirements are based on industry and Maintenance standards not on individual ability

Meet all compliance requirements

Check with ADA Coordinator of there's a question

**Q12** Is there a formal policy in place to respond to requests from the general public for Sign language, oral and cued speech interpreters, or other modifications to the program to allow persons with disabilities to participate?

Of the 12 total respondents:

3 or 25% responded yes

1 or 8.33% responded no

5 or 41.66% responded they did not know

3 or 25% responded they are not applicable

**Q13** Does the program have standard operating procedures in place to include persons with disabilities? For example, allowing a service animal into a facility, allowing someone to bring a personal attendant with them to a class, or moving a class or activity to an accessible location.

Of the 12 total respondents:

3 or 25% responded yes

Yes - please describe the written procedure below: Staff receives request and distributes hearing aids for theatre

Yes - please describe the written procedure below: Service animals are permitted in our areas as service animals

Yes - please describe the written procedure below: LPD General Orders address these concerns

1 or 8.33% responded no

1 or 8.33% had no response

4 or 33.33% responded they do not know

3 or 25% responded they are not applicable

**Q14** Have program staff been trained on the correct procedures to follow when a person requests an interpreter?

Of the 12 total respondents:

1 or 8.33% responded yes.

Yes - please describe the training: LPD receives annual training in this area

2 or 16.66% responded no

6 or 50% responded they did not know

3 or 25% responded they are not applicable

**Q15** How much notice is required to provide an accommodation request for an interpreter?

Of the 12 total respondents:

8 or 66.66% responded they did not know. They have not completed such a request.

4 or 33.33% responded saying they are not applicable.

**Q16** Does the department/division track accessibility requests?

Of the 12 total respondents:

1 or 8.33% responded yes

3 or 25% responded no

No, too vague of a question. We track many different things. I would need to know a specific type of request.

6 or 50% responded stating they did not know

2 or 16.66% responded saying they are not applicable

**Q17** Does the program charge an additional fee for modifying the program for a person with disabilities?

Of the 12 total respondents:

3 or 25% responded no

6 or 50% responded they did not know

3 or 25% responded they are not applicable

**Q18** Are there any hard copy or digital forms required for admission or participation in the program (i.e. tests, applications, registration forms, etc.)?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe or list the forms: Citizens Police Academy requires an application be completed

4 or 33.33% responded no

5 or 50% responded they did not know

2 or 16.66% responded they are not applicable

**Q19** Do the forms contain a notice that the city does not discriminate against persons with disabilities?

Of the 12 total respondents:

2 or 16.66% responded yes

2 or 16.66% responded no

2 or 16.66% responded they did not know

6 or 50% had no response

**Q20** Is an interview required prior to an applicant's admission to the program?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the selection criteria used in the interview: A brief conversation to ensure the person knows what the program is, its requirements for attendance etc.

2 or 16.66% responded no

4 or 33.33% responded they did not know

5 or 41.66% responded they are not applicable

**Q21** Does the department/division ensure persons with disabilities are allowed the opportunity to participate as members of any program associated advisory boards and/or committees?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe: we do not discriminate any persons with disabilities

4 or 33.33% responded they did not know

7 or 58.33% responded they are not applicable

**Q22** Are you aware of any persons with disabilities currently serving on any of the department/division advisory boards or committees?

Of the 12 total respondents:

4 or 33.33% responded no

3 or 25% responded they did not know

2 or 16.66% responded they are not applicable

3 or 25% had no response

**Q23** Does the department/division offer any exemplary programs, services, activities or events for department/division advisory boards or committees?

Of the 12 total respondents:

7 or 58.33% responded no or none that they are aware of

5 or 41.66% responded they are not applicable

**Q24** Is a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement available and posted for program participants who may be persons with disabilities?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the locations where it is available: Website and all written and electronic notifications of available programs or events open to the public

1 or 8.33% responded no

5 or 41.66% responded they did not know

5 or 41.66% responded they are not applicable

**Q25** Does the nondiscrimination statement include information about the city's ADA Specialist and how to contact them or file a grievance?

Of the 12 total respondents:

- 1 or 8.33% responded yes
- 2 or 16.66% responded they do not know
- 9 or 75% had no response

**Q26** Are department/division staff familiar with the city's ADA grievance/complaint procedures for persons with disabilities?

Of the 12 total respondents:

- 1 or 8.33% responded yes
- 3 or 25% responded no
- 7 or 58.33% responded they did not know
- 1 or 8.33% responded they are not applicable

**Q27** Do department/division notifications of public meetings, hearings, interviews, agendas, meeting minutes and conferences state the availability of accommodations to participants with disabilities, and how to request such aids and accommodations?

Of the 12 total respondents:

- 1 or 8.33% responded yes

Yes - please describe how the notifications are made and how much advance notice is required for requesting an accommodation: 7 days' notice. Posted on all fliers, website and other electronic media

- 1 or 8.33% responded no
- 5 or 41.66% responded they do not know
- 3 or 25% responded the department/division does not provide notifications of public meetings, etc.
- 2 or 16.66% responded they are not applicable

**Q28** Is there a formal policy and/or procedure in place to respond to requests from the general public for note takers, computer-assisted real time transcription services, and other auxiliary aids and services for providing effective communication?

Of the 12 total respondents:

- 1 or 8.33% responded yes
- 1 or 8.33% responded no
- 7 or 58.33% responded they did not know
- 3 or 25% responded they are not applicable

**Q29** Does the department/division have printed materials (i.e. forms, newsletters, brochures, calendars, fact sheets) that are made available to the public?

Of the 12 total respondents:

6 or 50% responded yes

Yes - please describe the printed materials: promotional

Yes - please describe the printed materials: No Response

Yes - please describe the printed materials: Play maker periodical describing our recreation programs and park locations

Yes - please describe the printed materials: Consumer Confidence Report required annual distribution of water quality

Yes - please describe the printed materials: Lots of different materials throughout the department

Yes - please describe the printed materials: Traffic safety related literature

2 or 16.66% responded no

1 or 8.33% responded they did not know

3 or 25% responded they are not applicable

**Q30** Who manages the printed materials?

Of the 12 total respondents:

4 or 33.33% had no response

2 or 16.66% responded they do not know

4 or 33.33% responded the department manages printed material

1 or 8.33% responded they are managed both by the department and centrally. Please list the name of the central department: Communications and Customer Service

1 or 8.33% responded the printed materials are managed centrally. Please list the name of the central department: PIO / media relations Specialist Robin Tillett

**Q31** Is there a formal policy and/or procedure in place to respond to requests from the general public for alternate document formats, i.e. enlarged print or Braille, of the printed materials that are made to the public?

Of the 12 total respondents:

2 or 16.66% responded no

7 or 58.33% responded they do not know

3 or 25% had no response

**Q32** What types of accessible alternate document formats does the department/division make available for persons with disabilities when requested?

Of the 12 total respondents:

4 or 33.33% responded they do not know

5 or 41.66% responded they are not applicable

1 or 8.33% responded with Enlarged print, Electronic copy (for use with a screen reader), Email (i.e. sending a document directly to a person who cannot access it on the web or in person)

1 or 8.33% responded with Electronic copy (for use with a screen reader), Email (i.e. sending a document directly to a person who cannot access it on the web or in person)

1 or 8.33% responded with Audio recording (cassette or digital), Braille, Enlarged print, Electronic copy (for use with a screen reader), Email (i.e. sending a document directly to a person who cannot access it on the web or in person)

**Q33** How much notice is required to provide the alternate document formats?

Of the 12 total respondents:

8 or 66.66% had no response

2 or 16.66% responded they do not know- have not completed such a request

1 or 8.33% responded with 24 hours or less (not including weekends/holidays)

1 or 8.33% responded with 24 hours or less (not including weekends/holidays), 2-4 working days, More than 1 week

**Q34** Does the department/division track accessibility requests for alternate formats of printed material?

Of the 12 total respondents:

2 or 16.66% responded no

2 or 16.66% responded they did not know

8 or 66.66% had no response

**Q35** Does the department/division charge an additional fee for providing materials in alternative formats for persons with disabilities?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe: Depends on the request

2 or 16.66% responded no

1 or 8.33% responded they did not know

8 or 66.66% had no response

**Q36** Does the department/division periodically include images of persons with disabilities in their printed materials and publications?

Of the 12 total respondents:

3 or 25% responded no- image of persons with disabilities are not included

7 or 58.33% responded they are not applicable

2 or 16.66% had no response

**Q37** Does the department/division produce audiovisual, (film, videotape, television, digital) presentations, or website demonstrations/webinars for the public or provide these types presentations to the public?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please list the types of presentations which are provided: No Response

Yes - please list the types of presentations which are provided: Social Media outreach

Yes - please list the types of presentations which are provided: all above

4 or 33.33% responded no

3 or 25% responded they did not know

2 or 16.66% responded they are not applicable

**Q38** Is there a formal policy and/or procedure in place to respond to requests from the general public for accessible audiovisual, televised or online presentations provided to the public?

Of the 12 total respondents:

1 or 8.33% responded yes

1 or 8.33% responded no

3 or 25% responded they did not know

7 or 58.33% had no response

**Q39** What types of accessible audiovisual, televised or online presentation formats does the department/division make available when requested?

Of the 12 total respondents:

4 or 33.33% responded they do not know

7 or 58.33% had no response

1 or 8.33% responded Captioning

**Q40** How much notice is required to provide the accessible presentation formats?

Of the 12 total respondents:

1 or 8.33% responded they do not know- have not completed such a request

9 or 75% had no response

1 or 8.33% responded 24 hours or less (not including weekends/holidays)

1 or 8.33% responded 24 hours or less (not including weekends/holidays), 2-4 working days, More than 1 week

**Q41** Does the department/division track accessibility requests for accessible presentation formats?

Of the 12 total respondents:

1 or 8.33% responded no

2 or 16.66% responded they do not know

9 or 75% had no response

**Q42** Does the department/division charge an additional fee for providing presentations in accessible formats for persons with disabilities?

Of the 12 total respondents:

2 or 16.66% responded no

1 or 8.33% responded they do not know

9 or 75% had no response

**Q43** Does the department/division's audiovisual presentations periodically include portrayals of persons with disabilities?

Of the 12 total respondents:

2 or 16.66% responded no- persons with disabilities are not portrayed

1 or 8.33% responded they are not applicable

9 or 75% had no response

**Q44** Does the department/division provide information about its programs, services, or activities on the website?

Of the 12 total respondents:

6 or 50% responded yes

3 or 25% responded no

1 or 8.33% responded they do not know

2 or 16.66% had no response

**Q45** Briefly describe the information provided on the website.

Of the 12 total respondents:

8 or 66.66% had no response

Dates and times of events, promoting events

Any/everything anyone would want to know about the Lakeland fire department. Primarily informative, not service request based.

All sorts of information about our parks from closures to activities and special events

Handled by the ADA Specialist

**Q46** Does the department/division web page(s) include information about the accessibility of its programs, services, and activities (parking, bathrooms, assistive listening devices, sign language interpreters, Braille, etc.)?

Of the 12 total respondents:

2 or 16.66% responded yes

Yes - please briefly describe: we have info. on accessible parking, hearing and other general items

Yes - please briefly describe: No Response

3 or 25% responded they do not know

7 or 58.33% had no response

**Q47** Who manages the information regarding the department/division facilities, programs, activities and services provided on the website?

No response

**Q48** Are you affiliated with the central department responsible for web page content?

Of the 12 total respondents:

2 or 16.66% responded yes

3 or 25% responded no

7 or 58.33% had no response

**Q49** Do you have responsibility for creating web page content?

Of the 12 total respondents:

2 or 16.66% responded yes

2 or 16.66% responded no

8 or 66.66% had no response

**Q50** Are staff members who are responsible for web page content knowledgeable and trained on website accessibility requirements?

Of the 12 total respondents:

1 or 8.33% responded yes

2 or 16.66% responded they do not know

9 or 75% had no response

**Q51** Does the website home page include easily located information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services and information?

Of the 12 total respondents:

2 or 16.66% responded yes

1 or 8.33% responded they do not know

9 or 75% had no response

**Q52** Do all links have a text description that can be read by a screen reader (not just a graphic or "click here")?

Of the 12 total respondents:

1 or 8.33% responded yes

1 or 8.33% responded no

1 or 8.33% responded they do not know

9 or 75% had no response

**Q53** Do all the photographs, maps, graphics and other images on the web pages currently have HTML tags (such as an "alt" tag or a long description tag) with text equivalents of the material being visually conveyed?

Of the 12 total respondents:

2 or 16.66% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q54** Are all the documents posted on the web pages available in HTML or other text-based format (for example, rich text format (RTF) or word processing format), even if they are also provided in another format, such as Portable Document Format (PDF)?

Of the 12 total respondents:

2 or 16.66% responded yes

1 or 8.33% responded they did not know

9 or 75% had no response

**Q55** If a web page has data charts or tables, is HTML used to associate all data cells with column and row identifiers?

Of the 12 total respondents:

2 or 16.66% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q56** Do all video files available on the department's/division's web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?

Of the 12 total respondents:

2 or 16.66% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q57** Do all video files on the web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?

Of the 12 total respondents:

1 or 8.33% responded no

1 or 8.33% responded they did not know

10 or 88.33% had no response

**Q58** Does the top of each page with navigation links have a "skip navigation" link? This is a feature which directs screen readers to bypass the row of navigation links and start at the web page content, thus enabling people who use screen readers to avoid having to listen to all the links each time they move to a new page.

Of the 12 total respondents:

2 or 16.66% responded no

10 or 88.33% had no response

**Q59** Is the web page content regularly (at least annually) tested for accessibility to ensure it is usable by persons with disabilities, including those who use text to speech browsers?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please briefly describe how the content is tested for accessibility: We are now...

1 or 8.33% responded no

10 or 88.33% had no response

**Q60** Is there a formal policy established to ensure the web pages will be accessible?

Of the 12 total respondents:

1 or 8.33% responded yes

1 or 8.33% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q61** Is the policy posted on the website where it can be easily located?

Of the 12 total respondents:

2 or 16.33% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q62** Is there a standard operating procedure in place to ensure that new and modified web pages and content are accessible?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the process: new policy we are following as best we can

1 or 8.33% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q63** Do in-house staff and/or contractors responsible for web page content development receive training on the guidelines for website accessibility?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the training process: resources and policies are being determined

1 or 8.33% responded no

1 or 8.33% responded they did not know

9 or 75% had no response

**Q64** Does the department/division main public access number have an automated phone menu service (i.e. press 1 for..., press 2 for...)?

