



## Summary of Americans with Disabilities Act (ADA) - Section 504 Transition Plan

### Review of Accessibility of Village of Niles Programs, Services Activities and Public Rights-of-Way

Americans with Disabilities Act (ADA) Title II  
Section 504 of the Rehabilitation Act of 1973



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Niles, IL 60714

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In Collaboration and Assistance of the Village of Niles

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The Village of Niles ADA Title II Self-evaluation and Transition Plan is being prepared by Disability Access Consultants, with the collaboration and assistance of Village of Niles staff and input by other interested individuals and community members.

Mr. Greg Kallevig, Civil Engineer with the Department of Public Services, serves as the primary contact and facilitator for the Americans with Disabilities Act (ADA) Self-evaluation of programs, services, activities and events of the Village of Niles and the updated ADA transition/barrier removal plan for Village of Niles public rights-of-way.

Mr. Thomas J. Powers is the designated Americans with Disabilities Act (ADA) and Section 504 Coordinator for the ADA/504 Self-evaluation and Transition Plan.

A copy of the Self-evaluation and Transition Plan will be available from the ADA/504 Coordinator. Accessible alternate formats will be made available.

Disability Access Consultants (DAC)  
(800) 743-7067

### **Purpose of the Village of Niles ADA/504 Self-evaluation and Transition Plan**

The purpose of the Village of Niles Americans with Disabilities Act (ADA) Title II and Section 504 Self-evaluation and transition plan is to document the results of the Village of Niles's review of access to programs, services, activities, events, facilities, parks, and public rights-of-way by individuals with disabilities in order to determine if any discriminatory or potentially discriminatory practices, policies or procedures exist. This report contains preliminary findings and recommendations based on the in-progress review of the Village of Niles.

As evidenced by this study and update, the Village of Niles is committed to complying with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 (504), and other federal, state statutes and regulations to provide accessibility for persons with disabilities. The update further serves to demonstrate the ongoing compliance efforts by the Village.

The Village of Niles contracted with Disability Access Consultants (DAC) to conduct a review of selected public rights-of-way to update the Village of Niles ADA Self-evaluation and Transition Plan in accordance of Title II of the ADA. DAC is also in the process of training Village staff to conduct self-surveys of the remaining sidewalks in the Village using DACTrak intake software.

The study includes accessibility requirements for the Americans with Disabilities Act (ADA) Title II, Illinois Accessibility Code and the Public Right-of-Way Accessibility Guidelines (PROWAG).

The Village of Niles has demonstrated a commitment from the highest level of leadership with coordination of compliance activities and involvement of persons with disabilities and methodologies for compliance procedures. As evidenced in the preliminary ADA/504 Report, the Village of Niles understands that the ADA/504 Compliance Plan is not a static document, but requires ongoing implementation and periodic updates.

### **Background**

The ADA and Section 504 of the Rehabilitation Act requires state and local governments, such as Village and county governments (referred to as public entities in this document) to ensure that their facilities, public rights-of-ways, policies, procedures and practices are accessible and do not discriminate.

In addition to the Department of Justice (DOJ), the Federal Highway Administration's (FHWA) Americans with Disabilities Act (ADA) and Section 504 program plays an important role to ensure that pedestrians with disabilities have an equal opportunity to use the transportation system in an accessible and safe manner.

As part of FHWA's regulatory responsibility under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (504), the FHWA is required to ensure that recipients of Federal aid and State and local entities that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any highway transportation program, activity, service or benefit they provide to the general public; and to ensure that people with disabilities have equitable opportunities to use the public rights-of-way system. Furthermore, laws and regulations require accessible planning, design, and construction to integrate persons with disabilities and that the public entity does not discriminate.

As the Illinois Department of Transportation (IDOT) is a recipient of federal funds and cities, counties and other public entities are sub-recipients of the flow through funding, public entities are required to demonstrate their compliance with the ADA and Section 504 of the Rehabilitation Act. A component of the requests is the development of a comprehensive ADA/504 Self-evaluation and Transition Plan.

Section 504 of the 1973 Rehabilitation Act (Public Law 93-112) prohibits discrimination on the basis of disability in federally assisted programs. Section 504 requirements for USDOT administrations are covered under 49 CFR Part 27 (USDOT), Nondiscrimination on the Basis of Disability in Programs and Activities Receiving or Benefiting from Financial Assistance. The Americans with Disabilities Act (ADA, 1990, Public Law 101-336) is a broader civil rights statute that prohibits discrimination against people with disabilities.

The Department of Justice (DOJ) has rulemaking authority and enforcement responsibility for Title II, while USDOT is legally obligated to implement compliance procedures relating to transportation, including those for highways, streets, and traffic management. The Federal Highway Administration (FHWA) Office of Civil Rights oversees the DOT requirements in these areas.

In order to ensure compliance, IDOT conducts reviews to ensure that:

- FHWA recipients and sub-recipients are informed of their responsibilities to provide accessibility in their programs, activities, facilities and public rights-of-way
- Recipients and sub-recipients are in compliance with the ADA and Section 504
- Recipients and sub-recipients are applying appropriate accessibility standards to all public rights-of-way and transportation facilities
- All complaints filed under Section 504 or the ADA are processed in accordance with established complaint procedures

#### **Prior ADA Self-Evaluation and Transition Plans**

The current study being conducted by Disability Access Consultants updates and/or augments selected accessibility surveys and studies that were conducted previously.

#### **Dates of Self-Evaluation and Transition Plans**

The ADA self-evaluation and transition/barrier removal plans are currently being prepared using information and input being gathered by Disability Access Consultants and the Village staff. As the Village understands the commitment for regular updates and annual reports, the Village will continue to update its plan on a regular basis.

#### **ADA Self-evaluation and Transition Plan**

To further the Village's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the Village is conducting an updated Americans with Disabilities Act (ADA) and Section 504 Self-evaluation of programs, services, activities and public rights-of-way.

The updated ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the Village and provides an updated framework for implementation. The current study also incorporates recent updates in the ADA, related state codes and accessibility trends.

The self-evaluation of policies, procedures and activities is being conducted under the direction of Greg Kallevig, Civil Engineer for the Village of Niles. Disability Access Consultants (DAC) was contracted to conduct a survey of select Village public rights-of-way. The Village staff have been trained to conduct the surveys of the balance of the public rights-of-way that are maintained by the Village. The goal of the Village is that all potential physical and programmatic barriers for accessibility are identified and removed.

#### **Regular Self-Evaluation Updates**

The Village understands that the ADA/504 plan is a living, on-going document and requires regular updates to keep it current. In its continuing efforts to maintain compliance, the Village has several mechanisms in place to provide for an ongoing update of the Self-evaluation. The Village's designated ADA/504 Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA, Section 504 and related accessibility standards and regulation. The Village also has the use of web-based accessibility management software called DACTrak to document and track the findings and the implementation of the plan, including progress reports.

Although the Village actively solicited comments and surveys of programs, services and activities from Village staff, community organizations and members of the public in early 2017, it is anticipated that additional comments and input may be received.

As public input is important to develop and prioritize the plan, the Village conducted extensive public outreach and as described in the public outreach portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable and realistic plan.

Updates may also be necessitated by changes in the ADA, the Illinois Accessibility Code, PROWAG or MUTCD. An example is the court case regarding on-street parking. Another example is the FHWA and memorandum clarifying what is maintenance and what is an alteration.

### **Classification of the Village of Niles**

The Village of Niles is classified as a “public entity” pursuant to Title II of the Americans with Disabilities Act which applies to state and local governments. A public entity covered by Title II is defined as:

- 1) Any State or local government;
- 2) Any department, agency, special purpose district, or other instrumentality of a State or local government; or
- 3) Certain commuter authorities as well as AMTRAK.

As defined, the term "public entity" does not include the Federal Government. Title II, therefore, does not apply to the Federal Government, which is covered by sections 501 and 504 of the Rehabilitation Act of 1973. Title II is intended to apply to all programs, activities, and services provided or operated by State and local governments. As Section 504 of the Rehabilitation Act applies to programs or activities receiving Federal financial assistance, the Village understands that compliance with Section 504 is required.

Title II of the ADA covers programs, activities, and services of public entities. Title II is divided into two subtitles. This study focuses on subtitle A of Title II, which is implemented by the Department of Justice's Title II regulation. Subtitle B, covering public transportation, and the Department of Transportation's regulation implementing that subtitle, are not addressed in this study. The Village did, however survey and incorporate findings from Village owned and maintained public rights-of-way. In accordance with the ADA and Section 504, public rights-of-way are considered programs, services and activities of the public entity.

Subtitle A, the focus of the Village of Niles self-evaluation, is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination on the basis of disability established by section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance. By law, the Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under section 504, and incorporates specific prohibitions of discrimination from the ADA. Section 508 standards for website accessibility are also incorporated into the study.

### **Focus of the Updated Village of Niles ADA Self-Evaluation**

Barriers that deny or limit access to programs, services or activities may be structural or nonstructural. Nonstructural barriers may be due to policies, practices or procedures that may inadvertently limit, segregate or discriminate against individuals with disabilities.

The focus of the Village of Niles ADA/504 Self-evaluation and Transition Plan targets access to the Village's programs, services and activities in nonstructural or programmatic areas as defined by Title II of the ADA and Section 504 of the Rehabilitation Act. Structural barriers are referenced in the transition plan by site and are contained in detail in individualized Transition/Barrier Removal reports of sites inspected and are available from the ADA Coordinator and in the DACTrak Accessibility Management System. It is important to note that some structural barriers may be addressed by using a programmatic methodology if they did not involve new construction or new remodeling and renovation. Findings, recommendations and other pertinent information from the study has been loaded into the web-based DACTrak Accessibility Management System developed by Disability Access Consultants (DAC) and licensed to the Village of Niles.

