



ADA TRANSITION PLAN



May 2022



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1.0 Executive Summary

1.1 Summary of Findings

The City of Littleton is a jurisdiction that desires to make its programs, services, and resources available and accessible to as many people as possible. Over the last few years, the City of Littleton (City) has undergone a self-evaluation process with the help of the consulting firm Meeting the Challenge (MTC). In the self-evaluation process the City has found 814 non-compliant points within City of Littleton Facilities, and 4,947 non-compliant points in the public right-of-way (PROW). In addition to the physical barriers above, the self-evaluation revealed that much of the existing City of Littleton website does not meet current standards for accessibility. This transition plan prioritizes changes for Littleton facilities and Littleton PROW and lays out a strategy to mitigate these barriers in 10 years and 20 years, respectively. In addition, the City of Littleton will start overhauling its website in 2022 to increase the user interface and user experience features and will be ensuring the hired contractor creates an ADA compliant website. These changes will remove barriers to accessing all the programs, services, and resources the City provides and will be combined with staff training to ensure future barriers are not inadvertently created and that grievances are properly recorded.

1.2 Overview of Process

This transition plan is being prepared to partially fulfill the requirements set forth in Title II of the Americans with Disabilities Act (ADA) of 1990. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This plan will identify policies, programs, and barriers to access within City facilities, PROW, and programs that will be corrected so that all individuals are given an equal opportunity to access the City's resources and programs.

This Transition Plan is an evaluation of the City's buildings, city managed parks, and PROW where programs, activities, and services are available to the public. Facilities that are not addressed in the Transition Plan include private businesses and offices, private schools, County, State or Federal facilities, local special district facilities or parks, places of worship or private clubs.

The facility evaluations were conducted using the most recent 2010 ADA Standards, the Proposed Right of Way Access Guidelines (PROWAG), the Architectural Barriers Act (ABA), and the Accessibility Guidelines for Outdoor Developed Areas (AGODA). The resulting barrier assessment reports will be available from the City's ADA Staff Advisory Team (ADASAT) and on the City's ADA Webpage.

This Transition Plan is intended to provide a framework for the continuous improvement of City facilities for people with disabilities. The prioritizations in this plan will lay the framework for barriers within City facilities and barriers in the most heavily used areas in the ROW (categories 1 and 2) in the next 10 years.

The City of Littleton has established an ADA Staff Advisory Team responsible for coordinating the efforts of the City to comply with Title II and for investigating any related complaints. The ADA Staff Advisory Team is also responsible for coordinating the efforts of the City to comply with the 2010 ADA Standards and all other applicable State and Federal accessibility requirements.

A public meeting was held in-person on May 2, 2022, to review the Draft ADA Transition Plan with the public and receive feedback on identified barriers, removal priorities, and proposed policies. In addition to an in-person public meeting, a virtual public engagement option was also available along with a survey to gather feedback. After the Draft Transition Plan was released to the public on Monday April 18, 2022, and presented at the public meeting, the City collected comments on the plan via email, survey, and interactions at the public meeting. The survey officially closed at 11:59 PM MST on Monday May 9, 2022. The public comments received at the public meeting and throughout the online comment period were recorded and incorporated into this plan as appropriate. Individual comments and staff responses can be found in the appendices of this document in 11.1 Public Comments.

2.0 Introduction

2.1 Legislative Requirements

The American with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities regarding both employment and the provision of goods and services. The ADA states that its purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, allow full participation, independent living, and economic self-sufficiency for people with disabilities.

The development of a Transition Plan is a requirement of the federal regulations implemented by the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds to make their programs available without discrimination toward people with disabilities. The Act, which has become known as the "civil rights act for persons with disabilities", states that:

“ *No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504)* ”

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act (ADA) on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Specifically, the City may not, either directly or through contractual arrangements, do any of the following:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered to others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

“The ADA Amendments Act of 2008 (ADAAA) was enacted on September 25, 2008, and became effective on January 1, 2009. This law made a number of

significant changes to the definition of "disability." It also directed the U.S. Equal Employment Opportunity Commission (EEOC) to amend its ADA regulations to reflect the changes made by the ADAAA. The final regulations were published in the Federal Register on March 25, 2011.

The EEOC is making changes to both the Title I ADA regulations and to the Interpretive Guidance that was published with the original ADA regulations. The Guidance provides further explanation on how the regulations should be interpreted.

Aside from wanting to create an inclusive community with equal access to City resources, Littleton is a recipient of Federal Funding. As such, the City of Littleton is required by law to adhere to the standards and expectations outlined by the documents and agencies above.

2.2 Goals & Objectives

The ultimate goal of the City of Littleton is to provide equal access to all City materials, programs, and opportunities. This transition plan formally outlines the materials, programs, and processes that will be revised in order to make equal access possible for all. The below sections address nuances and high-level requirements for following the ADA. In section 2.2 at the end of each subsection is a specific objective for meeting a particular requirement of the ADA in an effort to achieve the overall goal of an accessible Littleton.

2.2.1 Meeting Federal ADA Requirements

Under current ADA regulations and guidance, there are generally two kinds of accessibility—programmatic accessibility and physical accessibility. The elimination of discrimination requires that both types of accessibility are provided.

Programmatic accessibility covers policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility may be achieved by acquisition or redesign of equipment, assignment of aides to beneficiaries, and provision of services at alternate sites.

Physical accessibility requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to, or use of, a facility. Physical barriers tend to be more objectively defined as a specific design element that does not meet the guidance in the ADAA

or PROWAG. However, some programmatic barriers include physical design elements—sidewalks, for example, are considered a jurisdictional programming—but can also include more subjective barriers like a webpage that may be accessible for someone with limited hearing, but not for someone with limited sight.

Providing both physical and programmatic accessibility means examining every City-run program, service, or facility to ensure individuals of all ability's levels have the opportunity to access them. There are a number of ways for Littleton to ensure accessibility is being achieved. The City plans to provide accessibility by the following methods:

- Structural modifications (or replacement of) existing facilities
- Acquisition of new equipment or retrofitting of inaccessible equipment
- Acquisition of visual or auditory aides
- Relocating services or programs to an accessible site

In situations where one of the above methods is needed, the City will give priority to the one that results in the most integrated solution appropriate to encourage interaction among all users. For example, if a piece of maintenance equipment does not provide access for an employee, modification or replacement of that equipment will be done so all employees, regardless of ability, can use the equipment.

Objective – Modify City programs, services, and resources to comply with programmatic and physical accessibility, and train Littleton Staff so that future programs, services, and resources are compliant as well.

2.2.2 Accessible City Facilities & Buildings

The American with Disabilities Act (ADA) was originally signed into law in 1990 by President George H.W. Bush. With a few exceptions, City-owned buildings and facilities were constructed several years prior to the passing of the 1990 legislation (see table below for details).

City Owned Facility	Address	Number of Structures	Year(s) Constructed
Littleton Center	2255 W. Berry Ave.	1	1977
Geneva Lodge	2305 W. Berry Ave.	1	1926
City Courthouse	2069 W. Littleton Blvd.	1	1907
Bemis Public Library	6014 S. Datura St.	1	1967
Littleton Museum	6028 S. Gallup St.	1	2004
Depot Arts Center	2069 W. Powers Ave.	1	1888
D&RG Depot	5777 S. Prince St.	1	1873
Town Hall Arts Center	2450 W. Main St.	1	1920
Bellevue Service Center	1800 W. Bellevue Ave.	6	1948-2007

As could be expected, City of Littleton buildings are largely out of compliance with the ADA. Though a more comprehensive list of upgrades is available as an appendix ([11.4 5 Complete Facilities Prioritization Analysis](#)), transitions to parking and loading areas, and building entrance components are the most common elements being upgraded. These upgrades will allow people of all ability levels to access the City’s services, and the ability to perform their jobs for those who work for Littleton.

