



City of Ocala  
**ADA Self-Evaluation  
& Transition Plan**

March 2019

Prepared by:

**Kimley»Horn**

101 East Silver Springs Boulevard  
Suite 400  
Ocala, FL 34470

In Association with:





# Table of Contents

<b>Abbreviations</b> .....	<b>iii</b>
<b>1.0 Purpose</b> .....	<b>1</b>
<b>2.0 Introduction</b> .....	<b>3</b>
2.1 Legislative Mandate.....	3
2.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process .....	3
2.3 Discrimination and Accessibility.....	3
2.3.1 Physical Barriers .....	4
2.3.2 Programmatic Barriers .....	4
2.3.3 Ongoing Accessibility Improvements .....	4
2.3.4 City of Ocala Approach .....	4
2.4 Exceptions and Exemptions .....	4
2.5 New Construction and Alterations .....	5
2.6 Maintenance Versus Alterations .....	6
2.7 FHWA Guidance on Closing Pedestrian Crossings.....	8
<b>3.0 Public Outreach</b> .....	<b>9</b>
<b>4.0 Self-Evaluation and Summary of Findings</b> .....	<b>11</b>
4.1 Programs, Services, and Activities Review.....	11
4.1.1 ADA/504 Coordinator (Title I / Title II).....	12
4.1.2 Roles and Responsibilities of the ADA/504 Coordinator .....	12
4.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the Americans with Disabilities Act.....	13
4.1.4 Public Notice Under the ADA.....	14
4.1.5 ADA Liaison Committee .....	15
4.2 Program, Services, and Activities Inventory .....	16
4.3 Facilities Review .....	18
4.4 Existing Facility Inventory .....	19
4.4.1 Buildings.....	19
4.4.2 Parks.....	23
4.4.3 Signalized Intersections .....	24
4.4.4 Sidewalk Corridors.....	25
4.4.6 Transit Stops.....	25
4.5 Self-Evaluation Action Plan .....	25
4.6 Schedule and Implementation Methods .....	28
4.7 Action Log .....	34
<b>5.0 Funding Opportunities</b> .....	<b>35</b>
5.1 Federal and State Funding .....	35
5.2 Local Funding .....	37
5.3 Private Funding .....	37
<b>6.0 Next Steps</b> .....	<b>39</b>

<b>Appendix .....</b>	<b>41</b>
Appendix A: Grievance Procedure	
A-1: City of Ocala Title II Grievance Procedure	
A-2: City of Ocala Title II Grievance Form	
Appendix B: Notice Under the Americans with Disabilities Act	
B-1: Current City of Ocala Notice Under the ADA	
B-2: Revised City of Ocala Notice Under the ADA	
Appendix C: City of Ocala Documents, Forms, and Videos	
Appendix D: Federal Highway Administration ADA Transition Plan Process Memo	
Appendix E: City of Ocala 2015 ADA Transition Plan	
E-1: Facility Evaluation Checklist	
E-2: 2015 ADA Transition Plan	
Appendix F: Facility Maps	
F-1: Signalized Intersections	
F-2: Sidewalk Corridors	
F-3: Transit Stops	
Appendix G: Interlocal Agreement between City of Ocala and Marion County	
Appendix H: Sample Action Log	

## List of Tables

<b>Table 1. ADA Liaison Committee.....</b>	<b>15</b>
<b>Table 2. Summary of Buildings Evaluated in 2015 .....</b>	<b>20</b>
<b>Table 3. Summary of Buildings to be Evaluated.....</b>	<b>21</b>
<b>Table 4. Summary of Parks Evaluated in 2015.....</b>	<b>24</b>
<b>Table 5. Prioritization Factors for Buildings/Parks.....</b>	<b>30</b>
<b>Table 6. Prioritization Factors for Signalized and Unsignalized Intersections.....</b>	<b>31</b>
<b>Table 7. Prioritization Factors for Sidewalk Corridors .....</b>	<b>32</b>
<b>Table 8. Prioritization Factors for Transit Stops.....</b>	<b>33</b>
<b>Table 9. Funding Opportunities.....</b>	<b>36</b>

## List of Figures

<b>Figure 1. Maintenance versus Alteration Projects.....</b>	<b>7</b>
--	----------

## Abbreviations

---

ADA - Americans with Disabilities Act

ADAAG - Americans with Disabilities Act Accessibility Guidelines

CFR - Code of Federal Regulations

CIP - Capital Improvement Projects

DOJ - United States Department of Justice

FHWA - Federal Highway Administration

MUTCD - Manual on Uniform Traffic Control Devices

PROWAG - Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Program, Services, and Activities

*[Page intentionally left blank]*

## 1.0 Purpose

---

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Ocala to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards for Accessible Design (2010 ADA Standards), Title 24 of the 2012 Florida Accessibility Code for Building Construction, and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). Details regarding the prioritization methodology are provided in this document.

This document includes an overview of the ADA and provides recommendations for the City of Ocala based on guidance from the Federal Highway Administration (FHWA) and U.S. Department of Justice (DOJ) to improve accessibility for the public.

*[Page intentionally left blank]*



## 2.0 Introduction

---

### 2.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Ocala will undertake a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

### 2.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Ocala is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Ocala's PSAs and facilities and presents a Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.

### 2.3 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

### 2.3.1 Physical Barriers

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

### 2.3.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

### 2.3.3 Ongoing Accessibility Improvements

City PSAs and facilities to be evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

### 2.3.4 City of Ocala Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Ocala's programs, services, and activities within a reasonable timeframe. The City's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Ocala residents seek to enjoy, and guides future improvements.

The City of Ocala should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Ocala will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

## 2.4 Exceptions and Exemptions

A municipality is not required to take any action that would create any undue financial or administrative burden for the public entity, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property.

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include: (i) the nature and cost of the alteration needed under this chapter; (ii) the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; (iii) the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location

of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is on the National Register of Historic Places. Based on a search of the National Register of Historic Places NPGallery Database (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2210280>), there are several registered historical places within the City of Ocala, including: Coca-Cola Bottling Plant, East Hall, Old Fessenden Academy Historic District, Fort King Site, Marion Hotel, Mount Zion A.M.E. Church, Ocala Historic Commercial District, Ocala Historic District, Ocala Union Station, The Ritz Apartment, E.C. Smith House, Tusawilla Park Historic District, and West Ocala Historic District. The City should review the registered historic places within Ocala to determine for which facilities and areas the City is responsible.

The City has established the Ocala Historic Preservation Advisory Board (OHPAB). OHPAB's responsibilities include, but are not limited to, the following: issuing Certificates of Appropriateness (CAs); advising City Council and other city boards on issues regarding the City's historic resources; and educating the public on the economic benefits of historic preservation and federal, state and local laws and policies regarding programs that encourage historic preservation. The OHPAB should take the ADA into consideration when providing recommendations to ensure the current standards are being met when facilities are altered.

A municipality is not necessarily required to make each of its existing facilities accessible to and usable by individuals with disabilities. In the event the City determines a proposed action would generate undue financial or administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property, a municipality has a responsibility to communicate and document the decision and the methodology used to reach it. If an action would result in such an alteration or such burdens, a municipality shall take any other actions that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the City.

