

City of Oshkosh

Americans with Disabilities Act

**Transition Plan for Public Buildings and
Facilities**

February 2022



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Introduction and Executive Summary

ADA Transition Plan

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination against individuals on the basis of disability. ADA consists of five titles outlining protections in the following areas:

1. Employment
2. State and local government services
3. Public accommodations
4. Telecommunications
5. Miscellaneous provisions

Title II of ADA pertains to the programs, activities and services public entities provide. As a public entity that employs 50 or more persons, the City of Oshkosh must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA provides that, “...no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” ([42 USC. Sec. 12132; 28 CFR. Sec. 35.130](#))

As required by Title II of [ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150](#), the City of Oshkosh has conducted a self-evaluation of its public buildings and facilities throughout the City and is developing a Transition Plan detailing how the organization will ensure that those facilities are accessible to all individuals.

The Transition Plan and its implementation is overseen by the City’s General Services Division and are specific to the maintenance, construction, and rehabilitation of public buildings and facilities under its jurisdiction. The other areas of protection under ADA that are under the auspices of other city departments or government agencies will coordinate as necessary with the General Services Division to achieve compliance. Interagency coordination will be outlined in the improvement schedule of the Transition Plan.

Self-Evaluation

A key activity in developing the Plan is for the City to perform a self-evaluation of its current building and facility infrastructure, policies, practices and programs. The City partnered with the SRF Consulting Group team to develop a scope of work to collect a physical inventory of each element of building and facility infrastructure with public access. This inventory was collected over the course of six days in July and August of 2021. A database, photo, set, and cost estimated document was included as part of the final report. Our inventory includes those features that are accessible to the public and their respective entry and access points.

The self-evaluation inventories barriers in programs and activities that prevent persons with disabilities from reasonable access. Evaluation of parks and public buildings and facilities occurred in the Summer of 2021. Other infrastructure elements, like public right-of-way will be incorporated into stand-alone documents or in future updates to this one. The City’s Consultant, SRF Consulting Group (SRF), worked with City staff to provide professional services in completing the self-evaluation process. This consists of a field review of infrastructure and facilities alongside a review of policies and programs.

Evaluation Content

Table 1 shows an inventory of the facilities that were reviewed for ADA compliance, and Figure 1 shows what elements and accessible features were documented. For each facility compliance and accessibility issues were identified by the review team, and divided into the following categories based on input from City staff and industry best practices on how to prioritize projects:

- Approaches and Entrances to Facilities
- Low-Effort Modifications (typically completed by maintenance staff, or in day-to-day operations)
- Other Items

Table 1. Facility Inventory

Public Buildings	<ul style="list-style-type: none"> • Convention Center • Public Library • Safety Building • City Hall • Fire Department - Station 18 • Public Museum • Grand Oshkosh Opera House • Senior Center - North • Senior Center - South
Transit Facilities	<ul style="list-style-type: none"> • GO Transit • OshBuy Garage

<p>Parks, Boat Launches, Fishing Piers</p>	<ul style="list-style-type: none"> • 24th Ave Boat Launch • 44th Parallel Park • Abbey Park • Abe Rochlin Park • Al Broullire Memorial Park • Bauman Park • Boat Works • Camp Bragg Memorial • Carl Steiger Park • Congress Ave Tot Lot • Fugleberg Park • Garden Club Park • Lakeshore Golf Course Trail • Leach Amphitheatre • Mary Jewell Park 	<ul style="list-style-type: none"> • Menominee Park • Mill Ave Boat • Rainbow Memorial Park • Red Arrow Park • Riverside Cemetery • Roe Park • South Park • Spanbauer Park • Stevens Park • Stoegbauer Park • Teichmiller Park • West Algoma Park • Westhaven Park • William A Steiger • William Waters Plaza
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Figure 1. Accessible Features Reviewed by Consultant Team