Objective – Renovate City of Littleton owned buildings so that staff, contractors, and (where appropriate) the public can access these facilities free of barriers and remove additional barriers to programming inside City-owned buildings.

2.2.3 Accessible Public Right-of-Way

Like the buildings owned and maintained by the City of Littleton, the public right-of-way (PROW) was largely constructed prior to the adoption of the 1990 ADA. Though a significant portion of the PROW has been upgraded as roadway projects have been constructed, there still remains almost five thousand elements that are non-compliant. The bulk of these elements are intersections or crossings without curb ramps, and sidewalks that do not meet the appropriate width (48” with passing areas every 200’ or 60” continuously). The magnitude of such upgrades is so great it will be several years before the entire PROW can be upgraded, so the City has prioritized upgrading non-compliant elements that are adjacent to planned capital work, and elements that are in areas with a high number of pedestrians (ex: in the Downtown Neighborhood and near K-12 schools). **Of course, individual requests from residents, employees, and business owners will take priority when those non-compliant points interfere with a person’s day-to-day activities.** In addition to improving access for those with limited mobility, the sidewalk and curb ramp upgrades will better facilitate the first and last mile of transit trips.

Objective – Bring the almost five thousand non-compliant points in the public ROW up to current ADA standards following the prioritization laid out in this document.

2.2.4 Accessible Digital Content

In late 2019 and early 2020 the City contracted with Meeting the Challenge (MTC), an engineering consulting firm that provides evaluations and services related to ADA compliance, to audit the City’s Website and digital content for accessibility. In their report MTC notes that several of the persons with disabilities that tested the website had trouble with one feature or another and that the website was not completely accessible to any one individual used in the evaluation. That being said, “...none of our testers was totally excluded from investigating the City’s website. Each of them found features that they liked and of which they encouraged the use.” The complete report can be found in the appendices in section 11.2 City of Littleton – Website Tester/WCAG 2.1 Audit Report. As the City strives to create a website that is accessible for every resident and individuals seeking digital information, upgrades will be made to the City’s website. Digital information about City resources, programs, services, and public hearings will be created in such a manner that are accessible to all users. Those seeking information about past programs and public hearings will be able to request relevant documents in an accessible format.

Objective- Create and maintain a website for the City of Littleton that meets all current digital accessibility standards and allows individuals to find and access any publicly available information regardless of ability.

2.2.5 City Employee Training

In March of 2020 MTC conducted an organization-wide survey of Littleton Staff regarding their knowledge of the ADA and what it requires of them as a City employee (see 11.3 ADA Staff Knowledge Survey Results). Overall, the survey found that “City employees have limited awareness, knowledge, and understanding of the ADA.” For one particular question regarding service animals nearly two-thirds (61.6%) of employee respondents selected an answer which could violate the ADA rights of a qualified individual with a disability. After the adoption of this transition plan, one of the primary focuses of the City will be providing training for City Staff on understanding and abiding by the ADA. One of the most common tasks for City Staff is creating documents that ultimately end up on the City’s website. Providing staff training in the creation and maintenance of accessible digital documents will also be a key part of employee training.

Objective - Provide training for City employees to better understand the ADA specifically as it relates to their specific job duties and interactions with the public. In addition, City staff will research and, where necessary, implement current best practice and role specific training opportunities for employees—especially first responders.

3.0 Previous Work Performed

3.1 1994 Self Evaluation & Transition Plan

In 1994 the City of Littleton developed a Self-Evaluation and Transition Plan and took many of the steps to be compliant with current ADA procedures including creating a grievance policy, designating an ADA Coordinator, and completing a self-evaluation. However, this document doesn't seem to have been adopted by City Council, and though the 1994 plan says several policies were implemented, these policies were not passed down as staff positions were filled with new people and new positions were added. That being said, the 1994 Plan had a number of notable general policies and procedures that should be updated and included in this plan:

1. It is the policy of the City of Littleton to provide a consistently high level of service to all of its citizens, including people with disabilities who may require special consideration in order to access these services.
2. It is the policy of the city to provide people with disabilities the same access to programs, services and employment provided to all citizens.
3. In all cases, city employees will attempt to take all steps necessary to assist people with disabilities to access the full range of services provided by the City. Consideration must be given to those steps that will lead to a positive outcome for the citizen while, at the same time, complying with city safety policies and regulations.
4. Participation by disabled members of the community in such activities as council meetings, board meetings and other activities open to the general public shall be facilitated by providing the necessary access to ensure such participation.
5. Membership on city council, advisory boards or other governing bodies shall not be denied on the basis of disability.
6. It is not the intent of this policy to provide detailed information on all disabilities. However, the city will make as much information available on various disabilities to employees through training and other sources. City employees should be aware that many people have multiple disabilities.
7. Employees will attempt to ensure that people with mental, emotional, and psychological disabilities are assisted in accessing city services. Such assistance may require time and patience beyond that usually provided. In order to facilitate employees' interactions with disabled individuals, the city will offer training on communication and other interpersonal skills.
8. If a facility providing a particular city service is inaccessible, city employees will make every attempt reasonable to provide that service to a person with a disability at an alternate location accessible to such a person.

9. The city recognizes the important historical significance of buildings and programs and the need to balance preserving history with providing access to the disabled population. Currently, three city-owned properties are designated as national historic landmarks. In addition, the city owns and operates a living history farm at the Littleton Historical Museum. The city will attempt to ensure that individuals with disabilities have access to programs through alternative steps where historically significant buildings should not or cannot be architecturally altered.
10. The Littleton City Center utilizes a number of conference rooms for small meetings. The following rooms have been designated as accessible and shall be equipped with the proper height table and equipment to accommodate disabled individuals. The Community Room on the first floor of the Littleton Center and the Staff Commons on the second floor of the Littleton Center.

The 1994 plan will be made available in its entirety on the City of Littleton website (www.littletongov.org/ada) for anyone to review or reference.

3.2 Self Evaluation & Transition Plan

Beginning in 2016 the City of Littleton began working with MTC to conduct a Self-Evaluation of its facilities and PROW to identify specific points that needed to be upgraded in order for the City to be compliant. The effort with the City and MTC has been a phased approach that spanned the period from 2016 – 2022. Further details are below:

ADA Phase	Start Date	Work Performed
Phase 1	May-16	<ul style="list-style-type: none"> • City facilities barrier report
		<ul style="list-style-type: none"> • Evaluation of city policies, practices, programs, and services
Phase 2	May-17	<ul style="list-style-type: none"> • ROW barriers data collection and analysis
Phase 3	May-19	<ul style="list-style-type: none"> • ROW barrier cost estimates and GIS data
		<ul style="list-style-type: none"> • Training recommendations for city policies, practices, programs, and services

As outlined above, these evaluations culminated in the production of two comprehensive databases that identify and recommend mitigation for every single non-compliant point within Littleton Facilities and Littleton ROW. These databases will serve as a comprehensive list of points that need to be remedied, and for the ROW this list was used to prioritize fixes based on adjacent land uses and nearby attractions.