Using the features available in the DACTrak accessibility management software, the Village is able to generate compliance assessment reports that provide the following information:

- A description of the non-compliant physical element
- Identification of the reason(s) a physical element is considered non-compliant
- Applicable federal and state accessibility code references that apply to the element

- Digital photographs of the non-compliant physical element
- Summary and detail aerial maps depicting the location of the non-compliant physical element, which are able to be exported into an ArcGIS file format
- Recommended method to bring the item into compliance
- A construction cost estimate when applicable
- A list of compliant elements found for each facility

### **Location of Self-Evaluation**

The ADA/504 Self-evaluation and Transition Plan will be maintained and made available for public inspection by the Village's ADA Coordinator, Thomas J. Powers. The ADA/504 Self-evaluation and Transition Plan is available in alternate formats, as requested. Accommodations are also made by the Village as requested.

### **Designated ADA/504 Coordinator**

Mr. Thomas J. Powers is designated as the ADA/504 Coordinator for the Village of Niles. The Village of Niles has noticed and posted the contact information for the ADA Coordinator as below:

Thomas J. Powers, ADA Coordinator/504 Coordinator  
Village of Niles  
6849 W Touhy Avenue  
Niles, IL 60714  
Email: [tjp@vniles.com](mailto:tjp@vniles.com)  
Phone: (847) 588-7900  
TTY: (800) 877-8339

The Village offers alternate methods and accommodations to provide access to review or provide input into the Village's plan.

Requests for information from the ADA/504 Coordinator can be sent by email, phone, mail, and fax. The ADA/504 Coordinator currently does not have a direct TTY number, but uses the Illinois relay system. Information is available in alternate formats upon request.

Requests for copies or information about the Village of Niles ADA/504 Self-evaluation and Transition Plan can be obtained from the ADA/504 Coordinator.

### **Self-evaluation Format**

This self-evaluation provides a preliminary summary and profile of findings and recommendations. Findings and recommendations for potential physical barriers are found in the web-based DACTrak software program. DACTrak has photographs of barriers, GIS information, findings, recommendations, estimated costs and other information. Custom reports and transition plan information can be generated from DACTrak to monitor and track the implementation of the plan.

### **Village Organization, Departments, Committees**

#### ***Organization and Departments***

The main Village of Niles departments and divisions include:

- Mayor's Office
- Village Board of Trustees
- Administration
- Community Development
- Family Fitness Center
- Family Services
- Finance
- Fire
- GIS
- Police

- Public Services
- Senior Center
- Teen Center

### **Methodology for Self-Evaluation**

A Village of Niles staff member is designated to provide oversight representation and direction regarding the study of Village programs, services, activities and events. Greg Kallevig is designated as the Village staff member to serve as the Village contact for the ADA/504 Self-evaluation. Mr. Thomas J. Powers has been designated as the ADA/504 Coordinator.

Several methods are being used to provide comprehensive input regarding the public's accessibility to programs, services and activities offered by the Village, including:

- Review of policies, procedures and other documents
- Survey of facility users
- Survey for program and site administrators
- Survey of organizations representing individuals with disabilities
- Review of the previous efforts by the Village
- Visits to selected sites
- Inspection of Village of Niles public rights-of-way and other areas
- Information posted on the website
- Public postings and notices requesting input at Village locations in conspicuous locations
- Public input - phone calls, meetings and input during training sessions

Relevant policies, procedures and documents are continually being reviewed. Data is being collected regarding programs, services and activities for compliance with the requirements of Title II of the ADA and Section 504 of the Rehabilitation Act. Surveys have been distributed as one measure to determine the level of ADA/504 compliance within the organization. Public postings and notices are displayed in Village locations asking for input in the study. Announcements have also been made in the local newspaper and on the Village of Niles website.

### **Transition/Barrier Removal Plan**

The term "transition plan" comes from the terminology in the 1990 Americans with Disabilities Act (ADA) that describes how public entities would be "transitioning" into compliance during the timelines of 1992 to 1995. The term barrier removal plan is used in addition to the term transition plan, as public entities are no longer transitioning into compliance during the three years set aside in the law. The transition/barrier removal plan identifies the noncompliant barrier that may deny access to goods and services, the proposed method to remove the barrier, the identity of the responsible person to oversee the implementation of the plan and the projected schedule for barrier removal of "structural" barrier. The self-evaluation, on the other hand focuses on programmatic barriers that may deny access to programs services and activities. The two plans work congruently to remove the structural and programmatic barriers.

Public entities, such as the Village of Niles, are required to provide access to Village programs, services and activities for the recipients of services. Thus, the Village must provide access for individuals with disabilities and document areas of noncompliance. Documentation is incorporated into the plan as barriers are removed. Plans are updated, for example, as the Village acquires additional properties, remodels facilities or removes properties from its inventory list.

The following public rights-of-way were inspected by Disability Access Consultants:

- **Sidewalks**
  - Albion Avenue - Milwaukee Avenue to Newcastle Avenue - North Side
  - Amelia Drive
  - Ashland Avenue
  - Austin Avenue - Touhy Avenue to End of Sidewalk



- Ballard Road - Milwaukee Avenue to Greenwood Avenue
- Ballard Road - Milwaukee Avenue to Washington Street
- Bellefort Road - Wright Terrace to Cul-De-Sac
- Betty Terrace
- Birchwood Avenue - Waukegan Road to Milwaukee Avenue
- Birchwood Avenue - Waukegan Road to Nordica Avenue
- Breen Street - Harlem Avenue to Cul-De-Sac
- Breen Street - Oketo Avenue to Harlem Avenue
- Bruce Drive
- Caldwell Avenue - Gross Point Road to Touhy Avenue
- Caldwell Avenue - Main Street to Seward Street
- Callero Drive
- Canavan Court
- Carol Avenue - Shermer Road to National Avenue
- Carol Court - Shermer Road to Cul-De-Sac
- Carol Street
- Carol Street -Oketo Avenue to End
- Catino Terrace
- Cedar Lane
- Central Avenue - Touhy Avenue to Howard Street
- Chase Avenue - Harlem Avenue to Neva Avenue
- Cherry Street - Franks Avenue to Cul-De-Sac - North Side
- Chester Avenue
- Chester Avenue - Dempster Street to End
- Church Street - Maryland Street to Greenwood Road
- Church Street - Washington Street to Courtland Drive
- Church Terrace
- Churchill Avenue - Washington Street to Churchill Circle
- Churchill Circle - Churchill Avenue to Lake Street
- Clara Court - Cumberland Avenue to Cul-De-Sac
- Clara Drive
- Cleveland Street - Olcott Avenue to Milwaukee Avenue
- Cleveland Street - Waukegan Avenue to Caldwell Avenue
- Cleveland Street - Waukegan Road to Harlem Avenue
- Clifton Avenue
- Clifton Avenue - Ballard Road to Davis Street
- Concord Lane
- Conrad Avenue - Oketo Avenue to Harlem Avenue
- Courtland Avenue - Milwaukee Avenue to Davis Street
- Courtland Drive - Church Street to Lyons Street
- Courtland Drive - Davis Street to Church Street - East Side
- Courtland Drive - Lyons Street to Alley - East Side
- Crain Street
- Crain Street - Milwaukee Avenue to Ozark Avenue
- Crain Street - National Avenue to Cul-de-sac
- Crain Street - Oketo Avenue to Harlem Avenue
- Croname Road - Gross Point Road to Howard Street

- Cumberland Avenue - Clara Drive to Clara Court
- Cumberland Avenue - Clara Drive to Oakton Street
- Cumberland Avenue - Clara Drive to Roseview Drive - West Side
- Cumberland Avenue - Dempster Avenue to Roseview Drive
- Cumberland Avenue - Dempster Street to Church Street
- Davis Street - Courtland Avenue to Washington Street
- Davis Street - Cumberland Avenue to Chester Avenue
- Davis Street - Greenwood Road to Chester Avenue
- Days Terrace
- Dee Road - Heathwood Drive to Golf Road
- Delphia Avenue
- Dempster Street - Milwaukee Avenue to Ozark Avenue
- Dempster Street - Waukegan Avenue to Ozark Avenue
- Dobson Street - Harlem Avenue to Waukegan Road
- Dobson Street - Oconto Avenue to Harlem Avenue
- Dobson Street - Waukegan Road to End
- Ebinger Drive - Riverview Avenue to Milwaukee Avenue
- Elizabeth Avenue - Grand Street to Root Street
- Elizabeth Avenue - Milwaukee Avenue to Prospect Street
- Elmore Street - Dempster Street to Park Avenue
- Elmore Street - Main Street to Oakton Street
- Elmore Street - Milwaukee Avenue to Dempster Street
- Emerson Street
- Fargo Avenue - Waukegan Road to Sidewalk End, Waukegan Road to 6926/6927 Fargo Avenue
- Farnsworth Drive - Prospect Avenue to Monroe Street
- Field Drive - Greendale Avenue to Monroe Street
- Forest View Lane - Rosemary Lane to Riverview Avenue
- Foster Lane - Washington Street to End
- Franks Avenue - Harts Road to Touhy Avenue
- Georgia Drive - Waukegan Road to Cul-De-Sac
- Glendale Lane
- Glendale Road - Mayard Road to 9509 Glendale Road
- Grace Avenue
- Grace Avenue - 8887 Grace Avenue to 8631 Grace Avenue
- Grace Avenue - Ballard Road to Davis Street
- Grand Court - Monroe Street to Cul-De-Sac
- Grand Street - Dempster Street to Oak Avenue
- Greendale Avenue
- Greendale Avenue - 8159 Greendale Avenue to Oakton Street
- Greendale Avenue - Prospect Drive to School Driveway
- Greenleaf Avenue - Harlem Avenue to Shermer Road
- Greenleaf Street - Oriole Avenue to Harlem Avenue
- Greenleaf Street - Ottawa Avenue to Overhill Avenue
- Greenleaf Street - Ozark Avenue to Milwaukee Avenue
- Greenleaf Street - Shermer Road to National Avenue
- Gregory Lane - Greenwood Avenue to End of 9612 Greenwood Avenue Building
- Grennan Place - Ottawa Avenue to Milwaukee Avenue