## 2.5 New Construction and Alterations

If the start date for construction is on or after March 15, 2012, all newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards. Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

The current standard is the 2010 ADA Standards, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG).

However, the FHWA considers PROWAG to be the recommend best practices for the design and construction of pedestrian facilities in the public rights-of-way as well as the state of the practice that can be followed for areas not fully addressed by the 2010 ADA Standards.

The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within PROWAG. As of January 2019, the Florida Department of Transportation (FDOT) has not officially adopted PROWAG, but according to FDOT's current ADA Coordinator, FDOT has incorporated criteria from PROWAG into the design standards and Plans Preparation Manual. It is recommended that the City of Ocala adopt PROWAG so that it becomes an

enforceable document for all City projects within the public rights-of-way, regardless of its adoption status at the state and federal level.

### **2010 ADA Standards**

The Department of Justice's revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 ADA Standards for program accessibility and barrier removal.

### **PROWAG**

The U.S. Access Board is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The Board's aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. Once these guidelines are adopted by the DOJ, they will become enforceable standards under Title II of the ADA. However, in a memorandum dated January 23, 2006 from the Federal Highway Administration, the draft PROWAG is the recommended best practice and can be considered the state of the practice that should be followed for areas not fully addressed by the 2010 ADA Standards.

### **MUTCD**

Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The MUTCD is incorporated by reference in 23 CFR, Part 655, Subpart F and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the FHWA to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.

## **2.6 Maintenance Versus Alterations**

The DOJ has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. It is recommended this clarification with regard to when curb ramp installation is required as part of a project be distributed to the appropriate City of Ocala staff.

The ADA is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the DOJ. DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ

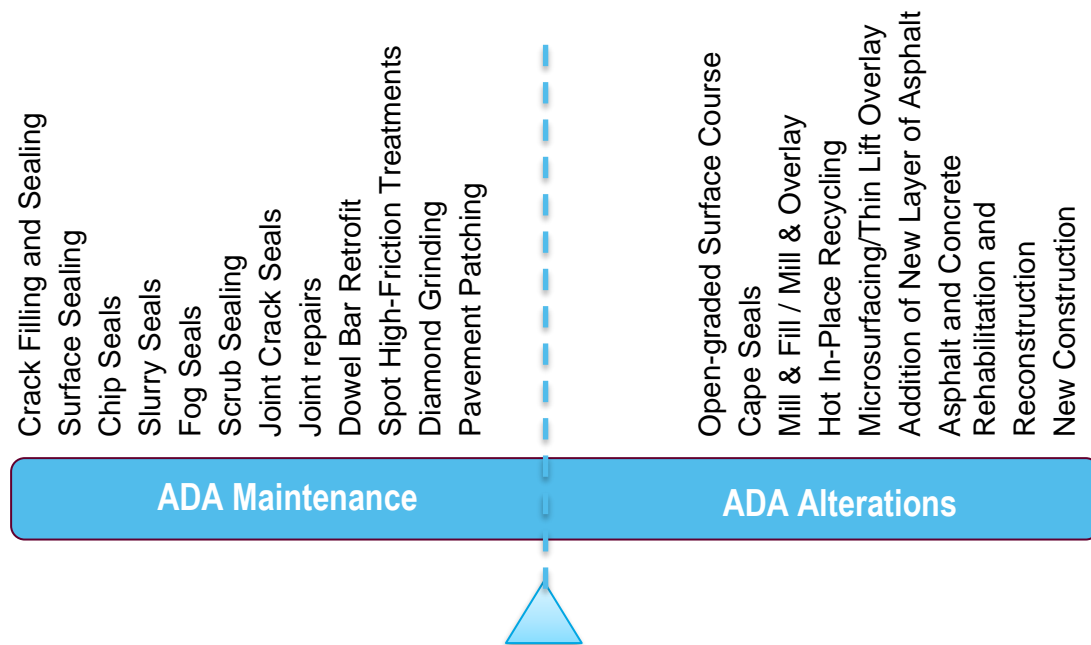
regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

*FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.*

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.*

*This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.*

**Figure 1. Maintenance versus Alteration Projects**



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

## 2.7 FHWA Guidance on Closing Pedestrian Crossings

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed if an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb IS acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The agency wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Ocala should also develop and implement a policy on how to close those crossings that are accommodated based on the existing conditions at the crossing location (e.g. existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk serving the crossing) but should not be due to safety concerns.

## 3.0 Public Outreach

---

The City plans to establish an external ADA Advisory Committee consisting of representatives from local disability organizations. The City intends to meet with the ADA Advisory Committee to introduce the ADA Self-Evaluation and Transition Planning process, seek feedback from the committee how the City is doing regarding accessibility, and to identify high priority areas within the City where programs, services, activities, or facilities that have barriers to access. Local organizations that will be contacted for participation include:

- ARC Marion
- HOPE - Horses Helping People, Inc.
- Ocala Autism Support Network, Inc.
- Transitions Life Center
- Elder Options
- FAAST Atlantic Region
- Florida Center for the Blind
- Disability Rights Florida
- Paralyzed Veterans of America
- Little People of America - Chapter 13
- Down Syndrome Association of Central Florida
- Disabled American Veterans Central Chapter
- National Multiple Sclerosis Society - Mid Florida
- Florida Developmental Disabilities Council
- Attain Inc.
- Florida Autism Center

The City also intends to host a public workshop on to provide a summary of the ADA Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility.

*[Page intentionally left blank]*



## 4.0 Self-Evaluation and Summary of Findings

---

The City of Ocala's ADA Transition Plan will include the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The Plan will also include the findings from facility evaluations of all City-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, signalized intersections, public rights-of-way sidewalks and associated curb ramps, and transit stops.

### 4.1 Programs, Services, and Activities Review

Under the ADA, the City of Ocala is required to complete a Self-Evaluation of the City's facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City's programs, services, and activities, as well as the policies and practices the City uses to implement its various programs and services.

To comply with requirements of the plan, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

- (1) Relocation of programs to accessible facilities;
- (2) Modifications to existing programs so they are offered in an accessible manner;
- (3) Structural methods such as altering an existing facility;
- (4) Policy modifications to ensure nondiscrimination; and
- (5) Auxiliary aids needed to provide effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

Programs, services, and activities offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination can only be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or his designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.

#### 4.1.1 ADA/504 Coordinator (Title I / Title II)

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

##### ADA/504 Coordinator: Self-Evaluation Findings

The City of Ocala has appointed Christopher J. Watt as ADA/504 Coordinator for Title I and Title II. Below is his contact information.

Christopher J. Watt, Esq. SHRM-SCP  
ADA/504 Coordinator  
City Hall, 3<sup>rd</sup> Floor  
110 SE Watula Avenue  
Ocala, FL 34471  
Office: 352-401-3994  
Relay: 7-1-1  
cwatt@ocalafl.org

##### ADA/504 Coordinator: Possible Solutions

The ADA Coordinator's information should be prominently displayed in common areas that are accessible to all employees and areas open to the public. Also, the ADA/504 Coordinator contact information must be included in all materials that are distributed from the City. This includes posting this information on the website.