3.5 Public Outreach Effort

In late spring of 2022 a public outreach effort was held to gather feedback on the draft ADA Transition Plan and the Self Evaluation. To ensure the City of Littleton received the widest swath of opinions and feedback on the plan, there was an in-person public meeting held on May 2, 2022 that consisted of an open house style meeting where attendees could discuss the plan with staff and large format printed media that summarized the same information provided in this document. At this meeting, information was printed on large 30" x 40" boards so that individuals could see the presentation slides up-close and without time limits. Attendees were able to leave feedback using a number of different methods including tablets with survey forms, sticky notes that could be attached to the 30" x 40" boards, or by leaving comments with a staff member that recorded these comments for inclusion in the comprehensive comment database (see 11.1 Public Comments). In addition to an in-person event, the City hosted a virtual public engagement opportunity on its website that was open for two weeks. This opportunity included a video presentation of the same content shown at the in-person meeting and a link to a survey for people to provide feedback on the Draft ADA Transition Plan.

In total, nearly three dozen public comments were left on the Draft ADA Transition Plan, all of which can be read in their entirety in section 11.1 Public Comments, as well as response from staff on how the comment is being addressed. Below is a list of some of the recurring themes from the comments:

- + **Citizen Participation in the ADA Committee**
 - In the draft version of the plan, the ADA Staff Advisory Team (ADASAT) was referred to as the ADA Committee. Public comments indicated that there was some confusion about this committee and it being a citizen advisory board. This team will be made up of Littleton staff members that will lead the City in its effort to implement the ADA Transition Plan and address grievances received by the City. This team will consult members of Littleton's various disabled communities when a specific issue that affects that community needs to be addressed. Currently there is no Citizen Accessibility Advisory Board, though City Council may decide to establish one in the future.

- + **Grievance Procedure Timeline**
 - The existing grievance procedure allowed 15 calendar days for each phase of the grievance procedure. After receiving public comments questioning the length of the existing procedure, City Staff discussed the issue with the City's lead ADA

consultant and the City's legal department and revised the grievance procedure timeline. See section 5.0 Grievance Policy & Procedure for further details.

+ **City Owned Building Prioritization**

- Commenters expressed concern over non-public buildings being prioritized in the same way as buildings that are publicly accessible. For city-owned facilities an entire facility is not prioritized in the same way. Buildings that have public programming will be a higher priority in general, but in individual buildings passages from the public right-of-way or parking area and entrance ways will be prioritized over other elements at that facility. All city-owned facilities will have elements that range from priority 1 to priority 4 based on the element. See 11.4 5 Complete Facilities Prioritization Analysis for further details.

+ **ADA Training Specific to People in First Responder Roles**

- Commenters noted there was no section focusing on training specific to first responders. Littleton Staff understands that interactions with first responders can be greatly influence by a first responder's training related to the ADA and common disabilities. Currently the Littleton Police Department has specific annual training related to the ADA which will continue in the future. Additionally, the City's ADA Staff Advisory Team will be committed to researching current best practices for this type of role specific ADA training for all City Departments and implementing it as needed. It is also important to note that South Metro Fire Rescue is a standalone self-taxing special district that is completely separate from the City of Littleton and is not required to participate in City of Littleton ADA training though regular correspondence with South Metro Fire Rescue seems to indicate they have regular ADA training as well.

4.0 Outcomes

4.1 Littleton Facilities Upgrade Plan

Ideally all of the ADA non-compliant points within City of Littleton facilities could be remedied simultaneously. However, limited funds and staff resources means that these efforts must be prioritized and accomplished gradually. Additionally, local governments are not necessarily required to make each of their facilities accessible. Actions that would threaten or destroy historic significance of an historic property, or action that would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens are not required [see [35.150\(a\)](#)]. The purpose of a transition plan is to identify and plan for the removal of structural barriers that must be removed to achieve program accessibility [see [35.150\(d\)\(1\)](#)].

In developing the following priorities list the City is aiming to provide basic access to facilities first, followed by better access to services within those facilities, and finally improving access to supplemental amenities within the facilities. The facilities prioritization was created by taking a comprehensive look at how likely a physical barrier was to create a programmatic barrier. For example, providing access from a parking lot to a building may be a relatively small correction (installation of a curb ramp) but if that building host several City programs then that one barrier is preventing a great deal of programmatic access. The complete facilities prioritization can be found below, and a comprehensive list of prioritized fixes can be found in the appendices.

Priority One

Removing barriers that impede accessibility at the main entrance of a facility (either from the ROW or a parking area) or improving a path of travel to the portion of the facility where program activities take place. Examples:

- Connection to the public rights-of-way
- Parking and passenger loading
- Entrance walks
- Entrance ramps
- Entrance stairs
- Entrance doors

Priority Two

Removing barriers that impede access to program use areas. Examples:

- Transaction counters
- Recreation environments/features
- Public offices
- Public restrooms

Priority Three

Removing barriers that impede access to amenities serving program areas. Examples:

- Drinking fountains
- Public telephones
- Site furnishings
- Vending machines

Priority Four

The fourth priority addresses features that are not required to be modified for accessibility because no public programs are located in this area, or there are nearby duplicate accessible features.

4.1.1 Prioritizing Barrier Removal by Facility

In addition to prioritizing individual types of barriers, City staff worked with MTC to prioritize each of the City's Facilities based on their level of public access and programming. City owned facilities were ranked based on the following criteria:

- **Level of Public Use:** Facilities that have a high level of public use can be assigned a higher priority;
- **Unique Programs:** Some programs are unique to a building, facility, or park and cannot occur at another location. Building that host seasonal availability and programs that emphasize health and wellness can be assigned a higher priority; and
- **Services Provided:** Facilities that provide critical services related to accessibility, health, safety, and the administration of essential City services such as permitting, and licensing can be assigned a higher priority.

4.1.2 Phasing Schedule

The tables below outline the schedule or barrier removal at City facilities. These schedules represent a 10-year plan for barrier removal and are split into three-year increments. It is the City's intent to complete as many maintenance related items as possible in years 1-3 but have schedule some barrier removal for years 4-6 to accurately the resources needed for completion. Though the timeline to complete all barrier removal in Littleton facilities is schedule for 10 years, City staff will actively work to complete projects in a shorter timeframe.

For reference, the project scales in the table below are determined by the following parameters.

- **Maintenance Issues:** Completed in-house for less than \$5,000.
- **Small Projects:** Completed in-house or by using a contractor for \$5,000 - \$25,000.
- **Large Projects:** Require a contractor and/or purchasing materials that are greater than \$25,000.

Table: Transition Plan Schedule - City Buildings

Facility / Project Scale	Year 1-3	Year 4-6	Year 7-10	Year 10+	N/A
Littleton Center					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>		•			
<i>Large Capital</i>				•	
Municipal Courthouse					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>		•			
<i>Large Capital</i>				•	
Bellevue Service Center					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>					•
<i>Large Capital</i>					•
Bemis Library					
<i>Maintenance Issues</i>		•			
<i>Small Capital</i>					•
<i>Large Capital</i>					•
Littleton Historical Museum					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>			•		
<i>Large Capital</i>					•
Town Hall Art Center					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>				•	
<i>Large Capital</i>				•	
Art Depot					
<i>Maintenance Issues</i>					•
<i>Small Capital</i>		•			
<i>Large Capital</i>				•	
Light Rail Station					
<i>Maintenance Issues</i>	•				
<i>Small Capital</i>				•	
<i>Large Capital</i>				•	

4.2 Public Right-of-Way Prioritization

Under Title II Regulations § 35.150(d)(2) a jurisdiction must address the PROW in its transition plan based on the below criteria:

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

The primary focus of the public right-of-way (PROW) is in addressing sidewalk width and the availability of curbs, though there are several points where grade, cross slope, offsets need to be addressed as well. The facilities were evaluated using the 2010 ADA Standards and 2011 Proposed Public Right-of-Way Access Guidelines (PROWAG). Due to the volume of curb ramps and sidewalks managed by the City, a GIS based assessment was used to allow for a cost effective and efficient initial assessment of these facilities. As a follow-up, Meeting the Challenge (MTC) performed field verification in areas where remote sensing tools were insufficient. In addition to cataloging all the non-compliant points in the PROW (which totals about five thousand points), MTC also provided a high-level description of how the non-compliant points could be remedied, and high-level, conservative, cost estimate to address each point as well. The total estimate cost to fix each non-compliant point in the PROW is \$81.6 million, however, this estimate assumes each point would be fixed individually and doesn't account cost savings that might stem from addressing several issues in a single effort.