Approach and Entrance	Access to Goods and Services	Restrooms	Other Access Features
<ul style="list-style-type: none"> • Parking • Access Route • Curb Ramps • Ramps • Entrances 	<ul style="list-style-type: none"> • Interior Accessible Routes • Ramps • Elevators • Lifts • Signs • Interior Doors • Rooms and Spaces • Controls • Seating • Service Counters 	<ul style="list-style-type: none"> • Accessible Routes • Signage • Entrances • Spaces • Sinks • Towel, Tissue, Soap Dispensers • Toilet Stalls 	<ul style="list-style-type: none"> • Drinking Fountains • Team Sports • Play Areas • Changing Rooms • Swimming Pools • Fishing and Boating Access • Other Misc. Features

The consultant team also worked with City staff to evaluate current policies related to accessibility and make recommendations on how it relates to plan content project prioritization.

- Compliant/Grievance Procedure
- Listing in Capital Improvement Program

The self-evaluation provides an inventory of ADA compliance gaps and allow the City to catalog and prioritize future improvements. Programs and facilities are inventoried in a database that will be delivered to the City for continuous monitoring and updates.

Public right-of-way in the City will be inventoried at a future date and includes roadways and their adjacent facilities that serve a transportation purpose. This includes sidewalks, curb ramps, and signals that provide a transportation route.

Plan Elements

The plan document is developed based on the outcome of the self-evaluation. In addition to the compliance assessment and progress report that the self-evaluation provides, several core elements will be incorporated into the Plan for both public parks and public buildings and facilities.

Designating an ADA Coordinator

The City has identified a coordinator to oversee ADA policies and procedures and serve as the primary point of contact for ADA related issues. Contact information is located in Appendix A.

Grievance Procedure

If users of City facilities and services believe the City has not provided reasonable accommodation, they have the right to file a grievance. A procedure for the prompt and equitable resolution of citizen complaints, concerns, comments, and other grievances is included in the Plan.

Monitoring

The Plan will be updated at least every 5 years, as policies within the City evolve, projects are completed, and development continues.

Design Standards

All applicable design standards related to ADA are included in the Plan appendices.

Schedule and Budget

A projected schedule with defined milestones to achieve reasonable compliance is included in the Plan. Additionally, the City's Capital Improvement Plan (CIP) is updated annually and will include budgetary estimates for anticipated projects, which may include ADA-related projects.

External Agency Coordination

Several other agencies are responsible for pedestrian facilities, such as pedestrian curb ramps, sidewalks and trails within the jurisdiction of the City. The City will coordinate with those agencies to track and assist in the elimination of accessibility barriers along their routes. ADA contacts and interagency agreements may be provided for City, County, and State authorities that are responsible for these facilities in the City of Oshkosh.

Project Timeline

The complete Transition Plan document includes the following:

- Evaluation of existing parks.
- Evaluation of existing public buildings and facilities.
- Final establishment of a working ADA Transition Plan Document.

This project was be completed prior to the end of calendar year 2021. An outline of project processes and schedule is shown in Figure 2.

Figure 2. ADA Transition Plan Process

Cost Estimates

Based on the results of the self-evaluation, the estimated costs associated with providing ADA accessibility within the entire jurisdiction including parks, public buildings, and facilities is \$1,208,000 to \$1,589,000 with contingency. The maximum potential cost of park and public building and facility improvements were used for estimating purposes. This amount assumes project cost estimates depicted in Tables 2 and 3 are applied as stand-alone projects. The City will likely benefit from economies of scale when larger building and facility reconstructions occur.

The City will continue to incorporate ADA best practices and standards with CIP projects and as part of stand-alone projects.