- Grennan Place - Shermer Road to Cul-De-Sac
- Gross Point Road - Caldwell Avenue to Lehigh Avenue
- Hamilton Drive - Shermer Road to Cul-De-Sac
- Hamlin Avenue - Terrace Place to Sherry Lane
- Harlem Avenue - Howard Street to Oakton Street
- Harlem Avenue - Main Street to Dempster Street
- Harlem Avenue - Main Street to Oakton Street
- Harrison Street - Sheryl Lane to Warren Road - South Side
- Harvard Street - Harlem Avenue to Waukegan Road
- Howard Street - Central Avenue to Lehigh Avenue
- Howard Street - Harlem Avenue to Waukegan Road
- Howard Street - Oriole Avenue to Harlem Avenue - North Side
- Howard Street - Waukegan Road to Lehigh Avenue
- Huber Lane
- Huber Oval
- Jarvis Avenue - Alley to Waukegan Road - South Side
- Jarvis Avenue - Caldwell Avenue to Cul-De-Sac
- Jarvis Avenue - Central Avenue to End
- Jarvis Avenue - End to 6921 Jarvis Avenue - South Side
- Jarvis Avenue - Milwaukee Avenue to Harlem Avenue
- Jarvis Avenue - Waukegan Road to School Street - North Side
- Joey Drive
- Johanna Drive
- Jonquil Terrace - Milwaukee Avenue to Harlem Avenue
- Jonquil Terrace - Milwaukee Avenue to Oriole Avenue
- Jonquil Terrace - Waukegan Road to End
- Kathy Lane - Western Avenue to Path to Mark Twain School
- Kay Street
- Kedzie Street - Neva Avenue to Shermer Road
- Kedzie Street - Odell Avenue to Milwaukee Avenue
- Keeney Street - Harlem Avenue to Milwaukee Avenue
- Keeney Street - Harlem Avenue to Waukegan Road
- Keeney Street - Washington Street to Ozanam Avenue
- Keeney Street - Waukegan Avenue to Caldwell Avenue
- Kirk Drive
- Kirk Street - End to Harlem Avenue - North Side
- Kirk Street - Harlem Avenue to Odell Avenue - South Side
- Kirk Street - Harlem Avenue to Waukegan Road
- Knight Avenue
- Knight Avenue - Emerson Street to 9344 Knight Avenue
- Lake Street - Washington Street to Churchill Circle
- Lauren Lane
- Lawler Avenue
- Lee Street - Harlem Avenue to Breen Street
- Lee Street - Milwaukee Avenue to Oriole Avenue
- Lee Street - Oketo Avenue to Harlem Avenue
- Lehigh Avenue - Touhy Avenue to End of Sidewalk

- Lexington Lane
- Lill Court - Harlem Avenue to Cul-De-Sac
- Lill Court - Ozanam Avenue to Cul-de-sac
- Lill Street - Oketo Avenue to Harlem Avenue
- Lincoln Avenue
- Lincoln Avenue - Emerson Avenue to 9344 Lincoln Avenue
- Loras Lane
- Lyons Street - Courtland Drive to Washington Street - North Side
- Lyons Street - Maryland Street to Callero Drive
- Lyons Street - Washington Street to Maryland Street - South Side
- Madison Court - Cumberland Avenue to Cul-De-Sac
- Madison Drive
- Madison Steet - Neva Avenue to Shermer Road
- Madison Street - Oriole Avenue to Milwaukee Avenue
- Madison Street - Waukegan Street to Caldwell Avenue
- Main Street - Harlem Avenue to Waukegan Road
- Main Street - Milwaukee Avenue to Harlem Avenue
- Main Street - Milwaukee Avenue to Washington Street
- Maryland Street - Lyons Street to Church Street
- Maryland Street - Oak Avenue to Church Street
- Maynard Drive - Huber Lane to 2200 Maynard Drive
- Maynard Oval
- Maynard Road
- Maynard Terrace
- Meacham Court - Monroe Street to Cul-De-Sac
- Melvina Avenue - Touhy Avenue to Gross Point Road
- Menard Avenue - Howard Street to Jarvis Avenue
- Merrill Avenue - Park Avenue to Churchill Street
- Merrill Street - Dempster Street to Park Avenue
- Merrill Street - Greenleaf Street to Dempster Street
- Merrill Street - Main Street to Oakton Street
- Merrimac Avenue
- Milwaukee Avenue - Dempster Street to Courtland Avenue
- Milwaukee Avenue - Oakton Street to Dempster Street
- Monroe Court - Newland Avenue to Cul-De-Sac
- Monroe Street - Cumberland Avenue to Washington Street
- Monroe Street - Harlem Avenue to Milwaukee Avenue
- Monroe Street - Harlem Avenue to Waukegan Road
- Monroe Street - Washington Street to Milwaukee Avenue
- Mulford Street
- Mulford Street - Lehigh Avenue to Merrimac Avenue
- Mulford Street - Milwaukee Avenue to Harlem Avenue
- Natchez Avenue - Gross Pointe Road to Howard Street
- National Avenue - Carol Avenue to Greenleaf Street
- National Street - Wright Terrace to Greenleaf Avenue
- Neva Avenue - Birchwood Avenue to Howard Street
- Neva Avenue - Cleveland Street to Kedzie Street

- Neva Avenue - Milwaukee Avenue to End
- Neva Avenue - Oakton Street to Howard Street
- New England Avenue - Oakton Street to End
- Newark Avenue - Hayes Avenue to Rusch Drive
- Newcastle Avenue - Albion Avenue to Cemetery Fence
- Newcastle Avenue - Cleveland Street to Madison Street
- Newland Avenue - Cleveland Street to End
- Niles Avenue - Harlem Avenue to Shermer Road
- Niles Terrace - 6965 Niles Terrace to Waukegan Road - South Side
- Niles Terrace - Waukegan Road to 6914 Niles Terrace - North Side
- Nora Avenue - Birchwood Avenue to Howard Street
- Nora Avenue - Jarvis Avenue to End
- Nora Avenue - Oakton Street to Howard Street
- Nora Avenue - Seward Street to Oakton Court
- Nordica Avenue - Fargo Avenue to Howard Street - West Side
- Nordica Avenue - Howard Street to Harvard Avenue
- Norma Court - Huber Lane to 8200 Norma Court
- Normal Avenue
- Normal Court - Cumberland Avenue to Cul-De-Sac
- Normandy Avenue - Albion Avenue to Cemetery Fence
- North Terrace
- Nottingham Avenue - Howard Street to End
- Nottingham Avenue - Howard Street to North End
- Oak Avenue
- Oak Avenue - Milwaukee Avenue to Cumberland Avenue
- Oak Lane
- Oak Park Avenue - Albion Avenue to Cemetery Fence
- Oak Park Avenue - Howard Street to Touhy Avenue
- Oakton Court - Harlem Avenue to Nora Avenue
- Oakton Court - New England Avenue to Stewart Street
- Oakton Court - New England Avenue to Waukegan Road
- Oakton Street - Harlem Avenue to Milwaukee Avenue
- Oakton Street - Harlem Avenue to Oconto Avenue - South Side
- Oakton Street - Milwaukee Avenue to Washington Street
- Oakton Street - Nordica Avenue to Waukegan Road - South Side
- Oakton Street - Oconto Avenue to Milwaukee Avenue - South Side
- Oakton Street - Prospect Avenue to Cumberland Avenue
- Oakton Street - Waukegan Road to Harlem Avenue
- Oakton Street - Waukegan Road to Harlem Avenue - South Side
- Oakton Street - Waukegan Road to New England Avenue
- Oconto Avenue - Main Street to Oakton Street
- Oconto Avenue - Oakton Street to Dobson Avenue
- Octavia Avenue - Main Street to Oakton Street
- Octavia Avenue - Oakton Street to Milwaukee Avenue
- Odell Avenue
- Odell Avenue - Kirk Street to Oakton Street - West Side
- Odell Avenue - Main Street to Oakton Street

- Odell Avenue - Oakton Street to Mulford Street - East Side
- Oketo Avenue
- Oketo Avenue - Main Street to Dempster Street
- Oketo Avenue - Main Street to Oakton Street
- Oketo Avenue - Oakton Street to Kirk Street
- Olcott Avenue
- Olcott Avenue - Main Street to Dempster Street
- Olcott Avenue - Main Street to Keeney Street
- Oleander Avenue
- Oleander Avenue - Main Street to Dempster Street
- Oleander Avenue - Main Street to Monroe Street
- Oriole Avenue - Main Street to Dempster Street
- Oriole Avenue - Main Street to Monroe Street
- Oriole Avenue - Milwaukee Avenue to Oakton Street
- Oriole Avenue - Oakton Street to Howard Avenue - East Side
- Osceola Avenue
- Osceola Avenue - Main Street to Dempster Street
- Osceola Avenue - Main Street to Oakton Street
- Ottawa Avenue - Main Street to Greenleaf Street
- Ottawa Avenue - Main Street to Kedzie Street
- Ottawa Avenue - Milwaukee Avenue to Oakton Street
- Overhill Avenue - Lee Street to Greenleaf Street
- Overhill Avenue - Main Street to Park Entrance
- Overhill Avenue - Monroe Avenue to Oakton Street
- Ozanam Avenue - Dempster Street to Park Avenue
- Ozanam Avenue - Main Street to Oakton Street
- Ozanam Avenue - Milwaukee Avenue to Dempster Street
- Ozark Avenue - Main Street to Dempster Street
- Ozark Avenue - Milwaukee Avenue to Oakton Street
- Park Avenue - Cumberland Avenue to End
- Park Avenue - Washington Street to Ozanam Avenue
- Park Lane
- Peter Terrace
- Prospect Avenue - Oakton Street to Cedar Lane
- Prospect Court
- Prospect Street - Dempster Street to Ballard Road
- Prospect Street - Monroe Street to Cedar Lane
- Riverside Drive - Harts Road to Touhy Avenue
- Riverview Avenue - 6515 Riverview Avenue to End
- Riverview Avenue - End to 6515 Riverview Avenue - West Side
- Robin Road
- Root Court - Monroe Street to Cul-De-Sac
- Root Street - Dempster Street to Oak Avenue
- Rosemary Lane - Forest View Lane to Cul-De-Sac
- Roseview Drive
- Rusch Drive
- School Street - Cul-De-Sac - 7331 to 7330 School Street