The ADA Title II Regulations also state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. This plan proposes a 15 to 20-year strategy for removing public rights-of-way barriers that limit program accessibility in the highest priority locations (categories 1-3). Similar to the prioritization of facilities and facility barriers, prioritization of non-compliant points in the PROW was based on frequency of public use. Though the City plans to follow this prioritization closely, Staff may deviate from these priorities to realized efficiencies as needs for capital work and maintenance change over time. Below are the prioritization criteria developed by staff to address non-compliant points in the PROW.

Total Estimated Project Cost: \$81.6M (in 2020 dollars) – 4,947 Sites

Category 1: Highest Priority (Scheduled CIP Work) - \$4.3M (5.2%) 937 Sites

Projects that are within, or adjacent to, planned capital improvement projects, or areas that qualify for CDBG grants.

- + 1.1 First year of CIP – \$1.5m (346 Sites)
- + 1.2 Second year of CIP - \$1.5m (305)
- + 1.3 Third year of CIP - \$249k (152)
- + 1.4 Fourth year of CIP - \$1.0m (128)
- + 1.5 Fifth year of CIP - \$5k (6)
 - o Note: Widening sidewalks will be included with reconstruction projects only, ramps will exclusively be included with all mill & overlay projects.

Category 2: 2nd Highest Priority (Heavily Used Sidewalks) - \$5.5M (6.7%) 635 Sites

Projects that meet the following criteria:

- + 2.1 Along “Mixed Use/Downtown Connectors” (TMP street classification) within ¼ mile of Main Street and/or Alamo Avenue - \$190k (36 Sites)
- + 2.2 Along “Mixed Use/Downtown Main Streets” (TMP street classification) within ¼ mile of the Downtown Littleton LRT Station - \$280k (25)
- + 2.3 Along Non-Local Streets within ¼ mile of the Mineral Avenue LRT Station - \$366k (38)
- + 2.4 Along Non-Local Streets within ¼ mile of a High School or Higher Education Facility - \$2.9m (245)
- + 2.5 Along Non-Local Streets within ¼ mile of a Government Use Building - \$1.8m (291)

Category 3: High Medium Priority (Well Used Sidewalks) - \$12.0M (14.7%) 804 Sites

Projects that meet the following criteria:

- + 3.1 Along a Commercial Connector or Suburban Connector, within 150’ of a *heavily used** transit stop - \$26k (13 Sites)
- + 3.2 Along Non-Local Streets within 100’ of an Elementary or Middle School - \$1.0M (72)
- + 3.3 Along Non-Local Streets within 100’ of other public buildings – \$830k (23)
- + 3.4 Along Non-Local Streets within 100’ of DRCOG recognized High Employment Concentration Areas - \$3.2M (434)
- + 3.5 Sidewalks within 100’ of parks and open spaces, or within 100’ of a SSPRD or COL designated trail connection - \$7.0M (262)

Category 4: Medium Priority (Lightly Used Sidewalks) \$18.3M (22.5%) 680 Sites

Projects that meet the following criteria:

- + 4.1 Along a safe route to school (SRTS) street, not captured in an above criterion - \$17.6M (652 Sites)
- + 4.2 Along a Commercial Connector or Suburban Connector, within 100' of a *lightly used** transit stop - \$670k (28)
- + 4.3 Connecting two ADA compliant facilities within 100' of each other - \$TBD

Category 5: Lowest Priority (Unused, Non-Existent Sidewalks with Few Users) - \$38.6M (47.3%) 1,693 Sites

Projects that meet the following criteria:

- + 5.1 Sidewalks or paths within Estate Residential areas - \$6.3k (102 Sites)
- + 5.2 Sidewalks or paths within a Business Park or Industrial area - \$136k (77)
- + 5.3 All other sidewalks and paths in City ROW, not captured in an above criterion - \$32.2M (1,514)

Completed Sites: Since the initial draft of this plan was started in 2020 a number of non-compliant points have been remedied - \$2.8M (3.4%) 198 Sites

4.2.1 Time Period for Public Rights-of-Way Improvements

This plan proposes a 15 to 20-year strategy for removing public rights-of-way barriers that limit program accessibility in high priority areas. The City reserves the right to modify barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, and funding opportunities and constraints. The barrier removal strategy incorporates flexibility in the process and allows the City to respond to new opportunities as they arise.

4.3 Media Content Update & Compliance Plan

In phase 3 of the ADA Transition Plan, the City of Littleton worked with Meeting the Challenge (MTC) to evaluate the accessibility of the municipal website. The evaluation revealed that several of the City's webpages are not ADA compliant and difficult for people with a number of disabilities to access information.

To address these issues, the City will be overhauling its website beginning in 2022 with a new developer and host service that will ensure compliance with ADA regulations and guidance related to media and digital content. The City's website also has hundreds (if not thousands) of

digital documents that are accessible to the public—many of which do not meet digital accessibility standards. In addition to the overhauling of the website, City staff will be trained on how to create digital content to ensure that it meets current accessibility standards. In addition, the City will convert older digital documents that are non-compliant on a per request basis.

5.0 Grievance Policy & Procedure

5.1 Grievance Procedure & Timeline

The draft version of the ADA Transition Plan included the existing City grievance policy and timeline. After public comments suggested the existing timelines in the grievance process may be inadequate, City Staff discussed revisions with the Legal Department and the City's lead ADA consultant (MTC) and have revised the grievance procedure timeline to the following:

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by City of Littleton, CO. The City's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Stacey Covington
ADA Coordinator
2255 W Berry Avenue
Littleton, CO 80120
(303) 795-3774 (Office)
(303) 734-8403 (Fax)

Within 15 calendar days after receipt of the complaint, the ADA Coordinator (or his/her designee, will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting the ADA Coordinator (or his/her designee) will respond

in writing, and where appropriate, in format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of City of Littleton and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator (or his/her designee) does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 60 calendar days after receipt of the response to the City Manager or his/her designee.

Within 30 calendar days after receipt of the appeal, the City Manager (or his/her designee) will meet with the complainant to discuss the complaint and possible resolutions. Within 30 calendar days after the meeting, the City Manager (or his/her designee) will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator (or his/her designee), appeals to the City Manager (or his/her designee), and responses from these two offices will be retained by the City for at least three years.

The previous grievance procedure can be viewed here: <https://www.littletongov.org/city-services/city-departments/human-resources/grievance-procedure-americans-with-disabilities-act>.

5.2 Filing a Grievance

As outlined in the original ADA 1990, a Grievance Procedure must be established and made available to anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City. For employment related grievances the City's Personnel Policy governs that process and can be discussed with the City's Human Resources department. The City's ADA Compliancy webpage will offer some details on employment related grievances and the contact information for the appropriate staff in the Human Resources Department to contact.