Of the 12 total respondents:

2 or 16.66% responded yes

5 or 41.66% responded no

4 or 33.33% responded they did not know

1 or 8.33% responded they are not applicable

**Q65** Does the system offer a simple, 1-step way for a caller to bypass the menu and speak directly with a staff person during regular business hours?

Of the 12 total respondents:

2 or 16.66% responded yes

1 or 8.33% responded no

2 or 16.66% responded they did not know

7 or 58.33% had no response

**Q66** What tools does the department/division use to communicate by phone with people with speech or hearing difficulties?

Of the 12 total respondents:

4 or 33.33% responded they did not know

1 or 8.33% had no response

4 or 33.33% responded none

1 or 8.33% responded Text-telephone (TTY/TTD)

1 or 8.33% responded Third-party "relay" system where a trained operator facilitates a conversation between staff and the caller

1 or 8.33% responded hearing assist

**Q67** Does the department/division publish the city's (text telephone) relay service in all materials where a phone number is listed?

Of the 12 total respondents:

1 or 8.33% responded yes

1 or 8.33% responded no  
10 or 83.33% had no response

**Q68** If a third-party "relay" system is used, does department/division staff receive training on how to place a relay call as well as receive one?

Of the 12 total respondents:  
2 or 16.66% responded they did not know  
10 or 83.33% had no response

**Q69** Does the department/division allow members of the public to use electronic equipment such as copy machines, kiosks or computers?

Of the 12 total respondents:  
1 or 8.33% responded yes  
Yes - please describe the equipment which the public is allowed to use: Kiosks  
9 or 75% responded no  
1 or 8.33% responded they did not know  
1 or 8.33% responded they are not applicable

**Q70** Does the department/division ensure that the electronic equipment is accessible to and usable by persons with disabilities? For example, is a public computer provided on a lowered counter or in an accessible workstation?

Of the 12 total respondents:  
3 or 25% responded no  
1 or 8.33% responded they did not know  
8 or 66.66% had no response

**Q71** Are auxiliary aids (such as a movable light source, adjustable worktable levels, paper and pen, magnifying glass, etc.) provided to assist persons with disabilities?

Of the 12 total respondents:  
4 or 33.33% responded no  
3 or 25% responded they did not know  
1 or 8.33% had no response  
4 or 33.33% responded they are not applicable

**Q72** Is purchasing of equipment and software managed centrally, departmentally, or both?

Of the 12 total respondents:

5 or 41.66% responded they did not know

1 or 8.33% responded they are not applicable

1 or 8.33% responded Department

2 or 16.66% responded Centrally

Centrally - please list the name of the centralized department: IT

Centrally - please list the name of the centralized department: Purchasing

3 or 25% responded both.

Both - please list the name of the centralized department: generally through the IS Dept., we may purchase specialty items

Both - please list the name of the centralized department: IT

Both - please list the name of the centralized department: Alisa Anderson

**Q73** Are policies and procedures in place to assure the purchase of accessible products where required?

Of the 12 total respondents:

1 or 8.33% responded no

4 or 33.33% responded they did not know

7 or 58.33% had no response

**Q74** Does the department/division hold public meetings, events, hearings or conferences?

Of the 12 total respondents:

7 or 58.33% responded yes

4 or 33.33% responded no

1 or 8.33% responded they are not applicable

**Q75** Does the department/division require that public meetings and conferences be held in accessible locations?

Of the 12 total respondents:

4 or 33.33% responded yes

2 or 16.66% responded they did not know

6 or 50% had no response

**Q76** Do all printed or electronic materials about department/division sponsored/hosted public events, public meetings, or public appearances by and with city officials include instructions about how to request accommodations?

Of the 12 total respondents:

1 or 8.33% responded

Yes - please describe the instructions provided and how much advance notice is required to provide accommodations: Standard wording with 7 day notice preferred

1 or 8.33% responded no

4 or 33.33% responded they did not know

6 or 50% had no response

**Q77** What types of accommodations can the department/division provide to the public when requested?

Of the 12 total respondents:

5 or 41.66% had no response

4 or 33.33% responded they are not applicable

1 or 8.33% responded Assistive listening devices (like FM transmitters)

1 or 8.33% responded Large Print

1 or 8.33% responded American Sign Language interpreters; Electronic/computer-based document readers; Large print

**Q78** Are Assistive listening devices or systems available for public meetings?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please include how many are available and the capacity of seating in the combined rooms utilized for public meetings: mainly for the theatre

2 or 16.66% responded no

9 or 75% responded they did not know

**Q79** Does the department/division charge an additional fee for providing accommodations for persons with disabilities?

Of the 12 total respondents:

3 or 25% responded no

5 or 41.66% responded they did not know

4 or 33.33% responded they are not applicable

**Q80** Does the department/division provide transportation to volunteers, visitors, or students?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe: We transport people to jail

5 or 41.66% responded no

3 or 25% responded they do not know

3 or 25% responded they are not applicable

**Q81** Does the department/division have procedures to make transportation accessible to persons who have visual, hearing, mobility and learning disabilities?

Of the 12 total respondents:

2 or 16.66% responded yes

Yes - please describe the procedures: we assist citizen that needs to get to a graveside service with our golf cart

Yes - please describe the procedures: LPD General Orders

1 or 8.33% responded no

2 or 16.66% responded they do not know

7 or 58.33% had no response

**Q82** Does the department/division provide facility tours or organize trips for members of the public or students?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please list the tours and trips offered: Station Tours

Yes - please list the tours and trips offered: Downtown Tour

Yes - please list the tours and trips offered: tours of the PD

5 or 41.66% responded no

2 or 16.66% responded they did not know

2 or 16.66% responded they are not applicable

**Q83** Does the department/division have procedures to make sure facility tours or trips for members of the public are accessible to persons who have visual, hearing, mobility and learning disabilities?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the procedures: provide accommodations as needed

1 or 8.33% responded no

1 or 8.33% responded they did not know

6 or 50% had no response

3 or 25% responded they are not applicable

**Q84** Does the department/division hire consultants or contractors?

Of the 12 total respondents:

8 or 66.66% responded yes

3 or 25% responded no

1 or 8.33% responded they are not applicable

**Q85** Are consultants, contractors or vendors who bid on capital projects or other contractual work requested to sign a statement of their intent to comply with the ADA and all applicable accessibility standards?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please list the types of consultants and contractors from whom this is required: standard city requirements through Purchasing

2 or 16.66% responded no

6 or 50% responded they did not know

3 or 25% had no response

**Q86** Does department/division staff monitor consultants, contractors, or vendors to ensure equal participation of persons with disabilities?

Of the 12 total respondents:

4 or 33.33% responded no

5 or 41.66% responded they did not know

3 or 25% had no response

**Q87** When selecting contractors or vendors, does the department/division use criteria that does not discriminate based on ability?

Of the 12 total respondents:

1 or 8.33% responded yes

Yes - please describe the criteria used: We follow all City of Lakeland purchasing standards and policies.

1 or 8.33% responded no

7 or 58.33% responded they did not know

3 or 35% had no response

**Q88** Do department/division staff have an evacuation plan or procedures in place that describes how to evacuate persons with disabilities from a facility during an emergency?

Of the 12 total respondents:

6 or 50% responded yes

Yes - please describe the procedures: accessible chair available in the stairwell for evacuation

Yes - please describe the procedures: signs at each door and near restrooms

Yes - please describe the procedures: we can provide

Yes - please describe the procedures: No Response

Yes - please describe the procedures: Gather staff to be evacuated and meet at posted congregation points

Yes - please describe the procedures: LE Admin building has policies and procedures.

6 or 50% responded they do not know

**Q89** Is the evacuation route and/or instructions posted in a visible and accessible area of each floor in all facilities used by the department/division?

Of the 12 total respondents:

8 or 66.66% responded yes

2 or 16.66% responded no

2 or 16.66% they did not know

**Q90** Is there staff at each department/division facility trained to carry out the instructions of the evacuation plan or procedures?

Of the 12 total respondents:

6 or 50% responded yes

Yes - please describe the training: annual

Yes - please describe the training: Meeting with staff

Yes - please describe the training: Internal and industry standard

Yes - please describe the training: No Response

Yes - please describe the training: Annual training listed in Emergency Management Plan

Yes - please describe the training: We follow LE Admin building policies and procedures.

5 or responded they do not know

1 or 8.33% had no response

**Q91** Is there staff available whom have had training in American Sign Language or other means of communicating in emergency situations with people who have hearing or speech difficulties?

Of the 12 total respondents:

1 or 8.33% responded yes describing the staff training process as several members are ASL certified

2 or 16.66% responded no

9 or 75% responded they did not know. One (1) wrote ADA Specialist?

**Q92** Does the department/division host any private or public special events on public property?

Of the 12 total respondents:

5 or 41.66% responded yes

Yes - please describe: most of our events

Yes - please describe: No Response

Yes - please describe: Christmas Parade, Snow Fest

Yes - please describe: too many to list in the LPD Community Room

Yes - please describe: APWA Event

4 or 33.33% responded no

2 or 16.66% responded they did not know

1 or 8.33% responded they are not applicable

**Q93** Do department/division staff notify both private entities and staff of their obligations to facilitate participation of persons with disabilities in special events or private events held on public property?

Of the 12 total respondents:

3 or 25 % responded no

No; we do not have special events or private events

5 or 41.66% responded they do not know

4 or 33.33% responded they did not know

**Q94** Are there policies and procedures in place for any events which you may sell tickets to with regards to accessible seating?

Of the 12 total respondents:

- 1 or 8.33% responded yes stating they provide accessible seating
- 4 or 33.33% responded stating they do not sell tickets to any events
- 2 or 16.66% responded no
- 4 or 33.33% responded they do not know
- 1 or 8.33% had no response

**Q95** Are department/division staff who have contact with the public informed of the department's obligations and policies that enables persons with disabilities to participate in the program?

Of the 12 total respondents:

- 3 or 25% responded yes
- Yes - Describe how department/division staff are informed: staff is aware
- Yes - Describe how department/division staff are informed: No Response
- Yes - Describe how department/division staff are informed: LPD General Orders
- 2 or 16.66% responded the Department/division staff are not in contact with the public
- 1 or 8.33% responded they do not have programs at the cemeteries division
- 4 or 33.33% responded they do not know
- 2 or 16.66% responded they are not applicable

**Q96** Do department/division staff having contact with the public receive training on interacting with persons with disabilities?

Of the 12 total respondents:

- 3 or 25% responded yes
- Yes – staff training is provided. Please describe the staff training process: Supervisors help if citizens need to get to a graveside service
- Yes – staff training is provided. Please describe the staff training process: customer service training
- Yes – staff training is provided. Please describe the staff training process: Police Academy, In-service Training every year
- 1 or 8.33% responded no
- No – staff did not receive training
- 5 or 41.66% responded they do not know
- 3 or 25% responded they are not applicable

**Q97** Is there department/division staff whom would be able to provide better customer service if they had training in American Sign Language (ASL) or other means of communicating with people who have hearing or speech difficulties?

Of the 12 total respondents:

2 or 16.66% responded no

7 or 58.33% responded they do not know

3 or 25% responded they are not applicable

**Q98** Would other training or technical assistance services be helpful to department/division staff such as (check all that apply):

Not applicable

No Response

Developing policies and procedures, How to work with person with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternate formats (i.e. Braille, audio recordings, etc.)

No Response

Developing policies and procedures, How to work with persons with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

Developing policies and procedures, How to work with persons with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

Developing policies and procedures, How to work with persons with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

Developing policies and procedures, How to work with persons with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

Not applicable

Not applicable

Legal requirements

Developing policies and procedures, How to work with persons with disabilities, Legal requirements, How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.), How to provide materials in alternative formats (i.e. Braille, audio recordings, etc.)

**Q99** List all facilities, or portions of facilities, used by your department/division. For each facility, designate the type of activities (i.e. employee work space, classroom/learning space, meetings & conferences, retail, customer interaction) for which it is used.

LE Admin – employee work space, T&D Building – employee work space, McIntosh Power Plant – employee work space, Larsen Power Plant – Employee Work Space, Training Building – employee work space

My answers are based on the cemeteries division, Office-selling spaces, Maintenance Shop-no citizens allowed, Cemetery-open to the public

We host sporting events, trade shows, corporate meetings, weddings and special events.

City Hall -Employee work space

Fire Stations, Fire Training Center, Fire Administrative Building

All of our parks are open to the public free of charge. Trails, biking, hiking, bird watching, softball, pickle ball, basketball, tennis, etc.

TB Williams WTP, CW Combee WTP, four (4) booster stations all of the above are mainly employee work spaces. However, the TB Williams and Combee WTPs have conference rooms for meetings with consultants, vendors, and other industry professionals

No Response

No Response

LE Admin, Airside, Parker Street, LPD Admin, City Hall.

LPD Main Head Quarters - Office Spaces, LPD Community Room open to community, LPD Records Department, LPD Station Duty Officer Desk area; LPD Training Facility - Not open to public. Office spaces, Classrooms, Firing range, police driving pad; LPD Special Operations Center at Airport - Classroom, office space, equipment hang...Not open to public, restricted access

Traffic Operations Offices used by employees to perform their daily work routines and staff meetings

**Q100** Do department/division facilities have provisions for accessible seating at public meetings, events, classes, etc. for persons with mobility difficulties?

Of the 12 total respondents:

4 or 33.33% responded yes

2 or 16.66% responded The department/division does not host any public meetings, events, classes, etc.

3 or 35% responded they do not know

3 or 35% responded they are not applicable

**Q101** Are you aware of any areas or elements of the facilities which the department/division utilizes which are not accessible to persons with disabilities?

Of the 12 total respondents:

10 or 83.33% responded no

2 or 16.66% responded they are not applicable

**Q102** Has the department/division received requests to improve facility accessibility in the past 3 years?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please describe the requests and how many received: we get comments on occasion

Yes - please describe the requests and how many received: A request was made to trim foliage outside of City Hall to help a person navigate the walkway better.

Yes - please describe the requests and how many received: LPD SDO area - do not know how it was received, possibly through COL inspections

5 or 41.66% responded no

No; Not that I am aware of

3 or 25% responded they do not know

1 or 8.33% responded they are not applicable

**Q103** Is the department/division responsible for the maintenance of any facilities, parks, parking lots, streets, sidewalks or landscaping?