Table 2. Public Building Cost Estimate Summary

City of Oshkosh, WI					
Americans with Disabilities Act - Facility Audit					
Cost Estimate of all Public Buildings					Updated December 2021
Facility	Subtotal 1: Approaches & Entrances	Subtotal 2: Minor Corrections	Subtotal 3: Remaining Items	Total Cost of Improvements	With 30% Contingency
Oshkosh Convention Center	\$96,500	\$7,450	\$145,700	\$249,650	\$325,000
Oshkosh Public Library	\$26,600	\$900	\$9,500	\$37,000	\$49,000
Oshkosh Safety Building	\$15,000	\$1,100	\$24,600	\$40,700	\$53,000
Oshkosh City Hall	\$41,500	\$1,400	\$31,500	\$74,400	\$97,000
Oshkosh Fire Department - Station 18	\$6,600	\$700	\$5,500	\$12,800	\$17,000
Oshkosh Public Museum	\$13,800	\$600	\$29,500	\$43,900	\$58,000
The Grand Oshkosh Opera House	\$42,800	\$2,400	\$39,100	\$84,300	\$110,000
Oshkosh Seniors Center - North	\$29,500	\$1,400	\$31,600	\$62,500	\$82,000
Oshkosh Seniors Center - South	\$26,700	\$2,800	\$22,200	\$51,700	\$68,000
Oshkosh Transit Center	\$21,400	\$0	\$0	\$21,400	\$28,000
GO Transit	\$15,500	\$0	\$0	\$15,500	\$21,000
OshBuy Garage	\$10,500	\$0	\$0	\$10,500	\$14,000
City Building Total	\$347,000	\$19,000	\$340,000	\$705,000	\$922,000

Table 3. Park and Park Facilities Cost Estimate Summary

City of Oshkosh, WI					
Americans with Disabilities Act - Facility Audit					
Cost Estimate of all Public Parks					Updated December 2021
Facility	Subtotal 1: Approaches & Entrances	Subtotal 2: Minor Corrections	Subtotal 3: Remaining Items	Total Cost of Improvements	With 30% Contingency
24th Ave Boat Launch	\$5,500	\$1,100	\$7,500	\$14,100	\$19,000
44th Parallel Park	\$7,000	\$100	\$0	\$7,100	\$10,000
Abbey Park	\$2,000	\$200	\$1,500	\$3,700	\$5,000
Abe Rochlin Park	\$10,000	\$1,900	\$5,900	\$17,800	\$24,000
Al Broullire Park	\$10,000	\$0	\$0	\$10,000	\$13,000
Bauman Park	\$3,000	\$200	\$500	\$3,700	\$5,000
BoatWorks	\$6,500	\$1,600	\$5,000	\$13,100	\$18,000
Camp Bragg Memorial	\$6,000	\$0	\$0	\$6,000	\$8,000
Carl Steiger Park	\$2,000	\$200	\$0	\$2,200	\$3,000
Congress Ave Tot Lot	\$0	\$0	\$0	\$0	\$0
Fugleberg Park	\$0	\$1,500	\$9,300	\$10,800	\$15,000
Garden Club Park	\$5,000	\$0	\$0	\$5,000	\$7,000
Lakeshore Golf Course Trail	\$500	\$0	\$0	\$500	\$1,000
Leach Amphitheater	\$9,500	\$1,600	\$11,500	\$22,600	\$30,000
Mary Jewell Park	\$2,000	\$300	\$2,500	\$4,800	\$7,000
Menominee Park	\$105,400	\$2,400	\$42,900	\$150,700	\$196,000
Mill Street Boat Launch	\$1,000	\$0	\$0	\$1,000	\$2,000
Rainbow Memorial Park	\$40,000	\$1,500	\$12,900	\$54,400	\$71,000
Red Arrow Park	\$19,500	\$1,900	\$32,000	\$53,400	\$70,000
Riverside Cemetery	\$14,000	\$600	\$13,700	\$28,300	\$37,000
Roe Park	\$0	\$0	\$3,500	\$3,500	\$5,000
South Park	\$10,000	\$0	\$4,700	\$14,700	\$20,000
Spanbauer Park	\$2,800	\$900	\$3,000	\$6,700	\$9,000
Stevens Park	\$17,000	\$1,500	\$11,100	\$29,600	\$39,000
Stoegbauer Park	\$1,000	\$0	\$500	\$1,500	\$2,000
Teichmiller Park	\$8,000	\$1,700	\$8,500	\$18,200	\$24,000
West Algoma Park	\$1,000	\$700	\$0	\$1,700	\$3,000
Westhaven Park	\$2,000	\$500	\$11,000	\$13,500	\$18,000
William A Steiger Park	\$4,000	\$200	\$0	\$4,200	\$6,000
William Waters Plaza	\$0	\$0	\$0	\$0	\$0
City Park Total	\$295,000	\$21,000	\$188,000	\$503,000	\$667,000

