

**TIPTON COUNTY GOVERNMENT**  
**Americans With Disability Act (ADA) Self-Evaluation**



Honorable Jeff Huffman  
Tipton County Executive

by

Robert Beanblossom  
Tipton County ADA Coordinator

and

Donnie Wallace  
Technical Services

Covington, TN 38019  
9 December 2019 (rev 29 January 2020)

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# TIPTON COUNTY GOVERNMENT

## Americans With Disability Act (ADA) Self-Evaluation

### 1.0. Introduction

#### 1.1. Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity of access to County programs, services, and activities for qualified individuals with disabilities.<sup>1</sup> The ADA prohibits discrimination in access to jobs, government services, public transportation, public accommodations, and telecommunications in five titles within the ADA including:

Title I: Employment

Title II: State and Local Government

Title III: Public Accommodations and Commercial Facilities

Title IV: Telecommunications Relay Services

Title V: Miscellaneous Provisions

In practical terms, Title II is concerned with assuring accessibility by individuals with disabilities<sup>2</sup> to County operated programs, services, and activities. Under ADA guidelines and case law, a "Program," for instance can be a sidewalk or curb: it is any area where what the County does interacts with employees and/or the general public, either directly or indirectly. This survey, as mandated by Title II Part 34 Nondiscrimination on the Basis of Disability in State and Local Government Services and attendant regulations,<sup>3</sup> is specifically targeted to identify barriers to physical access and communications for qualified individuals in public spaces. A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; or the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or participation in programs or activities provided by Tipton County Government.<sup>4</sup> These rules do not require access for handicapped individuals above that available to non-handicapped individuals. Other sections of these rules allow specific exceptions to accommodations based upon feasibility, cost, and alternative solutions.<sup>5</sup>

The purpose of this document is to outline the steps Tipton County Government is taking to assure current and future conformity to ADA Title II: State and Local Government as part of an ongoing process to serve its citizens and visitors.

## 1.2. Purpose of the Self-Evaluation

According to the Department of Justice, more than 58 million Americans (about 19% of our population) have disabilities and they, like all Americans, participate in a variety of programs, services, and activities provided by their State and local governments. This includes many people who became disabled while serving in the military. By the year 2030, approximately 71.5 million baby boomers will be over age 65 and will need services and surroundings that meet their age-related physical needs. Some 12% of the Tipton County population under the age of 65 years reports having a disability according to Census data. Another 15% of the population is over 65 years of age.<sup>6</sup> Data shows that 50% of adults in this category have a disability.<sup>7</sup>

This Self-Evaluation is the first step in a deterministic process to identify and rectify existing barriers to handicapped individuals prohibiting or impeding access to county programs, services, and activities, as defined by Title II and associated regulations. It also includes a review of County new construction standards and the acquisition of existing structures. The Self-Evaluation will be evaluated and used by Tipton County Government to develop a Transition Plan including feasibility, prioritization, work to be done, and budget allocations to provide cost-effective remedies. In general, existing structures are not required to be updated solely for the purpose of meeting Title II requirements, but are required when facility (including parking areas) components that affect accessibility as defined in 28 CFR Part 36 are affected.

## 1.3 Self-Evaluation Plan Development Requirements and Process

Title II requires that the operation of each service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.<sup>8</sup> The intent is that no qualified individual with a disability will be excluded from participating in, or denied the benefits of, the services, programs, or activities provided by Tipton County because of a disability.<sup>9</sup>

Included in Title II are administrative requirements to:

1. Notify applicants, participants, beneficiaries, and other interested people of their rights and the public entity's obligations under Title II;<sup>10</sup>
2. Designate a responsible employee (ADA Coordinator) to coordinate its efforts to comply with and carry out the public entity's ADA responsibilities;<sup>11</sup>
3. Establish a grievance procedure for resolving complaints related to Title II;<sup>12</sup>
4. Conduct a self-evaluation:<sup>13</sup>
  - a. A self-evaluation is an assessment of the public entity's services, programs, and activities and the policies and practices that govern the administration of them. This can include laws, ordinances, regulations, and manuals.
  - b. The goal is to determine if the policies and practices adversely affect full participation of individuals with disabilities;

5. Develop a transition plan including any structural changes necessary to achieve accessibility;<sup>14</sup>

a. The Transition Plan will set forth the steps necessary to complete such changes must be developed.

b. The plan will, at a minimum:

i. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;

ii. Describe in detail the methods that will be used to make the facilities accessible; and,

iii. Specify the schedule for taking the steps necessary to achieve compliance with this section; and,

iv. If the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period.