- Seward Street - New England Avenue to Oakton Court
- Seward Street - Osceola Avenue to Cul-De-Sac
- Seward Street - Waukegan Road to New England Avenue
- Shermer Road - Dempster Street to Waukegan Road
- Steward Street - Harlem Avenue to Nora Avenue
- Steward Street - Waukegan Road to Cul-De-Sac
- Stolting Road
- Sunset Road
- Susan Court - Monroe Street to Cul-De-Sac
- Touhy Avenue - Caldwell Avenue to Lehigh Avenue
- Touhy Avenue - Central Avenue to Lehigh Avenue
- Warren Oval
- Warren Road - Harrison Street to Glendale Road
- Washington Street - Ballard Road to Dempster Street
- Washington Street - Ballard Road to Davis Street
- Washington Street - Davis Street to Courte Drive - West Side
- Washington Street - Main Street to Oakton Street
- Waukegan Road - Oakton Street to Georgia Drive
- Waukegan Road - Oakton Street to Milwaukee Avenue
- Wendy Way
- Western Avenue - 9352 Western Avenue to Golf Road
- Western Avenue - Weeg Way to North Terrace - East Side
- Willow Lane - Church Street to Woodland Drive
- Wisner Street - Crain Street to Dempster Street
- Wisner Street - Dempster Steet to Park Avenue
- Wisner Street - Main Street to Oakton Street
- Woodland Drive - Church Street to Lyons Street
- Wright Terrace - Harlem Avenue to Shermer Road
- Wright Terrace - Shermer Road to National Street

The Village of Niles staff have been trained on ADA and applicable state requirements to update the survey of the Village sidewalks using the DACTrak software.

***Findings***

The Village of Niles has demonstrated its ongoing commitment to enhance its accessibility to Village programs, services and activities by conducting an Americans with Disabilities Act (ADA/504) Self-evaluation and transition/barrier removal plan update.

The findings and recommendations for the Village public rights-of-way (PROW) are contained in the DACTrak Accessibility Management Software. The DACTrak software program provides the Village with a web-based tool to update its plan, document progress, estimate costs and schedule barrier removal. DACTrak allows the user to prioritize in a variety of methods. Different report formats can be printed from the DACTrak Accessibility Management Software provided by Disability Access Consultants.

The Village is currently in the process of reviewing their data to complete their schedule of barrier removal.

The Village has a standard procedure for barrier removal and maintenance. The annual plan for the Village's Street Improvement Program includes budgeting for barrier removal and sidewalk maintenance to maintain compliance.

The Village also maintains an internal oversight procedure that monitors all new construction to verify work is completed in compliance with accessible standards. The procedure includes all designs to be cross checked by a second professional engineer. All public projects are also inspected by a professional engineer.

Although the funding for the removal of accessibility barriers is incorporated into existing projects, the Village can plan to set aside funds for an ADA Budget to augment other ADA activities. Accommodations, for example, that are needed but are not a part of a current project, may be able to be addressed with a dedicated ADA Budget.

***Recommendations***

The Village should continue using their existing methods and procedures to update and maintain a current plan, budget funds, schedule, implement, document, and monitor barrier removal activities.

The Village should also continue using their current internal oversight procedures and methods to monitor new construction to verify that the work completed is compliant with accessibility standards.

Funds should be allocated for ADA projects and removal of ADA/504 barriers to accessibility, in addition to components of the Public Right-of-Way Accessibility Guidelines (PROWAG).

**Notice to the Public of the Self-Evaluation**

As the Village is still actively welcoming input into the plan, public notices of the self-evaluation process and study are currently posted. A copy of the notice is located in Appendix A.

**Summary of Findings and Recommendations**

This section of the Self-evaluation contains findings by Disability Access Consultants about the extent to which the Village of Niles’s policies and practices provide access to the Village’s programs, services and activities. It also includes recommendations by Disability Access Consultants.

The results from the ADA/504 Self-evaluation demonstrate not only the commitment by the Village to provide access to Village programs, services and activities, but the overall compliance by the Village of Niles. The findings from the review of policies, procedures and practices demonstrate a high level of compliance with the requirements of the ADA/504. Only a few recommendations are included in this report that will enhance compliance with the ADA/504.

Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the updated Village of Niles ADA/504 Transition/Barrier Removal Plan that is detailed in the DACTrak Accessibility Management Program. Access to information contained in the DACTrak program is available from the Village of Niles ADA/504 Coordinator.

**Designation of ADA/504 Coordinator**

The regulations implementing the ADA/504 require any public entity with fifty or more employees to designate at least one employee to coordinate ADA/504 compliance (28 CFR §35.107(a)).

***Findings***

The Village has a designated ADA/504 Coordinator to oversee the development, implementation and monitoring of the ADA/504 Self-evaluation and Transition Plan. The Village has designated Thomas J. Powers as the ADA/504 Coordinator.

The Village has posted the identity of the ADA/504 Coordinator on the Village website and by a posting in selected Village buildings.

***Recommendations***

Information regarding the identity of the Village’s ADA/504 Coordinator should continue to be provided to staff, posted at all Village locations, incorporated into new employee orientation packets, and placed in frequently used publications, on the website and in staff and public directories.

It is recommended that the Village continue to publish the name, address, e-mail address and phone numbers of the Village of Niles ADA/504 Coordinator in appropriate public notices, brochures, pamphlets and other



documents frequently distributed to the general public. Publications should also include the Telecommunications Device for the Deaf or Teletypewriter (TDD/TTY) and/or the Illinois relay phone number.

At the time of the ADA/504 Self-evaluation the ADA/504 Coordinator did not have a designated and posted TDD/TTY number.

#### **Posting of Identity of ADA/504 Coordinator and Notice of Rights**

Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA/504 coordinator (28 CFR §35.107(a)).

In addition, Section 35.106 requires a public entity to disseminate sufficient information to applicants, participants, beneficiaries and other interested persons to inform them of the rights and protections afforded by the ADA/504. Furthermore, in providing notice, the Village must comply with the requirements for effective communication in Section 35.160.

A copy of the public rights notice is located in Appendix A.

#### ***Findings***

The identity of the ADA/504 Coordinator and the notice of the rights afforded individuals with disabilities were posted and noticed at the commencement of the study. The identity of the ADA/504 Coordinator, address, phone number, and email address were noticed and posted.

#### ***Recommendations***

The Village should provide ongoing notice of the identity of the Village of Niles ADA/504 Coordinator on its website and in frequently used publications or documents accessed by the general public and by recipients of programs, services and activities.

The notice may also be provided in newspaper advertisements, on applications, at program sites, in program handbooks, in regular mailings, on legal notices, on radio announcements, in requests for proposals/qualifications, on facility use agreements, and in contracts.

The notice should include the name, title, address and phone numbers of the ADA/504 Coordinator. The notice should include a TDD/TTY number and/or Illinois Relay number to ensure equally effective communication. Although not required, it is recommended that the notice include the e-mail address for the ADA/504 Coordinator.

Notices should be posted in conspicuous locations on a regular basis.

Information regarding the requirement to post the identity of the ADA/504 Coordinator, notice of rights in accordance with the ADA/504 and related information should be sent to each department by the ADA/504 Coordinator or other appropriate official. A standard notice should be given as an example. Each department could add specific information applicable to the provision of programs, services and activities.

Posting and notice requirements should be updated if the identity of the ADA/504 Coordinator changes or if more than one ADA/504 Coordinator is designated.

#### **Statement of Accommodations on Public Notices**

Statements of accommodations should be available on public notices and agendas. The Village is required to provide Title II information in alternative formats to ensure that information is accessible to people with disabilities.

#### ***Findings***

Public Village Board and Committee Agendas and other public postings and notices currently do not have an ADA/504 compliance statement.

**Recommendations**

A sample statement may include the following statement with the phone and TDD/TTY numbers:

“Individuals who need auxiliary aids and or services for effective communication or to participate in programs and services of the Village of Niles are invited to make their needs and preferences known to the ADA/504 Coordinator or the alternate Contact Person. This notice is available in accessible alternate formats from the ADA/504 Coordinator.”

It is recommended that the Village includes a statement of accommodation and compliance on all future board and committee agendas.

**Statement of Nondiscrimination**

All public entities are required to provide information to applicants, participants, beneficiaries, employees and other interested persons of the rights and protections afforded by Title II of the ADA (26 CFR §35.106).

**Findings**

A Nondiscrimination Notice was found on the Village’s Website using a search for the term “Nondiscrimination” from the search box on the Village’s home page. The Nondiscrimination notice states the identity of the Village’s ADA/Section 504 Coordinator, along with information for contact by mail, email, phone, fax and TTY.

The Village of Niles employment application, found through the “How Do I Apply for Employment” link from the Village website’s homepage, also contain the following statement of nondiscrimination.

“We consider all applicants for positions without regard to race, color, religion, sex, national origin, age, disability, veteran/reserve/national guard or any other legally protected status. Those applicants requiring accommodation to the application and/or interview process should notify the Human Resources Department.”

**Recommendations**

Nondiscrimination statements should be posted on frequently used publications for the public.

A sample nondiscrimination notice should also be utilized. A notice, such as the following sample, could be utilized:

“The Village of Niles does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services or activities. The Village does not discriminate on the basis of disability in its hiring or employment practices. Questions, concerns, complaints or requests for additional information regarding the Americans with Disabilities Act may be forwarded to the Village’s ADA/504 Coordinator (provide contact information).”

Policies, practices and procedures for nondiscrimination should refer to members of the public, in addition to employees, and address nondiscrimination in regards to access to all programs, services and activities for individuals with disabilities and not be limited to employment. The Village should consider adopting a general nondiscrimination policy for access to programs, services, activities, applicants and employees.

Statements of nondiscrimination should be included on selected publications, brochures describing programs, services and activities offered by the Village, new employee materials, recruitment materials, publications and frequently used forms and documents.

Departments should be directed to include the statement in selected publications, documents and forms.

