



Cheatham County, Tennessee
GOVERNMENT

Cheatham County ADA Evaluation and Transition Plan

Draft January 13, 2019

Cheatham County Government

100 Public Square | Ashland City, Tennessee 37015 | Phone: (615) 792-4316

CheathamCountyTN.gov

Executive Summary

About the Cheatham County

Cheatham County was created by an act of the Tennessee General Assembly passed February 28, 1856. The county is named after Edward S. Cheatham, who was speaker of the State Senate. The County has an estimated population of 39,800 (2018) across 307 square miles. Ashland City serves as the seat of county government which is managed by a full-time County Mayor and governed by a 12-member County Commission. Ashland City is one of four municipalities that also include Kingston Springs, Pegram, and Pleasant View

About this Document

This document satisfies a requirement of Title II of the Americans with Disabilities Act for Cheatham County Government to conduct a self-evaluation of the compliance of its programs, activities, services that interface with members of the general public and to identify the necessary actions and timelines with ensuring compliance. The development of a transition plan was originally a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities.

The scope of the evaluation conducted for this ADA Transition Plan was limited to the inspection and assessment of county-owned facilities and public rights-of way and did not address certain ADA process requirements, including notification of all peoples of their rights and Cheatham County's obligations under Title II of the ADA beyond what is required during this evaluation (28 CFR 35.106) or an evaluation of Cheatham County's services, programs, activities, and policies or practices that may adversely impact the participation of an individual with disabilities (28 CFR 35.105).

Transition Plan Highlights

In total, fifteen (15) county-owned buildings or facilities were inspected in preparation of the ADA Transition Plan. In addition, a review of the public rights-of-way owned or managed by Cheatham County Government were assessed for ADA compliance. The review of County-owned buildings identified 146 issues to be addressed by Cheatham County Government across 12 different priority levels. No issues of non-compliance were determined for County-owned public rights-of-way.

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Section 1. General Information

1.1 About Cheatham County Government

Cheatham County was created by an act of the Tennessee General Assembly passed February 28, 1856. The county is named after Edward S. Cheatham, who was speaker of the State Senate. The County has an estimated population of 39,800 (2018) across 307 square miles. Ashland City serves as the seat of county government which is managed by a full-time County Mayor and governed by a 12-member County Commission. Ashland City joins Kingston Springs, Pegram, and Pleasant View as one of the municipalities located within the county.

1.2 About the Americans with Disabilities Act

The Americans with Disabilities Act (ADA) is a civil rights law enacted in 1990 that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, government services, public transportation, public accommodations, and telecommunications. There are five titles in the ADA which include:

- Title I: Employment,
- Title II: State and Local Government,
- Title III: Public Accommodations and Commercial Facilities,
- Title IV: Telecommunications Relay Services, and
- Title V: Miscellaneous Provisions.

Cheatham County Government is required to serve all provisions of Title I in its employment practices; Title II in its policy practices, services, programs and activities, and any parts of Title IV and Title V that may apply to Cheatham County.

1.3 About the ADA Transition Plan

This document satisfies a requirement of Title II of the Americans with Disabilities Act for Cheatham County Government to conduct a self-evaluation of the compliance of its programs, activities, services that interface with members of the general public and to identify the necessary actions and timelines with ensuring compliance. The development of a transition plan was originally a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities.

Included in ADA Title II [28 CFR 35.150(d)] are administrative requirements for all government entities employing more than fifty people. These administrative requirements are:

- **Notify.** Inform all applicants, participants, and other interested people of their rights and Cheatham County's obligations under Title II;
- **Designate an ADA Coordinator.** The designated responsible employee is charged with coordinating efforts in complying with and carrying out Cheatham County's ADA responsibilities;
- **Establish a Grievance Procedure.** Develop a procedure to resolve complaints relating to Title II;
- **Conduct a Self-Evaluation.** Assess Cheatham County's services, programs, activities, and the policies and practices that govern the administration of them. The goal is to determine if policies and practices adversely impact the participation of individuals with disabilities; and

- **Develop a Transition Plan.** Identify the necessary steps to implement the improvements required to achieve program accessibility.

The Federal Highway Administration (FHWA) provides guidance on the ADA Transition Plan process in the “INFORMATION AND ACTION: ADA Transition Plan Process” memorandum dated November 17, 2015, which specifically addresses State Departments of Transportation. The memo provides a checklist to be included in ADA Transition Plans and other ADA requirements that agencies must fulfill. The ADA Transition Plan checklist includes:

- **ADA Coordinator/Responsible Official:** Cheatham County Government needs to identify an official responsible for implementation of the ADA Transition Plan and coordinating efforts in complying with and carrying out Cheatham County’s ADA responsibilities (28 CFR 35.150(d)(3)(iv)). Cheatham County has identified Shelly Carney, Human Resources Director, to serve as the ADA Coordinator.
- **Inventory of Barriers:** The inventory of barriers will identify physical obstacles in Cheatham County’s facilities that limit the accessibility of its programs or activities to individuals with disabilities (28 CFR 35.150 (d)(3)(i) and 28 CFR 35.150 (a)).
- **Schedule:** This section needs to specify a prioritized schedule for taking the necessary steps to achieve compliance by eliminating barriers and correcting deficiencies. If the time period associated with the transition plan is in excess of one year, the transition plan will identify steps that will be taken during each year of the transition period (28 CFR 35.150(d)(2) and 28 CFR 25.150 (d)(3)(ii)).
- **Methods:** The transition plan needs to describe in detail methods that will be used to make facilities accessible (28 CFR 35.150 (d)(3)(ii)).