## **2.0 Self-Evaluation Plan General Compliance Measures**

### **2.1. Notification**

Tipton County Government provides ongoing notification to applicants, participants, beneficiaries, and other interested people of their rights and the public entity's obligations under Title II through its website at <https://www.tiptonco.com> and via the county ADA Coordinator. See Appendix 6.1.

### **2.2. ADA Coordinator**

Tipton County Government has appointed Robert "Bob" Beanblossom as the county ADA Coordinator. The County ADA Coordinator is the designated contact person for internal and public questions, comments, and concerns. He is responsible to the County Executive to monitor Title II activities and concerns, and to bring both resolutions and corrective opportunities to his attention. He is responsible for monitoring the progress on implementation of the Transition Plan as initially adopted and amended.

His contact information is available on all forms and announcements as well as on the Tipton County website, <https://www.tiptonco.com>. Contact information is:

Bob Beanblossom  
Tipton County ADA  
103 E. Pleasant Ave.  
Covington, TN 38019

Phone 901 476-0219  
E-mail [rbeanblossom@tiptonco.com](mailto:rbeanblossom@tiptonco.com)

### 2.3. Public Involvement

Per 29 CFR 35.150(d)(3)(ii), Tipton County Government makes both ADA policy and activities available for the public to readily access and submit comments for both the Self-Evaluation and Transition Plans. The ADA Coordinator is the designated contact person for public questions, comments, and concerns. Instructions and forms are also available online and from the ADA Coordinator for the public to voice concerns about access issues or to submit formal complaints (see 2.7, below).

### 2.4 Communication Policy

Tipton County Government assures that Department Heads are aware of a variety of assistance available to them to communicate effectively with individuals with a variety of visual and hearing handicaps. Priority is given where possible to the choice of service requested by the handicapped individual or their designated helper. The Tipton County Government website at <https://www.tiptonco.com>. The notification to the Department Heads by the County Executive is reproduced in the Appendix 6.5.

These resources include, but are not limited to,

1. The free nationwide **Telecommunications Relay Service (TRS)**, reached by calling 7-1-1, uses communications assistants (also called CAs or relay operators) who serve as intermediaries between people who have hearing or speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant tells the telephone user what the other party is typing and types to tell the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities. Additional information is available at:  
<https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>.
2. **Video Relay Service (VRS)** is a free, subscriber-based service for people who use sign language and have videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying. More information is available at:  
<https://www.fcc.gov/consumers/guides/video-relay-services>.
3. For handicapped individuals whose primary language is not English, Department Heads are advised that another resource is available. It is a subscriber-based language translation telephone service (Avaza) is available at 615 534-3400. Information is available at [avaza.com](http://avaza.com).

### 2.5 Construction and Renovation Design Guidelines

It is the intent of Tipton County Government to incorporate current ADA guidelines into all new construction and renovation designs. Contract architects and engineers will be instructed to assure that their designs conform to ADA guidelines and best practice. The County ADA Coordinator will monitor the design process to assure that all parties have access to current

standards and best practices in an advisory context. Both designed and ad hoc renovations will be reviewed to assure that accessibility is improved rather than hampered wherever practicable. Specific applications will consider planned use, architectural feasibility, and cost and time factors of planned construction and renovations.

## 2.6 Procurement of Existing Facilities Guidelines

It is the intent of Tipton County Government that, when considering the procurement of existing facilities for County use, that the proposed use of that facility will be weighed against current applicable ADA guidelines. Post-procurement renovations will include, if necessary, bringing the facility into conformance for the intended use. The County understands and operates under a variety of constraints that may limit actual improvements to an extended timeframe.

## 2.7 Request for Accommodation and Complaint Procedure

Tipton County Government has developed a procedure to allow individuals with disabilities or their representatives to request accommodations or removal of barriers, and to lodge formal grievances alleging any act prohibited by Title II and associated laws and regulations. The procedures are provided on a handout available from the ADA Coordinator or the Tipton County website at <https://www.tiptonco.com> (see Appendix 6.2 for the Procedures, 6.3 for the Request for Accommodation or Barrier Removal Form, and 6.3 for the Complaint Form).

The instruction sheet and request forms are available from the ADA Coordinator or Tipton County website at <https://www.tiptonco.com> to request the removal of barriers for individuals with disabilities. See Appendix 6.2 for Request for Accommodation Procedures, and 6.3 for Request for Accommodation Form.