#### 4.1.2 Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA/504 Coordinators that are recommended by the DOJ:

- Familiarity with the entities structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

##### Roles and Responsibilities of the ADA/504 Coordinator: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA/504 Coordinator is provided on the City's website or in City documents.

## Roles and Responsibilities of the ADA/504 Coordinator: Possible Solutions

The City should document the roles and responsibilities of the ADA/504 Coordinator. These roles and responsibilities should be consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

### 4.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the Americans with Disabilities Act

#### ***Title I***

Title I of the ADA prohibits private employers, state and local governments, employment agencies, and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees based on an entity-wide employee total count, including state and local governments.

The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level.

#### ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Self-Evaluation Findings

A City of Ocala Title VI Nondiscrimination Policy and Complaint Procedure are available on the City's Legal Information webpage (<https://www.ocalafl.org/government/legal-information>). However, the City does not have a Title I grievance policy, procedure, or form.

#### ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title I): Possible Solutions

The City should develop a Title I-specific grievance policy, procedure, and form.

#### ***Title II***

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the DOJ suggests the follow content:

- A description of how and where a compliant under Title II may be filed with the government entity;
- If a written compliant is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- A description of the time frames and processes to be followed by the complainant and the government entity;
- Information on how to appeal an adverse decision; and
- A statement of how long compliant files will be retained.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II):  
Self-Evaluation Findings

The City does not have a Title II ADA grievance policy, procedure, or form with an appeals process.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II):  
Possible Solutions

The City should establish a Title II ADA grievance policy, procedure, and form with an appeals process, which should be distributed to all City department heads, and copies should be posted in public spaces of public buildings and on the City's website. The ADA grievance procedure must be available in alternative formats so that it is accessible to all people with disabilities.

ADA Grievance Policy, Procedure, and Form with Appeals Process for the Americans with Disabilities Act (Title II):  
Completed Actions

A City of Ocala Title II ADA Grievance Procedure and Form were developed in March 2019. A copy of the City's Title II Grievance Procedure and Form are provided in **Appendix A-1** and **Appendix A-2**, respectively. The grievance procedure and form will also be posted on the City's website.

#### 4.1.4 Public Notice Under the ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entities programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. The DOJ suggests including brief statements about:

- Employment;
- Effective communication;
- Making reasonable modifications to policies and programs;
- Not placing surcharges on modifications or auxiliary aids and services; and
- Filing complaints.

The notice should also include the name and contact information of the ADA/504 Coordinator. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary.

Public Notice Under the ADA: Self-Evaluation Findings

The City of Ocala Notice Under the Americans with Disabilities Act is posted on the City's website. The notice includes statements about employment, effective communication, and modifications to policies and procedures. However, statements about not placing surcharges on modifications or auxiliary aids and services and filing complaints are not included. The name and contact information of the ADA/504 Coordinator is out-of-date. A copy of the current City of Ocala Notice under the Americans with Disabilities Act is provided in **Appendix B-1**.

Public Notice Under the ADA: Possible Solutions

Below is sample language provided by the DOJ that could be added to the existing City notice:

**Surcharges**

City of Ocala will not place a surcharge on a particular 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.

**Complaints**

Complaints that a program, service, or activity of the City of Ocala is not accessible to persons with disabilities should be directed to **Christopher J. Watt, ADA/504 Coordinator at 352-401-3994 or cwatt@ocalafl.org.**

Public Notice Under the ADA: Possible Solutions: Completed Actions

A revised City of Ocala Notice Under the Americans with Disabilities Act was developed in March 2019. A copy of the City’s revised Notice is provided in **Appendix B-2** and will be posted on the City’s website.

4.1.5 ADA Liaison Committee

The ADA Liaison Committee is comprised of representatives from each City department. These individuals work closely with ADA/504 Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinator works closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures.

ADA Liaison Committee: Self-Evaluation Findings

The City of Ocala has established an ADA Liaison Committee and is comprised of a representative from various City department. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator regarding all ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log shall be shared with ADA/504 Coordinator and shall be retained for at least three (3) years. The current Liaison Committee members are listed in **Table 1**.

**Table 1. ADA Liaison Committee**

Name	Department
Chris Watt	ADA/504 Coordinator
Noel Cooper	City Engineer’s Office
Jeff Mackey	Facilities Management
Aubrey Hale	Growth Management
John Long	Human Resources & Risk Management
Tom Casey	Public Works
Kathrine Stewart	Recreation & Parks
Rusella Bowes-Johnson	Water Resources

ADA Liaison Committee: Possible Solutions

The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and areas open to the public. This includes posting this information on the City website.

## 4.2 Program, Services, and Activities Inventory

The City of Ocala has compiled a list of all City PSAs required to be reviewed for compliance with Title II of the ADA. The City will evaluate current status regarding ADA requirements including eligibility requirements, participation requirements, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures.

The Self-Evaluation of these PSAs will be completed over an estimated five (5) year period and updates to the City's Transition Plan will be made to including findings and possible solutions for identified barriers. The following sections detail the identified PSAs for review.

### Boards and Commissions

1. Affordable Housing Advisory Committee
2. Airport Advisory Board
3. Board of Adjustment
4. Brownfield Advisory Committee
5. Downtown Ocala Redevelopment Advisory Committee
6. East Ocala Redevelopment Advisory Committee
7. Firefighters' Retirement Plan
8. General Employees' Pension Board of Trustees
9. Golf Advisory Board
10. Investment Committee
11. Municipal Arts Commission
12. Municipal Code Enforcement Board
13. Municipal Tennis Association Advisory Board
14. North Magnolia Redevelopment Advisory Committee
15. Ocala Historic Preservation Advisory Board
16. Ocala Housing Authority
17. Planning & Zoning Commission
18. Police Officers' Retirement System
19. Recreation Commission
20. Special Magistrate
21. Tree Commission
22. Utility Advisory Board
23. West Ocala Redevelopment Advisory Committee

### Departments

1. Budget
2. City Clerk
3. City Manager's Office
4. City Engineer's Office
5. Community Development Services
6. Customer Service Office
7. Electric Utility
8. Facilities Management
9. Finance
10. Fire Rescue
11. Fleet Management

#### Departments (cont.)

12. Growth Management
13. Human Resources & Risk Management
14. Information Technology
15. Internal Auditor
16. Ocala Fiber Network
17. Ocala International Airport
18. Ocala Police Department
19. Procurement
20. Public Works
21. Recreation & Parks
22. Strategic Engagement
23. Sun Tran
24. Transportation Planning
25. Water Resources

#### Policy / Procedures / Guidelines

1. City of Ocala Complaint Procedure Under Title VI and the Americans with Disabilities Act (<https://www.ocalafl.org/government/legal-information>)
2. Report A Web Accessibility Issue (<https://www.ocalafl.org/government/city-departments-a-i/information-technology/report-a-web-accessibility-issue>)
3. Title VI Nondiscrimination Policy (<https://www.ocalafl.org/government/legal-information>)
4. Modifications to Policies and Procedures (<https://www.ocalafl.org/government/legal-information>)

The City does not have policies, procedures, or guidelines related to the following and should consider the development of these documents:

- ADA Grievance Procedure and Grievance Form with Appeals Process (Title I)
- Reasonable Accommodation Request Policy, Procedure, and Request Form
- Service Animal Guidance for Reasonable Accommodations
- Service Animal Guidance for Reasonable Modifications in Public Places
- ADA Assurance
- Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I)
- Review of Previous ADA Complaint Log and Summary (Title I and II)
- Entity-Wide ADA Training
- Community Disability Organization Listing

#### Documents / Forms / Videos

All documents, forms, and videos available to the public should be reviewed. Examples include lease agreements, planning documents, contracts, department-specific handbooks, standard operating procedures, meeting agendas, and meeting minutes, online forms, applications, PDF forms, checklists, and videos. An inventory of documents, forms, and videos posted on the City's website is provided in **Appendix C**.