Contracts and vendors that provide printing and publication services should be notified of required statements, required font and required contrast for accessible publications.

### **Input into the Self-Evaluation Process**

The regulations which implement the ADA require public entities to provide an opportunity to interested persons and organizations to participate in the Self-evaluation process. For three years after completion of the Self-evaluation, the public entity must keep records of any problems identified (28 CFR §35.105).

#### ***Findings***

The Village of Niles is providing numerous opportunities using different methodologies to solicit input into the Village plan. The public input process is comprehensive. Public input surveys are available in hard copy format at several high public use Village facilities. Links to the survey designed for Niles program and facility users and for organizations representing individuals with disabilities are also provided on the Village's website. Surveys for input from organizations who serve persons with disabilities were mailed to many organizations in Niles and the surrounding area, requesting comments and feedback. An online fillable form to respond to the survey for program or facility users is also available on the Village website. In addition to formal surveys, the phone number, email address and mailing address of the Village of Niles ADA/504 Coordinator was posted publically offering several further methods for citizens to offer comments.

#### ***Recommendations***

Although no additional activities are required, the Village may wish to conduct periodic customer satisfaction surveys or gather input from recipients of services as an ongoing activity. An additional emphasis may include outreach activities to collect and integrate input from individuals with disabilities and organizations representing individuals with disabilities on an ongoing basis.

### **Grievance/Uniform Complaint Procedures**

A public entity that employs fifty or more people must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA (28 CFR §35.107(b)).

#### ***Findings***

A search for the term "grievance" from the search box on the Village's home page, resulted in quick access the Village's complaint and grievance procedure which includes contact information for the Village's ADA Coordinator for submission of a grievance. The notice however, does not include a form for a grievant to complete, which would ensure the Village collects the information needed to investigate and resolve a grievance within the time frame specified.

The Village currently utilizes a software called VueWorks to track complaint resolution. This software allows the Village to centralize and manage the resolution of complaints.

#### ***Recommendations***

The Village should make efforts to inform staff and the public of the existence of the Village's ADA/504 Coordinator, grievance procedures, the steps for handling grievances, and the Village policies for remediation of grievances.

Information regarding complaint procedures should be readily available to members of the public in addition to employees and applicants. Procedures should outline the steps needed to resolve a complaint.

Grievance procedures should be a part of the new employee orientation packet.

Grievance procedures should be available in accessible alternate formats.

A method to collect data and collect a profile of complaints should be developed. The status of the complaint and the time from complaint to resolution should be documented to assist with interventions and staff development to reduce or eliminate repeated complaints.

Complaint procedures and forms should be available at all Village buildings and in all departments. As noted in the findings, the Village does have a posted complaint procedure, but not an accompanying complaint form. A recommended complaint form has been included as Appendix C. This form should be made available in alternate formats, upon request. Alternate formats may include large print or braille. The Village staff

may ask what the preferred alternate format is when a request is made. It is not acceptable to inquire what the person's disability is, but staff may ask what format would allow the requestor to complete the form.

The Village should continue using the current VueWorks software that allows for the centralization of complaint handling and tracking of complaint resolution. An analysis of types and locations of complaints contained in the database may also assist with developing profiles to help with targeting quality control and training measures. If the Village chooses to discontinue use of the VueWorks software in the future, it is recommended that it be replaced with a similar centralized record keeping software or database to ensure that information will be easily available to staff, allowing the Village to regularly update its compliance efforts, and plan for additional compliance implementation through training and budget considerations.

The ADA/504 Coordinator or designated staff can develop updated reports based on a profile of concerns or complaints to determine the needs for proposed training materials, agenda items, and proposed budget expenditures.

Procedures should continue to be developed, implemented and instituted to provide consistency for complaint resolution and record keeping.

Grievance procedures could also provide an alternate point of contact other than the ADA/504 Coordinator.

### **Access to Programs, Services and Activities**

A public entity may not adopt official policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have a discriminatory effect (28 CFR §35.130(b)(3)).

#### ***Findings***

Village programs, services and activities are currently being reviewed and none are found to be discriminatory. Public input is also being sought regarding access to programs, services and activities as described in the opportunities for public input section of this summary.

#### ***Recommendations***

The ADA/504 Coordinator should continue to monitor and receive information regarding concerns or issues about access to programs, services and activities and take the appropriate action regarding any potential discriminatory practices for persons with disabilities.

### **Village Policies**

#### ***Findings***

Village policies, procedures and practices are being reviewed and none are found to be discriminatory. DAC has noted a few comments and recommendations for consideration by the Village.

#### ***Recommendations***

The Village should continue to provide programs, services and activities that include individuals with disabilities.

The ADA/504 Coordinator should continue to monitor programmatic access.

Additional and ongoing training should be provided regarding the requirements of the Americans with Disabilities Act and accommodations that provide equal access to programs, services and activities.

Meetings and events open to the public should be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.

Information regarding the facility should include information regarding accessible features and elements of the site. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the Village website. Indicating accessible paths of travel and accessible

entrances also provides valuable information for individuals with disabilities. A contact number and email address should be provided for additional assistance.

**Eligibility Criteria**

Public entities cannot use eligibility criteria that tend to exclude or screen out persons with disabilities (28 CFR §35.130(b)(8)).

***Findings***

No discriminatory practices were noted regarding eligibility criteria for program access.

***Recommendations***

Program eligibility criteria should be reviewed as they are drafted or modified to ensure that eligibility criteria do not put additional burdens or requirements on individuals with disabilities.

The Village should continue to ensure that all eligibility criteria allow for accommodations for individuals with disabilities.

**Accommodations to Access Programs, Services and Activities**

The ADA/504 prohibits public entities from excluding persons with disabilities from programs, activities or services offered by the public entity. The law allows a public entity to use both structural and nonstructural methods to achieve accessibility to programs, services and activities (28 CFR §35.150(a)(1); (b)(1)).

***Findings***

A statement of reasonable accommodations is contained in the ADA Nondiscrimination notice on the Village website.

***Recommendations***

Information about how to request accommodations should appear on all public notices, announcements and agendas. Information should be disseminated to all departments and divisions regarding the statement for accommodations requirement.

The Village should provide training for staff and volunteers regarding accommodations for individuals with disabilities. All staff, and in particular frontline staff such as receptionists and staff with high public contact, should receive training on interacting and accommodating individuals with disabilities.

Additional training materials and videos should be purchased or developed to assist with training efforts.

Currently, individuals requesting ADA/504 accommodations are directed to contact the Village's ADA/504 Coordinator, Thomas J. Powers, by phone, TTY or email. The Village of Niles does not currently have an ADA/504 accessibility request form on their website. This form should be available using several methods and should be available in an alternate format. An example of the form is included as Appendix D. The ADA/504 Coordinator should maintain records of requests, concern and comments and the status and method to resolve the concerns.

The Village should assist departments with planning and budgeting for selected accommodations, such as large print, cassettes, CD-ROMs, Braille materials, etc.

A centralized method for producing alternate formats may provide a cost savings and reduce the timelines to produce alternate formats.

**Equally Effective Communication**

Public entities must ensure that applicants, participants and members of the public with disabilities have communication access that is equally effective as that provided to persons without disabilities (28 CFR §35.160(a)).

**Auxiliary Aids and Services**

***Findings***

The Village is in the process of assessing the availability of auxiliary aids and services to persons with disabilities.

***Recommendations***

The Village should provide staff training and information regarding auxiliary aids and effective communication to employees and volunteers.

The Village's policy directives should require equally effective communications for programs, services and activities provided for the public by the Village of Niles.

The Village could purchase a portable indoor-outdoor assistive listening system that could be checked out from the ADA/504 Coordinator on an as-needed basis. Information should be sent to departments regarding the availability of assistive listening systems.

**Interpreter Services**

***Findings***

Interpreter services are generally handled individually by departments.

***Recommendations***

Interpreters should be provided as determined through the request for accommodation process or in circumstances where an interpreter is known to be required. The Village may want to inquire about a contract for Village-wide interpreter services for departments to utilize as needed to provide a quicker response at a lower cost.

The Village must ensure that those individuals utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.

The Village may consider the use of a video relay interpreter system to augment the current contract and arrangements for interpreters.

**Telecommunications Devices for the Deaf**

***Findings***

TTY/TDD numbers were found to be available in some departments, Village publications, website pages or in staff or service directories.

***Recommendations***

All staff responsible for responding to incoming telephone calls should be trained in the proper use and protocol of TDD/TTYs. Information and training should be provided on an ongoing basis.

The Village should install additional telecommunications devices for the deaf (TTY/TDD) phone lines in several areas or purchase a network compatible system that would reside on the server.

Departments with high public use should purchase a unit or a network system. The Village might consider the purchase of a network PC compatible TTY/TDD system that would allow individual computers to be networked and access TTY/TDD calls, instead of purchasing separate TTY/TDD units that require a dedicated line. The advantages of the networkable system are allowing the user to transfer calls, conduct conference calls and utilize voice mail.

Employees who communicate with the public should become familiar with the use of TDD/TTY communications and how to maintain the TDD/TTY in an operable condition. The development of TDD/TTY help sheets noting abbreviated words commonly used in TDD/TTY communications would be helpful to staff when communicating via TDD/TTY. Posting the help sheet near TDD/TTY's would also be helpful to the user.

Procedures should be developed and institutionalized to ensure that TDD/TTY and other communication devices are maintained in working and operable order at all times.

The Village may wish to purchase additional back up TDD/TTYs for replacement, in the event that permanently located TDDs may be temporarily out of commission.

Publication of all TDD/TTY numbers must be provided in program literature, in phone directories and on selected publications.

## **Website**

### ***Findings***

The Village website was found to be reasonably compliant regarding website accessibility to meet W3C protocols.

Very few errors were found, and are mostly “empty link” errors. This type of error means that the link contains no text description of the function or purpose of the link and results in an “empty link”. In this situation, screen reader software has no content to present to the user regarding the function of the link. This can introduce confusion for users of screen readers, as the target of the link is not revealed to them.

### ***Recommendations***

The Village should apply a document language to the Village’s websites and attempt to add suitable text descriptions to “Empty Links”. The Village should continue to monitor its website accessibility.