## 3.0 Self-Evaluation Scope

This Self-Evaluation is an internal assessment of Tipton County Government's services, programs, and activities and the policies and practices that govern them relative to the ADA rules and regulations.<sup>15</sup>

3.1. Self-Evaluation: Programs, Policies, and Practices is a review of potential policy and procedure, and communication<sup>16</sup> barriers to produce an index of these barriers. Evaluation of communication and programmatic barriers include, where applicable:

- Public meetings
- Interaction with County employees by the handicapped
- Availability of information concerning County programs, policies, and practices for the handicapped

3.2. Self-Evaluation: Physical Barriers develops an index of physical barriers in public-access areas of County facilities. Physical barriers to access for a handicapped individual can be found in:

- Parking lots

- Paths of travel either indoors or outdoors
- Building signage
- Doors and entryways
- Service counters
- Restrooms
- Drinking fountains
- Emergency notification and alarms

#### **4.0 Self-Evaluation Results: Programs, Policies, and Practices**

The following requirements are complete.

- 4.1. Appoint an ADA Coordinator
- 4.2. Prepare and post a public notice of ADA compliance
- 4.3. Prepare and post a Barrier Removal or Modification policy, procedure, and form
- 4.4. Prepare and post an ADA Violation Reporting policy, procedure, and form
- 4.5. Initiate and complete a Self-Evaluation survey for Tipton County Government

#### **5.0 Self-Evaluation Results: Buildings, Facilities, Parking Lots, and Parks Findings**

This section contains the results of the Self-Evaluation of all of Tipton County Government properties with public areas except for those of the Board of Education. The latter are covered separately under the policies and procedures for Tennessee's Local Agencies on Section 504 of the Rehabilitation Act of 1973. The County Fire Station has no public spaces, so is not included.

##### **5.1 Index of Properties**

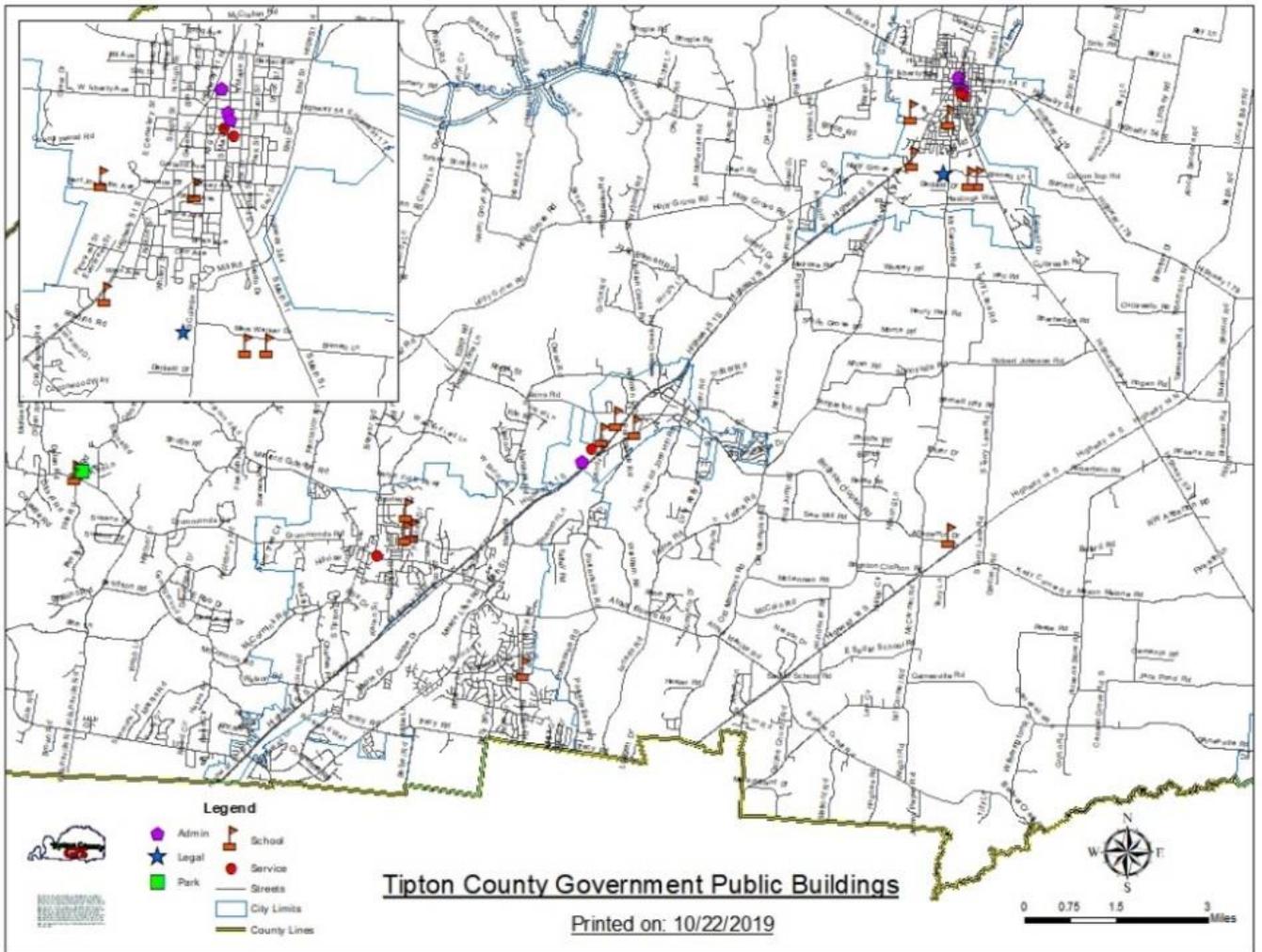
Tipton County Government is housed in twenty-five primary buildings throughout the county as displayed on the map below. This evaluation will consider twelve administrative centers that directly conduct county business with individuals on a regular basis and one park. The Board of Education and Justice Complex are not included in this evaluation since they administer their own Title II programs. Centers that are not open to the public, such as maintenance complexes, are not included since Title II is concerned primarily with public access to County operated programs, services, and activities. The sole county-operated park complex, Drummonds Park, is included.