Of the 12 total respondents:

5 or 41.66% responded yes

Yes - please describe: parking lot and sidewalk

Yes - please describe: indirectly, Parks and Rec handle the maintenance

Yes - please describe: Maintain all amenities and landscaping at all our parks

Yes - please describe: Water Production maintains the grounds at the two (2) water treatment facilities, as well as, the four (4) booster stations

Yes -please describe: We maintain the City parking garages and several off-street parking lots

5 or 41.66% responded no

2 or 16.66% responded they did not know

**Q104** Are there any procedures in place for monitoring and/or maintaining accessible features (i.e. adjusting door closer speed, repainting accessible parking spaces, repairing uneven curb cuts and sidewalks, trimming trees and hedges encroaching into a sidewalk, etc.)?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please describe: Upon noticing issues or request

Yes - please describe: LPD maintenance personal monitor items such as these

Yes - please describe: Routine patrols and customer requests.

2 or 16.66% responded no

1 or 8.33% responded they did not know

6 or 50% had no response

**Q105** Does the department/division rent or lease facilities or space to individuals, groups or organizations?

Of the 12 total respondents:

2 or 16.66% responded yes

9 or 75% responded no

1 or responded they are not applicable

**Q106** Do you have input or involvement with design and construction activities for new or altered space?

Of the 12 total respondents:

5 or 41.66% responded yes

Yes - please elaborate: as a facility coordinator

Yes - please elaborate: works with architects that are required to follow ADA

Yes - please elaborate: Oversight of capital improvement projects at the water treatment facilities

Yes - please elaborate: LPD is undergoing a renovation currently. All plans were evaluated by COL ADA inspectors

Yes - please elaborate: We review design plans for sidewalk and roadway improvements.

7 or 58.33% responded no

**Q107** Are there procedures and/or standards in place which ensure accessibility compliance and best practices are incorporated into design and construction activities?

Of the 12 total respondents:

3 or 25% responded yes

Yes - please elaborate: ADA law

Yes - please elaborate: COL ADA inspections of plans

Yes - please elaborate: We follow all FOOT and federal standards

1 or 8.33% responded no

5 or 41.66% responded they do not know

2 or 16.66% had no response

1 or 8.33% responded they are not applicable

**Q108** Does the city plan and budget for improving accessibility to its facilities (i.e. buildings, parks, sidewalks, street crossings, parking lots)?

Of the 12 total respondents:

5 or 41.66% responded yes

Yes - please describe: plans are being made

Yes – please describe: No Response

Yes – please describe: No Response

Yes – please describe: No Response

Yes – please describe: Projects are included in the 10-year CIP

6 or 50% responded they do not know

1 or 8.33% responded they are not applicable

**Q109** What do you feel should be the highest priority of the City of Lakeland to improve accessibility for persons with disabilities?

Of the 12 total respondents:

6 or 50% had no response

Accessibility for everyone everywhere

Access to buildings

To ensure that all people have the ability to access areas that are open to the public.

Areas where public gather and or utilize City facilities

Due to budget constraints and last-minute requests for accommodations.

Parks and playgrounds should receive a high priority.

**Q110** Thank you for completing this questionnaire. The information collected will assist the various city departments and divisions, and the people the city serves. If you have any questions regarding the City of Lakeland's ADA Self-evaluation and Transition Plan, or aware of any specific physical or programmatic barriers, please use the space below for your questions, suggestions or comments.

11 or 91.66% had no response

I have answered the questions as best I can pertaining to the cemeteries division not the Parks and Recreation Dept.

## **Survey Comments from Volunteers**

**Volunteers filled out hard copies of the survey forms. Results are reported by person. Names have been redacted.**

**Q2** What role most adequately describes your association with the City of Lakeland and the representation you are providing?

City volunteer (I am also disabled.)

**Q3** The following departments/divisions within the City of Lakeland have been identified. Please check which department or division you primarily work or volunteer for.

Community & Economic Development

**Q4** Are you aware of any specific concerns, complaints or problems regarding access for persons with disabilities to any of the facilities, programs, services or activities provided by the City of Lakeland?

Yes - please describe: A. Code Hearings. Bathrooms are on far side of exit from chambers & building. Getting to dais by ramp requires knowing there is a ramp (can't see it from audience). Ramp extends oddly to center where one must "double back" to be seated at dais. Locked doors to chambers make accessible entrances long walks. Code violators who are disabled are not watched out for well at registration—must climb 2 steps to register with clerk. Only 2 handicapped parking spaces sometimes have employees in them, aren't enough during code hearings. (Recent new railing and extra ramp outside are big helps.). County building offers 3 used scooters to navigate their buildings—kept at security and very helpful. Low English speakers don't realize they could get a translator.

Gandy Pool. Not enuf upright chairs or high seating lounges. Chair configuration blocks entry to infinity ramp (have to go around). People use metal shaded seat to stack pool bags so people can't sit there. Instructor piles weights and tubes at railing at infinity entrance, making rail access difficult or placement of rollator, canes difficult. Recently 35 elderly people at pool with all upright chairs and lounges taken. Disabled (& elderly) can't get out of Adirondacks. Could use two entrance railings down infinity ramp. Need auto open button from pool to exit. Need to monitor non-handicapped using prime handicapped spaces.

Permitting. Not enough "wait" seating in area. No plan B for disabled when there are lines. Too many "stops" on permit scavenge in same general area. High seats at counters not for disabled. Multiple repeat visits required. Online navigation is difficult to impossible if not tech savvy. Wasted trip to county building as another stop

Downtown Activities. Have had difficulty with parking garages having steep slopes I can't navigate. Have difficulty with close parking to functions (like Food Truck Rally, Munn Park events, RP Funding Ctr) when there are crowds unless I go hours early.

**Q5** Do you know who the designated ADA Specialist is for the City of Lakeland?

Yes - please provide the name: Jenny Sykes

**Q6** Is a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement available and posted for program participants who may be persons with disabilities?

Don't know. I have not seen it – unless it's the sign about hearing aid support in chamber?

**Q7** Are department/division staff familiar with the city's ADA grievance/complaint procedures for persons with disabilities?

Don't know. When issues brought up, staff attempts to help right away. Most don't know of the special wheelchair seat in the chambers. Some aren't experienced to think from the disabled point of view as to what might be a hardship.

**Q8** Do department/division notifications of public meetings, hearings, interviews, agendas, meeting minutes and conferences inform of the availability of adaptive/auxiliary aids and accommodations (such as assistive listening devices, readers for the blind, interpreters) to participants with disabilities and how to request such aids and accommodations?

No. Not that I'm aware of for Code Enforcement Board meetings. Don't see any at Gandy Pool or in Permitting.

**Q9** What types of accessible alternate document formats does the department/division make available for persons with disabilities when requested?

Don't know

**Q10** What types of accessible audiovisual, televised or online presentation formats does the department/division make available when requested?

Don't know. They do bring the microphone to someone seated in the audience rather than make them come up to the speaker's box.

**Q11** Are staff members whom are responsible for web page content knowledgeable and trained on website accessibility requirements?

Don't know

**Q12** Do all video files available on the department's/division's web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?

Don't know

**Q13** What tools does the department/division use to communicate by phone with people with speech or hearing difficulties?

Don't know

**Q14** Does the department/division ensure that the electronic equipment is accessible to and usable by persons with disabilities? For example, is a public computer provided on a lowered counter or in an accessible workstation?

Don't know

**Q15** Are policies and procedures in place to assure the purchase of accessible products where required?

Don't know (for others)

Yes -please describe the policies and procedures:

Jenny Sykes has been very helpful with some things for me.

**Q16** Does the department/division require that public meetings and conferences be held in accessible locations?

Yes, but I believe parking is a hardship for some as is the slanted room and location of restrooms. Not sure how far "accessible" is taken.

**Q17** Do all printed or electronic materials about department/division sponsored/hosted public events, public meetings, or public appearances by and with city officials include instructions about how to request accommodations?

Don't know

**Q18** Are Assistive listening devices or systems available for public meetings?

Yes - please include how many are available and the capacity of seating in the combined rooms utilized for public meetings:

Don't know

**Q19** Does the department/division have procedures to make sure facility tours or trips for members of the public including students, are accessible to persons who have visual, hearing, mobility and learning disabilities?

Don't know, I do know Jenny was very helpful in doing a tour with/for me.

**Q20** Are consultants, contractors, or vendors who bid on capital projects or other contractual work requested to sign a statement of their intent to comply with the ADA and all applicable accessibility standards?

Don't know. But I hope in future only "universal design" projects are accepted.

**Q21** Do department/division staff have an evacuation plan or procedures in place that describes how to evacuate persons with disabilities from a facility during an emergency?

Don't know. Seriously important. I would not make it down 3 flights of stairs.

**Q22** Is the evacuation route and/or instructions posted in a visible and accessible area of each floor in all facilities used by the department/division?

Don't know

**Q23** Do department/division staff having contact with the public receive training on interacting with persons with disabilities?

Don't know. It does not seem like it at Gandy Pool or in Permitting.

**Q24** Would other training or technical assistance services be helpful to department/division staff such as (check all that apply):

Not applicable I don't feel a volunteer (like me) should evaluate what training is needed without knowing what training is already received.

**Q25** Does the city plan and budget for improving accessibility to its facilities (i.e. buildings, parks, sidewalks, street crossings, parking lots)?

Don't know. This survey and Jenny Sykes make it sound very promising.

**Q26** What do you feel should be the highest priority of the City of Lakeland to improve accessibility for persons with disabilities?

Think through evacuation safety issues at the various locations (like no elevator use). Start using "universal design" for future projects. Continue to teach awareness and practice courtesy with disabled issues. Continue to be open to new ideas and set aside funds. Continue to post and inform of what is available and how to access. (Don't fall for the emotional support animal "con" issues. Service dogs, yes.) Help parks be accessible with solid surfaces and increased reserved seating. Thank you for asking.

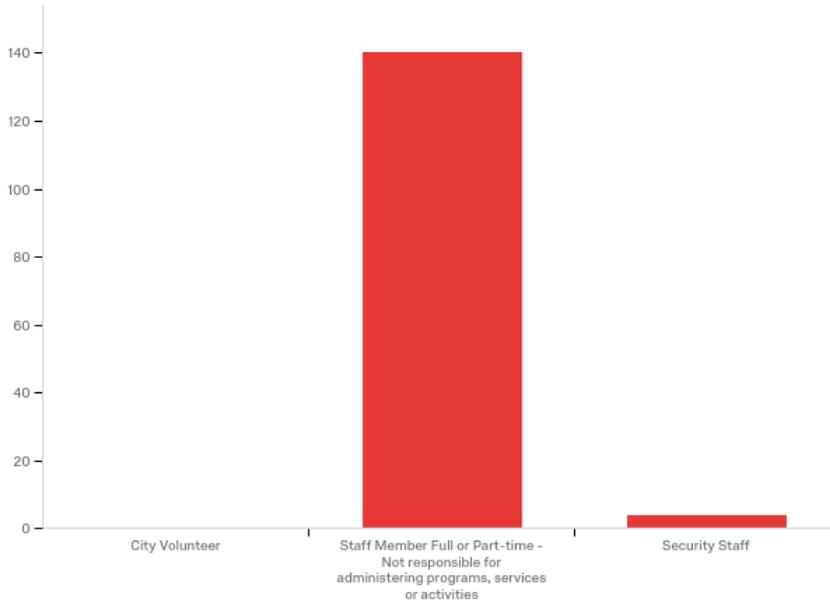
**Q27** Thank you for completing this questionnaire. The information collected will assist the various city departments, divisions, and the people it serves. If you have any questions regarding the City of Lakeland's ADA Self-evaluation and Transition Plan, or aware of any specific physical or programmatic barriers, please use the space below for your suggestions or comments.

No Response

**Survey Comments from the Public-online**

**Surveys were made available to the public online. A summary of the results follows.**

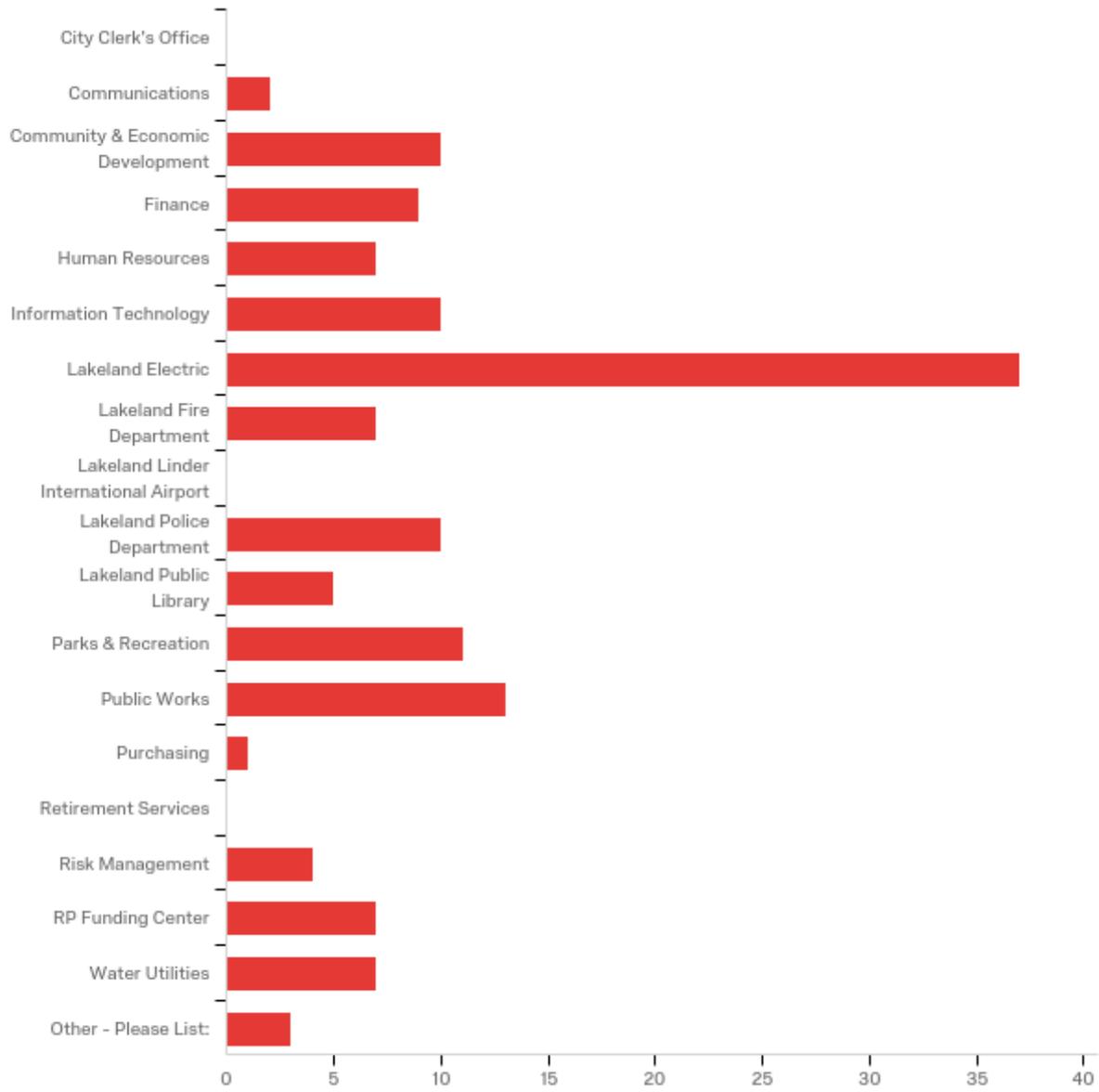
**Question - What role most adequately describes your association with the City of Lakeland and the representation you are providing?**