Non-employment related grievances should be submitted in writing and contain information about the alleged discrimination such as name of the person initiating the grievance; address of the person; phone number, program or location of the grievance, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request. In addition, the City's ADA compliancy webpage will offer an online form for reporting grievances. Though personal details are required to adequately record and respond to the grievance, these details will be treated with the utmost confidentiality.

6.0 ADA Staff Advisory Team (ADASAT)

Roles/Responsibilities

The City's ADA Staff Advisory Team (referred to as the ADA Committee in the draft version of the plan) and head of the committee (who is the ADA Coordinator) will be identified on the City's ADA Compliancy Webpage along with the appropriate contact information. The committee's specific responsibilities include, but are not limited to, those outlined below.

6.1 Grievance Management

The primary responsibility of the ADASAT is the intake of ADA grievances and the management of them through the grievance process. This committee will ensure the grievances are documented properly, respond to grievances in a timely manner, distribute grievances to the appropriate City Staff for response, document the corrective action, and communicate with the person who lodged the initial grievance.

6.2 Implementation & Monitoring

The ADASAT will be key in implementing the ADA Transition Plan by ensuring the plan is reviewed by public, covers all the items required by the ADA, and that every City Department is implementing the measures that are called for in this plan. The City's ADASAT will have at least quarterly meetings with the appropriate Department and Division heads to check on the progress being made toward goals outlined in the transition plan. In addition, the ADASAT will collect annual progress updates from every relevant City Department and compile the updates into an annual progress report.

6.3 Auxiliary Aides and Service Requests

The ADASAT will be responsible for ensuring the City performs the necessary acquisition and/or management of auxiliary aides that allow individuals with disabilities to fully access City programs and resources. The City's ADA Coordinator will ensure there is an up-to-date list of nearby equipment and services providers for American Sign Language, video transcription, braille production, large format document production, and equipment available for the assisted listening system in the City Council Chambers. This list will be the primary resource for both staff and citizens to access auxiliary aids and services. In addition,, there will be a designated staff member from each City Department that will have this information as well and be the

primary department resources on ADA regulations and compliance. While the City will strive to have the necessary equipment to accommodate impromptu auxiliary aid requests, the City may need to be notified 48 hours in advance to ensure the request can be accommodated. In addition, the City of Littleton is committed to bearing the cost of any auxiliary aids or services needed to provide access to its programs, service, and resources.

6.4 Role Specific Employee Training

In the draft version of the ADA Transition Plan, public comments touched on the importance of ADA specific training for first responders. In response, one of the primary focuses of the ADASAT will be to work with disability advocates and the various disabled communities in Littleton to determine what additional role specific training would be beneficial for different departments within the City of Littleton. This effort will start with first researching responder training, but more comprehensive research on role specific ADA training will be done for all City departments.

6.5 Primary ADA Resource

The ADASAT will be the primary resource for both staff and residents that are looking for information on ADA regulations and how the City is striving to meet them. This means pointing individuals to both internal and external resources as the specific circumstances dictate. A list of the ADASAT's first year priorities can be viewed in section 9.5 ADA Staff Advisory Team Action Items.

7.0 Employee Training

While the ADA Staff Advisory Team (ADASAT) will oversee most of the management and implementation of the ADA Transition Plan, it will take individual staff members that are properly trained to ensure that City is meeting ADA requirements in day-to-day interactions and operations, and in establishing a culture of ADA compliance. On a daily basis it will be staff members from all departments that will be approached about ADA grievances, setting up and running City events, and creating digital content to keep the citizenry informed about projects and events, therefore proper staff and employee training will be vital in establishing and maintaining an accessible Littleton.

7.1 Grievance Intake Procedure

As part of onboarding, new staff and employees will be informed of who the current ADA Staff Advisory Team members are, the grievance intake process, and how to point individuals to the grievance intake form either in hard copy or digital format, or in cases where an individual cannot access the form, how to record and enter the concern into the grievance intake process. This same training will be provided to all current staff and employees and ensure that staff knows the importance of recording grievances accurately and promptly.

7.2 Event & Program Setup

For events and programs, staff in departments that are responsible for setting up and running events and programs will be trained on how to set up so that individuals with disabilities will have equal access to the program or event. Often there is one department who performs set up and tear down of events, and another department that runs the event and interacts with attendees at the events. Having staff from both departments trained in proper event setup and accommodations will ensure that events are done in a way to provide equal access to all individuals.

7.3 Digital Content Creation

Like the grievance intake process, digital content creation will be a training that will be incorporated into the onboarding process for all new employees and staff and all current staff will undergo the training as well. Digital content creation will be one of the most important trainings for employees because content creation is such a decentralized task and performed by every department with minimal central oversight. Therefore, it is important to make sure there is at least one individual in each department that vets digital content before it is distributed for public consumption. This will be a vital step in ensuring compliance in this area. In addition, the Communications Departments and the Clerk's Office will have special training to vet digital content before it is posted as these departments are responsible for putting most of the digital content on the web. This approach will provide three layers to ensure digital content is compliant with ADA Standards:

1. The individual creating the content are trained in accessible content creation
2. The department's lead for reviewing digital content will ensure a document is accessible
3. The department responsible for posting digital content to the web will ensure a document is accessible

8.0 Annual Plan Update Procedure

8.1 Documenting Upgrades

Public right-of-way (PROW) upgrades will be recorded in a publicly accessible GIS database that shows the location of existing non-compliant features. This database will be updated on a project-by-project basis and incorporated into the project closeout procedure. This database was created as part of the self-evaluation process and will be updated and maintained by the City's GIS Department at the direction of the Public Works Director or City Engineer.

For City of Littleton Facilities, a database with the existing non-compliant points was created as part of the self-evaluation process. This database will be maintained by the Fleet and Facilities Department and updated as projects are completed as part of the project close out process. The City's ADA Compliancy webpage will have a map where City Facilities are located and where the ADA accessible entrance is located in relation to parking areas or public pathways. Detailed floor plans will not be displayed on the City's website for security purposes, but any individual with accessibility questions related to accessing a specific City service, program, or resource can inquire with City' ADA Staff Advisory Team. The most recent contact information for the ADA Coordinator will be found on the City's ADA Compliancy webpage.

For digital accessibility, the City of Littleton website will be overhauled to ensure it meets digital accessibility standards (see section 4.3 Media Content Update & Compliance Plan), as will all new digital content created by the City. However, previously created digital content will be updated to meet digital accessibility standards on a per request basis.

8.2 Updating Non-Compliant Database & Priority

Non-compliant points both in the PROW and City Facilities will be tracked by separate non-compliant databases. As mentioned above, the PROW database will be maintained by the City's GIS Department and updated at the direction of the Public Works Department. The Facilities Database will be maintained and updated by the Fleet and Facilities Department.

The City's Website will be upgraded in its entirety and digital documents available on the City's website will be upgraded on a per request basis but will not be tracked in a database.

In both the PROW and Facilities Database, priorities will be assigned to each of the non-compliant points and priorities will be changed at the discretion of the departments responsible for updating each database and with the approval of the Public Works Director. As funding

opportunities and maintenance needs shift non-compliant points may have their priority changed in an effort to be good stewards of the City's funding.