Evaluation of 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: building signage, customer communication and interaction, sidewalks or curb ramps, emergency notifications, alarms, and visible signals, participation opportunities for County-sponsored events, parking, path of travel to, throughout, and between buildings and amenities, doors, service counters, restrooms, drinking fountains, path of travel along sidewalk corridors within the public right-of-way, and access to pedestrian equipment at signalized intersections.

Limitations of this Report

The scope of the evaluation conducted by staff of the Greater Nashville Regional Council (GNRC) was limited to the inspection and assessment of county-owned facilities and public rights-of way and did not address certain ADA process requirements, including notification of all peoples of their rights and Cheatham County’s obligations under Title II of the ADA beyond what is required during this evaluation (28 CFR 35.106) or an evaluation of Cheatham County’s services, programs, activities, and policies or practices that may adversely impact the participation of an individual with disabilities (28 CFR 35.105).

The above-listed ADA requirements which go beyond the scope of this report should be addressed by Cheatham County through an additional self-evaluation process.

Ongoing Accessibility Improvements

The Cheatham County Government-owned facilities evaluated during the ADA Transition Plan process will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been completed since the initial evaluation. This Plan will be posted on the County's website for review and consideration by the public.

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Section 2. Evaluation & Findings

2.1 County-Owned Facilities

Surveys of Cheatham County Government-owned facilities were performed by the staff of the Greater Nashville Regional Council (GNRC). All public buildings owned by the County Government were inspected using the ADA Checklist for Existing Facilities as the guide (available in Appendix E). The checklist addresses areas of compliance and non-compliance with Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the areas of parking, exterior paths of travel, entrances, interior paths of travel, restrooms, service counters, meeting rooms, drinking fountains, and any additional public facilities.

Cheatham County Government Facilities List

The following Cheatham County Government-owned facilities were evaluated as a part of this transition plan. All facilities included in the evaluation are listed below and shown on the map in Appendix A.

Facility	Address	SF
Animal Control	2797 Sams Creek Road, Pegram	4,456
Ashland City Library & Election Commission	272 St., Ashland City	10,000
Convenience Center	1039 Thompson Lane, Ashland City	100
Convenience Center	Old Clarksville Pike, Pleasant View	128
Convenience Center	Highway 12, Ashland City	64
Cheatham County Convenience Center	1020 Griffin Town Road, Ashland City	100
Courthouse	100 Public Square, Ashland City	43,494
EMA Headquarters	99 Ruth Drive, Ashland City	3,750
EMS Headquarters & Station	3455 Bell St., Ashland City	7,730
EMS Kingston Springs Station	197 East Kingston Springs Road, Kingston Springs	2,430
Health Department	270 Frey St., Ashland City	10,000
Kingston Springs Library	358 North Main St., Kingston Springs	2,426
Solid Waste/Transfer Station	2791 Sams Creek Road, Pegram	2,500
Sycamore Square Office Space	356 Frey St., Ashland City	102,000
Tucker Empson County Office Building	264 Main Street, Ashland City	9,684

The following Cheatham County facilities are scheduled to be remodeled or reconstructed within the next three years and were not evaluated as part of the preparation of this ADA Transition Plan.

Facility	Address	SF
Building Maintenance (Old jail)	107 Sycamore St., Ashland City	6,160
Annex Building	199 Court St., Ashland City	7,492
Highway Garage	1037 Thompson Road, Ashland City	12,000

ADA Checklist for Existing Facilities

The ADA Checklist for Existing Facilities was used to carry out the Cheatham County facility evaluations. This checklist is based on the 2010 ADA Standards for Accessible Design and follows the four priorities that are listed in the Department of Justice ADA Title III CFR 36.304 regulations. These priorities are equally applicable to state and local government facilities. The four priorities include:

- **Priority One-** Accessible Approach and Entrance,

- **Priority Two-** Access to goods and services,
- **Priority Three-** Access to public toilet rooms, and
- **Priority Four-** Access to other items such as water fountains and public telephones.

Facility Evaluation Findings

Results from the inspections conducted of each County Government-owned facility are documented in summary reports included as Appendix C to the ADA Transition Plan. Reports were prepared for each building to document its compliance and include:

- Full checklists for each facility, detailing compliant and non-compliant areas with accompanying measurements;
- Brief recommended actions to resolve non-compliant issues for each facility;
- A photolog summary for each issue of non-compliance; and
- A prioritization level based on recommended prioritization.

2.1.1 Animal Control

Cheatham County Animal Control is located at **2797 Sams Creek Road in Pegram**. It is a Certified Animal Control Agency under the State of Tennessee Board of Veterinary Medical Examiners- State Health Department. The Control Center operates in a variety of areas to meet the needs of the community including shelter operations, field operations, adoption services, volunteer programs, community service programs, shelter and rescue networks, euthanasia services, pet facilitative therapy programs, humane education programs, spay and neuter services, and cruelty or neglect cases.

Animal Control is located in a 4,456 square foot, concrete construction building that was built in 2005, with kennel facilities added in 2010. The facility includes a foyer, lobby with reception counter, two (2) offices, two (2) cat kennel rooms, two (2) restrooms, two (2) dog kennel rooms, a shower room, treatment room, laundry room, and storerooms with an overhead door. For this evaluation, the foyer with reception counter, cat kennel rooms, restrooms, dog kennel rooms, and access to other areas of the facility were reviewed for compliance.