Summary Notes

Based on the consultant team review, the City of Oshkosh performs well in its ADA compliance efforts. There have been numerous incorporations of accessible design into its building plans and improvements. There is evidence that designers have kept up with changes to accessibility standards and the City of Oshkosh has a great deal of flexibility with how they would like to move forward with improvements.

ADA Transition Plan

ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations: the [Architectural Barriers Acts of 1968](#) and [Section 504 of the Rehabilitation Act](#) of 1973.

The Architectural Barriers Act of 1968 is a federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a Federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any federal department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

Agency Requirements

Under Title II, the City must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities (28 C.F.R. Sec. 35.150).
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability (28 C.F.R. Sec. 35.130 (a)).
- Must make reasonable modifications in policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result (28 C.F.R. Sec. 35.130(b) (7)).
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective (28 C.F.R. Sec. 35.130(b)(iv) & (d)).
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others (29 C.F.R. Sec. 35.160(a)).
- Must designate at least one responsible employee to coordinate ADA compliance [28 CFR Sec. 35.107(a)]. This person is often referred to as the "ADA Coordinator."

The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [28 CFR Sec. 35.107(a)].

- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 CFR Sec. 35.106]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [28 CFR Sec. 104.8(a)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 CFR Sec. 35.107(b)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

This document has been created to specifically cover accessibility within parks, public buildings and facilities and does not include information on the City of Oshkosh programs and practices not related to parks, public buildings, and facilities.

Parks, Public Buildings, and Facilities

Parks, public buildings and facilities in the City include shelters, warming houses, play areas, built public structures that house the City's public services and the City's Pedestrian Access Routes (PAR) to include parking lots, sidewalks, and curb ramps that approach these locations.

The accessibility evaluation consisted of the following categories (when applicable):

- **Approach and Entrance:** Parking, Access, Routes, Curb Ramps, Ramps, Entrance
- **Access to Goods and Services:** Interior Accessible Route, Ramps, Elevators, Lifts, Signs, Interior Doors, Seating Benches, Service Counters
- **Toilet Rooms:** Accessible Routes, Signs, Entrance, Space, Sinks, Soap and Towels, Toilets, Stalls
- **Additional Access:** Drinking Fountains, Phones, Fire Alarm
- **Additional Rooms:** Room Notes i.e. Kitchenettes, Conference Rooms, Etc.

A detailed evaluation on how these parks, public buildings and facilities relate to ADA standards is found in Appendix B and will be updated periodically. For the City's future reference, the ADA Checklist for Existing Facilities used to conduct the field review of public buildings and facilities is found in Appendix C.

Policies and Practices

Previous Practices

Since the adoption of the ADA, the City has strived to provide accessible pedestrian features as part of the City's capital improvement projects. As additional information was made available, as to the methods of providing accessible pedestrian features, the City updated their procedures to accommodate these methods.

Policy

The City's goal is to continue to provide accessible pedestrian design features as part of the City's capital improvement projects. The City has adopted ADA design standards and procedures as listed in Appendix C. These standards and procedures will be kept up to date with nationwide and local best management practices.

The City will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with facility priorities and as established in the CIP.

Requests for accessibility improvements can be submitted to the City's ADA Coordinator. Contact information for Title II ADA Coordinator is located in Appendix A.