8.4 Annual Update Memo

All of the aforementioned efforts will be documented and given to the ADA Coordinator for compiling into an Annual ADA Update Memo. This annual memo will document the physical barriers remedied in Littleton facilities, and in the public rights-of-way, and the amount of money and estimates staff hours spent over the previous calendar year in addressing ADA compliancy. This annual memo will also record progress in meeting the timelines set forth in this document and if the City is on schedule.

All of the relevant ADA upgrades will be reported to the ADA Coordinator no later than the last weekday of January for the previous calendar year. The ADA Coordinator will compile these updates annually into 2–3-page memo that will be released to the public on the City's ADA Compliance webpage no later than the last weekday of March for the previous calendar year.

9.0 Transition Plan Action Items

Should this transition plan be adopted by Littleton's City Council, the following action items will be added incorporated into department priorities and reflected in the City's budgeting process. The below items are a consolidated list of the actions previously recommended in this document.

9.1 Facilities Action Items

As part of the adoption of this ADA Transition Plan, Littleton's Facilities Department will adopt and work toward accomplishing the following action items:

1. Officially adopt the Facilities Prioritization Plan outlined in the document.
2. Incorporate the facilities prioritization into an annual work plan.
3. Track dollars spent and man hours used to mitigate non-compliant points in Littleton facilities.
4. Work with the ADA Staff Advisory Team to document and resolve grievances related to Littleton facilities.
5. Work with the ADA Staff Advisory Team to produce annual an ADA memo with information on the progress made toward full ADA compliance with regard to Littleton facilities.

6. Train the appropriate Facilities Staff in the creation of ADA accessible digital content.
7. Identify 1-2 Facilities staff person(s) to vet all digital content before it is sent out for posting.

9.2 Public Rights-of-Way (PROW) Action Items

As part of the adoption of this ADA Transition Plan, Littleton's Public Works Department will adopt and work toward accomplishing the following action items:

1. Officially adopt the PROW prioritization plan outlined in the document.
2. Incorporate the PROW prioritization into the 5 Year Capital Improvements Plan.
3. Track dollars spent and man hours used to mitigate non-compliant points in the PROW.
4. Work with the ADA Staff Advisory Team to address grievances related to Littleton's PROW.
5. Work with the ADA Staff Advisory Team to produce annual an ADA memo with information on the progress made toward full ADA compliance with regard to Littleton's PROW.
6. Train the appropriate Public Works Staff in the creation of ADA accessible digital content.
7. Identify 1-2 Public Works staff person(s) to vet all digital content before it is sent out for posting.

9.3 Digital Content Action Items

As part of the adoption of this ADA Transition Plan, Littleton's Communications Department will adopt and work toward accomplishing the following action items:

1. Ensure that upgrades to the City of Littleton website (scheduled for 2022) meet current standards for digital accessibility.
2. Train all Communications Staff on the proper way to create accessible digital content.
3. Identify 1-2 staff person(s) from Communications who are responsible for vetting all new digital content before posting on the City of Littleton website.
4. Work with the City Clerk's Office to vet digital content for accessibility as it relates to posting materials for public hearings.
5. Develop training for all City of Littleton Employees on how to create accessible digital content for the City of Littleton website in a self-guided format.
6. Work with the ADA Staff Advisory Team to produce annual ADA memo with information on the progress made toward full ADA compliance with regard to digital accessibility.

9.4 Human Resources Action Items

As part of the adoption of this ADA Transition Plan, Littleton's Human Resources Department will adopt and work toward accomplishing the following action items:

1. Incorporate the digital content creation training (developed by Communications) into the onboarding process for all new employees and staff.
2. Lead the creation of the ADA Staff Advisory Team and ensure all committee members are trained in the relevant ADA regulations and standards regarding grievance in-take procedures.
3. Incorporate trainings developed by the ADA Staff Advisory Team into the employee onboarding procedures including, but not limited to, the grievance intake procedure.

9.5 ADA Staff Advisory Team Action Items

As part of the adoption of this ADA Transition Plan, Littleton's ADA Staff Advisory Team will focus on accomplishing the following action items in its first year:

1. Working with the Human Resources and Communications Department, lead the development of an ADA Compliancy webpage as the primary resources for individuals with questions related to ADA compliance.
2. Using the outline in this document (and relevant ADA regulations) to create a more detailed grievance intake process that is accessible via internet, phone call, in-person communication with staff, and hand-written communication.
3. Develop a guide for Littleton Staff on how to properly setup public events like the Meet Greet and Eat to ensure the location and layout meet accessibility Standards.
4. Identify one person to serve as the point of contact for the ADA Staff Advisory Team. This person's contact information should be made available on the City's ADA Compliancy webpage.
5. Work with the Facilities Department, Public Works Department, and Communications Department to develop and update an annual memo on the progress made toward achieving the accessibility goals in this document for the previous year.
6. As needed, develop other trainings related to ADA compliance for City Staff at the direction of Human Resources and/or the City Manager's Office.
7. Create a detailed and specific plain for acquiring and providing auxiliary aid devices and services for public meetings, public programming, and municipal court proceedings.
8. Research role specific ADA training for the various City departments with an initial focus on first responder training.

10.0 Additional Resources

10.1 Buildings & Sites

Standards issued under the Americans with Disabilities Act (ADA) address access to buildings and sites nationwide in new construction and alterations.

- **2010 ADA Standards for Accessible Design:** This document contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990. These scoping and technical requirements are to be applied during the design, construction and alteration of buildings and facilities covered by Titles II and III of the ADA, to the extent required by regulations issued by federal agencies including the Department of Justice and the Department of Transportation. This document must be used in conjunction with Chapter 11 - Accessibility of the Oregon Structural Specialty Code.
- **2010 ADA Standards:** <https://www.access-board.gov/ada/>

10.2 Recreation Facilities

Access to recreation facilities, including play areas, swimming pools, sports facilities, fishing piers, boating facilities, golf courses and amusement rides, is addressed in the ADA standards. The ABA standards address outdoor developed areas guidelines which currently are applicable to Federal facilities and cover access to trails, picnic sites, camping sites and beach access routes.

- **Complete 2015 ABA Standards:** <https://www.access-board.gov/files/aba/ABASTandards.pdf> (Chapter 10: Recreational Facilities)
- **Outdoor Developed Areas Guide:** <https://www.access-board.gov/files/aba/guides/outdoor/outdoor-guide.pdf>

10.3 PROWAG for ROW Accessibility

The Public Right of Way Access Guidelines (PROWAG) is draft document that makes recommendations for how jurisdiction should ensure the public right-of-way is designed to provide access to all users. PROWAG covers a number of right-of-way design elements, including:

- pedestrian access routes and alternate pedestrian access routes

- pedestrian street crossings
- curb ramps and blended transitions
- detectable warning surfaces
- accessible signals and pushbuttons
- protruding objects in pedestrian paths
- signs
- street furniture
- transit stops and shelters
- on-street parking spaces and passenger loading zones
- stairways and escalators
- handrails
- doors, doorways, and gates

The complete PROWAG Document can be accessed at <https://www.access-board.gov/prowag/>

10.4 WCAG for Content Accessibility

10.3.1 Communications & IT

Access to information and communication technology (ICT) is addressed by Board standards and guidelines issued under Section 508 of the Rehabilitation Act and Section 255 of the Telecommunications Act.

- **Information & Communication Technology Accessibility, Revised 508 Standards and 255 Guidelines:**<https://www.access-board.gov/ict.html>
- **Refresh of the Section 508 Standards and the Telecommunications Act Guidelines:**
<https://www.access-board.gov/ict/#508-chapter-1-application-and-administration>
- **Telecommunications Act Accessibility Guidance:**
https://www.access-board.gov/ict/guide/2555_guide.md.html

11.0 Appendices

11.1 Public Comments & Survey Results

City of Littleton Staff took public comment on the Draft ADA Transition Plan via email, online survey, and interactions at the public open house. Below are comments received by the City.