The Main Entrance to the facility from the front parking area, which provides access to the lobby and reception counter, is an ADA accessible entrance. All publicly accessible rooms, which includes kennel rooms, treatment rooms, and the foyer, are ADA compliant.

Below is a brief overview of non-compliant portions of the Animal Control building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-3 through C-12.

- Accessible parking spaces are not marked and must include a van accessible space.
- There is no ADA compliant route to the entrance from the parking lot as the slope is not ADA accessible.

2.1.2 Ashland City Library & Election Commission

The Main Public Library is located at **272 Frey Street in Ashland City**. It is a 10,000 square foot concrete block building that was built in 2002. The Library is located on the same property as the Cheatham County Health Department and the rear, lower level of the Library building houses the Cheatham County Election Commission.

The Library facility includes a work room, two conference rooms, multiple offices, multiple restroom facilities, storerooms, a foyer, reading room lobby with circulation counter, a covered entrance, library room, break room, and genealogy room.

The Main Entrance into the lobby provides access into the foyer and the main area where the reading room lobby with the circulation counter is located. This Main Entrance is ADA accessible. The service areas at the circulation counter are accessible, as are the public spaces throughout the Library area.

Below is a brief overview of non-compliant portions of the Library building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-13 through C-38.

- There is no elevator in the two-story facility. Spaces on the lower level, including the Archives and the Election Commission, are spaces used by the public. These areas can only be accessed by stairs from the first floor, or through an entrance at the rear of the building. This rear entrance to the lower level of the building where the Election Commission is located, includes additional parking and is an ADA accessible entrance.
- The accessible parking located near the rear entrance of the building by the Election Commission does not have a properly compliant van accessible space. See Appendix C, page C-28.
- The restrooms are mostly compliant but a few of the stalls do not have proper maneuvering space and a few other components that do not meet ADA measurement requirements.

2.1.3 Convenience Centers

There are four Cheatham County Convenience Centers located at **1039 Thompson Lane in Ashland City, Old Clarksville Pike in Pleasant View, Highway 12 in Ashland City, and 1020 Griffin Town Road in Ashland City.**

Each facility is designed to provide residents a location to dispose of their household waste or drop-off recyclable material. These facilities can only be used by residents with a wheel tax sticker or proof of property document. All facilities include large roll off containers for solid waste and recyclables and an employee workspace/break room facility. Portable restrooms are provided at each facility for employee use.

A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, page C-39.

- Each convenience center has one drive-in entrance where residents can drop off waste. If necessary, employees can assist residents upon arrival with the materials they drop-off. The entrance to both the facility and most of the employee buildings are ADA accessible.
- There is no signage indicating that residents who need assistance should ask employees. The Director of Solid Waste has indicated he is in the process of acquiring new signage for the facilities, including signs detailing how to request assistance from the facility employees when dropping off materials.

2.1.4 Courthouse

The County Courthouse is located at **100 Public Square in Ashland City.** It is a 43,494 square foot brick and concrete structure that was built in 1914, with additions completed in 1969 and 1986. The building includes County offices, court facilities, an E911 center, jail cells, and jail associated facilities.

New jail cells and associated facilities are slated to be constructed; thus, these areas of the courthouse were not evaluated during this Transition Plan. This project will also include the demolition of the Cheatham County Annex building (199 Court St., Ashland City) and the old jail.

For this evaluation, the County offices, Courthouse, and associated facilities were evaluated. The Main Entrance to the County Courthouse building is not open to the public. The Main Entrance to the Court is the entrance the public is instructed to enter through, and this entrance is also an ADA accessible entrance. There is an accessible elevator that is available down a hallway from the Main Entrance, which provides access to the second-floor courtrooms and offices.

Below is a brief overview of non-compliant portions of the County Courthouse building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-40 through C-55.

- There are two parking lots on the property with sixty-eight (68) spaces total. Of those sixty-eight (68) spaces, there are five (5) accessible spaces, which is compliant. The striping surrounding the spaces is

not compliant. Additionally, the van accessible space near the accessible entrance does not have an access aisle, which is non-compliant.

- There are both men's and women's restrooms on the first and second floor of the facility. The second-floor restrooms near the Sheriff's office do not have proper, compliant signage.
- The two (2) courtrooms do not have adequate seating areas for individuals in wheelchairs per ADA checklist guidelines.

2.1.5 Emergency Management Agency Headquarters

The Emergency Management Agency (EMA) Headquarters building is located at **99 Ruth Drive in Ashland City**. It is a 3,750 square foot, steel frame and metal siding structure, built in 1974. The building has three (3) truck bays with overhead doors, a dispatch room, kitchen area, restroom, office, conference room, and storeroom.

The Main Entrance to the facility requires the use of stairs and thus is not ADA accessible. There is an alternative entrance through the truck bays that is ADA accessible. The building's public spaces, including meeting rooms and passageways, are ADA accessible.

Below is a brief overview of non-compliant portions of the EMA Headquarters building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-56 through C-65.

- There is no van accessible space or access aisle in the parking lot.
- The main entrance is not accessible and requires the use of stairs.
- The restroom does not have grab bars and does not meet ADA measurement requirements.

2.1.6 Emergency Management Services Headquarters & Station

The Emergency Management Services (EMS) Headquarters and Station are located at **3455 Bell Street in Ashland City**. The facilities are in a 7,730 square foot, concrete block structure that was built in 2002. The building includes a lobby with a reception counter, six (6) offices, a day room with a kitchen area, multiple storerooms, three (3) restrooms, two (2) bunk rooms, a covered entrance and two (2) truck bays with two (2) overhead doors. For this evaluation, the entrance, the lobby and reception counter, accessible restroom, and access to all other areas of the building were measured for compliance.