Lease agreements that should be reviewed but are not posted on the City's website include:

- Ocala Golf Club Management Agreement (July 17, 2012)
- Coleman Center (August 4, 2009)
- Kids Central, Inc. (October 7, 2014)

### Employment Practices

- Employment practices
- City job descriptions for discriminatory language and identification of essential, secondary, and non-essential job functions
- City of Ocala Employee Handbook (January 2019)
- Hiring and new employee procedures
- Recruiting procedures
- Training programs

### Ordinances

A review of the City ordinances for consistency with current accessibility requirements and standards should be completed. The current City of Ocala Code of Ordinance is posted online:  
[https://library.municode.com/fl/ocala/codes/code\\_of\\_ordinances](https://library.municode.com/fl/ocala/codes/code_of_ordinances).

### Emergency Preparedness Manual

The City of Ocala Emergency Preparedness Manual should be evaluated for employee evacuation and emergency operations for consistency with current accessibility requirements and standards.

### Design Standards

The City of Ocala has adopted the Florida Building Code and the International Building Code. The City is not responsible for these codes. The following City standards should be evaluated for consistency with the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG:

- City of Ocala Standard Specifications – Streets, Stormwater, Traffic, Water and Sewer Construction (October 2018)
- Ocala International Airport Development Standards (Adopted October 16, 2007)

### Website

A review of the City website for compliance with Section 508 of the Rehabilitation Act of 1973 and Web Content Accessibility Guidelines (WCAG) 2.0 should be completed.

## 4.3 Facilities Review

The FHWA has provided guidance on the ADA Transition Plan process in their “INFORMATION AND ACTION: ADA Transition Plan Process” memo dated November 17, 2015 (see **Appendix D**). While this memo specifically addresses State Departments of Transportation, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.

Items included in the FHWA checklist related to the public rights-of-way are:

- **Inventory of Barriers** (identification of physical obstacles)
  - Identify intersection information, including curb ramps and other associated accessibility elements.
  - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.



- Discuss jurisdictional issues/responsibilities for sidewalks.
- **Schedule**
  - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
  - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
  - Schedule should include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
  - Dedicate resources to eliminate identified ADA deficiencies.
- **Implementation Methods**
  - Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2011 PROWAG).

The City of Ocala has compiled a list of all City-owned and/or maintained facilities to be evaluated for compliance with 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG. The City's Action Plan to complete the evaluation of these facilities will be completed an estimated five (5) year period and updates to the City's Transition Plan will be made to including findings and possible solutions for identified barriers.

## 4.4 Existing Facility Inventory

The first step in completing a Self-Evaluation is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The City completed a facility inventory in 2018 and the results are documented in the following sections.

### 4.4.1 Buildings

In 2015, eight (8) City-owned buildings with public access were evaluated for compliance with the 2010 ADA Standards (see **Table 2**). Copies of the facility evaluation checklist template and the City of Ocala 2015 ADA Parks Transition Plan are provided in **Appendix E-1** and **Appendix E-2**, respectively. The remaining City-owned buildings with public access were also inventoried (see **Table 3**).

*[Remainder of page intentionally left blank]*

**Table 2. Summary of Buildings Evaluated in 2015**

Buildings	
Location Name	Property Address
1. Clyatt Park (Restrooms)	1500 SE 17th St
2. Lillian Bryant Park Restrooms	2200 NW 17th PI
3. Jervey Gantt Complex	
<i>East Restrooms</i>	2200 Block SE 36 <sup>th</sup> Ave
<i>West Restrooms</i>	2100 Block SE 32 <sup>nd</sup> Ave
4. Heritage Nature Park (Restrooms)	2005 NE 3rd Street
5. Nature Park Restrooms	1600 SE 30 Ave
6. Tusawilla Park	300 – 899 NE Sanchez Ave
<i>Concession</i>	
<i>Fieldhouse</i>	
<i>Restrooms</i>	
<i>Discovery Science</i>	
<i>Discovery Science Shop (Behind Center)</i>	
7. Ocala Regional Sportsplex	3500 SW 67 <sup>th</sup> Ave
<i>Concessions/Restrooms</i>	
<i>Maintenance Building</i>	
<i>Security Trailer</i>	
<i>Soccer Restrooms (NE)</i>	
<i>Softball Restrooms</i>	
<i>Ticket Booth</i>	
8. Tusawilla Pavilion	812 NE Sanchez Ave

*[Remainder of page intentionally left blank]*

**Table 3. Summary of Buildings to be Evaluated**

Buildings	
Location Name	Property Address
1. Airport Terminal Bldg #10	1770 SW 60th Ave
2. Airport Hangar #19 Office	750 SW 60 Ave
3. Airport Foreign Trade Zone (Office) - Beautiful Moments	3400 SW 60 Ave
4. City Hall	110 SW Watula Ave
<i>Clerk's Office</i>	
<i>Common Areas &amp; Restrooms</i>	
<i>Lobby</i>	
<i>City Manager's Office, 2nd Floor</i>	
<i>Council Chambers, 2nd Floor</i>	
<i>Common Areas &amp; Restrooms, 2nd Floor</i>	
<i>Mayor's Office, 2nd Floor</i>	
<i>Human Resources/Risk, 3rd Floor</i>	
<i>Senator, 3rd Floor</i>	
<i>Common &amp; Restrooms, 3rd Floor</i>	
<i>Citizens' Circle Restrooms</i>	
5. Customer Service Office	201 SE 3rd Ave
<i>Citizens Service Center, 1st Floor</i>	
<i>Finance, 2nd Floor</i>	
<i>Code Enforcement, 2nd Floor</i>	
<i>Growth Management, 2nd Floor</i>	
<i>Revitalization, 2nd Floor</i>	
<i>Fire Prevention, 2nd Floor</i>	
<i>Transportation Planning Office, 2nd Floor</i>	
<i>Common and Restrooms, 2nd Floor</i>	
6. Engineering/Real Estate/Survey	1805 NE 30th Ave, Bldg 700
7. Care Clinic	2100 NE 30th Ave, Bldg 300, Ste 102
8. Electric Utility	1805 NE 30th Ave, Bldg 400
9. Telecommunications - Main Office	1805 NE 30th Ave, Bldg 500
10. Power Plant Incubator Bldg (2-Story)	405 SE Osceola Ave
11. Power Plant Side Building	405 SE Osceola Ave
12. Power Plant Incubator (1-Story)	303 SE Osceola Ave
13. Ocala Downtown Market	403 SE Osceola Ave
14. Facilities- Offices/Restroom/Breakroom	1805 NE 30th Ave, Bldg 1000
15. Fire Administration	3001 NE 21 St
16. Fire Station 1	235 NE Watula Ave
17. Fire Station 2	2701 SE 36th Ave
18. Fire Station 3	737 SW M.L.K. Ave