#	Answer	%	Count
4	City Volunteer	0.00%	0
8	Security Staff	2.78%	4
6	Staff Member Full or Part-time - Not responsible for administering programs, services or activities	97.22%	140
	Total	100%	144

**Question - The following departments/divisions within the City of Lakeland have been identified. Please check which department or division you primarily work or volunteer for.**

City of Lakeland ADA Self-Evaluation and Transition Plan Update



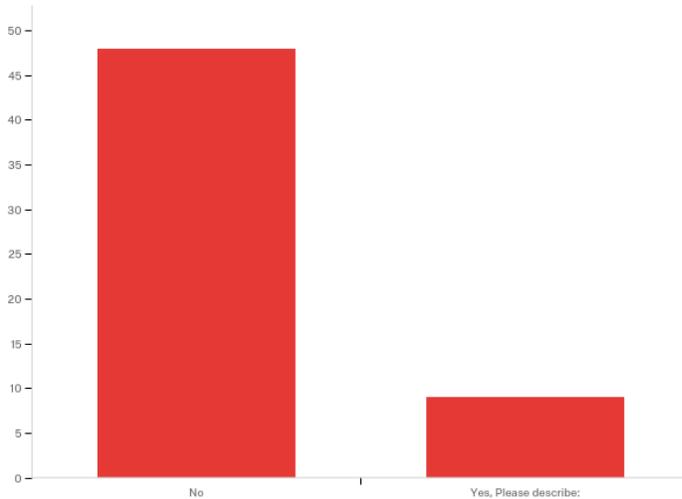
#	Answer	%	Count
1	City Clerk's Office	0.00%	0
28	Communications	1.40%	2
4	Community & Economic Development	6.99%	10
2	Finance	6.29%	9
10	Human Resources	4.90%	7
27	Information Technology	6.99%	10
29	Lakeland Electric	25.87%	37
6	Lakeland Fire Department	4.90%	7
22	Lakeland Linder International Airport	0.00%	0
30	Lakeland Police Department	6.99%	10

City of Lakeland ADA Self-Evaluation and Transition Plan Update

5	Lakeland Public Library	3.50%	5
3	Parks & Recreation	7.69%	11
35	Public Works	9.09%	13
38	Purchasing	0.70%	1
39	Retirement Services	0.00%	0
40	Risk Management	2.80%	4
41	RP Funding Center	4.90%	7
42	Water Utilities	4.90%	7
15	Other - Please List:	2.10%	3
	Total	100%	143

Other – Parks/recreation

**Question - Are you aware of any specific concerns, complaints or problems regarding access for persons with disabilities to any of the programs, services or activities provided by the City of Lakeland?**



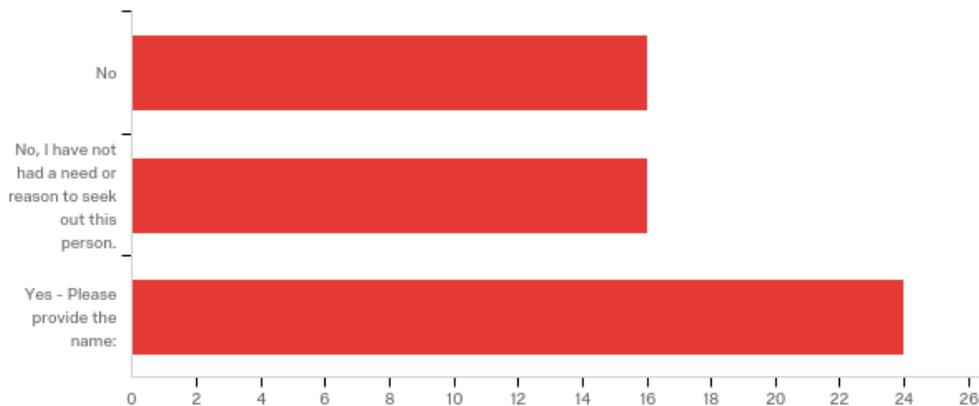
#	Answer	%	Count
1	No	84.21%	48
2	Yes, Please describe:	15.79%	9
	Total	100%	57

Yes, Please describe:

City hall area only has a few handicap parking places and when city employees with handicap placards park there they are asked to move. They are told there aren't enough places for non-city handicap people to park. So, we need more handicap parking places to take care of our employees and the public. As it is, we are discriminating against our employees and not taking care of their needs. I know some handicap people who work there that have to park across the street

(sometimes on the top floor of parking garage) and walk all the way to their office at city hall. That is not right. These people are probably too scared to raise a fuss.
Difficulty in accessing the front steps to buy tickets
Events - ADA accessible Restrooms
Making web applications accessible by change in fonts used for labeling and background contrast of font.
Meetings with public at McIntosh unit 5 parking lot is dangerous for people with disabilities.
We need comprehensive training & awareness of visible & hidden disabilities. This should be required for all City staff. The Human Resources/Civil Service Department & City Management should receive continuing education regarding developments of ADA Accommodation options (i.e: the DOL's askJAN.org). Also, review the request process & verify if it is truly interactive, as to determine the best outcomes for employer & employee.
Parking garage designated for City Hall and Lakeland Electric employee parking has the majority of the accessible parking on the top level of the parking garage. The only access to the buildings or lower levels of the garage are via an elevator. The outside enclosure that surrounds the elevator entrance has a door with no accessible device (button, etc.) to open the door. It is not accessible by someone in a wheelchair, motorized scooter, etc.
Door openings needed to bathrooms, hallways, and other alternate doors to get to services offered at this location
Some offices are in-accessible to members of the public that are challenged in certain physical areas.

**Question - Do you know who the designated ADA Specialist is for the City of Lakeland?**



#	Answer	%	Count
3	No	28.57%	16
1	No, I have not had a need or reason to seek out this person.	28.57%	16
2	Yes - Please provide the name:	42.86%	24
	Total	100%	56

Yes - Please provide the name:

Jenny Sykes- Count-24

Geli Eldemire- Count-1

**Question - What do you feel should be the highest priority of the City of Lakeland to improve accessibility for persons with disabilities?**

Train Staff
Work on areas of concentrated public use like parks, stadium, schools.
Internal awareness and preparedness to accommodate the immediate need of our ADA customers. Placing employees in a position of success from the initial encounter, and not "wow, I could have done that better".
Over all, I believe they do well. Knowledge is power to understand how to meet the needs or others.
Bringing awareness to the citizens and affected persons with disabilities that may have recommendations or may be unaware of how best to help improve accessibility in the future.
Educating Employees
Making sure we not only take care of the public with disabilities, but also the ones who work here.
Training
Customers are not the only people with disabilities. Employees have them too. When I was located in the LE building, the handicapped parking spaces were moved to the top floor. The door to enter for the elevator doesn't have a button to push, in order to get in. If you are in a wheelchair or are on crutches, it would be very difficult to hold the door open & enter into the area where the elevator is.
Training of employees who are responsible for posting notifications, scheduling meetings, updating websites, etc.
Install an elevator to help get people up the stairs or move the box office to street level
Employees should be more informed
Lower time clocks, Computers, Soap, Paper towels, signs.
I am new with the City and live in another area, so don't feel qualified to make a recommendation on the priority.
Making programs available. Better ways to navigate for the visually impaired. Make sure all city buildings are accessible.
Educating its personnel and providing the equipment required to meet the ADA requirements.
Wheelchair Ramps
NOT SURE
Let front-line staff know what resources are available
I think the City of Lakeland is doing a good job in this area.
A comprehensive plan that includes all buildings.
Physical disabilities should be accommodated to allow anyone access to meetings and departments. I believe the City does a very good job of this since all public areas are accessible in this manner. Designated parking is available. I believe written information is available upon request although I do not know the policy and do not know if there is a charge when requested by someone with disabilities.

City of Lakeland ADA Self-Evaluation and Transition Plan Update

I believe at the City Hall and LE admin buildings anyone requesting help would be accommodated as best as possible to include personal one on one help. This may not be a policy but is the servitude nature of the general population of the City of Lakeland employees.
Give more training to the staff and workers
Standard operating procedures for public meetings and notices to ensure they are accessible and understood by people of all abilities.
Number 1: Training, Awareness, & a Generous approach. (Number 2: shorter staff surveys that don't time out before finishing & allow some work time to complete important surveys such as this one.)
Accessible sidewalks
Don't know, I don't have enough information about what the City is currently doing in order to prioritize future projects
Inform the working staff of available services offered at the many locations within the City's organization.
Overall, I think the City/LE is compliant with legal requirements. In taking the survey the void would be being proactive to know ahead of the event/meeting will someone be in attendance that have a need that can be met
I do not have any insight in this matter.
Communication should be the highest priority in relation to improving accessibility for persons with disabilities. I believe the City of Lakeland is doing a great job at making sure everyone has the same accessibility regardless of physical or mental abilities.
Always be open and willing to do anything within reason to accommodate any person with a disability that insures they get the help and assistance they need from the City of Lakeland

**Question - Do you know who to contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service or event?**

No Response

**Question - Have you ever requested an accommodation for a disability from the City?**

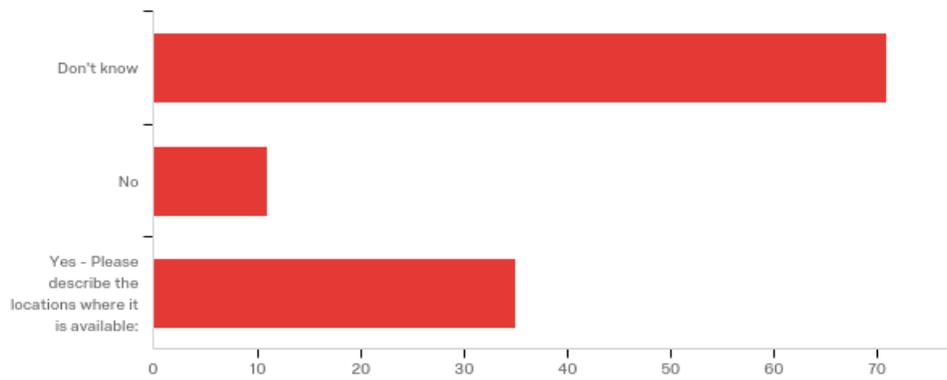
No Response

**Question - Is the attitude of City of Lakeland staff towards persons with disabilities generally helpful, supportive, positive and proactive in solving accessibility issues?**

No response

**Question - Is a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement available and posted for program participants who may be persons with disabilities?**

## City of Lakeland ADA Self-Evaluation and Transition Plan Update



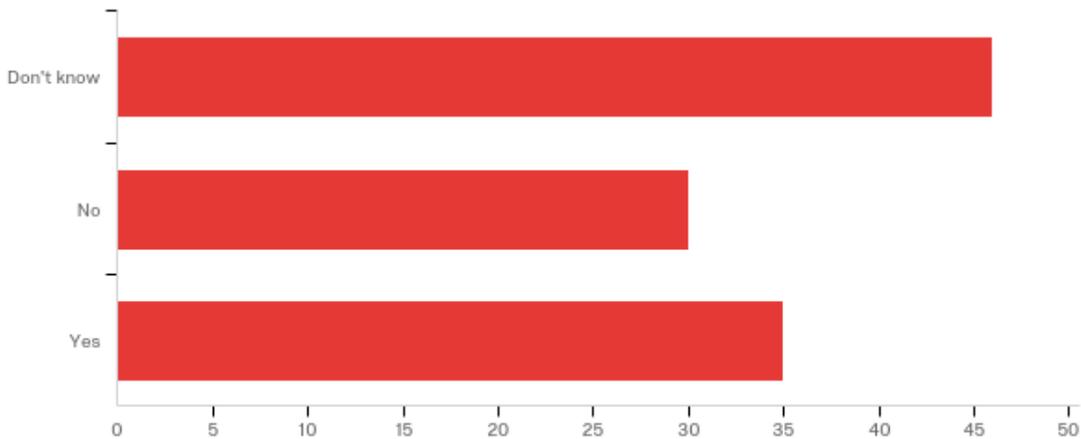
#	Answer	%	Count
1	Don't know	60.68%	71
2	No	9.40%	11
3	Yes - Please describe the locations where it is available:	29.91%	35
	<b>Total</b>	<b>100%</b>	<b>117</b>

Yes - Please describe the locations where it is available:

One break area at least
All City sponsored Events.
Main entry, office left wall next to the door.
Bulletin board near break room
Information regarding ADA can be found at the following link on the City of Lakeland website: <a href="http://www.lakelandgov.net/departments/public-works/ada-accessibility/">http://www.lakelandgov.net/departments/public-works/ada-accessibility/</a>
You can access through the Lakeland insite page
Bulletin Board
In front of the area in which DVDs are shelved.
Breakroom
Fleet has installed a restroom ADA folk on the ground floor level.
General Employee Break Room
Breakroom
In the common area
On bulletin board in hall
Office
All notices of public hearings have this information.
Break room Hallway
Hall way and possibly break room (but no sure of the second location)
I have seen it printed in small letters on City business meeting agendas.