The Main Entrance to the building, which provides access to the lobby and reception counter, is an ADA accessible entrance. The hallway, which provides access to the restroom, is ADA accessible.

Below is a brief overview of non-compliant portions of the EMS Headquarters building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-66 through C-76.

- There is no signage indicating a van accessible parking space.
- The service counter does not have enough clearance when taking a forward approach.
- Components in the restroom do not meet ADA measurement requirements.

2.1.7 Emergency Management Services Kingston Springs Station

This Kingston Springs EMS Station is located at **197 East Kingston Springs Road in Kingston Springs**. It is a 2,430 square foot concrete block building built in 2011. The facility includes a two-bay (2) garage with two (2) overhead doors, an office, day room with kitchen area, restroom, bathroom, and two (2) bunk rooms. For this evaluation, the entrance, accessible restroom, and access to all other areas of the building were measured for compliance.

The Main Entrance to the building, which provides access to the day room and kitchen area, is an ADA accessible entrance. The hallway, which provides access to the restroom, is ADA accessible.

Below is a brief overview of non-compliant portions of the EMS Kingston Springs building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-77 through C-85.

- There is not enough maneuvering space for a wheelchair in the restroom.

2.1.8 Health Department

The Health Department is located at **270 Frey Street in Ashland City**. It is a 10,000 square foot, concrete block structure, built in 2000 and located on the same property as the Ashland City Cheatham County Library. The facility includes multiple restrooms, a covered entrance, a lab, multiple storerooms, 6 (six) clinic rooms, a pharmacy, 6 (six) offices, a break room, a nurse's station, a conference room, Centerstone offices with a lobby and waiting room, reception counter, and an administrative office with file area.

The rear of the building includes a second entrance to an Agricultural Extension lobby and Agricultural Extension offices. This area of the facility is leased by University of Tennessee Agricultural Extension and thus was not included in the facility evaluation, per guidance from a Specialist via the ADA information line.

The Main Entrance to the facility, which provides access to the lobby, waiting room, and reception counter, is ADA accessible. All restrooms, patient rooms, and hallways or access to other areas of the building are ADA compliant.

Below is a brief overview of non-compliant portions of the Health Department building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-86 through C-97.

- The main waiting room does not have dedicated waiting space for an individual in a wheelchair.

2.1.9 Kingston Springs Library

The South Cheatham County Public Library is located at **358 North Main Street in Kingston Springs**. It is housed in a 2,246 square foot log cabin structure that was repurposed as the Library in 1989. This smaller library facility includes a library room, meeting room, office, restroom, covered front and rear porch, and a storeroom.

The rear of the facility includes parking and a Main Entrance to the building, which is ADA accessible. The front entrance located on the front porch, which is the entrance that would be accessed from the sidewalk along the street, is not an ADA accessible entrance.

Below is a brief overview of non-compliant portions of the Kingston Springs Library building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, pages C-98 through C-109.

- The front entrance is not ADA compliant as the only possible approach is a set of stairs to the front porch.
- The rear entrance is ADA accessible but has no universal signage of accessibility.
- Because of the smaller size of the restroom, the handrails, dimensions, maneuvering space, and signage are not ADA compliant.

2.1.10 Solid Waste Transfer Station

The Solid Waste Transfer Station is located at **2791 Sams Creek Road in Pegram**. It includes a new truck scale, transfer station, fleet maintenance services bays, an office, break room, and scale house, which were completed in April 2016. The property also includes a Convenience Center to serve the public. For this evaluation, the entrances, office, break room, and convenience center facility were evaluated for compliance.

The Solid Waste Transfer Station's entrance, employee facilities, and public spaces are compliant.

Below is a brief overview of non-compliant portions of the Transfer Station. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, page C-39.

- There is no proper signage detailing how to request assistance from the facility employees when dropping off materials.

2.1.11 Sycamore Square Office Space

Sycamore Square is located at **356 Frey Street in Ashland City**. It is a newly renovated County office space located within the Sycamore Square Shopping Center, purchased by the County in 2017. The renovated space in the Shopping Center houses about 102,500 square feet of county offices, including the Trustee, Property Assessor, Veteran Services, and additional County offices. The facility includes a large lobby area, restrooms, and multiple office spaces for services, each with individual service counters. These listed areas of the facility were all evaluated for compliance.

The Main Entrance to the facility is located at the front strip center, adjacent to the available parking, and is ADA accessible. The main foyer and throughway, which provides access to offices and restrooms, is ADA accessible.

Below is a brief overview of non-compliant portions of the Sycamore Square building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, on pages C-110 through C-122.

- The directional and general room usage signage is not ADA compliant.
- The service counters exceed ADA height requirements.

2.1.12 Tucker Empson County Office Building

The Tucker Empson County Office Building is located at **264 Main Street in Ashland City**. The building was originally built as a grocery store and completely renovated as an office building with a new roof in 1997. The building was originally built in 1945. This County Office building includes a break room, lobby, multiple offices, file and storage rooms, a covered entrance, a conference room, and restrooms.

This facility is currently vacant and is not being used as County Offices.

The Main Entrance to the facility is located at the front of the building, adjacent to the parking lot, and is ADA accessible. All publicly accessible spaces, including passageways, offices, and the main entrance, are ADA accessible.