**Table 3. Summary of Buildings to be Evaluated (cont.)**

Buildings	
Location Name	Property Address
19. Fire Station 4	3300 SW 20th St
20. Fire Station 5	2340 NE 25th Ave
21. Fire Station 6	5220 SW 50 Court
<i>Fire Training 1st Floor</i>	
<i>2nd Floor &amp; Apparatus Bays</i>	
<i>OPD 2 Offices 1st Floor</i>	
22. Building 200, Second Floor	1805 NE 30th Ave Bldg 200
23. Ocala Golf Club	3130 E Silver Spg Blvd
<i>Clubhouse &amp; Rental Hall</i>	
<i>Night Rng House</i>	
<i>Restroom #3 Green</i>	
<i>Restroom #15 Green</i>	
<i>Rain Shelter #13 Tee</i>	
24. Pine Oaks Golf Club	2201 NW 21st St
<i>Clubhouse/Pro Shop</i>	
<i>Administration</i>	
<i>Restaurant/Snack Bar</i>	
<i>Atrium</i>	
<i>Starter Shed/Ballwasher</i>	
<i>E Restroom</i>	
<i>N Restroom</i>	
<i>S Restroom</i>	
25. Brick City Arts Center	21 SW Broadway
26. The Marion Theatre	50 Magnolia
27. Public Works Admin/Traffic	1805 NE 30th Ave, Bldg 300
28. Building 200	2100 NE 30th Ave, Bldg 200
<i>Commercial Sanitation</i>	
<i>Residential Sanitation</i>	
29. PW/Streets Bldg G - Offices	1805 NE 30th Ave, Bldg G
30. Deveraux Building	121 NW MLK Blvd
31. Model Rr Building	1247 NE 3rd St
32. Coleman Center @ Jervey Gantt Park	2200 SE 36th Ave
33. Ft King House	3925 SE Ft King St
34. Ft King Tennis Center	3301 SE Ft King St
35. Barbara Washington Senior Center	210 N.W. 12 Ave
36. Scott Springs/Celebrate 2000	2825 SW 24 Ave
37. Design Studio	533 NE 1st Ave
38. Downtown Square/Gazebo	Downtown Square

**Table 3. Summary of Buildings to be Evaluated (cont.)**

Buildings	
Location Name	Property Address
39. Lillian Bryant Recreation Center	2200 NW 17th Pl
40. Jervey Gantt Complex	2200 SE 36th Ave
<i>Aquatic Center</i>	
41. Hampton Aquatic Center	255 NW Martin Luther King Blvd
42. Ed Croskey Rec Complex	1510 NW 4th St
<i>Recreation Center</i>	
<i>Baseball Restrooms</i>	
<i>Concession Stand</i>	
<i>Football Restrooms</i>	
43. Administration Office	828 NE 8th Ave
44. Girl Scout House	801 NE Sanchez Ave
45. 8th Ave Senior Center	830 NE Sanchez Ave
46. American Legion Building	516 NE Sanchez Ave
47. Reilly Center	836 NE Sanchez Ave
48. Parks Operation	1307 NW 4th Ave
<i>Parks Operation</i>	
<i>Parks Operation</i>	
49. Sun Tran - Office	1805 NE 30th Ave, Bldg 500
50. Administration	1805 NE 30th Ave, Bldg 600
51. Water Treatment Plant	1808 NE 36th Ave
52. WRF #2 Administration Bldg	4200 SE 24th St
53. WRF #3 Operations Bldg	3100 SW 67 Ave
54. WRF #2 Maintenance Bldg	4200 SE 24th St

All buildings with public access not previously evaluated in 2015 (see **Table 3**) will be evaluated for compliance with the 2010 ADA Standards and Title 24 of the 2012 Florida Accessibility Code for Building Construction, including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. Approximately four (4) miles of on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant will also be evaluated.

If a City of Ocala employee requests an accommodation to be able to work at one of the buildings without public access, the City will evaluate the property at the time of the request.

#### 4.4.2 Parks

In 2015, 32 City-owned parks were evaluated for compliance with the 2010 ADA Standards (see **Table 4**). Copies of the facility evaluation checklist template and the City of Ocala 2015 ADA Parks Transition Plan are provided in **Appendix E-1** and **Appendix E-2**, respectively.

Table 4. Summary of Parks Evaluated in 2015

Parks	
Location Name	Property Address
1. Anderson Park	SE 12 <sup>th</sup> St & SE 11 <sup>th</sup> Ave
2. Clyatt Park	1400 SE 17 <sup>th</sup> St
3. Fisher Park	900 SE 22 <sup>nd</sup> St
4. Fort King Memorial	3925 SE Ft King St
5. Heritage Nature Conservancy	2005 NE 3 <sup>rd</sup> St
6. Highlands East	3160 SE 13 <sup>th</sup> St
7. Highlands West	2840 SE 13 <sup>th</sup> St
8. Hilldale	NE 8 <sup>th</sup> St
9. Idylweir	SE 10 <sup>th</sup> & SE 11 <sup>th</sup> St
10. Jervey Gantt – East	2200 Block SE 36 <sup>th</sup> Ave
11. Jervey Gantt – West	2100 Block SE 32 <sup>nd</sup> Ave
12. Lamb Park	NW 13 <sup>th</sup> & 9 <sup>th</sup> Ave
13. Lillian Bryant	2200 NW 17 <sup>th</sup> Pl
14. MLK Memorial	500 Block SW MLK Ave
15. MLK Recreation Complex	1510 NW 4 <sup>th</sup> St
16. Nature Park	1600 SE 30 <sup>th</sup> Ave
17. Northside	2000 NE 12 <sup>th</sup> Ave
18. Ocala Regional Sportsplex	3500 SW 67 <sup>th</sup> Ave
19. Poinciana Park	1670 SW Ft. King St
20. Polly Palmer	3700 Block SW 27 <sup>th</sup> Ave
21. Powhattan (no amenities)	3800 SE 3 <sup>rd</sup> St
22. Ritterhoff Park	1400 Block SE 17 <sup>th</sup> St
23. Scott Springs	2300 SW 24 <sup>th</sup> Ave
24. Second Chance	NW 19 <sup>th</sup> & 2 <sup>nd</sup> Ave
25. Todd C. Prosser	SE 12 <sup>th</sup> St & 11 <sup>th</sup> Ave
26. Toms Park	2300 N Magnolia Ave
27. Preserve at Pine Oaks	2201 NW 21 <sup>st</sup> St
28. Thompsons Bowl	900 Block SW 9 <sup>th</sup> Ave
29. Turnipseed Park	SE 7 <sup>th</sup> St & 13 <sup>th</sup> Ave
30. Tusawilla Park	300 – 899 NE Sanchez Ave
31. Walker Park	SE 7 <sup>th</sup> & SE 17 <sup>th</sup> Ave
32. Wyomina Park	NE 10 <sup>th</sup> St & 11 <sup>th</sup> Ave

#### 4.4.3 Signalized Intersections

The City of Ocala owns and maintains 126 signalized intersections. All City signalized intersections elements will be evaluated for compliance with PROWAG, including the pedestrian street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

A map of the signalized intersections to be evaluated are included in **Appendix F-1**.