The following map and list, however, includes all Tipton County Government properties including those of the Board of Education and those without public spaces for reference. Many are primarily operational with limited public functions and areas such as Public Works, located at 8279 Highway 51 S. in Brighton. The County Fire Station in Drummonds has no public spaces. The public spaces of County facilities are included in the survey. Some structures house several different departments as well as state-operated functions with public functions such as the Justice Center on 220 N. Main St. in Covington where both county and state offices are housed. State-operated offices located in County property are not included in this survey.

### Tipton County Government Properties

ADDRESS	CITY	ZIP	Property Name	OFFICE/DEPARTMENT	TYPE
103 E Pleasant Ave.	Covington	38019	Administrative Offices	Budget and Accounts	Admin
				Mayor's Office	Admin
111 W Washington Ave.	Covington	38019	Agricultural Ext Office		Service
8621 Highway 51 S.	Brighton	38011	Animal Shelter		Service
1580 Highway 51 S.	Covington	38019	Board of Education	Administrative Offices	Admin
870 Rosemark Rd.	Atoka	38004		Atoka Elementary	School
474 Academic Dr.	Covington	38019		Austin-Peay Elementary	School
1201 Old Highway 51 S.	Brighton	38011		Brighton Elementary	School
151 Mark Walker Dr.	Covington	38019		Crestview Elementary	School
5068 Drummonds Rd.	Drummonds	38023		Drummonds Elementary	School
1200 McLaughlin Dr.	Munford	38058		Munford Elementary	School
760 Bert Johnston Ave.	Covington	38019		Covington Integrated Arts	School
7785 Highway 51 S.	Brighton	38011		Brighton Middle	School
201 Mark Walker Dr.	Covington	38019		Crestview Middle	School
100 Education Ave.	Munford	38058		Munford Middle	School
8045 Highway 51 S.	Brighton	38011		Brighton High	School
803 S College St.	Covington	38019		Covington High	School
1080 McLaughlin Dr.	Munford	38058		Munford High	School
1580 Highway 51 S.	Covington	38019		Alternative Learning Center	School
1 W Liberty Ave.	Covington	38019	Court House	Mayor's Office	Admin
				Property Assessor	Service
				Register of Deeds	Service
				Trustee	Service
261 Tate Rd.	Drummonds	38023	County Fire Station		Service
261 Tate Rd.	Drummonds	38023	Drummonds Park		Park
113 E Church Ave.	Covington	38019	Election Commission	Election Commission	Service
				Keep Tipton Beautiful	Service
8629 Highway 51 S.			EMA		Admin
4700 Mueller Brass Rd.			Health Department		Service
1801 S College St.	Covington	38019	Justice Complex	Courts	Legal
				Jail	Legal
				Sheriff's Office	Legal
220 Highway 51 N .	Covington	38019	Justice Center	ADA Coordinator	Service
				County Clerk	Service
				E 911	Service
				GIS	Admin
				Planning and Development	Service
8279 Highway 51 S.	Brighton	38011	Public Works		Service
1286 Munford Ave.	Munford	38058	Veterans Affairs		Service

5.2. Map of Facilities



### 5.3. Inventory of Barriers

This section reflects the findings of a survey of listed County buildings relative to current ADA guidelines. Spaces with no public access are not included. The ADA Priority column reflects the information posted at <https://adachecklist.org/about.html>. This data reflects only the findings of the survey conducted during October thru December, 2019. Evaluation of that data, and the Transition Plan will be found in the companion document, "Tipton County Government, Americans With Disability Act (ADA) Transition Plan, dated 9 December 2019, including all supplements and addendums.