Below is a brief overview of non-compliant portions of the Tucker Empson building. A complete listing of issues of non-compliance can be found in the Building Facility Reports in Appendix C, on pages C-123 through C-131.

- There is no sign reading “van accessible” at the van accessible space in the main parking lot.
- Restrooms do not meet ADA measurement requirements in both the stalls and passageways.

2.2 Public Rights-of-Way

A desk review of the public rights-of-way owned or operated by Cheatham County Governments was performed by the Greater Nashville Regional Council using the most recently available data from the Tennessee Department of Transportation and public availability aerial imagery. The evaluation sought to identify any formal pedestrian crossing areas including those at signalized intersections. A map of all Cheatham County Government-owned roads and sidewalks in Cheatham County is available in Appendix A. The map illustrates that there are no pedestrian facilities located on streets or roadways owned or operated by Cheatham County Government that would require field verification of ADA accessibility.

Section 3.0 Findings & Proposed Actions

3.1 Summary of Findings

In total, fifteen (15) county-owned buildings or facilities were inspected in preparation of the ADA Transition Plan. In addition, a review of the public rights-of-way owned or managed by Cheatham County Government were assessed for ADA compliance. Below is a brief overview of the non-compliance issues for each facility. A complete listing of issues of non-compliance can be found in the County Facility Reports provided in Appendix C.

Animal Control

- Accessible parking spaces are not marked and must include a van accessible space.
- There is no ADA compliant route to the entrance from the parking lot as the slope is not ADA accessible.

Ashland City Library & Election Commission

- There is no elevator in the two-story facility. Spaces on the lower level, including the Archives and the Election Commission, are spaces used by the public. These areas can only be accessed by stairs from the first floor, or through an entrance at the rear of the building. This rear entrance to the lower level of the building where the Elections Commission is located, includes additional parking and is an ADA accessible entrance.
- The accessible parking located near the rear entrance of the building of by the Election Commission does not have a properly compliant van accessible space. See Appendix C, page C-28.
- The restrooms are mostly compliant but a few of the stalls do not have proper maneuvering space and a few other components that do not meet ADA measurement requirements.

Convenience Centers

- Each convenience center has one drive-in entrance where residents can drop off waste. If necessary, employees can assist residents upon arrival with the materials they drop-off. The entrance to both the facility and most of the employee buildings are ADA accessible.
- There is no signage indicating that residents who need assistance should ask employees. The Director of Solid Waste has indicated he is in the process of acquiring new signage for the facilities, including signs detailing how to request assistance from the facility employees when dropping off materials.

Courthouse

- There are two parking lots on the property with sixty-eight (68) spaces total. Of those sixty-eight (68) spaces, there are five (5) accessible spaces, which is compliant. The striping surrounding the spaces is not compliant. Additionally, the Van Accessible space near the accessible entrance and does not have an access aisle, which is non-compliant.
- There are both men's and women's restrooms on the first and second floor of the facility. The second-floor restrooms near the Sherriff's office do not have proper, compliant signage.
- The two courtrooms do not have adequate seating areas for individuals in wheelchairs per ADA checklist guidelines.

Emergency Management Agency Headquarters

- There is no van accessible space or access aisle in the parking lot.

- The main entrance is not accessible and requires the use of stairs.
- The restroom does not have grab bars and does not meet ADA measurement requirements.

Emergency Management Services Headquarters & Station

- There is no signage indicating a van accessible parking space.
- The service counter does not have enough clearance when taking a forward approach.
- Components in the restroom do not meet ADA measurement requirements.

Emergency Management Services Kingston Springs Station

- There is not enough maneuvering space for a wheelchair in the restroom.

Health Department

- The main waiting room does not have dedicated waiting space for an individual in a wheelchair.

Kingston Springs Library

- The front entrance is not ADA compliant as the only possible approach is a set of stairs to the front porch.
- The rear entrance is ADA accessible but has no universal signage of accessibility.
- Because of the smaller size of the restroom, the handrails, dimensions, maneuvering space, and signage are not ADA compliant.

Solid Waste Transfer Station

- There is no proper signage detailing how to request assistance from the facility employees when dropping off materials.

Sycamore Square Office Space

- The directional and general room usage signage is not ADA compliant.
- The service counters exceed ADA height requirements.

Tucker Empson County Office Building

- There is no sign reading “van accessible” at the van accessible space in the main parking lot.
- Restrooms do not meet ADA measurement requirements in both the stalls and passageways.

Public Rights-of-Way

- There are no pedestrian facilities located on streets or roadways owned or operated by Cheatham County Government that would require field verification of ADA accessibility.

3.2 Prioritization & Implementation

The Facility Reports provided in Appendix C identify a prioritization level for each issue of non-compliance, along with a recommended improvement and implementation schedule. The suggested level of priority for the development of the implementation plan is based on a 12-point scale with Level 1 representing the highest priority for improvement and Level 12 representing the lowest priority.

- **Level 1:** Level 1 would include any issues of non-compliance that are known to have an existing complaint or have a threat of imminent danger. At the time of the completion of this Transition Plan, there are no items to be ranked as Level 1. During Annual Review of this Transition Plan, this section

should be updated to include any complaints or threats of imminent danger as Level 1. Level 1 items should be reviewed and added to the Implementation Schedule as soon as possible.

- **Level 12:** Items that are included in Level 12 are allowed to be noncompliant because of construction prior to March 5, 2012, but in the event that an update occurs to these elements, the update should bring the element into compliance.