Improvement Schedule

Types of Improvements

The following are typical improvements to public buildings that can be made to correct deficiencies in accessibility:

- Improvements to the access routes and curb ramps (rebuilding to correct steep slopes and surface characteristics) leading from parking and drop-off areas to buildings and bus loading areas.
- Providing accessible parking stalls in close proximity to entrances.
- Improvements to accessible parking stalls and aisles, and improvements to signage associated with accessible parking.
- Doorway and entryway improvements (where buildings and shelters are provided).
- Ensuring movement within restrooms and public spaces is wide enough for wheelchair access to all amenities.
- Replace in accessible amenities within restrooms like sinks, soap dispensers, toilet paper dispensers.
- Ensure drinking fountains are at an accessible height and are detectable by cane.

- Replace signage for versions that have Braille and contrasting characters. Ensure new signs are mounted at an appropriate height.
- Ensuring service counters and seating areas have accessibility for all users.

Cost estimates of these improvements are included in Appendix D.

Priority Areas

At a workshop with City staff held on September 21, 2021, some examples of project priorities were presented. A government agency can have some discretion as how it can prioritize accessibility improvements based on its community values. While some facility alterations necessitate the placement of an accessible feature, others can be phased in over time. There are a variety of ways that a community can prioritize its transition to ADA compliance. While eventually each item evaluated must be brought into compliance, there are common approaches to determining what to do first as a stand-alone project or as a capital improvement planning criteria. Some examples of how projects are prioritized are as follows:

Public Access Points

A sound policy is to prioritize initial access to facilities and buildings for community members that require accessible features. This strategy addresses building and facility entrances and access points, such as:

- Accessible parking
- Accessible pedestrian routes to main entrances
- Entry walkways
- Doorways
- Ramps

Low-Cost Improvements

It is common for a City to develop a stand-alone initiative for low-cost improvements such as signage, replacing door handles, dispensers, or sink knobs, parking lot striping, and other items that require little investment but could bring a building or facility closer to compliance. This may be the first step taken in an ADA Transition Plan in advance of higher cost improvements.

Schedule

Prioritizing and scheduling of work will be established by the City based on numerous factors, including, but not limited to, year of build/renovation, severity of non-compliance, barriers to program accessibility, feasibility of remedies, safety concerns, or level of public use. Prioritization will also be given to locations that would most likely not be updated by means of other City programs.

The availability of funding and future development trends in the City may affect how these projects are prioritized, and the timing of public building and facility improvements may affect progress toward the compliance goal.

The list below categorizes the City's Public Buildings and Facilities by the built prior and after 1991. Not all of these facilities have public access.

Built Prior to 1991

- Grand Opera House (1883)
- Public Library (1900)
- Public Museum - Carriage House (1908)
- Public Museum (1908 and 1982)
- City Hall (1915)
- Parks - Cemetery Chapel and Garage (1920)
- Public Works – Bowen St. Lift Station (1930)
- Public Works – Lakeview Lift Station (1930)
- Police - Equip. Storage Building A and B (1940)
- Police - Story Building A (1940)
- Public Works – Sanitation Division (1950)
- Sawyer Street Storage and Garage (1958)
- Public Works – Water Filtration Chemical Feed Station (1963)
- Transit – Bus and Electrical Garage (1968)
- Public Works – 28th Ave. Lift Station (1970)
- Public Works – Broad St. Lift Station (1970)
- Public Works – Main St. Lift Station (1970)
- Public Works – Northside Lift Station (1970)
- Fire Dept. Station #15 (1973)
- Police - Safety Building (1979)
- Parks - Cemetery Tool Shed (1980)
- Seniors Center North (1984)
- Convention Center and Hotel Ramp (1985)
- Public Works – Water Filtration Pump Station (1985)
- Fire Dept. Station #16 (1987)
- Seniors Center South (1990)
- Transit – Layover Station and Comfort Station (1990)

Built or Renovated after 1991

- Public Works – Water Distribution Center High Pressure Pump Station (1991)