#### 4.4.4 Sidewalk Corridors

Based on an existing sidewalk inventory developed by the City, the City of Ocala maintains approximately 224 miles of sidewalk corridors, including pedestrian street and driveway crossings. There are approximately 1,472 unsignalized intersections along the City-maintained sidewalk corridors.

All City-maintained pedestrian paths of travel along the sidewalk corridors will be evaluated for compliance with PROWAG, including sidewalk, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at cross street. At intersections where existing sidewalk does not cross the curb and curb ramps are not installed, no evaluations are needed. Locations where curb ramps are missing, but are required, will also be identified and included in the Transition Plan.

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 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.”

A map of the sidewalk corridors to be evaluated is included in **Appendix F-2**.

#### 4.4.6 Transit Stops

The City of Ocala maintains 278 Sun Tran transit stops. An additional 78 Sun Tran stops outside the City limits are maintained by Marion County and are not the responsibility of the City of Ocala. The City-maintained transit stops will be evaluated for compliance with PROWAG based upon the conditions and measurements at the stops and within each shelter.

A copy of the Interlocal Agreement between City of Ocala and Marion County is provided in **Appendix G**. A map of the transit stops to be evaluated are included in **Appendix F-3**.

### 4.5 Self-Evaluation Action Plan

The second step in completing a Self-Evaluation is developing an Action Plan to evaluate all existing buildings, parks, signalized intersections, sidewalk corridors, unsignalized intersections along the sidewalk corridor path of travel (including cross streets and driveways), and transit stops based on the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and the most recent version of PROWAG. This Action Plan should include the identification of evaluation criteria, the development of evaluation methodology and reporting output, and a schedule to complete the evaluations. Best practices for each of these items are detailed in the following sections. Once an Action Plan has been developed, the existing facility Self-Evaluations should be started.

#### ***Evaluation Criteria***

For each facility type, the following elements should be evaluated for consistency with 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, PROWAG, and the 2009 MUTCD, where incorporated into PROWAG by reference.

### ***Evaluation Methodology***

Several technologies are currently available to aid in the data collection process. At a minimum, it is recommended that the equipment used to collect the data be consistent with the evaluation criteria measurement accuracy provided in the applicable standards. For example:

#### Facilities

- Slopes to the nearest tenth of a percent
- Dimensions (counter top heights, maneuvering spaces, clearance, etc.) to the nearest inch
- Vertical discontinuities to ¼ inch
- Force required to open doors to the nearest pound

#### Public Rights-of-Way

- Slopes to the nearest tenth of a percent
- Sidewalk, curb ramp, and crosswalk dimensions to the nearest inch
- Cross street widths, driveway widths, and sidewalk segment lengths to the nearest foot
- Vertical discontinuities to ¼ inch
- Push button location dimension to the nearest inch

The data collection process should allow for isolating the measurements for each element listed in the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, PROWAG, and the 2009 MUTCD. Field data output should be available in GIS shapefile format with geospatially referenced photos of evaluated elements.

### ***Reporting Capabilities***

When selecting a technology to aid with data collection, the City should take into consideration whether a reporting system has been developed to process the raw data. For the data to be readily usable by the City for developing their ADA Transition Plan, the reporting system should provide the following output:

- Compliance status of each element evaluated based on the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG;
- Possible solutions to remove any barriers and bring the element into compliance;
- Estimated cost of possible solutions; and
- Prioritization of the individual facility, independent of other locations of the same facility type.

The City should also establish a working database that will allow staff to track and monitor progress as projects are implemented and barriers are removed. The database should also allow staff to report progress by facility type on a periodic basis, which could be used in support of any mobility related performance metrics.

The progress monitoring database should incorporate existing City programs currently in place to implement ADA improvements, including:

- Bringing required elements into ADA compliance during road reconstructions and widenings;
- Bringing required elements into ADA compliance as new developments are constructed;
- Reviewing design plans for all new facilities to ensure ADA required elements are included and designed to meet the ADA standards; and
- Inspecting all new construction to ensure facilities were built per the design plans.



There is not a one size fits all solution to progress monitoring and the City should make a citywide collaborative effort to understand what existing City project information needs to be integrated with the ADA Self-Evaluation reporting data, or vice versa, to make the progress monitoring useable by City staff in maintaining the City's ADA Transition Plan.

### ***Phased Self-Evaluation Approach***

The deadline set by DOJ to have program accessibility was January 26, 1992 and the deadline set by DOJ to have a ADA Transition Plan completed, including the Self-Evaluations, was July 26, 1992. Therefore, the Self-Evaluation of existing facilities should be completed as soon as practical. The DOJ does not have any requirements or guidelines on how to prioritize which facilities should be evaluated first if the City plans to phase the data collection over time. Ultimately, all facilities must be evaluated for an agency's ADA Transition Plan to be complete.

However, minimizing risk for litigation and risk for pedestrians should be the goal when determining the order in which to evaluate facilities. Several factors can increase risk at a location, including:

- **Number of existing complaints** – Locations with complaints identified by the public as problem areas should be evaluated as soon as possible to determine if the complaints are valid.
- **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, and churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.
- **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.
- **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design reason for the crashes.
- **Age of facility** – Facilities constructed after July 26, 1991 are a higher risk than those constructed before the 1991 Standards for Accessible Design were published since they were constructed out of compliance.
- **Roadway functional classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian actuations at signalized intersections.
- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant and the accessible route must be maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.

- **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if an issue exists and the City does not respond and/or does not make any improvements.

Other factors to consider include:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council districts might be more well-received by the public, assuming all the risk factors above are equal.
- **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of your high-risk areas. If the sidewalks evaluated are determined to be mostly compliant and the curb ramps evaluated are determined to be mostly non-compliant, the City may want to consider including a higher percentage of curb ramps during the next phase of evaluations.

**Upcoming Capital Improvement Projects (CIP)** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction should be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The final step is to execute the Self-Evaluation Action Plan. The Action Plan may be modified as needed during and in between Self-Evaluation phases to account for lessons learned or budget changes.

## 4.6 Schedule and Implementation Methods

It is acceptable for the City to phase the Self-Evaluation over several fiscal years; however, the DOJ and FHWA will not consider the initiative to be complete until all evaluations have been completed. The City should determine and document in the Transition Plan the anticipated number of years required to complete the Self-Evaluation of City programs, services, activities, and facilities identified in **Section 4.2 Program, Services, and Activities Inventory** and **Section 4.4 Existing Facility Inventory**.