	ADA Priority	Estimated Cost
<b>5.3.1. Administrative Office</b>		
Door closers exceed 5 ft./lbs. force to open	1	
Adjust or replace closers place on annual inspection schedule or as needed		\$75.00
ADA Signage not to code	1	
Place signage as required		\$200.00
Restrooms are not ADA compliant	3	
Remodel Men's Restroom to a unisex that meets ADA codes		\$800.00
Service counter and Conference room table will not accommodated a Wheelchair	2	
Purchase a portable Table to accommodate Wheelchair		\$200.00
Note: Parking by City of Covington , approach ,and Entrance is OK		

Priority 1 Estimate: \$ 275  
 Priority 2 Estimate: \$ 200  
 Priority 3 Estimate: \$ 800  
 Priority 4 Estimate: \$ 0  
 Total \$1,275

	ADA Priority	Estimated Cost
<b>5.3.2. Agricultural Ext. Office</b>		
This Facility does not meet any ADA accommodations	1	
Relocate Facility to a Building that can meet ADA requirements.		\$250,000.00
Note: Make accommodations offsite for any services or programs that meet ADA accommodations		

Priority 1 Estimate: \$ 250,000  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 0  
 Priority 4 Estimate: \$ 0  
 Total \$250,000

5.3.3. Animal Shelter	ADA Priority	Estimated Cost
Handicap Parking or aisles is not striped	1	
Stripe parking and place Handicap signs to code		\$200.00
There is a 1" gap at entrance landing and sidewalk	1	
Fill gap		\$50.00
Entrance Door has a knob lockset	1	
Change lockset to a lever type		\$125.00
Thresholds in this building are not ADA compliant	1	
Replace thresholds		\$175.00
At dog cage pathway a rail blocks passage	1	
Remove rail		\$50.00
North pathway grate missing on dog cleaning drain	1	
Replace grate		\$75.00
Restroom does not meet ADA regulations	3	
Remodel Restroom		2,500

Priority 1 Estimate: \$ 675  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 2,500  
 Priority 4 Estimate: \$ 0  
 Total \$ 3,175

	ADA Priority	Estimated Cost
5.3.4. Court House		
North and South Entrance has steps with no signs showing accessible entrance	1	
Place signs at North and South entrance		\$125.00
Van accessible parking has no Van accessible sign	(1)	
Request City of Covington to meet parking to meet ADA codes		N/A
Basement level Restrooms do not meet ADA codes	3	
Build a unisex Restroom on Basement Level		\$2,500.00
Four Doors on First Level needs Lever Locksets	1	
Install Lever Locksets		\$800.00
Door closers exceed 5ft/lbs. force to open	1	
Adjust or replace closers place on annual inspection schedule or as needed		\$75.00
Drinking Fountain on first level in not wheelchair accessible	4	
Install paper cup dispenser		\$50.00
Three Doors on second level needs Lever Locksets	1	
Install Lever Locksets		\$600.00
Restrooms on second level does not meet ADA codes	3	
Remodel Men's Restroom to a unisex restroom that meets ADA codes		\$750.00
Drinking Fountain on second level in not wheelchair accessible	4	
Install paper cup dispenser		\$50.00
ADA Signage not to code	1	
Place signage as required		\$300.00

Priority 1 Estimate: \$ 1,900  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 3,250  
 Priority 4 Estimate: \$ 100  
                     Total                      \$ 5,250

5.3.5. County Fire Station—Drummonds (no public spaces)

	ADA Priority	Estimated Cost
<b>5.3.6. Drummonds Park</b>		
Parking Lot Lines are faded	1	
Re-Stripe lines so you can see Handicap spaces and regular parking		\$1,500.00
Outside drinking Fountain has a part missing	4	
Replace part		\$125.00
Cross slope on walking trail is more than 2% about 50' ( 3% )	1	
Correct when trail is re-paved		\$200.00
Ramp to Stage at little theater has no hand rails	1	
Install Hand Rails		\$250.00

Priority 1 Estimate: \$ 1,950  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 0  
 Priority 4 Estimate: \$ 125  
 Total \$ 2,075