- Public Works – Sludge Storage Building (1994)
- Public Works – Water Distribution Center (1995)
- Transit – Electrical Storage Building (1996)
- Fire Dept. Station and Garage #17 (1998)
- Fire Dept. Station and Garage #18 (1998)
- Police - Story Building C (1999)
- Fire Dept. Station #19 (1999)
- Fire Dept. Station #19 - Garage (1999)
- Public Works – Water Filtration Plant (1999)
- Public Works – Wastewater Treatment Plant (1970, 1996, 2004)
- Parks - Pollock Aquatic Center Building (2006)
- Parks - Pollock Equipment Building (2006)
- Public Works – Water Filtration Pumphouse (2009)
- Public Works – Stormwater Pump Station (2010)
- Fire Dept. Station #19 - Metal Garage (2011)
- Public Works – Hickory Lane Lift Station (2011)
- Public Works - Field Operations Facility (2015)
- Public Works – Water Filtration Garage (2016)
- Public Works - Field Operations Facility Salt Storage (2016)
- Public Works - Field Operations Facility Cold Storage (2016)
- Public Works – Snell West Lift Station (2017)
- Public Works – Eagle Street Lift Station (2018)

Methodology

The City can utilize two methods for improving pedestrian facilities within Public Buildings and Facilities.

1) Scheduled Facility Projects

This type of project would include complete renovations or alterations to a Public Building or Facilities and/or construction of a new Public Building or Facility. All pedestrian facilities impacted by these projects will be improved to meet, to the greatest extents possible, current ADA accessibility standards.

This type of project will trigger the 20% rule, which states when an “Area of Primary Function” (e.g. the offices in an office building, the dining room in a restaurant, the lobby in a bank, the retail area in a store, etc.) is renovated/alterd in an existing facility, the Path of Travel to that area must be brought up to Code. The Path of Travel to the area does not have to be renovated/alterd if the cost and scope of such alteration is disproportionate to 20% of the cost of the Area of Primary Function renovation/alteration.

<https://gontramarchitecture.com/accessibility-the-20-rule-explained/>

2) Standalone ADA Accessibility Improvement Projects

This type of project would include ADA accessibility issue-specific projects and may not include the entire renovation of a Public Building or Facility, typically thought of as maintenance. This also includes improvements to address grievances that are submitted to the City.

External Agency Coordination

External agencies responsible for pedestrian facilities within the jurisdiction of the City include WisDOT. The City will coordinate with those agencies to track and assist in the facilitation of eliminating accessibility barriers within the City. Additionally, this Plan supports the goals of other adopted documents that affect pedestrian facilities within the City, which includes specific cooperative agreements with WisDOT.

External Agency Plans may be found at the following links or made available by the City's ADA Coordinator:

WisDOT ADA Transition Plan, 2021

<https://wisconsin.gov/Pages/doing-bus/civil-rights/titlevi-ada/ADAcompliance.aspx>

ADA Coordinator

In accordance with 28 CFR 35.107(a), the City of Oshkosh has identified an ADA Title II Coordinator to oversee the City policies and procedures. Contact information for this individual is located in Appendix A.

Plan Access

The ADA Transition Plan for Parks, Public Buildings and Facilities will be posted on the City's website. A printed hard copy of the draft document is also available for review at City Hall: 215 Church Avenue, Oshkosh, WI 54903.

Further information on the Plan Access initiatives can be found within Appendix E.

Grievance Procedure

Under the ADA, each agency is required to publish its responsibilities regarding the ADA. A draft of this public notice is provided in Appendix F. If users of City facilities and services believe the City has not provided reasonable accommodation, they have the right to file a grievance.

To monitor the progress of compliance, the City, in accordance with 28 CFR 35.107(b), has established a grievance procedure for the prompt and equitable resolution of comments, concerns, or questions from the citizens of the City. The ADA grievance form is available online and at City Hall and can be returned to the ADA Coordinator. It may be used by anyone wishing to file a complaint, comment, or concern regarding discrimination based on disability. A sample of the Grievance Form can be found in Appendix F.

Monitor the Progress

This Plan will continue to be updated as conditions within the City evolve.