



# 504 Self Evaluation and Transition Plan

January 2016



## Introduction

The City of Evans has recently received a number of Grants through HUD's CDBG-DR program for flood recovery work related to the 2013 flood event. In order to fulfill the requirements of these grants, the City was required to complete a 504 self-evaluation to ensure compliance with the Americans with Disabilities Act. The city completed the evaluation in December 2015 and found several deficiencies. The following report documents the deficiencies found and the steps that the city intends to take to correct these deficiencies in the upcoming year. The evaluation itself can be found at the end of this report.

The following staff were involved in the Self Evaluation:

- Brian Stone, Recreation Director
- Chad Reischl, City Planner
- Dave Burns, Emergency Management Coordinator
- Julie Roeder, Human Resources and Risk Management Director
- Julie Tymkowych, Human Resources Analyst
- Kim Doss, Customer Service Administrator
- Kristan Williams, Communications Manager
- Raegan Robb, City Clerk
- Raul Rodriguez, Safety & Risk Management Specialist

Chad Reischl managed the Self Evaluation process with the primary assistance of Julie Tymkowych and Raul Rodriguez, the remaining people merely provided input on specific questions.

It should be noted here that none of the above people identify as disabled, and as there are no City employees, at this time, that identify as such, we were not able to utilize their expertise in the area.

## Deficiencies

Programs policies and Procedures:

- The City of Evans does not provide training on 504/ADA. Training is provided by the school district. The City will look into ways/means for tapping into this training for City staff
- We do not currently have a designated coordinator for Section 504, the City will need to appoint someone to this position.

Employment

- While the City's Human Resources department is dedicated to non-discriminatory practices, very little actual documentation of policies and procedures exist at this time. Some 504/ADA language was found within the employee and supervisor handbooks, but not enough to be fully compliant with 504. The HR team should be directed to add appropriate language to these handbooks to demonstrate our commitment to non-discrimination in hiring and employment.

Effective Communication

- While the City feels that they have been able to provide equally effective communication, again there is little documentation to support this. The City has generally acted on the policy that

services will be provided “on request.” This, however, is not documented nor advertised. The City will need to define how it accommodates persons with disabilities and the types of services that can be offered.

#### Notice of Non-Discrimination

- The City does not have an official Notice of Non-Discrimination. This will need to be drafted and presented to council in the near future along with plans for posting and publication of the Notice.

#### Grievance Procedures

- While the City does regularly accommodate persons with disabilities and has not in recent memory had any complaints regarding inadequate accommodation, the City does not have an official grievance policy. The City will plan to adopt such policy at the same time that it adopts the Notice of Non-Discrimination

## Plan of Action

The City of Evans is putting in place the following plan of Action.

### **Action 1 – Designate a Section 504 Coordinator**

Following the Self Evaluation the City of Evans has designated Raul Rodriguez, Safety and Risk Management Specialist as the 504 coordinator. Raul will work with staff to ensure that the rest of these actions are completed in a timely manner

**Timeframe: This action is Complete**

### **Action 2 – Notice of Non-Discrimination and Grievance Policy**

The City of Evans’s second action will be to draft a Notice of Non-Discrimination (NoND) and present the notice to City Council for approval. The Notice will include language to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communication with others. We feel that this language will help physically document our commitment to ensuring effective communication with the public. In conjunction with the Notice, the City will draft a grievance policy to accompany the notice.

**Timeframe: We intend to complete this action by February 2016**

### **Action 3 – Post/Advertise Notice of Non-Discrimination**

Shortly after approval of the NoND, the City will post the notice in the following locations: the main bulletin board at the Evans Community Complex, our website and in the Greeley Tribune, our local newspaper. The City will make a plan to post this NoND in the paper once yearly

**Timeframe: We intend to complete this action by March 2016**

### **Action 4 – Provide Training on 504/ADA**

Evans' Human Resources Department and City Managers have trainings on important legal issues relating to employment every two years. The next training will take place sometime in the summer of 2016. HR has indicated that they will look into covering important issues regarding 504/ADA at that time. We also know that ADA training is provided within the Greeley Evans School District. If the proper training cannot be provided at the bi-yearly training, we will look into ways to partner with the School District to provide adequate training.

**Timeframe: We intend to complete this action by August 2016**

#### **Action 5 – Employment Policies**

Evans' Human Resources staff has indicated that they have no intent on creating an Employment Policy and Procedure Manual as cited above, but that the Employee and Supervisor Handbooks needed an overhaul as they were last updated in 2004. It is, therefore our intent to add appropriate language to the handbooks as they are updated.

**Timeframe: We intend to complete this action by December 2016**

#### **Certification**

The City of Evans has made a commitment to the completion of the above actions.

As the section 504/ADA Coordinator, I \_\_\_\_\_ certify that the above actions will be completed as described above for the purpose of the CDBG-DR grants that the City is currently administering.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date