	ADA Priority	Estimated Cost
<b>5.3.7. Election Commission/Keep Tipton Beautiful</b>		
Handicap parking not striped and sign not labeled correctly	1	
Stripe Parking space and place sign at correct height		\$60.00
Entrance Ramp handrails do not meet codes	1	
Handrails needs a bottom rail		\$75.00
Unisex Restroom does not have enough turning radius	3	
Remove partition to have enough turning radius		\$35.00
No grab bar at back of unisex restroom toilet	4	
Install grab bar		\$50.00
Paper towel dispenser blocking access to sink	3	
Move dispenser to another location		\$35.00
Exit door threshold and panic bar hinders exit from building	1	
Replace panic bar with a short profile bar and replace threshold that is to high		\$250.00

Priority 1 Estimate: \$ 385  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 70  
 Priority 4 Estimate: \$ 50  
 Total \$ 505

	ADA Priority	Estimated Cost
5.3.8. EMA		
Handicap parking not in compliance	1	
Need a van accessible sign		\$25.00
ADA signage not to code	1	
Place signage as required		\$200.00
Men's Restroom grab bars are not to code	3	
Grab bars need to be place in correct place		\$75.00

Priority 1 Estimate: \$ 225  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 75  
 Priority 4 Estimate: \$ 0  
 Total \$ 300

	ADA Priority	Estimated Cost
5.3.9. Health Department		
Parking Lot lines have faded to a point that you can't see all of them	1	
Re-stripe Parking Lot		\$1,500.00
Handicap parking needs Van accessible sign	1	
Install Van sign		\$50.00
Entrance Vestibule doorways are 30" from door to door 48" required	1	
Remove interior door		\$50.00
Designated Handicap restrooms do not have enough room for a 5' diameter turning area	3	
Remodel front entrance to include ADA compliant restrooms		\$25,000.00
ADA Signage not to code	1	
Place signage as required		\$200.00
All service counters are 36" high	2	
Make accommodations with a portable table when needed		\$200.00

Priority 1 Estimate: \$ 1,640  
 Priority 2 Estimate: \$ 200  
 Priority 3 Estimate: \$ 25,000  
 Priority 4 Estimate: \$ 0  
 Total \$ 26,840

	ADA Priority	Estimated Cost
5.3.10. Justice Complex		
Handicap parking spaces is not adequate for the number of spaces ( 195 )	1	
Restripe parking lot a total of 6 handicap spaces is required		\$2,500.00
Sidewalks have rough or uneven surfaces	1	
Repair sidewalks		\$500.00
Grab bar in all Handicap restrooms are 24" and 36"	3	
Replace grab bars with 36" and 42" ( 4 sets )		\$240.00

Priority 1 Estimate: \$ 3,000  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 240  
 Priority 4 Estimate: \$ 0  
 Total \$ 3,240

	ADA Priority	Estimated Cost
5.3.11. Justice Center		
Ramp at main entrance to County Court Clerk has hand rails on one side only	1	
Install hand rails on both sides to code		\$1,500.00
Ramp at main entrance first landing has concrete that is uneven.	1	
Repair landing and install drain holes to let rain water drain out		\$500.00
Double doors at main entrance are not wide enough	1	
Install automatic door opener		\$5,000.00
Restrooms in main Lobby are not ADA compliant	3	
Remodel Restrooms to meet ADA codes		\$3,500.00
There is no ADA compliant counter in Clerks office	2	
Make accommodations for wheelchair public ( table )		\$200.00
Water fountain are not ADA compliant	4	
Provide cup dispenser		\$50.00
Double doors at Codes entrance are not wide enough	1	
Install automatic door opener		\$5,000.00
Restrooms on Code side are not ADA compliant	3	
Remodel one to a unisex restroom that meet ADA codes		\$1,800.00
There is no ADA compliant counter in Codes office	2	
Make accommodations for wheelchair public ( table )		\$200.00

Priority 1 Estimate: \$ 12,000  
 Priority 2 Estimate: \$ 400  
 Priority 3 Estimate: \$ 5,300  
 Priority 4 Estimate: \$ 50  
 Total Estimate: \$ 17,750

	ADA Priority	Estimated Cost
5.3.12. Public Works		
Handicap parking is not marked Van accessible	1	
Restripe and provide sign		\$100.00
Main entrance door takes 14 lbs. Force to open	1	
Adjust door closer		\$25.00
Vestibule doors are 36" apart should be 48"	1	
Remove interior door		\$50.00
Water fountain in lobby is at 38"	4	
Provide cup dispenser		\$50.00
The two Restroom in lobby are not ADA compliant	3	
Remodel one and make it a unisex restroom		\$2,500.00