The Village should ensure that the website vendor/contractor provide a compliant website and issue a statement of accessibility.

## **Alternate Formats**

### ***Findings***

Statements of accommodations do not specify to persons with disabilities that alternate formats are available and it is not known what alternate formats may be available for public documents.

### ***Recommendations***

The Village should consider a method to centralize a department, possibly connected to information services or printing, that would provide documents and materials in alternate accessible formats. The centralized approach to developing and maintaining alternate accessible formats may be more cost effective and timely.

The Village should continue to provide staff training regarding the requirements for accessible alternate formats, what accessible alternate formats are and how to provide accessible alternate formats. Procedures should be put in place for the development of accessible alternate formats.

The Village should produce accessible alternate formats for high use areas where the probability for a request for an alternate format is high. Examples include provision of audiocassettes, large print, information that sent via e-mail, screen readers, Braille, and pictograms.

Public meetings that are broadcast should be captioned and interpreters made available when requested.

It is recommended that the Village consider contracting out selected services to organizations that have the ability to develop Braille documents for brochures, pamphlets, applications, documents and other public information written in text.

## **Availability of Online Information and Services**

Information regarding Village of Niles programs, services and activities should be available in alternate formats to assist individuals with disabilities.

### ***Findings***

The accessibility of Village of Niles information, meetings, agendas and minutes is significantly enhanced due to the online availability of documents for meetings that are archived. The Village’s website has a page for upcoming and archived meetings that includes agendas and minutes of upcoming and previously held meetings.

### ***Recommendations***

Public notices regarding meetings and other methods for input should have a statement of accommodations that includes who to contact for an accommodation. A TTY/TDD number should also be included. Any meetings that are recorded and available by video should be captioned. The methods for submitting

information should also be expanded to include a method for online input in addition to appearing in person and submitting written comments.

**Terminology**

Village publications should be reviewed to see if the word “handicapped” is used. The words “individuals with disabilities” or “persons with disabilities” should replace “handicapped”. The term “disabled person” should also be avoided. Information regarding acceptable terminology in “people first language” should also be provided to Village staff. Publications should be updated as they are reprinted.

It is recommended that the ADA/504 Coordinator disseminate information regarding acceptable terminology to be utilized by departments and agencies.

**Staff Training**

Village of Niles staff have been receiving training on ADA/504 and requirements for public rights-of-way compliance by Disability Access Consultants. Village staff have been trained to conduct self-surveys of public rights-of-way to enhance compliance with federal and related state codes for Village sidewalks and intersections.

Ongoing compliance with the ADA/504 is enhanced when staff and officials receive continuing and updated training about the rights of persons with disabilities and the obligations of public employees under the ADA/504. Although training is not required by the ADA/504, training regarding the requirements of the ADA/504 is recommended.

**Findings**

Training has been provided to Village staff regarding ADA requirements, assessment and maintenance. DAC is also continuing to provide consultation for administrative and facilities staff.

**Recommendations**

The Village should continue to provide ongoing training regarding the ADA/504 for facilities, public rights-of-way and outdoor recreation standards. Suggested training topics should include, but are not limited to:

- Requirements of the ADA/504 for the Village of Niles
- Individuals with Disabilities
- Acceptable Terminology and Expressions
- Noncompliance Consequences
- Accessible vs. Compliant
- Barriers – Programmatic or Physical
- Providing Services for Individuals with Disabilities
- Leased Sites
- Special Events
- Accessible Locations for Meetings
- Events & Voting
- Auxiliary Aids and Services
- Construction & Remodeling
- Maintenance of Accessible Features
- Community Donations and Construction Projects
- Village of Niles Responsibilities
- Notice of the ADA/504 Coordinator
- Notice and Rights Posted for Individuals with Disabilities
- TDD/TTY
- Assistive Listening
- Grievance Complaint Procedures
- Statement of Accommodations
- Individuals with Disabilities Participation



- Use of Village Facilities By Organizations and Individuals
- Reasonable Accommodations
- Statement of Accommodations
- Effective Communication
- Alternate and Accessible Formats
- Accessible Websites
- Volunteers
- Staff Development

The Village should provide staff training in additional formats other than a classroom session, if needed. Training methodologies could include videos (captioned) that could be viewed at the training or checked out by departments and agencies.

Additional training videos should be purchased and maintained for checkout, or borrowed from a variety of agencies, such as the Department of Rehabilitation.

Handouts and training materials should be prepared, if needed, in alternate accessible formats.

The ADA/504 Coordinator should continue to provide or coordinate additional ADA/504 training to all management and staff who have regular contact with the public.

### **New Employee and Volunteer Orientation**

#### ***Findings***

The online application for employment with the Village includes a statement of nondiscrimination and accommodation. The Village's volunteer opportunities page does not include a statement of nondiscrimination or reasonable accommodations.

#### ***Recommendations***

The Village should add information as to the identity, title, address, phone number and e-mail address of the ADA/504 Coordinator to new employee orientation and volunteer information.

The Village should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and Section 504. Materials could also be offered on providing accommodations for individuals with disabilities.

### **Outreach Materials and Activities**

The ADA/504 does not specifically state how a public entity provides for accessibility to the Village's programs, services and activities. One method is to disseminate information in a variety of locations and formats to enhance the access to programs, services and activities of the Village.

#### ***Findings***

No specific outreach activities were noted regarding providing activities and materials for individuals with disabilities.

#### ***Recommendations***

The Village should consider including additional pictures and references to individuals with disabilities in publications, brochures and materials.

Organizations representing individuals with disabilities and areas with an increased population of individuals with disabilities could be targeted for input regarding additional methods to disseminate information regarding programs, services and activities of the Village.

In Village publications, areas or services that are accessible should be indicated with descriptive text and the International Symbol of Accessibility (ISA). For example, accessible restrooms and routes can be designated on the website, on maps and in publications.

### **Distribution and Location of Publications**

Publications, documents and brochures are required to be accessible for individuals with disabilities.

***Findings***

Most publications, brochures and documents are displayed in departments and areas that were accessible for individuals with disabilities. Displays should also allow for retrieval of the information without utilizing a tight pinching or grasping motion and be within a compliant reach range.

***Recommendations***

Provide information to departments regarding the placement of brochures, pamphlets and information in accessible locations and in accessible containers or displays for individuals with disabilities. Requirements for reach ranges and clear floor space to access publications would be helpful.

Counters and areas that are lowered for access by individuals with disabilities should be maintained and kept clear of display and work items.

**Fees and Surcharges**

Public entities may not charge a fee or add a surcharge to a fee to cover the cost of making its facilities, programs, services or activities accessible to persons with disabilities. (28 CFR §35.130(f)).

***Findings***

There was no evidence of fees charged to individuals with disabilities that were not charged to individuals without disabilities to access programs, services and activities.

***Recommendations***

The ADA/504 Coordinator should continue to randomly review policies and practices to ensure that fees and surcharges are not charged to individuals with disabilities that are not charged to individuals without disabilities.

**Emergency Evacuation Procedures**

The Village is required to plan to meet the needs of persons with disabilities in an emergency and provide access to emergency shelter services.

***Findings***

The Village of Niles website contains Emergency Services and Preparedness information and plans for a variety of natural disasters.

***Recommendations***

The Village should provide additional training and information regarding emergency evacuation procedures, particularly with regard to the evacuation of persons with disabilities. A provision should be noted in regards to emergency shelters and policy to allow service animals, and training should be provided to shelter staff to understand the difference between pets and service animals.

The Village should make sure that evacuation routes and procedures continue to be posted at all Village sites in accordance with ADA/504 regulations.

All staff should be made aware of the location of the posted evacuation routes within their facilities.

The Village should develop procedures and a mechanism to monitor the posting of emergency evacuation routes and procedures.

The Village should consider the development of a voluntary registry for individuals that may need additional assistance that may not have access to technology.

Shelters should be surveyed to determine that they are accessible for individuals with disabilities prior to be designated as an evacuation shelter. Noncompliant findings for designated shelters can be found in the Village of Niles ADA/504 Transition/Barrier Removal Plan.

Designated evacuation shelter sites should also be inspected on a regular basis to determine that the shelter continues to be accessible for persons with disabilities.

### **Organizations Representing Persons with Disabilities**

The ADA/504 does not require the Village staff or teams to directly participate with organizations representing persons with disabilities. The Village of Niles, however, has an opportunity to network and develop collaborative partnerships with individuals and organizations representing persons with disabilities. Through the network, partnerships, and the Village of Niles ADA/504 Committee, the Village has provided an additional mechanism for public input to ensure that current and future programs, services and activities are accessible.

#### ***Findings***

Information regarding the representation of individuals with disabilities on committees was not available.

#### ***Recommendations***

The Village should continue to include individuals with disabilities on committees and advisory boards.

### **Policies for the Use of Village Facilities**

#### ***Findings***

The Village's Park District notes that select park facilities are able to be reserved. The Niles Park District website does not include terms and conditions for reserving a facility or park, or nondiscrimination notice or information on accessibility. Persons interested in reserving facilities are directed to call for reservation information. The application for reserving a facility nor a facility use agreement is not available online.

#### ***Recommendations***

The Village should consider the inclusion of a nondiscrimination clause in their rental policy. The inclusion of non-discriminating language in policy and on forms would help ensure that outside groups and organizations would agree to abide by all applicable local, state and federal laws and Village policy regarding nondiscriminatory practices during the utilization of Village facilities.

The Village should make the application form and facility use agreement available in multiple formats, ensuring at least one is accessible, and offer multiple methods to submit the application. A policy that would prohibit pets in a facility or park should include a notice allowing service dogs, when appropriate.

### **Facilities Leased by the Village**

Under Title II of the ADA, the Village is responsible for providing access to its programs, services and activities in both owned and leased facilities.

#### ***Recommendations***

The Village should review the accessibility of sites that are and may be leased in the future prior to engaging in a lease or renewal, and establish a procedure for a pre-lease inspection.