#	Comment	Staff Response
1	The ADA Committee should include disabled people from the community to provide "real life" input. While the ADA regulations were created as guide each community has barriers that affect the disabled community. I can provide examples in more detail.	<p>Because the use of the word "Committee" seemed to be causing confusion in the draft plan, (as if it might be referring to a citizen advisory board) City Staff changed the "ADA Committee" to the "ADA Staff Advisory Team" (ADASAT). This team will be made up of staff members whose primary goal is implementing the ADA Transition Plan and dealing with ADA grievances. The ADASAT will reach out to members of Littleton's various disabled communities for advice on specific issues the team may need to address.</p> <p>The Littleton City Council may decide to create an Accessibility Advisory Board comprised of Littleton residents or workers in the future.</p>
2	Need to be sure this [ADA Committee] is open to many Littleton residents. Don't just pick people.	See staff response to Comment #1.
3	Will any at-large members of the community that experience various disabilities be included in the ADA	See staff response to Comment #1.

	Committee to make sure nothing is overlooked by those that are abled?	
4	Would it be possible to include at least two citizen members from the Littleton disabled community on the ADA Committee. One blind person (or staff member from Center for the Blind) and one person with mobility impairment. A committee entirely made up of able-bodied members will not be as effective at identifying and clarifying needed work/prioritization. I also think one member of the ADA Committee should be an active transportation advocate from the City's Transportation Advisory Board. The work ahead should dovetail with active transportation/mobility improvements that are not part of the ADA compliance work.	See staff response to Comment #1.
5	Appeal length should be longer than 15 days, possibly 30?	After discussions with the City's Legal Department and lead consultant on the ADA Transition Plan the length of time for each step in the grievance process was revised.
6	Doors are a barrier. Automatic doors are helpful, but don't always provide suitable access. Doors don't always open fully making it difficult to navigate in a wheel chair. Activation placement too close to the door forces the user to back up with out-swinging doors. Bathroom doors and alcoves. Inward opening doors in tight spaces very difficult to manage in a wheelchair.	As City Facilities are retrofitted, City Staff will make all possible modifications to ensure entrance ways are as accessible as possible. As new construction or renovations take place in City Facilities the latest ADA Standards and best practices in the field of accessibility will be applied.
7	Yes (in response to the question: Do you think the priorities for improving accessibility at City of Littleton	City Staff would like to hear more about your opinion on the buildings and facilities

	buildings and facilities should be changed, or is there anything these priorities miss?)	prioritization. Please reach out to us using the contact info at www.littletongov.org/ada
8	Service Center is definitely a lower priority--rare to have public access there	In section 4.1 the plan addresses removing barriers that prevent programmatic access. Because the Belleview Service Center is not typically publicly accessible, it has very little (or no) programming and would therefore be a lower priority than buildings such as Littleton Center that are publicly accessible and have a high number of public meetings and programming.
9	Unsure (in response to the question: Do you think the priorities for improving accessibility at City of Littleton buildings and facilities should be changed, or is there anything these priorities miss?)	If you would like to discuss any of the content in the draft plan further, please reach out to us using the contact info at: www.littletongov.org/ada
10	The BLANKET prioritization of "city-owned" buildings over non-City buildings/amenities could use adjustment. For example, Geneva Lodge and Belleview Services Center are not buildings for which public access is essential nor commonplace. Bringing these facilities in compliance with ADA requirements is NOT as important as, say, improving the overall pedestrian/mobility access at the Downtown Littleton Light Rail Station (currently hosting a few Priority 2 improvements). Many Priority 2 elements should be moved to Priority 1 compared to things like ADA work at something like the Depot Art Gallery (currently also Priority 1 simply because it is "city-owned" -- but access to this structure is nowhere near as important	Upgrades to city facilities and buildings will be done concurrently with upgrades in the public right-of-way. These two prioritizations have different budgets and staff resources so they will not necessarily be competing against one another. For city-owned facilities an entire facility is not prioritized in the same way. Buildings that have public programming will be a higher priority in

	<p>as fixing the many mobility problems on Prince St, or along the walking/biking route to City Hall where critical political decisions are made). The current plan's use of "city-owned" to automatically thrust something into Priority 1 is overly simplistic and not well aligned with the actual value of the particular update.</p>	<p>general, but in those buildings, passages from the public right-of-way or parking area and entrance ways will be prioritized over other elements at that facility. All city-owned facilities will have elements that range from priority 1 to priority 4 based on the element. See section 11.4 for further details.</p>
<p>11</p>	<p>I think that priorities 1 and 2 are almost 1 and 1a, both of these should be of the utmost importance to remedy</p>	<p>Because of limited funding to address these issues, some form of prioritization must be used as a guide on how to spend funds and direct staff. However, making city facilities completely ADA accessible is a high priority for Littleton Staff.</p>
<p>12</p>	<p>Get feedback from people with disabilities.</p>	<p>City Staff alerted the public about the opportunity to provide feedback on the draft plan using several platforms (City website, social media, and Littleton Report Online). The public was able provide feedback via three methods (virtual public engagement, in-person public engagement, and correspondence with staff). In addition, Littleton staff reached out the Colorado Center for the Blind and asked for feedback on the draft plan. If there are members of one of Littleton's</p>

		<p>disabled communities that would like to provide additional feedback, please use the staff contact information at www.littletongov.org/ada.</p>
13	<p>Where do elevator access and line of sight fall in the priorities? Will the city offer any braille directional signs or a braille directory in the buildings? Much that is covered is regarding barriers to access only but there are many types of disabilities. Does the city have anyone available that knows ASL if needed? Are staff work areas and conference rooms large enough to accommodate an electric scooter if someone arrives in one (with space to turn around)? Just a few examples.</p>	<p>Elevator access, lines of sight, work areas, conference rooms, and braille will be part of the detailed considerations when buildings and facilities are upgraded. The City has good working relationships with several disability service providers in Littleton. The ADA Staff Advisory Team (ADASAT) and other staff working on upgrade projects will engage these service providers when projects take place. Providing ASL interpreters (as well as other auxiliary services and devices) will be a primary focus of the ADASAT in their first year after the transition plan is adopted.</p>
14	<p>There must be reasonable access particularly when upgrading existing facilities, and the amount of visitation required by people with disabilities.</p>	<p>City staff agrees that reasonable access is a must. After lots of discussion and work with the City's lead ADA consultant (MTC), City Staff feels the approach and prioritization outlined in this document provides the greatest programmatic access to the most people as</p>

		<p>soon as possible given current resources. However, if an individual has encountered a barrier that prevents them from accessing City programming or resources, please reach out to staff using the contact information at www.littletongov.org/ada.</p>
15	<p>I think it makes sense, but I also think that the 2nd priority areas should be continually funneled through to the 5 year CIP to ensure that those are addressed soon too. Also - is the bridge over the railroad tracks at Prince and Church really compliant? That's the worst place to walk in the city.</p>	<p>The 5-year CIP is continually updated as city transportation needs shift and evolve. It is possible that Category 2 non-compliant points could move up to Category 1 as the 5-year CIP evolves.</p> <p>The Prince St bridge currently has planned work to address the entire Prince St and Church Ave intersection and the north leg of the Prince St and Lake Ave intersection. In addition, there is planned work to widen the sidewalks on the bridge.</p>
16	<p>Maintenance of existing pathways could make improvements that would be beneficial. Sidewalks along Littleton Blvd., for example are in bad repair in several areas making it difficult to negotiate through those areas. I would much rather have them repaired than to wait until they can be upgraded.</p>	<p>As there are opportunities to retrofit non-compliant points to better steward funding, the City of Littleton will do so. However, in some situations complete replacement is necessary. If there are specific points or issues keeping a resident or worker from completing everyday tasks, please reach</p>