Priority Level	Description of Issues (Factor or Criteria)	Number of Issues
1 (highest)	<ul style="list-style-type: none"> • Known complaint or imminent danger present 	0
2	<ul style="list-style-type: none"> • Element is more than 100% from compliance with the required measurement (i.e. a measurement is more than twice the allowable requirement). There is no known complaint • And (for exterior priorities) the location is near a hospital, school, transit stop, or another pedestrian attractor 	1
3	<ul style="list-style-type: none"> • Element is more than 100% from compliance with the required measurement (i.e. a measurement is more than twice the allowable requirement). There is no known complaint • And (for exterior priorities) the location is not near a hospital, school, transit stop, or another pedestrian attractor 	3
4	<ul style="list-style-type: none"> • Issues with parking or other exterior conditions (Priority 1)- moderately out of compliance 	23
5	<ul style="list-style-type: none"> • Issues with access to goods and services (Priority 2)- severely out of compliance 	0
6	<ul style="list-style-type: none"> • Access to goods and services (Priority 2)- moderately out of compliance; • Parking or exterior conditions (Priority 1)- minimally out of compliance; or • Restrooms (Priority 3)- severely out of compliance 	46
7	<ul style="list-style-type: none"> • Access to goods and services (Priority 2)- minimally out of compliance; • Restrooms (Priority 3)- moderately out of compliance • Drinking fountains (Priority 4)- severely of out compliance 	50
8	<ul style="list-style-type: none"> • Issues with drinking fountains (Priority 4)- moderately out of compliance 	1
9	<ul style="list-style-type: none"> • Issues with restrooms (Priority 3)- minimally out of compliance 	16
10	<ul style="list-style-type: none"> • Issues with drinking fountains (Priority 4)- minimally out of compliance 	0
11	<ul style="list-style-type: none"> • Client is a Title II Agency; and • Element is out of compliance but may be handled programmatically or does not need to be handled unless or until the agency hires a person with a disability 	1
12 (lowest)	<ul style="list-style-type: none"> • Element is fully compliant with an older standard (safe-harbored) but will need to be brought into compliance with current standards if altered 	5

Implementation Schedule

Cheatham County Government will establish an Implementation Schedule for the required improvements necessary to achieve ADA compliance. The schedule will be based, in part, on 1) the priority level identified for each improvement and 2) item costs and budget constraints. As a Title II entity, Cheatham County Government

is not required to remove all barriers within areas that only employees have access to until an employee with a disability makes a request.

Undue Burden

The County is not required to perform any corrective action toward compliance that it can demonstrate 1) would result in a fundamental alteration to the nature of a program or activity, 2) would create a hazardous condition for other people, or c) would represent an undue financial and administrative burden. This determination on corrective action can only be made by the ADA Coordinator or her designee and must be accompanied by a statement citing the reasons for reaching that conclusion.

3.3 Annual or Ongoing Activities

Annual Inventory and Evaluation Report

Cheatham County Government will produce an annual report on its progress to implement the ADA Transition Plan. Included with the County Facility Reports in Appendix C is a recommended template for updating its inventory. This inventory identifies all items listed as non-compliant, based on the reports contained in this plan. Cheatham County Government will complete the Inventory by reviewing all non-compliant items and assigned priority levels, and then determine a timeframe for completion of the corrective activity. This inventory should be updated on an annual basis and should be available for viewing online or upon request.

Annual Work Program

As part of its annual budgeting or capital improvement planning process, Cheatham County Government will identify ADA-related repairs or upgrades to be initiated or completed during the upcoming fiscal year. A resource list, which includes a funding toolkit, is provided as Appendix F to the ADA Transition Plan.

Review of Requests and Grievances

Cheatham County Government will continue to evaluate complaints and grievances which come about through the ADA Grievance Procedure. These items will become Level 1 items and will be added to the Work Program and prioritized accordingly, as they arise.

Section 4.0 Public Involvement

4.1 Requirements

Per Title II of the ADA 28 CFR 35.150(d)(1), Cheatham County Government is required to provide interested persons, including individuals with disabilities or organizations representing individuals with disabilities, an opportunity to provide input or comment on the ADA Transition Plan. A copy of the Plan should be made available in both electronic and hard copies for public inspection prior to its formal adoption by the Cheatham County Commission.

Additionally, it is recommended that a list of individuals and organizations consulted for input on this Transition Plan should be made available on Cheatham County's website.

4.2 Public Meetings & Adoption

Findings from the ADA Transition Plan process and the draft copy of the Cheatham County ADA Transition Plan will be presented to the Cheatham County Capital Improvement Program Committee on Monday, January 13, 2020 and to the Cheatham County Commission, for adoption, at the regularly-scheduled Commission meeting, in January 2020. The Cheatham County Capital Improvement Program Committee meeting and the Cheatham County Commission meeting will both be public, advertised meetings. Public comments received during these meetings will be incorporated into the final draft of the ADA Transition Plan.

4.3 Public Comments

Comments provided during the public involvement process and during public hearings prior to the adoption of the ADA Transition Plan will be summarized and included in this section once available.

4.4 Grievance Procedure

Title II of the ADA includes administrative requirements for all government entities employing more than fifty people. Establishing a grievance procedure is one of the administrative requirements. To meet this requirement, Cheatham County is required to develop a procedure to resolve complaints relating to Title II. The Grievance Procedure has been established and can be viewed on the County's website at https://www.cheathamcountyttn.gov/assets/pdfs/ada_grievance_procedure.pdf.