When considering a leased space, the ADA/504 Coordinator should be trained to conduct or have a designee or consultant conduct a field inspection of the prospective building to assess the building for a general, functional level of accessibility. The ADA/504 Coordinator could utilize an abbreviated checklist to determine general accessibility of facilities that the Village is considering to lease. A more comprehensive inspection could be conducted if the initial review appears to be favorable.

### **Selection of Contractors and Contracted Services**

Public entities cannot use contract procurement criteria that discriminate against persons with disabilities (28 CFR 35.130(b) (5)). Contractors should be held to the same nondiscrimination rules that apply to Village employees.

#### ***Findings***

No discriminatory or exclusionary practices were evident in the selection of contractors and contracted services.

### **Recommendations**

The Village should continue to monitor use of standard agreements and leases by all Village departments.

It is recommended that the Village consider one or more of these avenues to maintain compliance when contracting for services or when leasing facilities:

- Include ADA/504 compliance requirements in new requests for proposals.
- Review ADA/504 requirements when contracts or leases are negotiated, revised or renewed.

### **Maintenance of Accessible Features**

The ADA requires (35.133) public entities to maintain their accessible features and elements.

### **Findings**

No formal policies or procedures to maintain accessible features were found. There is evidence, however, of maintenance of some accessible features at Village sites.

### **Recommendations**

The Village should consider developing procedures or policies to maintain accessible features that require general maintenance. A few examples include re-stripping of parking, trimming vegetation or items that interfere with sidewalks, elevators and paths of travel.

### **Planning and Budgeting for Accessibility**

There is not a specific requirement in the ADA/504 for planning and budgeting for barrier removal. There is a requirement for public entities to incorporate a projected schedule for barrier removal into the transition/barrier Removal plan. A public entity that is budgeting or seeking funds to use for ADA/504 barrier removal and to improve access to programs, services and activities shows intent to implement the barrier removal/transition plan.

### **Findings**

There is evidence that the Village of Niles is incorporating the removal of barriers to accessibility on an ongoing basis and plans to remove additional barriers to Village programs, services and activities. The Village includes planning and funding for barrier removal and maintenance for continued compliance in their annual Street Improvement Program.

### **Recommendations**

The Village should maintain their current and ongoing barrier removal implementation plan and document the Village's progress, initiatives and funds expended.

It is recommended that the Village contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA) and Illinois State Codes. It is important and required that the accessibility barrier removal efforts meet federal and state accessibility codes.

The ADA/504 Coordinator, or designated staff, should be empowered with the authority to make recommendations and monitor the current Village of Niles ADA/504 Self-Evaluation and Transition Plan.

In addition to the removal of structural barriers, departments should consider budgeting for accessibility items, especially in the area of communication, such as TTY/TDD's and alternate formats.

### **Planning and Budgeting for Accessible Parking Requests**

### **Findings**

The Village is seeking advisement on a policy for handling requests for accessible parking spaces on residential streets and in Village owned parking lots.

### **Recommendations**

The goal of the policy is to meet the requirements of on-street parking, meet the needs of a resident with disabilities, and prevent misuse and abuse.

The policy would first need to include verification of the following items:

- The person making the request must be the resident or living in the household.
- The person making the request, or resident of the household making the request for the benefit of the person with a disability, must have documentation of a valid disability placard or plate, metro/transit pass, or paratransit pass.

The policy should also include the following conditions:

- The resident cannot not maintain exclusive use of the accessible space, the space would be available to any vehicle displaying an accessible placard or plate.
- All additional parking regulations would be enforced, such as posted time restrictions, meter payments, street sweeping and snow removal restrictions.

If all above conditions are met and agreed, the next step would be a site visit to determine the following:

- If the request is for an accessible space on a residential street, is there a residential driveway available?
- Is the driveway usable by the resident?
- Does the driveway allow better access than the residential street or parking lot, for features such as distance, grade, surface, etc.?
- In regards to both residential streets and public parking lots, are there any concerns or elements that would restrict use of the space or make it unsafe (traffic flow, median strips, street furniture, require person using the space to maneuver behind a parked car other than their own)?

The policy should also include protective conditions and stipulations that the final decision is at the sole discretion of Public Works or Traffic Engineering. The Village should determine who would have the final decision.

### **Opportunities for Input**

Title II of the ADA/504 requires opportunity for input into the self-evaluation process by individuals with disabilities, organizations representing individuals with disabilities and other interested individuals.

### ***Findings***

Many opportunities are being provided for input into the self-evaluation process. Input is being collected from within the Village's organizational structure through selected interviews, document reviews, selected site assessments and surveys. Notices requesting input and the identity of, and contact information for, the ADA/504 Coordinator (Appendix A) were posted at Village sites and on the Village website.

The content of the notice is included in the public notice section of this Self-evaluation.

Notices with information regarding the rights of individuals with disabilities (Appendix A) are posted at Village sites and are placed on the Village website.

Notices and postings regarding the ADA Self-evaluation and opportunities were posted on the Village of Niles website and at Village locations.

Survey forms (Appendix B) were available at Village sites to afford members of the public an opportunity to provide input. Those surveys were available in alternate formats. In addition to posted Village contact phone numbers, email addresses were also provided. The phone number, address and email information was also provided for Disability Access Consultants to provide an alternate and additional contact.

The public comment period for the Self-evaluation is currently being advertised for responses.

### **Surveys for Organizations Representing Individuals with Disabilities**

Community organizations representing individuals with disabilities and other interested individuals are provided opportunities for input via phone call, email or written input. The Village mailed the survey packet to eighteen area organizations. Two types of surveys were included and are still being made available. The

two surveys are for “Organizations Representing Individuals with Disabilities” and for “Facility Users”. Full versions of the surveys are contained in Appendix B. The option to complete both surveys were presented. The surveys include questions regarding contact with Village programs, if there were any current complaints or problems, what information or resources the organization could provide that would assist the Village and what general guidance or assistance the organization could provide.

The area organizations who were mailed the survey packet are as follows:

- Alzheimer's Association
- National Multiple Sclerosis
- Susan G Komen Breast Cancer
- The Brown Elephant
- The Chicago Lighthouse Vision Rehabilitation Center
- Salvation Army
- Avanti Wellness & Rehabilitation
- Goodwill
- Leaning Tower YMCA
- Niles Teen Center
- Saint Michaels Orthodox Church
- St John Brebeuf Youth Ministry
- Advocate Charitable Foundation
- Avenues of Independence
- Park Ridge Chamber of Commerce
- Park Ridge Nonprofit Center
- St Matthew Center
- Ell Parent Center

Neither the Village nor Disability Access Consultants have yet received any responses from the surveys. However, the Village is still continuing to welcome comments and responses from organizations at any time.

### **Surveys for Facility Users**

Surveys are available for facility users to provide input. Surveys are made available to the users of Village facilities at Village locations and on the website. The website also includes a fillable form for responses. The surveys included questions regarding accessibility, signage, accommodations, and the availability of auxiliary aids and equipment. The survey also asked the respondent to rate the Village’s attitude towards individuals with disabilities.

Survey questions included:

1. What is your relationship to the Village of Niles?
2. Check all programs, services or activities in which you participate at the facility, site or location.
3. Do you know who to contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service or event:
4. Have you ever requested an accommodation for a disability?
5. If any accommodation was requested, was your accommodation made by the Village?
6. Have you experienced any barriers, non-accessible areas, or non-accessible programs? (Examples: no accessible parking spaces, difficulty reaching an accessible entrance, steep ramps, uneven sidewalks, need for assistive listening device, large print, etc.).
7. Have you attended any special events in the Village? If yes, did you encounter any barriers to accessibility?

8. Is accessible seating provided for individuals with disabilities at programs, community events, etc. held at the facility?
9. Are you aware of any programs, services, or activities that are not accessible to individuals with disabilities?
10. Are you aware of any areas or elements of the facility that are not accessible to individuals with disabilities?
11. Is information provided regarding accommodations, auxiliary aids, assistive listening systems, interpreters, alternate formats, specialized equipment, or assisted services, etc.?
12. Is there adequate directional and informational signage provided at the facility?
13. If you have requested auxiliary aids, an interpreter or specialized equipment, was your request accommodated?
14. Has the attitude of staff of the Village of Niles towards you, or someone you know with a disability, generally helpful, supportive, positive, and proactive in solving accessibility issues?
15. Other comments:
16. What do you feel is the highest priority for accessibility in the Village of Niles Accessibility Plan?

**Responses to Surveys by Facility Users and Organizations**

The Village has not yet received any completed surveys in response to their request from program and facility users, however the Village is still accepting completed surveys and comments.

Following the public input window, the Village will still continue to welcome comments and responses from facility users at any time.

**Implementing Compliance Recommendations**

The Village of Niles has demonstrated an ongoing commitment to provide equal access to its programs, services and activities to maintain and enhance compliance with the requirements of the Americans with Disabilities Act. This commitment is evident throughout the organizational structure and is demonstrated by its outreach efforts and involvement of the community. The Village continues to embrace a concept of full and equal access for all of the people it serves.

As further evidence of its efforts for compliance with the Americans with Disabilities Act and related accessibility legislation, the Village of Niles has continued to prioritize and develop funding projections for implementation of the ADA Self-evaluation and barrier removal/transition plan.

Implementation of the recommendations in the Self-evaluation will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

**Appendix A - Public Notices and Postings**

Public Notice and Posting  
Village of Niles

The Village of Niles, in keeping with its ongoing efforts to serve all members of the community, is updating its Americans with Disabilities Act (ADA) transition plan and self-evaluation. The accessibility plan provides a comprehensive plan for access for individuals with disabilities to Village buildings, sidewalks, programs, services, activities and events.

The Village of Niles is seeking input from agencies, organizations and individuals with disabilities. As an agency, organization or individual, the value of stakeholder guidance will help to address and prioritize current and future needs. Individuals who would like to provide input are invited to complete a survey, call or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested individuals who wish to participate in the evaluation.

Your comments and opinions are important to us and will provide valuable information regarding how the Village of Niles can better serve individuals with disabilities. Surveys can be mailed to you or are available at:

Village Hall  
Village of Niles  
1000 Civic Center Drive  
Niles, IL 60714

Please contact Thomas J. Powers, ADA Coordinator, if you have questions or comments or would like to request a survey in an alternate format.