After the Self-Evaluation is complete, possible solutions have been identified, and cost estimates have been determined for each improvement, an implementation plan can be developed. Depending on the estimated cost of improvements, a typical implementation plan for an entity the size of the City of Ocala can range from 10 to 15 years. However, the deadline set by DOJ to implement all improvements identified in the Transition Plan was January 26, 1995 so the improvement of existing facilities should be completed as soon as practical. The implementation plan needs to show both a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. The implementation plan should also include prioritization information, planning, and investments directed at eliminating other identified barriers over time.

To aid in the development of the implementation plan, prioritization information should be provided for each facility with identified compliance issues. **Table 5, Table 6, Table 7, and Table 8** provide proposed prioritization criteria for buildings/parks, intersections (both signalized and unsignalized), sidewalk corridors, and transit stops. All compliance elements included in the prioritization schedule are based on requirements from the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG. While every effort will be made to design and implement improvements to be consistent with the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG, the City will provide access to the

maximum extent feasible where full compliance is technically infeasible. The priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., dangerous condition) and then second based on the barrier's proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data is recommended to be collected during the Self-Evaluation, all data needed for prioritization should already be contained in the database with the exception of known complaints and proximity to pedestrian attractors. To streamline the prioritization of each facility, the proximity to pedestrian attractors should be collected when the elements contained within the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG are evaluated.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, cross streets, and driveways. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together. However, for project design and costing purposes, the possible solutions for cross streets are more appropriately reported with the rest of the intersection improvements.

It should also be noted that sidewalks are not required by the ADA, but if they are installed, sidewalks must be compliant. Therefore, missing sidewalk segments are given a low priority.

To determine the priority for each facility, the raw data should be compared to the criteria in **Table 5**, **Table 6**, **Table 7**, and **Table 8**. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process should be repeated until a priority has been assigned to all facilities.

*[Remainder of page intentionally left blank]*

**Table 5. Prioritization Factors for Buildings/Parks**

Priority	Criteria
<b>1 (high)</b>	Complaint known or imminent danger present
<b>2 (high)</b>	<ul style="list-style-type: none"> <li>Element is more than twice the allowable requirement. No known complaint.</li> <li>AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.</li> </ul>
<b>3 (high)</b>	<ul style="list-style-type: none"> <li>Element is more than twice the allowable requirement. No known complaint.</li> <li>AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.</li> </ul>
<b>4 (high)</b>	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
<b>5 (medium)</b>	Issues with access to goods and services (DOJ level 2) – severely out of compliance
<b>6 (medium)</b>	Issues with: <ul style="list-style-type: none"> <li>Access to goods and services (DOJ level 2) – moderately out of compliance;</li> <li>Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR</li> <li>Restrooms (DOJ level 3) – severely out of compliance</li> </ul>
<b>7 (medium)</b>	Issues with: <ul style="list-style-type: none"> <li>Access to goods and services (DOJ level 2) – minimally out of compliance;</li> <li>Restrooms (DOJ level 3) – moderately out of compliance; OR</li> <li>Drinking fountains or public phones (DOJ level 4 &amp; 5) – severely out of compliance</li> </ul>
<b>8 (medium)</b>	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
<b>9 (low)</b>	Issues with restrooms (DOJ level 3) – minimally out of compliance
<b>10 (low)</b>	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
<b>11 (low)</b>	<ul style="list-style-type: none"> <li>Client is a Title II agency; AND</li> <li>Elements out of compliance but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability</li> </ul>
<b>12 (low)</b>	Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered

**Table 6. Prioritization Factors for Signalized and Unsignalized Intersections**

Priority	Criteria
<b>1 (high)</b>	Complaint filed on curb ramp or intersection or known accident/injury at site
<b>2 (high)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Running slope &gt; 12%</li> <li>• Cross slope &gt; 7%</li> <li>• Obstruction to or in the curb ramp or landing</li> <li>• Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>• No detectable warnings</li> </ul> AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>3 (high)</b>	<ul style="list-style-type: none"> <li>• No curb ramp where sidewalk or pedestrian path exists</li> </ul> AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>4 (high)</b>	No curb ramps but striped crosswalk exists
<b>5 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Running slope &gt; 12%</li> <li>• Cross slope &gt; 7%</li> <li>• Obstruction to or in the curb ramp or landing</li> <li>• Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>• No detectable warnings</li> </ul> AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>6 (medium)</b>	<ul style="list-style-type: none"> <li>• No curb ramp where sidewalk or pedestrian path exists</li> </ul> AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>7 (medium)</b>	One curb ramp per corner and another is needed to serve the other crossing direction
<b>8 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Cross slope &gt; 5%</li> <li>• Width &lt; 36 inches</li> <li>• Median/island crossings that are inaccessible</li> </ul>
<b>9 (low)</b>	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space
<b>10 (low)</b>	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
<b>11 (low)</b>	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
<b>12 (low)</b>	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
<b>13 (low)</b>	All other intersections not prioritized above

Table 7. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) has excessive vertical discontinuities or gaps	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	
Railroad crossing has excessive sidewalk vertical discontinuity	Elevation change greater than 1/4 inch or gaps greater than 1 inch)		
Railroad crossing pre-fabricated plate is plastic or does not exist	Yes – Plastic or No		
Railroad crossing flangeway gap is greater than 3 inches (freight) or 2.5 inches (non-freight)	Value > 3.0" (freight) Value > 2.5" (non-freight)		
Railroad crossing is missing detectable warning surface(s)	Value > 2.5"		