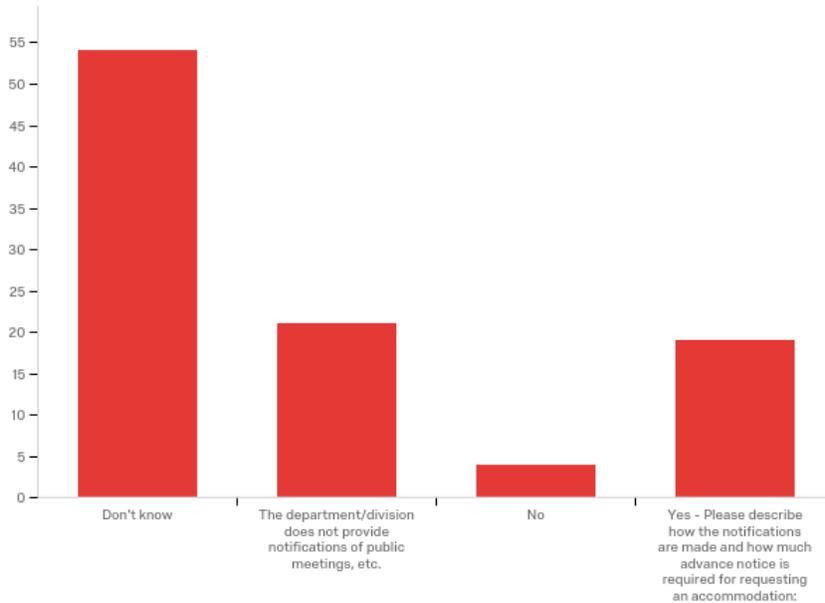
City Hall Lobby and all City Public Notices
On the wall of the west kitchenette of the 6th floor of the LE Administration building at 501 E. Lemon St.
If so, I couldn't locate it
Posted on bulletin board in some locations (I am sure not all are currently in compliance)
Near our workers comp poster and in our break room.
I believe it is posted in our break room.
Lobby
Break room
Bottom menu options in "Accessibility"
Break room
Hallway
In station office

**Question - Are department/division staff familiar with the City's ADA grievance/complaint procedures for persons with disabilities?**



#	Answer	%	Count
1	Don't know	41.44%	46
2	No	27.03%	30
3	Yes	31.53%	35
	Total	100%	111

**Question - Do department/division notifications of public meetings, hearings, interviews, agendas, meeting minutes and conferences inform of the availability of adaptive/auxiliary aids and accommodations (such as assistive listening devices, readers for the blind, interpreters) to participants with disabilities and how to request such aids and accommodations?**



#	Answer	%	Count
1	Don't know	55.10%	54
2	The department/division does not provide notifications of public meetings, etc.	21.43%	21
3	No	4.08%	4
4	Yes - Please describe how the notifications are made and how much advance notice is required for requesting an accommodation:	19.39%	19
	<b>Total</b>	<b>100%</b>	<b>98</b>

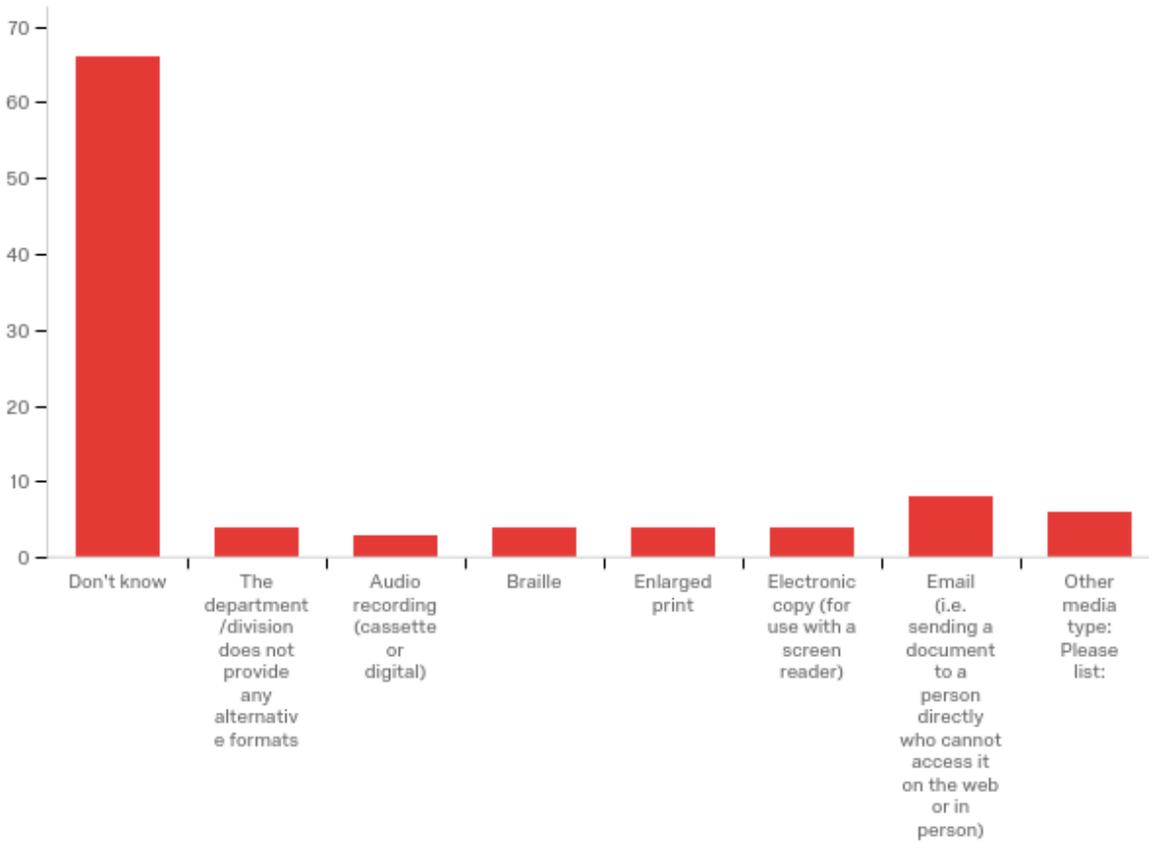
Yes - Please describe how the notifications are made and how much advance notice is required for requesting an accommodation:

Posted for all City sponsored events.
This is handled in a different department, However most city meeting at the city chambers have them available. short notice
In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statute, persons with disabilities needing special accommodation to participate in these proceedings, or those requiring language assistance (free of charge) should contact the City of Lakeland ADA Specialist. Because providing a reasonable accommodation may require outside assistance, organizations, or resources, the City asks that any request be made with as much notice as possible, preferably 72 hours, but no later than 48 hours in advance of the event, at: 863.834.8444, Email: Jenny.Sykes@lakelandgov.net. If hearing impaired, please contact the

City of Lakeland ADA Self-Evaluation and Transition Plan Update

TDD numbers: Local – 863.834.8333 or 800.955.8771 (TDD – Telecommunications Device for the Deaf) or the Florida Relay Service number: 800.955.8770 (VOICE), for assistance.
We have listening devices in the theater and we offer them to patrons who are in need. We have signage and also offer them to ones we hear complain if that can't hear sound.
VIA NEWSPAPER ADS AND POSTCARD NOTICES. 48 HOURS PRIOR TO MEETING DATE
Interpreters for public meetings. CART has been available for project meetings
Contact ADA Officer David Uria
Notifications are made through the legal ads we post and through the mailers we send out to neighboring properties. Deadline is 48 hours prior to meeting and they are told to contact Jenny Sykes at (863)834-8444 (there are also numbers if the citizen is hearing impaired)
Included in all hearing notices.
The notifications are in the last section of the Public Notices. They are written in a somewhat legalese style. Advance notice is requested by the City and "asks that any request be made with as much notice as possible, preferably 72 hours, but no later than 48 hours in advance of the event", then gives contact information with the City's ADA specialist.
All City Public Notices have the notifications and require at least a 48 hour notice.
Special need accommodations are listed on agendas posted online and legal ads published in the Ledger and require 48 hour notice: In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statutes, persons with disabilities needing special accommodation to participate in this proceeding, or those requiring language assistance (free of charge) should contact the City of Lakeland ADA Specialist, Jenny Sykes, no later than 48 hours prior to the proceeding, at (863) 834-8444, Email: Jenny.Sykes@lakelandgov.net. If hearing impaired, please contact the TDD numbers: Local - (863) 834-8333 or 1-800-955-8771 (TDD-Telecommunications Device for the Dear) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance.
Notice is made on the website that 48 hours notice is needed, with corresponding contact information.

**Question - What types of accessible alternate document formats does the department/division make available for persons with disabilities when requested?**

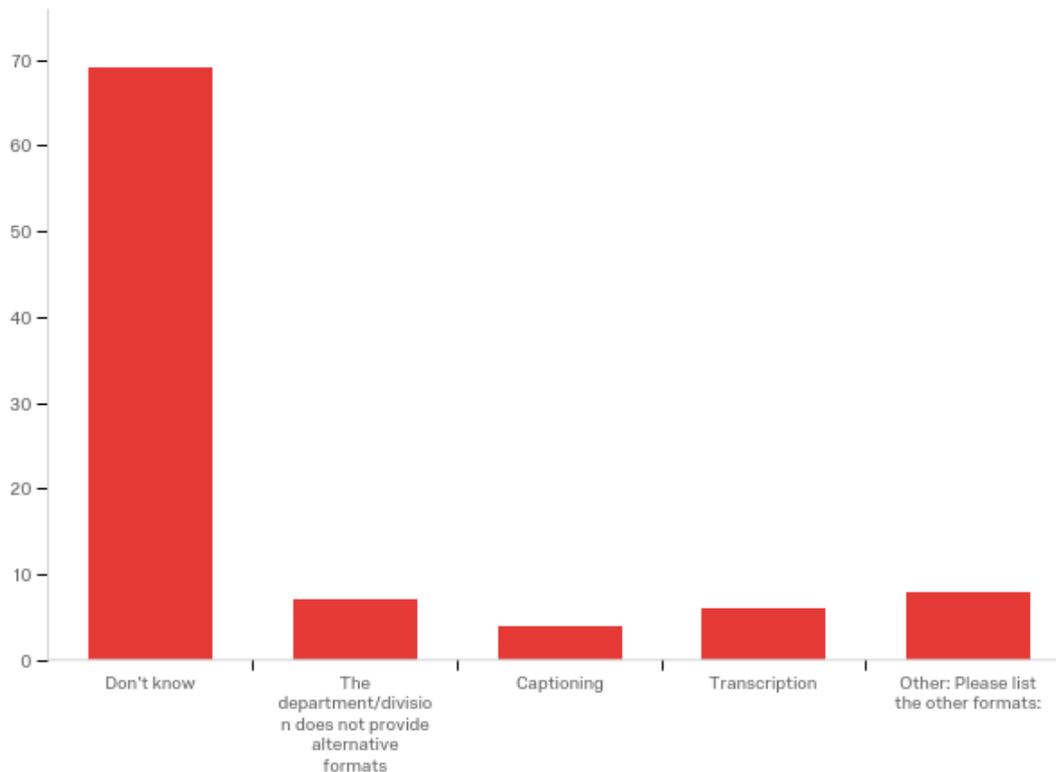


#	Answer	%	Count
1	Don't know	66.67%	66
2	The department/division does not provide any alternative formats	4.04%	4
3	Audio recording (cassette or digital)	3.03%	3
4	Braille	4.04%	4
5	Enlarged print	4.04%	4
6	Electronic copy (for use with a screen reader)	4.04%	4
7	Email (i.e. sending a document to a person directly who cannot access it on the web or in person)	8.08%	8
8	Other media type: Please list:	6.06%	6
	Total	100%	99

Other media type: Please list:

However we do have some braille information and on line recordings in video format.
Hearing loop
I've seen the ADA Accessibility wording on print & electronic documents sometimes, but this seems to fulfill a legal obligation rather than making accessibility welcoming or user-friendly.
What is reasonable and if verified by a doctor
Some public meeting notices are printed in Spanish.
I haven't seen anything

**Question - What types of accessible audiovisual, televised or online presentation formats does the department/division make available when requested?**

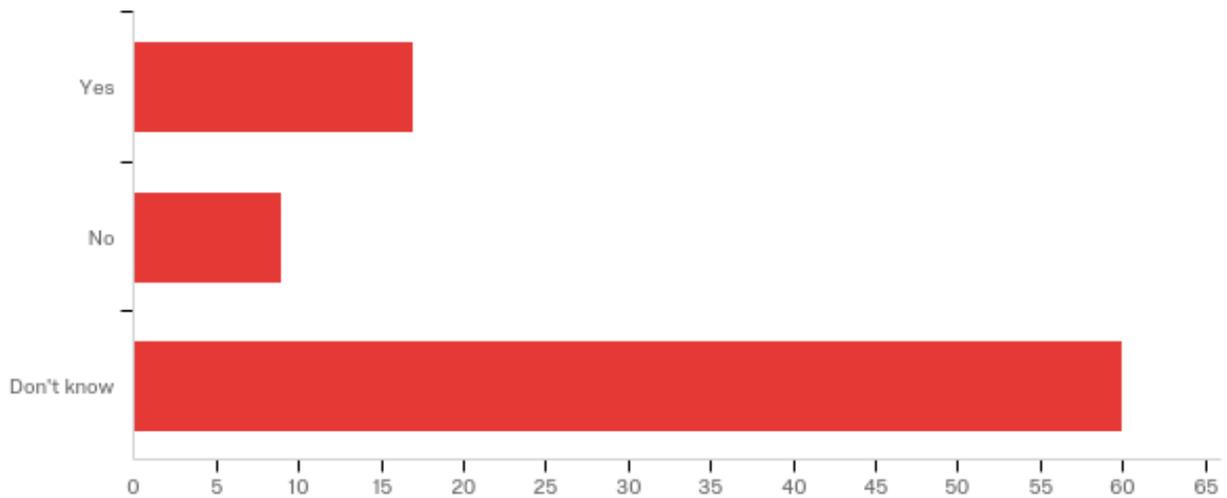


#	Answer	%	Count
1	Don't know	73.40%	69
2	The department/division does not provide alternative formats	7.45%	7
3	Captioning	4.26%	4
4	Transcription	6.38%	6
5	Other: Please list the other formats:	8.51%	8
	Total	100%	94

Other: Please list the other formats:

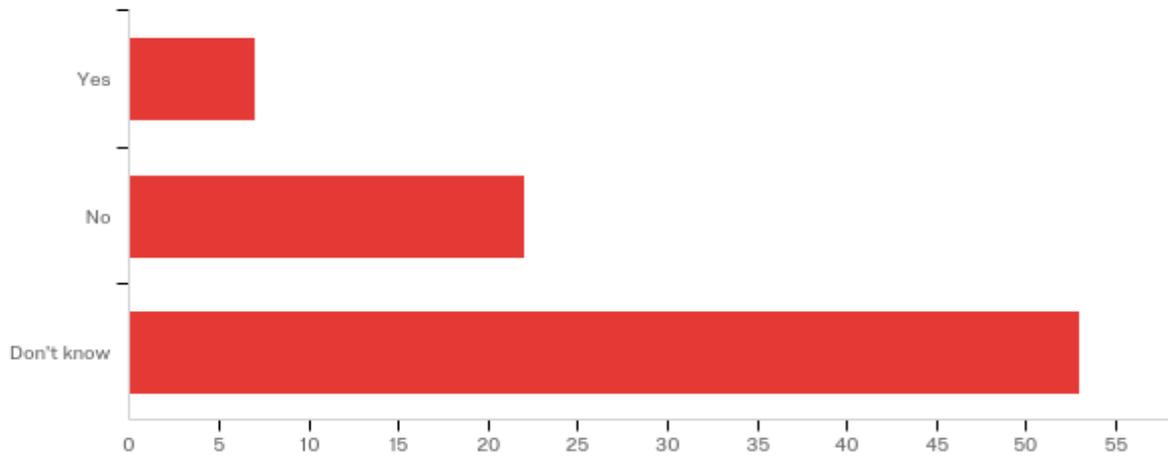
Not needed, Cemetery location
Audio enhancers
Visual aides
Provide interpreters for non english speaking respondents.
First, it takes an additional effort to discover there is an event where the accessibility is needed. Then, a significant time investment & some failed attempts to obtain alternate format. These seemingly normal hurdles are magnified for persons with physical &/or mental disabilities.
MP3 recordings of construction meetings
If a meeting has an invitee that we know has an ADA issue where he/she needs accommodation it would be handled on a case by case basis (has only come up once to my knowledge)
Those provided for meetings conducted in the City Commission Chamber.

**Question - Are staff members whom are responsible for web page content knowledgeable and trained on website accessibility requirements?**



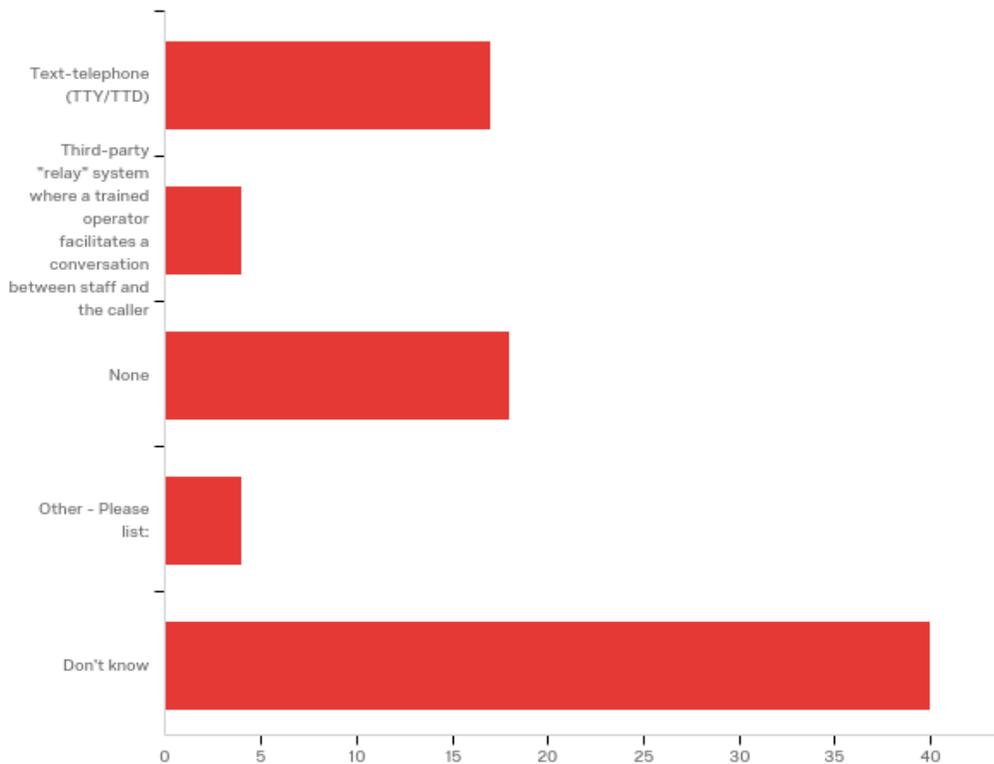
#	Answer	%	Count
1	Yes	19.77%	17
2	No	10.47%	9
3	Don't know	69.77%	60
	Total	100%	86

**Question - Do all video files on the web pages have written captions of spoken communication to provide access to people who are deaf or hard of hearing?**



#	Answer	%	Count
1	Yes	8.54%	7
2	No	26.83%	22
3	Don't know	64.63%	53
	Total	100%	82

**Question - What tools does the department/division use to communicate by phone with people with speech or hearing difficulties?**



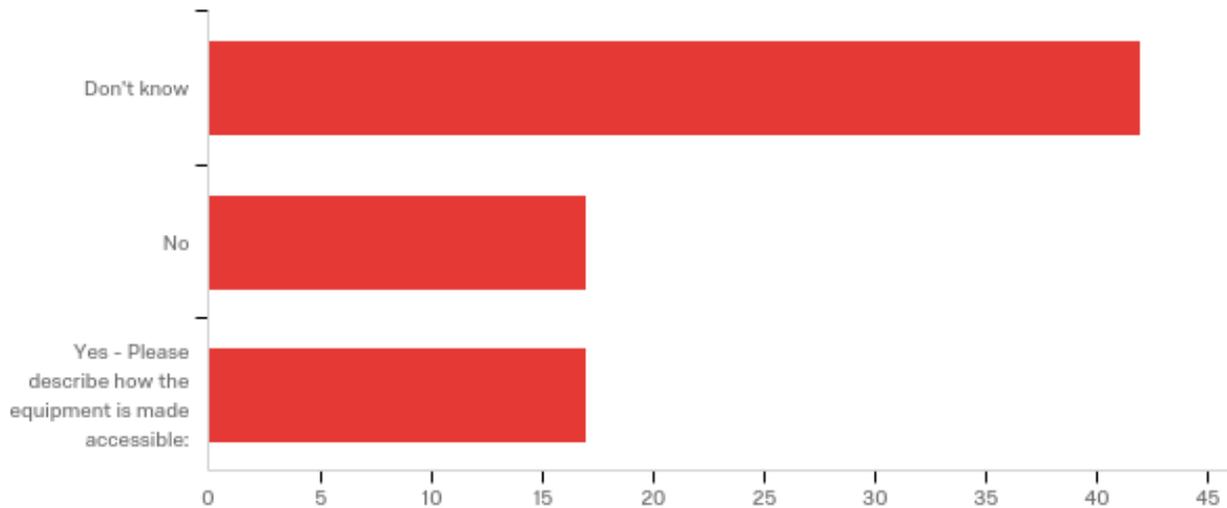
City of Lakeland ADA Self-Evaluation and Transition Plan Update

#	Answer	%	Count
1	Text-telephone (TTY/TTD)	20.48%	17
2	Third-party "relay" system where a trained operator facilitates a conversation between staff and the caller	4.82%	4
3	None	21.69%	18
4	Other - Please list:	4.82%	4
5	Don't know	48.19%	40
	Total	100%	83

Other - Please list:

Ask them to come into our office.
The Division of Parks & Recreation, where I work never deals with these kinds of calls.
Audio loop systems in the Public Library and the City Commission Chamber
I believe Customer Service Call Center has this available

**Question - Does the department/division ensure that the electronic equipment is accessible to and usable by persons with disabilities? For example, is a public computer provided on a lowered counter or in an accessible workstation?**

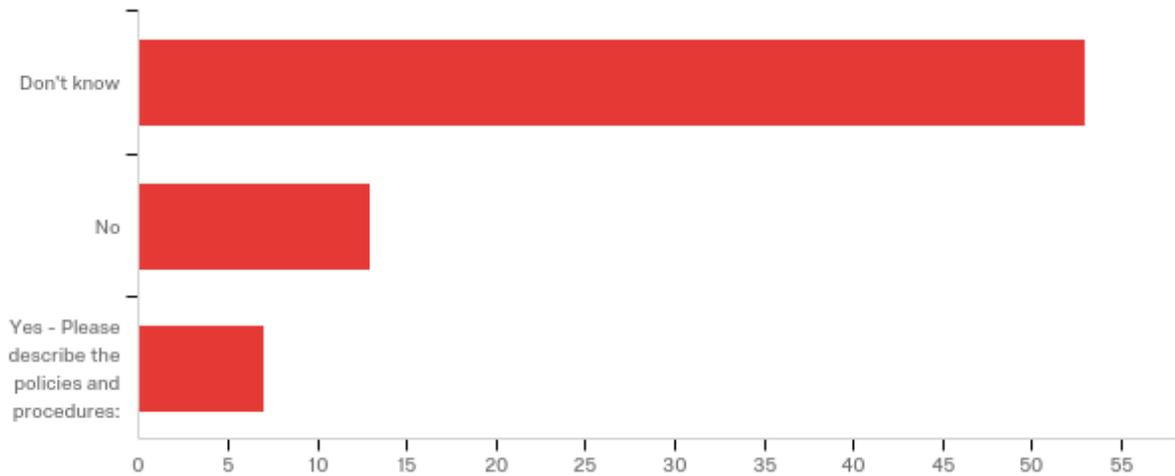


#	Answer	%	Count
1	Don't know	55.26%	42
2	No	22.37%	17
3	Yes - Please describe how the equipment is made accessible:	22.37%	17
	Total	100%	76

Yes - Please describe how the equipment is made accessible:

Computers available
Not applicable, there are no public provided equipment.
UP FRONT
In computer area, and reference
Contact Jenny Sykes ADA Specialist COL
We don't have public computers, but there is a lowered counter at the Property Information service desk
Electric desktops are available to raise or lower for use along with adjustable keyboard level.
All the public computers are the same height. People have used their wheelchairs to use the computers.
Facility Services would be subject matter expert on this.
Lower counter.
Level
Lowered counter and accessible workstations
The four Kiosks located at various locations in Lakeland have access according to ADA rules and regulations. The IVR has accommodations for users with disabilities.

**Question- Are policies and procedures in place to assure the purchase of accessible products where required?**

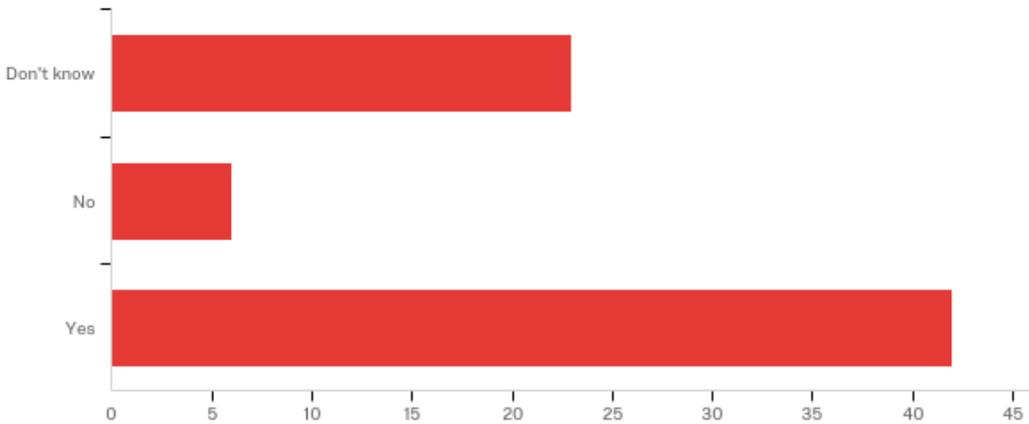


#	Answer	%	Count
1	Don't know	72.60%	53
2	No	17.81%	13
3	Yes - Please describe the policies and procedures:	9.59%	7
	Total	100%	73

Yes - Please describe the policies and procedures:

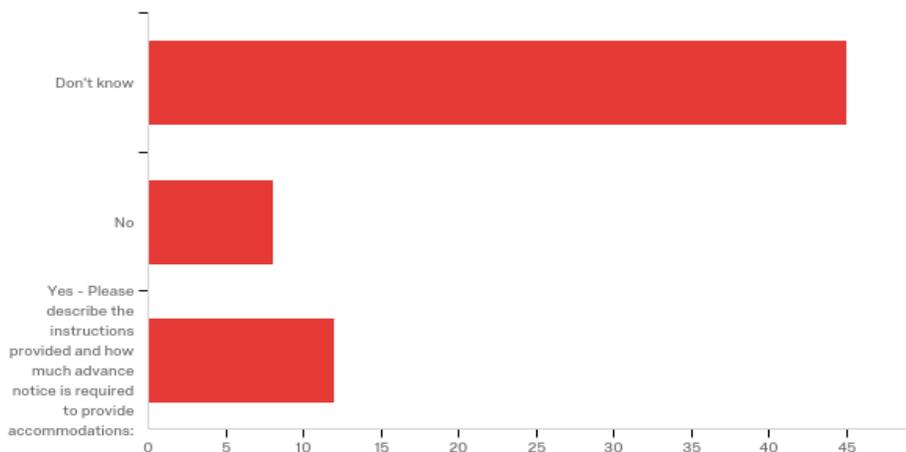
Not sure of the policy. However, have seen interpreter's provided, or an employee who speaks the language. comes to assist
Contact Jenny Sykes to be advised
In the department where I work, no more is done than the legal requirement, if that. There are no complaints due to history of &/or perception of resistance.
Accommodations are made in advance and on a case by case

**Question - Does the department/division require that public meetings and conferences be held in accessible locations?**



#	Answer	%	Count
1	Don't know	32.39%	23
2	No	8.45%	6
3	Yes	59.15%	42
	Total	100%	71

**Question - Do all printed or electronic materials about department/division sponsored/hosted public events, public meetings, or public appearances by and with City officials include instructions about how to request accommodations?**