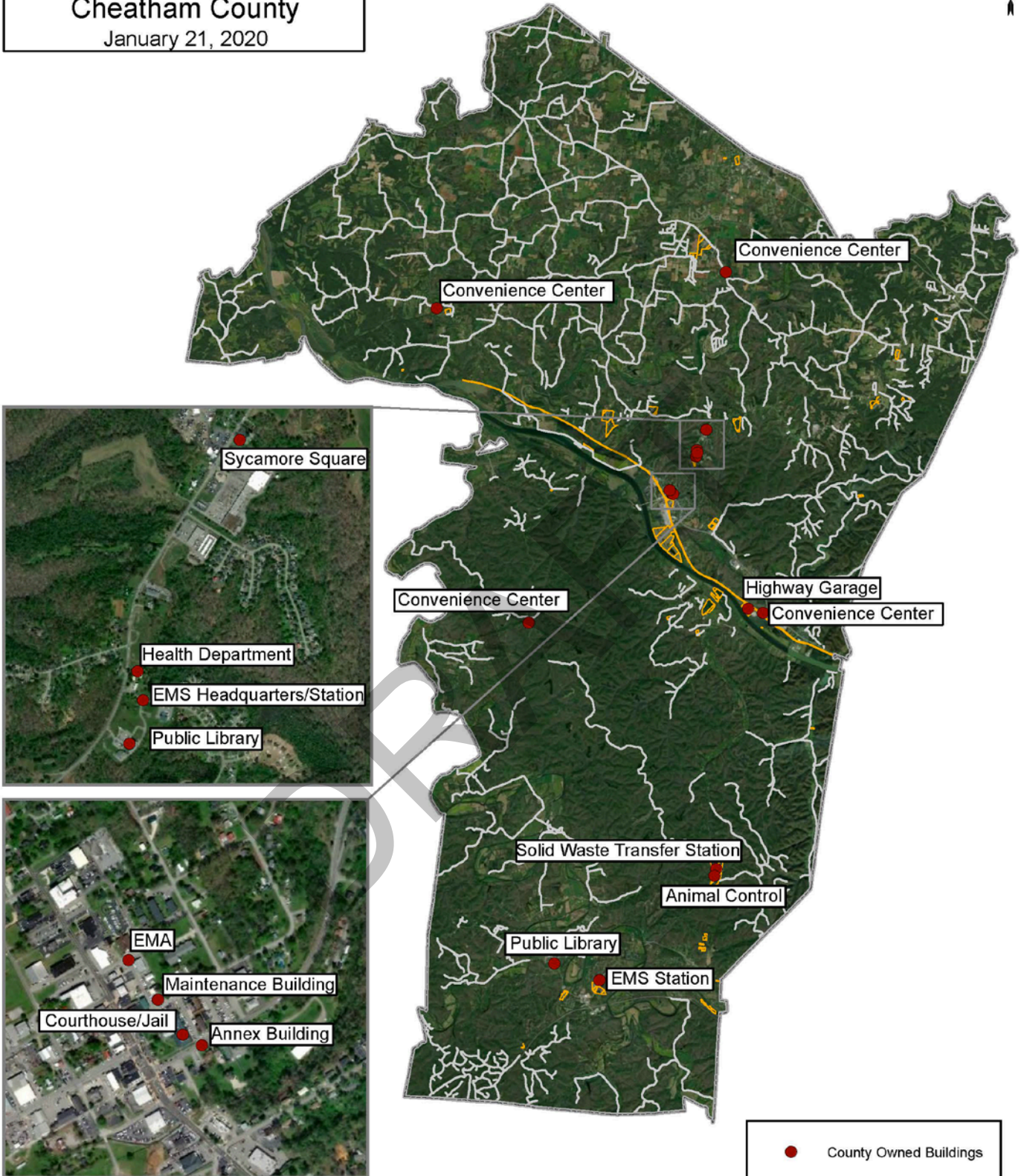
Appendix A. Maps of County Facilities

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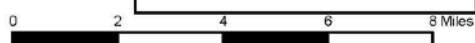
County Owned Assets