(847) 588-7900  
[tjp@vniles.com](mailto:tjp@vniles.com)

Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator. The Village of Niles complies with the Americans with Disabilities Act of 1990, Public Law 101-336, which prohibits discrimination on the basis of disability.



PUBLIC NOTICE

**Americans with Disabilities Act (ADA)**

The Village of Niles is committed to achieving full compliance with the Americans with Disabilities Act.

Village of Niles **DOES NOT**:

- Deny the benefits of Village programs, services and activities to qualified individuals with a disability on the basis of a disability.
- Discriminate on the basis of disability in access to or provision of programs, services, activities of the Village, or application for employment or employment to qualified individuals with disabilities.
- Provide separate, unequal or different programs, services or activities, unless the separate or different programs are necessary to ensure that the benefits and services are equally effective.

The Village of Niles operates its programs so that, when viewed in their entirety, they are readily accessible to or usable by individuals with disabilities.

In accordance with Section 35.106 of the Americans with Disabilities Act, all participants, applicants, organizations and interested individuals are advised and noticed that the ADA Coordinator for the Village is:

Thomas J. Powers  
Village of Niles  
6849 W Touhy Avenue  
Niles, IL 60714  
(847) 588-7900  
[tjp@vniles.com](mailto:tjp@vniles.com)



# VILLAGE OF NILES

## ADA PUBLIC NOTICE



In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (“ADA”) and Section 504 of the Rehabilitation Act (504), the Village of Niles will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** The Village of Niles does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

**Effective Communication:** The Village of Niles will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the Village of Niles’ programs, services, and activities.

**Modifications to Policies and Procedures:** The Village of Niles will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the Village of Niles offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Village of Niles, should contact the office of the program, service or activity coordinator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Village of Niles to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the Village of Niles is not accessible to persons with disabilities should be directed to:

Thomas J. Powers, ADA Coordinator/504 Coordinator  
6849 W Touhy Avenue  
Niles, IL 60714  
[tjp@vniles.com](mailto:tjp@vniles.com)  
Phone: (847) 588-7900  
TTY: (800) 877-8339

The Village of Niles will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

**This notice is available in alternate formats from the ADA Coordinator.**

**Appendix B - Surveys**



## Survey for Niles Program and Facility Users

The Village is seeing input from agencies, organizations and individuals with disabilities to help the Village enhance accessibility to its facilities, programs, services and events.

First Name (Optional)

Last Name (Optional)

Date (Optional)

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Address (Optional)

---

Phone (Optional)

---

E-mail address (Optional)

---

Name of Village of Niles Facility or type of Program or Service for which you are providing input.

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1. What is your relationship to the Village of Niles? (check all that apply)

- Resident
- Visitor
- Contractor
- Employee
- Participant of a Program, Service or Activity
- Other

If other please describe

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2. Check all programs, service or activities in which you participate at the facility.

- Classes
- Recreation
- Meetings
- Sporting Events
- Seminars
- Work (Volunteer)
- Work (Employee)
- Other

If other please describe

---

3. Do you know who to contact if you need assistance, have a concern or complaint, or need an accommodation to access a facility, service or event?

- Yes
- No

If yes, who would you contact?

---

4. Have you ever requested an accommodation for a disability from the Village?

- Yes
- No
- Not Applicable
- Don't Know

5. If an accommodation was requested, was your accommodation made by the Village?

- Yes
- No
- Not Applicable
- Don't Know

If yes, what accommodations were made? If no, were you given a reason why it was not provided?

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6. Have you experienced any barriers, nonaccessible areas, or nonaccessible programs? (Examples: no accessible parking spaces, difficulty reaching an accessible entrance, steep ramps, uneven sidewalks, need for assistive listening device, large print, etc.)

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

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7. Have you attended any special events in the Village?

- Yes
- No

If yes, did you encounter any barriers to accessibility?

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8. Is accessible seating provided for individuals with disabilities at meetings, classes, programs, etc. held at the facility?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

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9. Are you aware of any programs, service or activities that are not accessible to individuals with disabilities?

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

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10. Are you aware of any areas or elements of the facility that are not accessible to individuals with disabilities?

- Yes
- No
- Not Applicable
- Don't Know

If yes, please describe.

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11. Is information provided regarding accommodations, auxiliary aids (such as assistive listening systems, interpreters, alternate formats, specialized equipment, or assisted services, etc.?)

- Yes
- No
- Not Applicable
- Don't Know

Please describe.

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12. Is there adequate directional and informational signage provided at the facility?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

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13. If you have requested auxiliary aids, an interpreter or specialized equipment, was your request accommodated?

- Yes
- No
- Not Applicable
- Don't Know

If no, please describe.

---

---

14. Has the attitude of the staff of the Village of Niles towards you or someone you know with a disability been generally helpful, supportive, positive and proactive in solving accessibility issues?

- Yes
- No
- Not Applicable
- Don't Know

Please describe.

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15. Other comments:

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16. What do you feel is the highest priority for accessibility in the Village of Niles Accessibility Plan?

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**Village of Niles  
Organizational Survey**



Americans with Disabilities Act  
**Survey for Organizations Representing Individuals with Disabilities**  
Village of Niles

**The Village of Niles is currently updating its Americans with Disabilities Act Self-Evaluation and Transition/Barrier Removal Plans. In order to enhance access to programs and services for individuals with disabilities, the Village of Niles is asking for your input.**

**Name of organization:** \_\_\_\_\_

Address: \_\_\_\_\_ Contact person: \_\_\_\_\_

Phone: \_\_\_\_\_ Position: \_\_\_\_\_

Name of person completing this form: \_\_\_\_\_ Today's date: \_\_\_\_\_

Name of the ADA/504 Coordinator(s) for your organization: \_\_\_\_\_

*The following questions have been developed to determine how organizations and advocacy agencies perceive the Village of Niles' ability to provide services and accommodations for individuals with disabilities and to ask for input regarding how programs, services and activities can be more accessible for individuals with disabilities.*

1. What direct communications have you had with the Village of Niles to facilitate services and accommodations for individuals with disabilities?
2. Are there any specific complaints or problems regarding access for individuals with disabilities to any of the programs, services or activities provided by the Village of Niles?
3. What information or other resources can you supply to help educate or inform the Village of Niles about your organization and your services for individuals with disabilities?
4. What general guidance, advice or assistance could your organization provide to the Village of Niles to protect against potential discrimination of individuals with disabilities in its programs, services and activities?
5. What do you feel is the highest priority for the Village of Niles to improve accessibility for individuals with disabilities?

Please add any additional comments on the back of this survey or attach any additional documents.

**Thank you for your input.**

Please return this survey to Thomas J. Powers, ADA/504 Coordinator, Village of Niles, 6849 W Touhy Avenue, Niles, IL 60714. Comments can also be made by calling (847) 588-7900, through TTY at (800) 877-8339, or by email at [tjp@vniles.com](mailto:tjp@vniles.com).

**Appendix C – Grievance Form**

**Americans with Disabilities Act  
Section 504 of the Rehabilitation Act of 1973  
Grievance Form**

Instructions: Please fill out this form completely. A printed or typed response is recommended. Sign and return to the address on last page by email, fax, mail or in person. If you need an accommodation to complete or submit this form, please contact the ADA Coordinator as indicated on this form.

**1. Complainant:** \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Business: \_\_\_\_\_

**2. Person Discriminated Against: (if other than the complainant):** \_\_\_\_\_

Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone: Home: \_\_\_\_\_ Business: \_\_\_\_\_

**3. Department or person which you believe has discriminated (if known):**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

When did the discrimination occur? Date: \_\_\_\_\_

**4. Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**5. Have efforts been made to resolve this complaint?**

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes: what efforts have been taken and what is the status of the grievance?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



6. Has the complaint been filed with another bureau, such as the Department of Justice or any other Federal, State, or local civil rights agency or court?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes:

Agency or Court: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Date Filed: \_\_\_\_\_

7. Do you intend to file with another agency or court?

Yes \_\_\_\_\_ No \_\_\_\_\_

Agency or Court: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State and Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

8. Additional comments or information:

\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Return to:

**Thomas J. Powers,**  
**ADA Coordinator/504 Coordinator**  
**Village of Niles**  
**6849 Touhy Avenue**  
**Niles, IL 60714**  
**Email: tjp@vniles.com**  
**Phone: (847) 588-7900**

**FAX: (800) 877-8339**

**Appendix D – ADA/504 Accommodation Request Form**

**ADA/504 ACCOMMODATION REQUEST FORM**

The Village of Niles does not discriminate on the basis of disability in admission to, or operation of its programs, services, activities or facilities. This form may be used by individuals and their companions with a disability seeking access to Village programs, services, activities or facilities.

**ACCOMMODATION REQUEST INFORMATION**

Name: \_\_\_\_\_ Telephone (or TTY): \_\_\_\_\_

Address: \_\_\_\_\_ Date: \_\_\_\_\_

The program or facility to which I am requesting access is located at:

\_\_\_\_\_

I am requesting the following accommodation(s):

- Wheelchair Access
- Sign Language Interpretation
- Written Material in Alternate Format (Large Print/Computer Disc)
- Written Material in Braille
- Reader
- Modification of Policy Procedures
- Other

Please provide any other details or information necessary to process this request, such as date of event:

\_\_\_\_\_  
\_\_\_\_\_

**PLEASE RETURN THIS FORM TO:**

Department: \_\_\_\_\_ Telephone: \_\_\_\_\_

Address: \_\_\_\_\_ TTY (If Available): \_\_\_\_\_

**ADDITIONAL QUESTIONS MAY BE DIRECTED TO THE VILLAGE OF NILES ADA COORDINATOR:**

Thomas J. Powers  
ADA Coordinator/504 Coordinator  
Village of Niles  
6849 Touhy Avenue  
Niles, IL 60714  
Email: tjp@vniles.com  
Phone: (847) 588-7900

FAX: (800) 877-8339