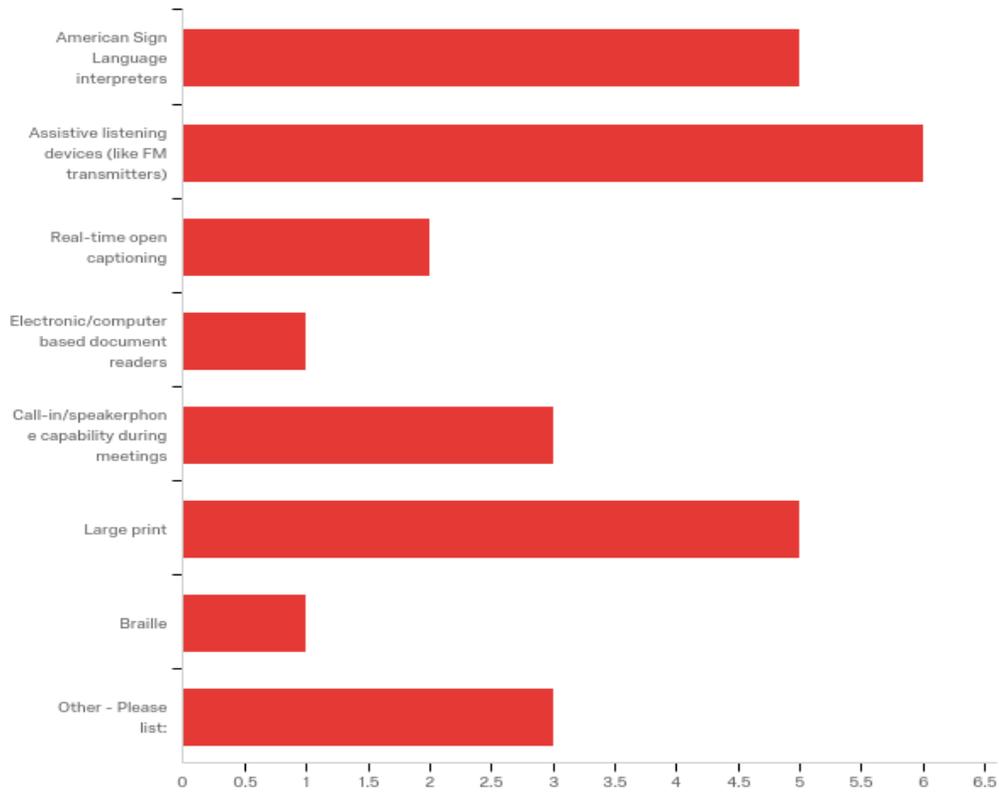
City of Lakeland ADA Self-Evaluation and Transition Plan Update

#	Answer	%	Count
1	Don't know	69.23%	45
2	No	12.31%	8
3	Yes - Please describe the instructions provided and how much advance notice is required to provide accommodations:	18.46%	12
	Total	100%	65

Yes - Please describe the instructions provided and how much advance notice is required to provide accommodations:

In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statute, persons with disabilities needing special accommodation to participate in these proceedings, or those requiring language assistance (free of charge) should contact the City of Lakeland ADA Specialist, Jenny Sykes. Because providing a reasonable accommodation may require outside assistance, organizations, or resources, the City asks that any request be made with as much notice as possible, preferably 72 hours, but no later than 48 hours in advance of the event, at: 863.834.8444, Email: Jenny.Sykes@lakelandgov.net. If hearing impaired, please contact the TDD numbers: Local – 863.834.8333 or 800.955.8771 (TDD – Telecommunications Device for the Deaf) or the Florida Relay Service number: 800.955.8770 (VOICE), for assistance.
There is usually a contact person for special accommodations
To call or email and 72 to 48 hours' notice
In common area
LEP Policy & Plan Contact COL ADA Coordinator, David Uria no later than (48) hrs. prior to proceeding
"Contact the City of Lakeland ADA Specialist, Jenny Sykes, no later than 48 hours prior to the proceeding, at (863) 834-8444"
All notices have the name, number, and email address for the ADA coordinator.
In the Public Meeting Notices requesting at least 48 hours advance notice
In accordance with the Americans with Disabilities Act and Section 286.26, Florida Statutes, persons with disabilities needing special accommodation to participate in this proceeding, or those requiring language assistance (free of charge) should contact the City of Lakeland ADA Specialist, Jenny Sykes, no later than 48 hours prior to the proceeding, at (863) 834-8444, Email: Jenny.Sykes@lakelandgov.net. If hearing impaired, please contact the TDD numbers: Local - (863) 834-8333 or 1-800-955-8771 (TDD-Telecommunications Device for the Dear) or the Florida Relay Service Number 1-800-955-8770 (VOICE), for assistance.

**Question - What types of accommodations can the department/division provide to the public when requested?**

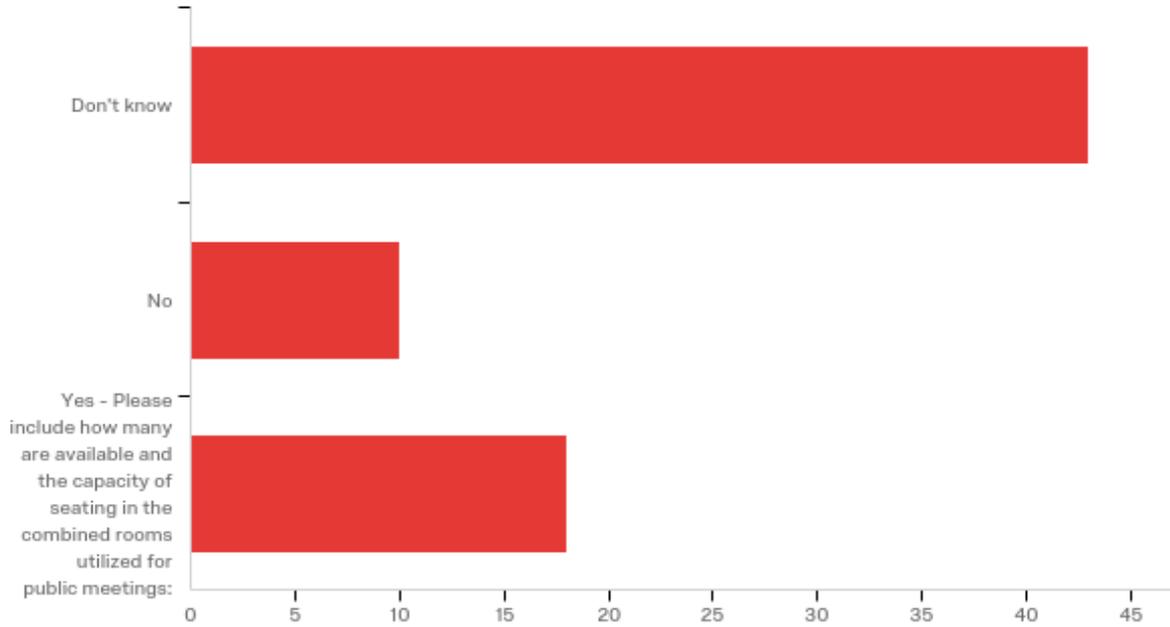


#	Answer	%	Count
1	American Sign Language interpreters	19.23%	5
2	Assistive listening devices (like FM transmitters)	23.08%	6
3	Real-time open captioning	7.69%	2
4	Electronic/computer-based document readers	3.85%	1
5	Call-in/speakerphone capability during meetings	11.54%	3
7	Large print	19.23%	5
8	Braille	3.85%	1
6	Other - Please list:	11.54%	3
	<b>Total</b>	<b>100%</b>	<b>26</b>

Other - Please list:

CART
I don't know
Staff language translators

**Question - Are Assistive listening devices or systems available for public meetings?**

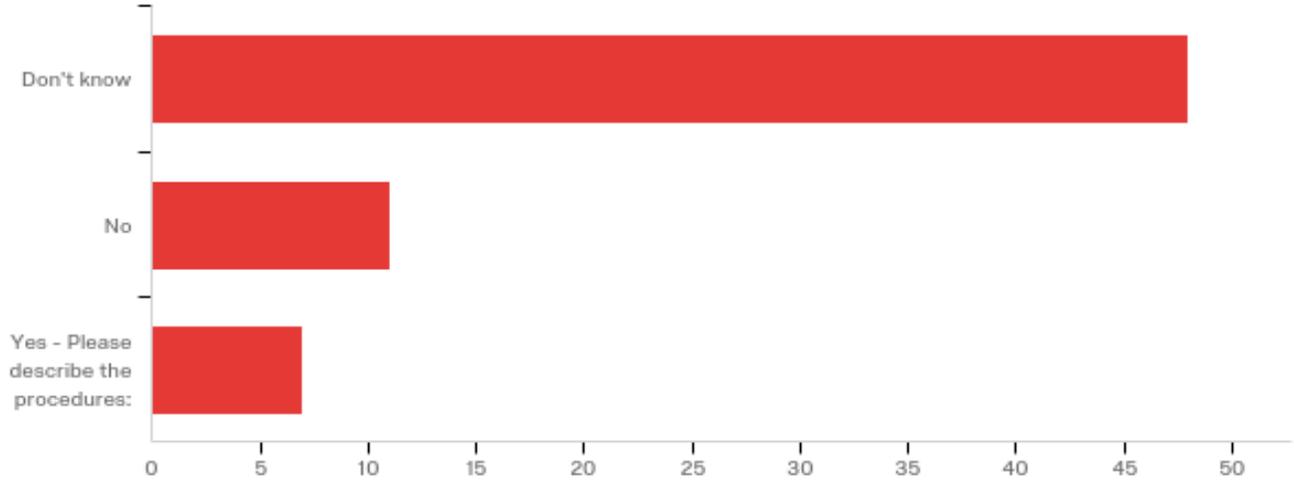


#	Answer	%	Count
1	Don't know	60.56%	43
2	No	14.08%	10
3	Yes - Please include how many are available and the capacity of seating in the combined rooms utilized for public meetings:	25.35%	18
	<b>Total</b>	<b>100%</b>	<b>71</b>

Yes - Please include how many are available and the capacity of seating in the combined rooms utilized for public meetings:

Don't know how many
Not sure.
Unsure how many. The room itself holds approximately 200 people. City Commission Chambers
Contact TDD or Fla Relay Service for assistance
City Commission meetings have facilities, but not sure how many. The meeting room has seating for about 200 people
For City Hall meeting rooms, perhaps; but, not readily available for all Division programs.
City Commission Chamber - seating for 200 and the Public Library - seating for 30
Whatever is provide for in the City Commission Chamber.
City Hall Commission room. Around 200

**Question - Does the department/division have procedures to make sure facility tours or trips for members of the public including students, are accessible to persons who have visual, hearing, mobility and learning disabilities?**

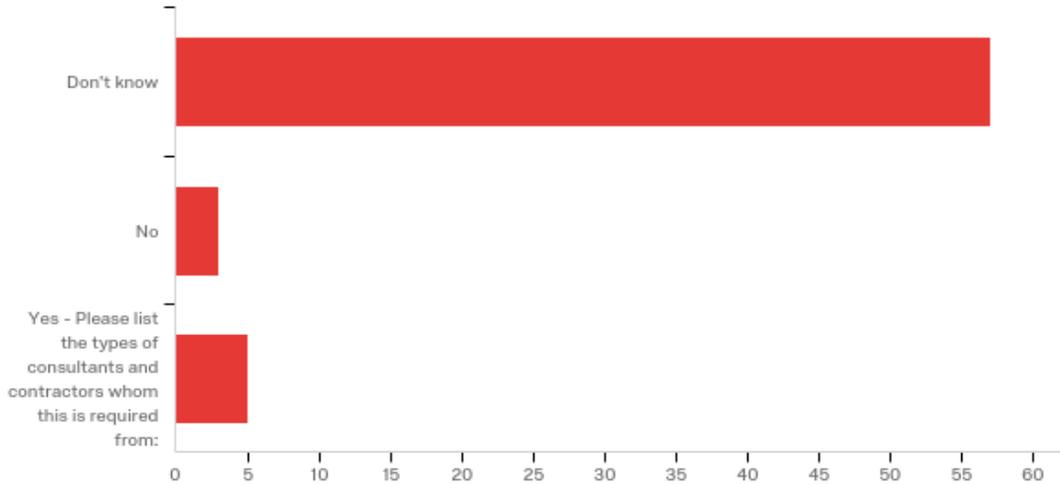


#	Answer	%	Count
1	Don't know	72.73%	48
2	No	16.67%	11
3	Yes - Please describe the procedures:	10.61%	7
	Total	100%	66

Yes - Please describe the procedures:

I am unaware of the specific details, but I am aware that there are procedures in place as dictated on the City of Lakeland webpage.
Contact Jenny Sykes ADA Specialist COL
Unit 5 parking lot is rocks and gravel, very limited and dangerous for people with disabilities.
Notice is given for possible loud noises, and the proper measures are in place for mobility. In addition, with notice, the department staff can adjust to be visible to those hard-of-hearing/deaf or a translator may accompany.

**Question - Are consultants, contractors, or vendors who bid on capital projects or other contractual work requested to sign a statement of their intent to comply with the ADA and all applicable accessibility standards?**

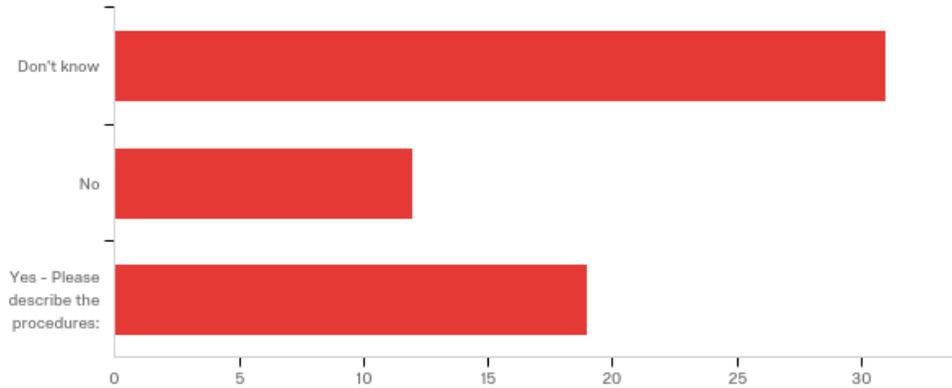


#	Answer	%	Count
1	Don't know	87.69%	57
2	No	4.62%	3
3	Yes - Please list the types of consultants and contractors whom this is required from:	7.69%	5
	Total	100%	65

Yes - Please list the types of consultants and contractors whom this is required from:

General Contractors
In accordance with the Americans with Disabilities Act and Section 286.26, all Consultants and Contractors.
Temporary staffing companies
Kubra (Lakeland Electric's bill print vendor) has made accommodations for physical equipment to meet the ADA rules and regulations. I only know this because I was involved in the project.