Cheatham County

January 21, 2020



- County Owned Buildings
- County Owned Roads
- County Owned Land



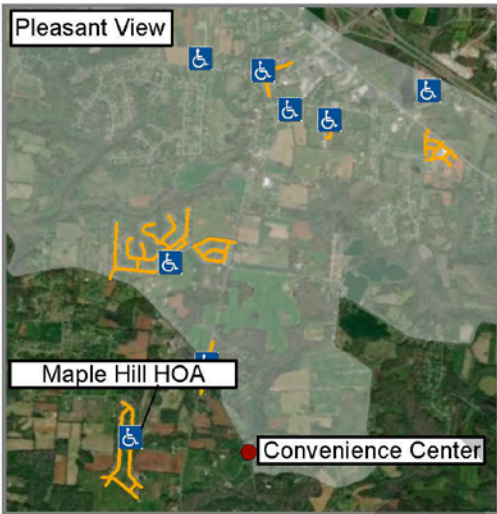
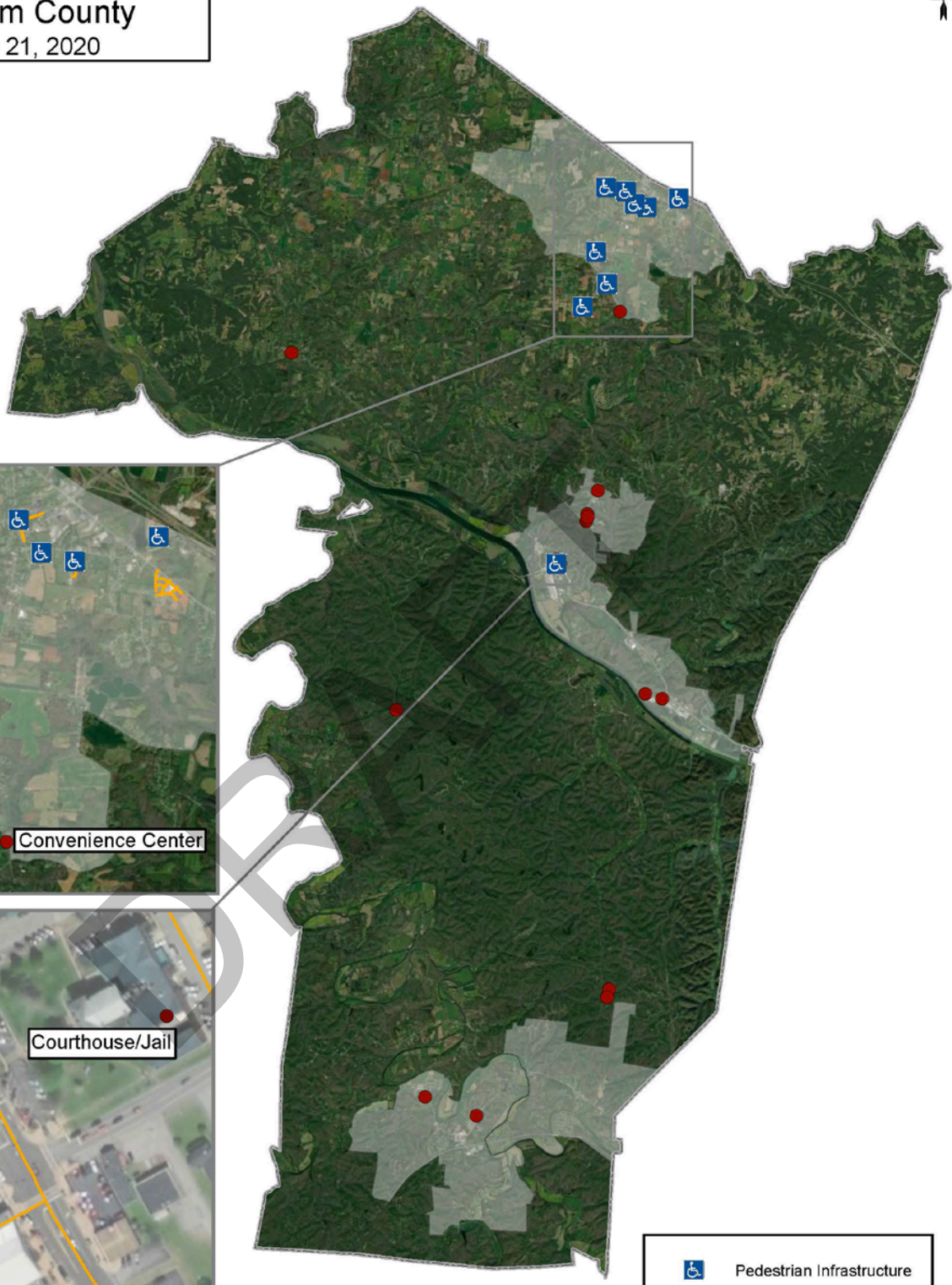
Map not intended for engineering purposes. Prepared by the Greater Nashville Regional Council, 220 Athens Way, Suite 200 | Nashville, TN 37226 | GNRC.org



Assets within County

Cheatham County

January 21, 2020



- Pedestrian Infrastructure
- County Owned Buildings
- Sidewalks
- City Boundaries



Map not intended for engineering purposes. Prepared by the Greater Nashville Regional Council, 220 Athens Way, Suite 200 | Nashville, TN 37228 | GNRC.org

Appendix B. Key Terms & Definitions

Disability

With respect to an individual: a physical or mental impairment that substantially limits one or more major life activities of such individual; a record of such impairment; or being regarded as having such impairment.

Qualified Individual with a Disability

An individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architecture, communication, or transportation barriers; or the provision of auxiliary aids or services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by TDOT.

Discrimination on the Basis of Disability

The action of -

- Limiting, segregating or classifying citizens in such a way that may adversely affect opportunities or status because of the person's disability;
- Limiting, segregating, or classifying a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participating in a contract that could subject qualified citizens with disabilities to discrimination;
- Using any standards, criteria, or methods of administration that have the effect of discriminating on the basis of a disability;
- Denying equal benefits because of a disability;
- Failing to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on TDOT's operations;
- Using selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Failing to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Complaint

A complaint or a grievance is a claimed violation of the ADA.

Substantial Limitation of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people. Major life activities are functions such as walking, seeing, hearing, speaking, breathing, learning, performing manual tasks, or caring for oneself. In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and

- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

Having a Record of Impairment

An individual is disabled if she or he is treated as having a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Reasonable Program Modifications

If the individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;
- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

A modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

A modification applies to known disabilities only. A modification is not required if it changes the essential nature of a program or activity of the person with a disability, it creates a hazardous situation, adjustments or modifications requested are primarily for the personal benefit of the individual with a disability, or it poses an undue burden on TDOT.

Auxiliary Aids and Services

Auxiliary Aids and Services include:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;
- Acquisition or modification of equipment or devices; and
- Other similar services and actions.

Appendix C. County Facility Reports

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Appendix D. Inspection Photolog

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Appendix E. ADA Checklists

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Appendix F. Resource List

This appendix is under development.

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