**Table 8. Prioritization Factors for Transit Stops**

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> <li>▪ No connection from transit stop to adjacent sidewalk</li> <li>▪ Transitions at connections between the boarding area, transit stop sidewalk, and/or sidewalk network is greater than 0.25"</li> <li>▪ Heaving/sinking/cracking in the boarding area, transit stop sidewalk, or sidewalk network that connects to the transit stop with level changes greater than 0.25", or gaps over 0.5"</li> <li>▪ Boarding area does not exist</li> </ul>
2	<ul style="list-style-type: none"> <li>▪ Boarding area length less than 48"</li> <li>▪ Boarding area width less than 36"</li> <li>▪ Boarding area running slope exceeds 5%</li> <li>▪ Permanent obstruction (&gt;0.25") in boarding area, transit stop sidewalk, or sidewalk network</li> <li>▪ Transition at connection to the curb is greater than 0.25"</li> <li>▪ Clear space width under shelter or adjacent to a stand-alone bench is less than 30"</li> </ul>
3	<ul style="list-style-type: none"> <li>▪ Sidewalk network or transit stop sidewalk cross slope is over 3.5%</li> <li>▪ No clear space adjacent to bench under shelter</li> <li>▪ Clear space cross slope under shelter or adjacent to a stand-alone bench is greater than 3.5%</li> <li>▪ Clear space running slope under shelter or adjacent to a stand-alone bench is greater than 3.5%; Clear space length under shelter or adjacent to a stand-alone bench is less than 42"</li> <li>▪ Shelter opening clear width is less than 30"</li> </ul>
4	<ul style="list-style-type: none"> <li>▪ Boarding area length is 48" – 76.9"</li> <li>▪ Boarding area width is 36" – 47.9"</li> <li>▪ Boarding area running slope is 3.1% - 5%</li> <li>▪ Ponding in the boarding area, transit stop sidewalk, or sidewalk network</li> <li>▪ Temporary obstruction (&gt;0.25") in boarding area, transit stop sidewalk, or sidewalk network</li> <li>▪ Sidewalk network connecting to the transit stop is 46.1" – 47.9" wide</li> <li>▪ Sidewalk network cross slope is between 2.1% to 3.5%</li> <li>▪ No transit stop signage</li> <li>▪ Non-compliant transit stop signage</li> <li>▪ No clear space adjacent to stand-alone bench</li> <li>▪ Clear space cross slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5%</li> <li>▪ Clear space running slope under shelter or adjacent to a stand-alone bench is 2.1% - 3.5%</li> <li>▪ Clear space length under shelter or adjacent to a stand-alone bench is 42" – 45.9"</li> <li>▪ Shelter opening clear width is between 30" and 32"</li> </ul>
5 (low)	<ul style="list-style-type: none"> <li>▪ Boarding area length is 72" - 95.9"</li> <li>▪ Boarding area width is 48" - 59.9"</li> <li>▪ Boarding area running slope is 2.1% - 4.9%</li> <li>▪ Clear space length under shelter or adjacent to a stand-alone bench is 46" – 47.9"</li> </ul>

#### 4.7 Action Log

As the evaluations are completed, the City will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and documenting City efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated on an annual basis and should be available to the public upon request. An example ADA Action Log is provided in **Appendix H**.



## 5.0 Funding Opportunities

---

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

### 5.1 Federal and State Funding

**Table 9** depicts the various types of federal and state funding available for the City to apply for funding for various improvements. The following agencies and funding options are represented in the table.

- BUILD – Better Utilizing Investments to Leverage Development Transportation Discretionary Grants
- INFRA – Infrastructure for Rebuilding America Discretionary Grant Program
- TIFIA – Transportation Infrastructure Finance and Innovation Act (loans)
- FTA – Federal Transit Administration Capital Funds
- ATI – Associated Transit Improvement (1% set-aside of FTA)
- CMAQ – Congestion Mitigation and Air Quality Improvement Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- TA – Transportation Alternatives Set-Aside (formerly Transportation Alternatives Program)
- RTP – Recreational Trails Program
- SRTS – Safe Routes to School Program / Activities
- PLAN – Statewide Planning and Research (SPR) or Metropolitan Planning funds
- NHTSA 405 – National Priority Safety Programs (Nonmotorized safety)
- FLTTP – Federal Lands and Tribal Transportation Programs (Federal Lands Access Program, Federal Lands Transportation Program, Tribal Transportation Program, Nationally Significant Federal Lands and Tribal Projects)

Most of these programs are competitive type grants; therefore, the City of Ocala is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.

**Table 9. Funding Opportunities**

ACTIVITY	BUILD	INFRA	TIFIA	FTA	ATI	CMAQ	HSIP	NHPP	STBG	TA	RTP	SRTS	PLAN	NHTS	FLTP
Access enhancements to public transportation	X	X	X	X	X	X		X	X	X					X
ADA/504 Self-Evaluation / Transition Plan									X	X	X		X		X
Bus shelters and benches	X	X	X	X	X	X		X	X	X					X
Coordinator positions (state or local)						X			X	X		X			
Crosswalks (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Curb cut and ramps	X	X	X	X	X	X	X	X	X	X	X	X			X
Paved shoulders for pedestrian use	X	X	X			X	X	X	X	X		X			X
Pedestrian plans				X					X	X		X	X		X
Recreational trails	X	X	X						X	X	X				X
Shared use paths / transportation trails	X	X	X	X	X	X	X	X	X	X	X	X			X
Sidewalk (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Signs / signals / signal improvements	X	X	X	X	X	X	X	X	X	X		X			X
Signed pedestrian routes	X	X	X	X	X	X		X	X	X		X			X
Spot improvement programs	X	X	X	X			X	X	X	X	X	X			X
Stormwater impacts related to pedestrian projects	X	X	X	X	X		X	X	X	X	X	X			X
Trail bridges	X	X	X			X	X	X	X	X	X	X			X
Trail / highway intersections	X	X	X			X	X	X	X	X	X	X			X
Trailside and trailhead facilities	X	X	X						X	X	X				X
Training						X	X		X	X	X	X	X	X	
Tunnels / undercrossings for pedestrians	X	X	X	X	X	X	X	X	X	X	X	X			X

Adapted from FHWA Pedestrian and Bicycle Funding Opportunities, Revised August 9, 2018:  
[https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/funding/funding\\_opportunities.cfm](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm)

## 5.2 Local Funding

There are several local funding options for the City to consider, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Transportation Reinvestment Zone
- Transportation User Fee / Street Maintenance Fee

## 5.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

*[Page intentionally left blank]*

## 6.0 Next Steps

---

This document serves as the ADA Transition Plan for the City of Ocala. The City intends to complete the Self-Evaluation of programs, services, activities, and facilities identified in this document over the next five (5) years, with an approximated \$200,000 annual budget.

The next steps for the City of Ocala are:

1. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and facilities.
2. Complete a Self-Evaluation for all City programs, services, activities, and facilities. Facility evaluations should also include the following:
  - a. Facility reports with the compliance status of each element evaluated based on the 2010 ADA Standards, Title 24 of the 2012 Florida Accessibility Code for Building Construction, and PROWAG;
  - b. Possible solutions to remove any barriers and bring the element into compliance;
  - c. Estimated costs of possible solutions; and
  - d. Prioritization of the individual facility, independent of other locations of the same facility type.
3. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.
4. If a phased Self-Evaluation approach is used, complete remaining Self-Evaluation phases and update the City's ADA Transition Plan after each additional phase.
5. Continue to update the City's ADA Transition Plan as projects are implemented and citizen requests/complaints are received.
6. Determine the best approach for receiving public input on the ADA Transition Plan.

*[Page intentionally left blank]*

## Appendix

---

### Appendix A: Grievance Procedure

A-1: City of Ocala Title II Grievance Procedure

A-2: City of Ocala Title II Grievance Form

### Appendix B: Notice Under the Americans with Disabilities Act

B-1: Current City of Ocala Notice Under the ADA

B-2: Revised City of Ocala Notice Under the ADA

### Appendix C: City of Ocala Documents, Forms, and Videos

### Appendix D: Federal Highway Administration ADA Transition Plan Process Memo

### Appendix E: City of Ocala 2015 ADA Transition Plan

E-1: Facility Evaluation Checklist

E-2: 2015 ADA Transition Plan

### Appendix F: Facility Maps

F-1: Signalized Intersections

F-2: Sidewalk Corridors

F-3: Transit Stops

### Appendix G: Interlocal Agreement between City of Ocala and Marion County

### Appendix H: Sample Action Log