**Question - Do department/division staff have an evacuation plan or procedures in place that describes how to evacuate persons with disabilities from a facility during an emergency?**



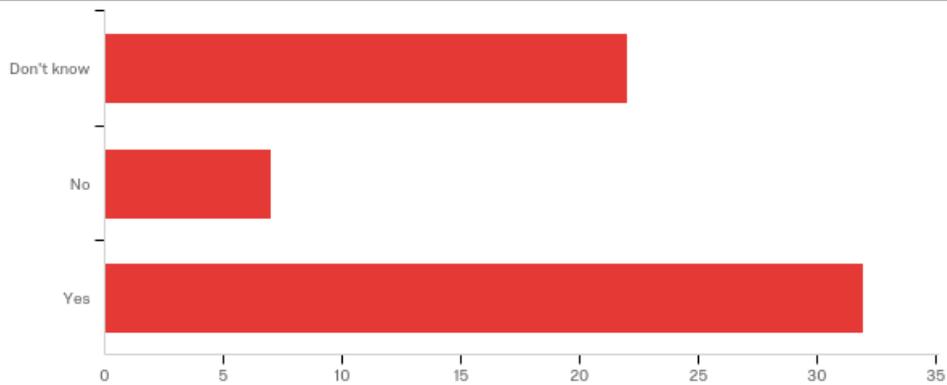
#	Answer	%	Count
1	Don't know	50.00%	31
2	No	19.35%	12
3	Yes - Please describe the procedures:	30.65%	19
	Total	100%	62

Yes - Please describe the procedures:

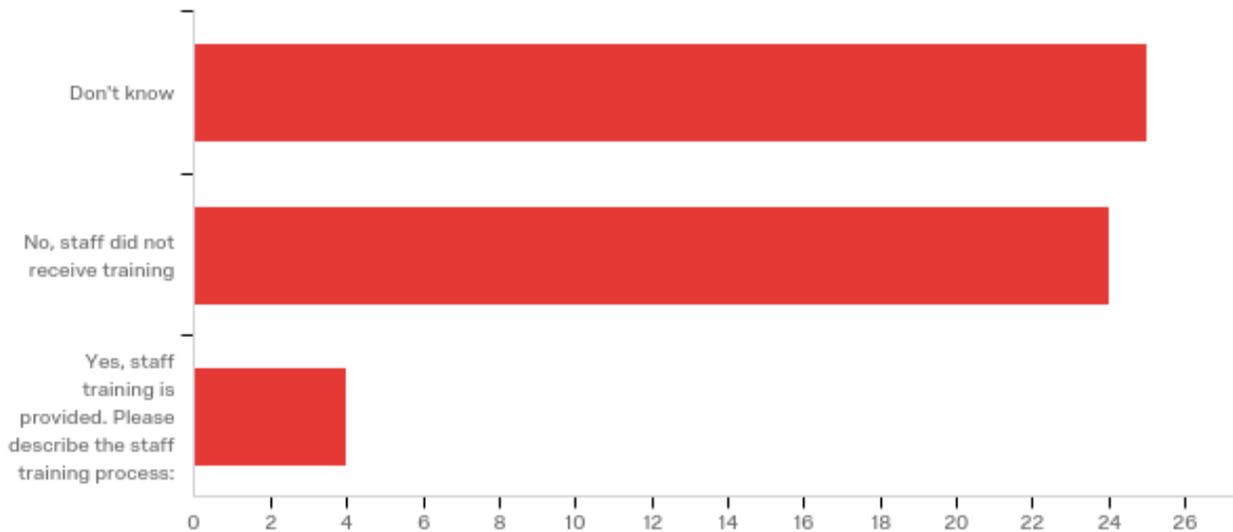
This is area / building specific.
Training with fire escape plan
Leave the cemetery property
Have chair with wheels at the top floor of each stairwell.
I am not personally familiar with all the steps; for fire, the stair wells are designated
Sort of, LE has an evacuation plan for the admin building that addresses people with mobility issues only.
A seat for moving someone down the stairs is located in the stairwell. Emergency floor coordinators would implement the retrieval and execution of this facility.
We review emergency procedures before all classes and onboarding and have people available to assist people with disabilities
Not applicable on the floor I work on
Employees would assist. No one is left unattended
There is equipment available in both stairwells to assist persons with disabilities during emergencies. The Fire Coordinators on the east and west sides of the building are trained on assisting those that may need help. The security desk keeps track of visitors and they are accounted for when evacuating during emergencies and drills.
Women, Children, and any person with disabilities are helped out first

**Question - Is the evacuation route and/or instructions posted in a visible and accessible area of each floor in all facilities used by the department/division?**

#	Answer	%	Count
1	Don't know	36.07%	22
2	No	11.48%	7
3	Yes	52.46%	32
	Total	100%	61



**Question - Do department/division staff having contact with the public receive training on interacting with persons with disabilities?**



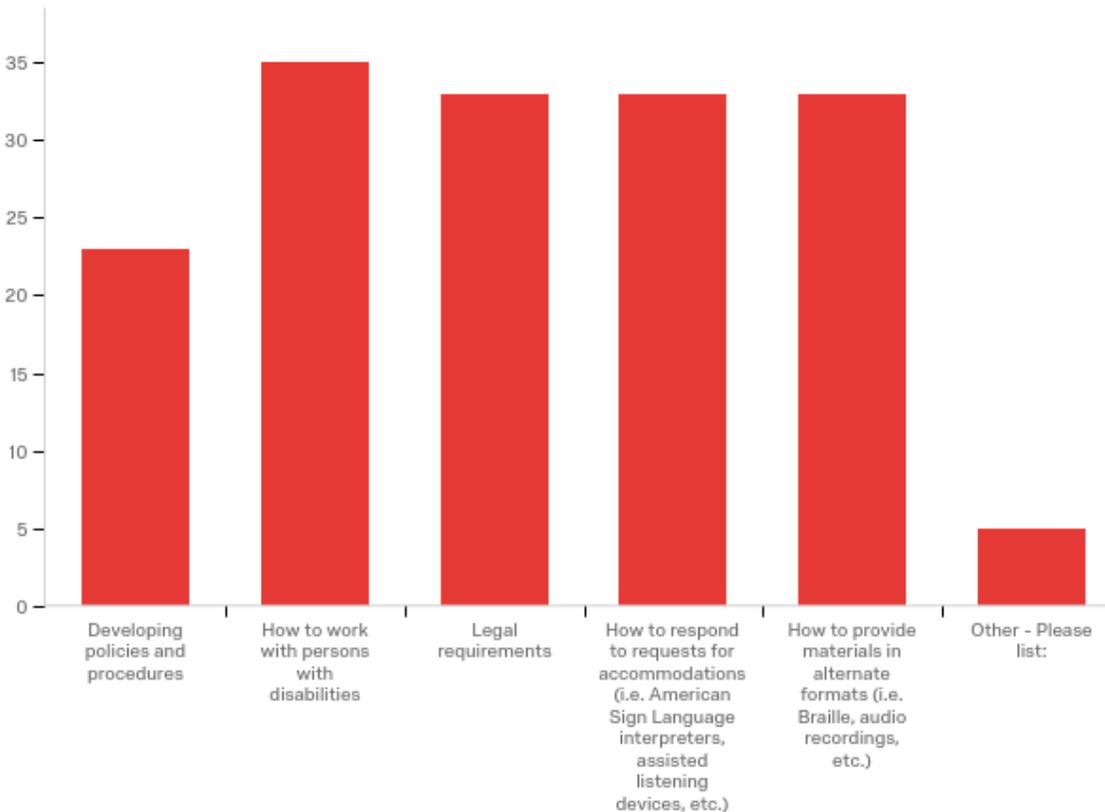
#	Answer	%	Count
1	Don't know	47.17%	25
2	No, staff did not receive training	45.28%	24
3	Yes, staff training is provided. Please describe the staff training process:	7.55%	4
	Total	100%	53

City of Lakeland ADA Self-Evaluation and Transition Plan Update

Yes, staff training is provided. Please describe the staff training process:

In processing training, as well as annual compliance mandatory training.
COL Title VI-EEO/Nondiscrimination ADA/504 Statement and ADA Officer Contact (DBE) (LEP) Fact Sheet
Not to my knowledge that this training is completed (might be a good new City U Program)

**Question - Would other training or technical assistance services be helpful to department/division staff such as (check all that apply):**

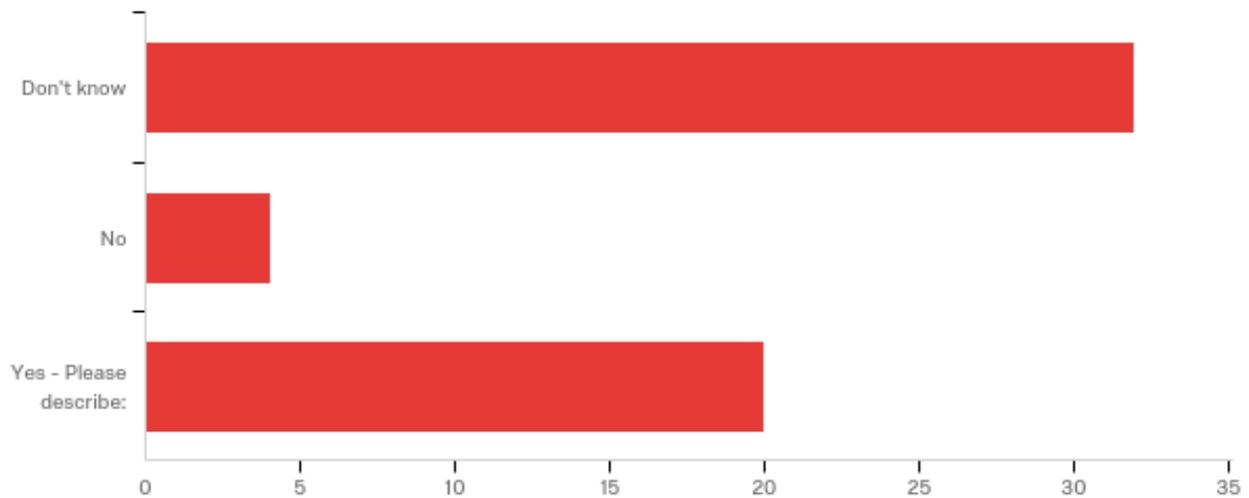


#	Answer	%	Count
1	Developing policies and procedures	14.20%	23
2	How to work with persons with disabilities	21.60%	35
3	Legal requirements	20.37%	33
4	How to respond to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.)	20.37%	33
5	How to provide materials in alternate formats (i.e. Braille, audio recordings, etc.)	20.37%	33
6	Other - Please list:	3.09%	5
	<b>Total</b>	<b>100%</b>	<b>162</b>

Other - Please list:

Other languages pamphlets, I currently have Spanish.
All would be helpful
It would be very helpful if there was training required for all staff members. Then, be able to have input on developing policies. One or two staff members with little or incomplete training is unhelpful, if no one else can have any input, while implementation of unwritten Division policies appear incorrect or ineffective.
Just being made aware of what is already available - perhaps as part of onboarding or an HR training class
I have not had an instance where I needed this equipment. Most I had was a mute reporter and we utilized pen and paper but this was at her residence, she did not respond to the police department

**Question - Does the City plan and budget for improving accessibility to its facilities (i.e. buildings, parks, sidewalks, street crossings, parking lots)?**



#	Answer	%	Count
1	Don't know	57.14%	32
2	No	7.14%	4
3	Yes - Please describe:	35.71%	20
	Total	100%	56

Yes - Please describe:

Heard about a transition plan
I see ADA improvements being made all over the area.
From what I have seen much effort is being made to improve on the already existing accessibility.
Done thru Annual Budgeting Process and planned thru divisions 5 years out
Not in all cases, such as, a Division facility located in a leased retail- plaza storefront. Perhaps the lessor did not allow the addition for closer handicapped parking. Not sure if this was ever worked out.

Annual budget includes dollars for improving accessibility
Informed by Public Works employees that COL has a plan to be ADA compliant
Sidewalks, parks
I am not directly involved but Facility Services would most likely have this in operating budget
It must be because when they (re)install a sidewalk, they create areas where handicapped/disabled persons are able to access the sidewalk, etc.
The City follows the ADA rules and regulations, so I assume they are planning and have a budget for this infrastructure.

**Question - Thank you for completing this questionnaire. The information collected will assist the various City departments, divisions, and the people it serves. If you have any questions regarding the City of Lakeland's ADA Self-evaluation and Transition Plan or are aware of any specific physical or programmatic barriers, please use the space below for your suggestions and comments.**

Thank you for assessing the City's current ADA state. This information will only help our City be better for our community, which is what we should always strive for.
City hall area only has a few handicap parking places and when city employees with handicap placards park there they are asked to move. They are told there aren't enough places for non-city handicap people to park. So, we need more handicap parking places to take care of our employees and the public. As it is, we are discriminating against our employees and not taking care of their needs. I know some handicap people who work there that have to park across the street (sometimes on the top floor of parking garage) and walk all the way to their office at city hall. That is not right. These people are probably too scared to raise a fuss.
Being at the Cemetery, we don't have all of the same issues with our facilities that other divisions have in Parks & Rec. The one issue that I see with our property is our entrance/exit road. I think that we need another way to go in & out of the cemetery property, or to at least have a ramp to merge with the traffic, when exiting the premises.
I suggest the Color Oracle software (colororacle.org) be made available to anyone responsible for publishing public media to allow consideration of color usage in such media for color vision impaired. This software does not change design, it just shows how a design may be perceived by color vision impaired and allows for design change if so desired by showing color spectrums that may work for all.
Pave the parking lot at unit 5 with wheelchair access.
This survey timed out twice before, I hope this submission works.
A lot of this did not apply to our department and most of the questions did not have an N/A.