Priority 1 Estimate: \$ 175  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 2,500  
 Priority 4 Estimate: \$ 50  
 Total \$ 2,752

	ADA Priority	Estimated Cost
5.3.13. Veterans Affairs		
Parking Lot there is no Van accessible sign in parking space	1	
Install Van accessible sign		\$50.00
36" wide Sidewalk from parking lot to ramp has a drop-off on right side	1	
Fill with rock or make sidewalk wider		\$250.00
The one restroom in this building has no sign	3	
install a unisex sign at restroom		\$35.00
Sink in restroom has 25" clear floor space should be @7"	3	
Trim off 2" of sink bottom support ( wood )		\$175.00

Priority 1 Estimate: \$ 300  
 Priority 2 Estimate: \$ 0  
 Priority 3 Estimate: \$ 210  
 Priority 4 Estimate: \$ 0  
 Total \$ 510

## **6.0 Appendix: Local ADA Documents**

These documents are available from the County ADA Coordinator and for download from the Tipton County website: [https://tiptonco.com/title\\_vi\\_and\\_ada/index.php](https://tiptonco.com/title_vi_and_ada/index.php). The documents follow this index.

- 6.1. Notice of ADA Compliance
- 6.2. Request for Accommodation and Complaint Procedures
- 6.3. Request for Accommodation Form
- 6.4. ADA Complaint Form
- 6.5. County Executive notice to Department Heads of available communication assistance for disabled individuals



## **Notice:**

### **Americans with Disabilities Act (ADA) Compliance**

Tipton County does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services, or activities. Tipton County does not discriminate on the basis of disability in its hiring or employment practices.

This notice is provided as required by Title II of the American with Disabilities Act of 1990 (ADA). Questions, concerns, complaints, or requests for additional information regarding the ADA, may be forwarded to the Tipton County ADA Coordinator:

ADA Coordinator: Bob Beanblossom

Address: Tipton County ADA  
103 E. Pleasant Ave.  
Covington, TN 38019

Phone: 901 476-0234  
E-mail: [tiptongis@tiptonco.com](mailto:tiptongis@tiptonco.com)

Days/Hours Available: Monday – Wednesday / 8:00 a.m. – 4:30 p.m.

Individuals who require auxiliary aids and/or services in accessing programs, activities, and services of Tipton County are invited to make their requirements and preferences known to the ADA Coordinator listed above. This notice is available in alternate formats upon request from the ADA Coordinator.



## **Request for Accommodation and Complaint Procedures**

### **Americans with Disabilities Act (ADA)**

#### **1. Auxiliary Aids & Services or Barrier Removal Procedure**

A person who requires an accommodation, or an auxiliary aid or service, or a modification of policies or procedures to participate in a County program, service, or activity, should submit a **Request for Accommodation or Barrier Removal Form** to the ADA Coordinator. This form should be submitted as far in advance as possible of the scheduled event to allow evaluation and the development and implementation of remedies.

An individual may also submit a **Request for Accommodation or Barrier Removal Form** to request the removal of a physical barrier to allow or improve access. Request forms and other information are available from the Tipton County ADA, 103 E. Pleasant Ave., Covington, TN 38019, during regular business hours, via fax, mail, or electronic mail. Other arrangements for submitting a request, such as personal interviews or tape recordings, as well as assistance in completing the form, are available by contacting ADA Coordinator at 901 476-0234.

The County will review the request and notify the requesting party of the County's proposed resolution. The County's notification will be in writing or a reasonable alternative format if requested. If an individual feels that the County's response is unsatisfactory, he or she may submit an appeal following these same procedures.

#### **2. Formal Complaint Procedures**

The County provides this complaint procedure to help provide prompt and equitable resolution of complaints alleging any action prohibited by Title II of the ADA and state disability rights. It is designed to meet requirements of both §504 of the Rehabilitation Act of 1973, as amended, and Title II of the ADA. This procedure is available for any individual who wishes to file a complaint alleging discrimination by the County based on disability regarding access to public Tipton County services, programs, and facilities. It is unlawful for Tipton County to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

The availability and use of this grievance procedure does not preclude filing a complaint of discrimination with any appropriate state or federal agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies, but is intended to avoid the necessity of doing so.





## Complaint Form

### Pursuant to the Americans with Disabilities Act (ADA)

#### I. COMPLAINANT INFORMATION

Name: \_\_\_\_\_  
Last First MI

Address: \_\_\_\_\_  
Street Number and Name PO Box

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

I prefer to be contacted by: Phone \_\_\_\_\_ TTY \_\_\_\_\_ Email \_\_\_\_\_ US Mail \_\_\_\_\_ Other (specify) \_\_\_\_\_

#### II. DESCRIBE YOUR COMPLAINT OF PHYSICAL DISCRIMINATION BASED UPON DISABILITY

Be specific & give dates, time and locations.

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#### III. PERSONS INVOLVED IN THIS COMPLAINT

List names or describe all persons involved in your complaint. Indicate the job title & County agency, department or division of County employees if possible.

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#### IV. WITNESSES TO YOUR COMPLAINT

List names or describe all persons involved in your complaint. Indicate the job title & County agency, department or division of County employees if possible.

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# Tipton County Government



To: Tipton County Government Department Heads

From: Jeff Huffman, County Executive

Date: October 9, 2019

Subject: Assistance for customers with disabilities under Title II of the Americans with Disabilities Act (ADA)

Title II of the ADA requires Tipton County Government to provide access to its services, programs, and activities to citizens with handicaps comparable to individuals with no handicaps. The county is addressing these requirements in three ways:

First, Bob Beanblossom has been appointed Tipton County ADA Coordinator to monitor county compliance and to assist county employees and the public with issues related to ADA compliance. He can be reached at 901 476-0234, e-mail: [tiptongis@tiptonco.com](mailto:tiptongis@tiptonco.com).

Second, a survey of all county facilities that serve the public directly is being conducted to identify obstacles to access by customers with various disabilities. The results will be reviewed, prioritized, and solutions developed within the scope of the law that considers many factors including alternatives and cost. This is an ongoing process. Findings will be discussed with appropriate department heads.

Third, this memo advises departments that ADA requires county agents to communicate as effectively with citizens who have vision, hearing, or speech disabilities ("communication disabilities") as they do with citizens without these disabilities. Specific choices of assistance are situational. Overall, county response has historically been effective, and these resources are intended to enhance our service.

Some citizens come to our offices with helpers familiar with their disabilities and solutions. ADA calls these people "companions," and require us to accommodate any disabilities they may have. A companion may include any family member, friend, or associate of a person seeking or receiving county services, programs, and activities. These companions should be used as much as possible, but ADA places responsibility for providing effective communication directly on covered entities. We cannot require a person to bring someone to help them communicate. The specific use of a companion may be complicated by issues of confidentiality or conflict of interest between the companion and the customer. Patience, good judgement, and sensitivity to the needs of the customer is required by you and your staff while seeking to provide equivalent levels of service to every customer.

## ENDNOTES

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<sup>1</sup> See 28 C.F.R. § 35.108 Definition of disability for a more complete discussion of "disability" under ADA.

<sup>2</sup> A working definition of an ADA disability with respect to the individual has been summarized from the various ADA Rules and Regulations by Tennessee Department of Transportation to include: (1) A physical or mental impairment that substantially limits one or more of the major life activities of such an individual; (2) A record of such impairment; or, (3) Being regarded as having such an impairment. "TDOT ADA Self-Evaluation & Transition Plan," prepared by Kimley Horn, Accessology, and Gresham Smith and Partners (12 September 2019, 5).

<sup>3</sup> 28 C.F.R Part 35 (CRT Docket No, 105; AG Order No. 3180-2010); RIN 1190—AA46 (Nondiscrimination on the Basis of Disability in State and Local Government Services). This Final Rule is effective 15 March 2011.

<sup>4</sup> An extensive list of program definitions can be found at 28 C.F.R. § 35.104 Definitions.

<sup>5</sup> 28 C.F.R. § 35.151 (a)-(d), (g)

<sup>6</sup> U.S. Census QuickFacts, Tipton County, TN. Accessed 3 December 2019. <https://www.census.gov/quickfacts/fact/table/tiptoncountytennessee/PST045218>.

<sup>7</sup> Disabled World, U.S. Disability Statistics from the Census Bureau (rev. 28 June 2017). Accessed 3 December 2019. <https://www.disabled-world.com/disability/statistics/census-stats.php>.

<sup>8</sup> 28 C.F.R. §§ 35.149-150

<sup>9</sup> 42 U.S.C. § 12132; 42 U.S.C § 12102(2)(B) & (C)

<sup>10</sup> 28 C.F.R. § 35.106

<sup>11</sup> 28 C.F.R. § 35.107(a)

<sup>12</sup> 28 C.F.R. § 35.107(b)

<sup>13</sup> 28 C.F.R. § 35.105

<sup>14</sup> 28 C.F.R. § 35.150

<sup>15</sup> 28 C.F.R. § 36 (D)

<sup>16</sup> 2004 ADAAG Chapter 7