		<p>out to City of Littleton staff about addressing the specific issue. www.littletongov.org/ada</p> <p>There are a number of non-compliant points along Littleton Blvd that are captured in Category 1 projects. Please reach out with details on specific issues to see if this work does (or can) include the issues referenced in your comment.</p>
17	These changes are wonderful	City of Littleton Staff appreciates your feedback and participation!
18	Many sidewalks need to be expanded, particularly around Bemis and north of Ketring Park	<p>Please reach out to City Staff with details on specific issues to see if planned work does (or can) include the issues referenced in this comment. www.littletongov.org/ada</p>
19	Unsure (in response to the question: Do you think the priorities for improving accessibility in the public right-of-way should be changed, or is there anything these priorities miss?)	<p>If you would like to discuss any of the content in the draft plan further, please reach out to staff using the contact info at: www.littletongov.org/ada.</p>
20	Ask someone with a disability	See staff response to comment #12
21	It's possible that Priority 3 should be Priority 2 instead. Many sidewalks need to be fixed for wheelchair and cane users and the seeing impaired in order for them to get to transit, retail, or employment	The prioritization for fixing non-compliant points in the public right-of-way was determined primarily by prioritizing areas with the

	<p>safely. What percentage of sidewalk users are disabled that fall into each of these priorities?</p>	<p>heaviest pedestrian traffic first. It is possible that priorities may need changing to provide better access to more users, or that a specific non-compliant point is addressed sooner than planned if it interferes with a person’s daily activities. Please reach out to staff to provide more specific feedback using the contact info at: www.littletongov.org/ada.</p>
22	<p>Sidewalk design is critical for safety of everyone who walks. Curb cuts should NOT cut across any sidewalk. They need to be as level as possible for everyone who uses them. This is best addressed in the building codes for new and existing development. Take Littleton BLVD, the reconstruction years ago involved two contractors and they did two different designs at the driveway curb cuts. On the east portion from Huron to Broadway, the sidewalks are level, the west portion from Huron to Datura, sidewalks are sloped, making it much more hazardous to walk.</p>	<p>See staff response to comment #16.</p> <p>In addition, City Staff is currently developing engineering design standards which will ensure that future construction from contractors is both consistent and ADA compliant.</p>
23	<p>See my prior comment on the prioritization of city-owned properties such as Bellevue Service Center and Geneva Lodge. There are several public right-of-way areas that would be better served by getting addressed immediately.</p>	<p>See staff response to comment #8.</p>
24	<p>Will the city council chambers be changed since it is not accessible?</p>	<p>City Council Chambers were upgraded in early 2021. If you have visited since then and still have issues with its compliance, please reach out to City Staff. www.littletongov.org/ada</p>

25	Are there grants to pay for these changes?	<p>There are several grant opportunities for public right-of-way upgrades to address larger transportation issues. As part of these projects ADA upgrades are made, and typically required as a stipulation of receiving the grant money.</p> <p>There are fewer grant opportunities for addressing issues in city-owned buildings and facilities, but the City is seeking and applying to those opportunities as they arise.</p>
26	Why are the costs so high?	<p>These cost estimates were created by the City’s lead ADA consultant—MTC (Meeting the Challenge)—and are conservative estimates. The cost of addressing each element assumes that it would be fixed individually rather than with a group of other non-compliant elements. There is cost savings in fixing a group of non-compliant elements at the same time which would lower the overall cost to address all non-compliant elements. As construction approaches on each issue contractors will provide a more detailed cost estimate. These costs, however, are based on 2020 pricing and</p>

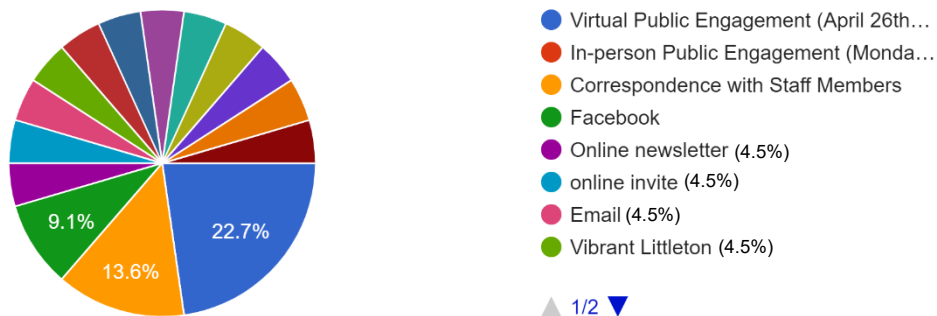
		inflation will be a factor in the final cost of each ADA project.
27	On page 11, Section 4.1, I would like to see public restrooms made a level 1 priority. For some folks, lack of access to a restroom makes the entire facility unusable.	While the City views access to restrooms as a vital upgrade, barriers to entering a building prevent programmatic access and access to civic engagement. Because of limited funding these issues were prioritized over restrooms. However, the City has already made upgrades to restrooms at many publicly accessible buildings including Littleton Center where the majority of public meetings take place. If a member of the public would like a specific restroom addressed, please contact city staff using the contact info at www.littletongov.org/ada .
28	On pages 13-14, Section 4.2, it does not appear that the prioritization has any mechanism for people to request that certain rights of way be prioritized. If, for instance, someone needs a curb cut in order to take the bus to work everyday, that person should be able to request that it be prioritized higher in the list. This is what Denver did and it works well, showing community members that they matter.	The public right-of-way prioritization was determined based on areas and features that are known to have the highest level of pedestrian traffic in the City. If a community member encounters a barrier that keeps them from performing daily routines, the City's grievance process is the best avenue for individuals to bring such issues to City Staff's attention. Issues

		entered into the grievance process will be addressed promptly and may include a retrofit or reconstruction of the element that is acting as a barrier. The action taken by the City of Littleton will vary based on the individual case.
29	On page 17, Section 6, there doesn't seem to be a description of who will be on the ADA committee, but I think it should specify that it will consist of Littleton residents with disabilities, at least in substantial part. A committee of city employees without disabilities, I fear, wouldn't be terribly effective.	See staff response to Comment #1.
30	On page 17, Section 6.3, the responsibilities spelled out for providing auxiliary aids and services seems inadequate and likely to put the blame back on the PWD. It also doesn't provide for how to actually go about security auxiliary aids and services, which is a lot more involved than many think upon first blush, and should be spelled out in more detail, even in a higher-level document such as this. The same could be said for a lot of the policies this discusses, but providing (and paying for) auxiliary aids and services is a particular area of concern because of the number of times I've seen it screwed up.	How to acquire and provide auxiliary aids is an important and potentially complicated endeavor. This plan outlines high-level objectives for how the City will achieve comprehensive compliance with the ADA. The ADA Staff Advisory Team (ADASAT) will address this issue as one of its primary focuses in its first year. This issue was added to the list of primary focuses for the ADASAT.
31	Want to flag that the fire department did not take the survey. It is incredibly important to ensure that first responders, including law enforcement, are thoroughly trained in the ADA and how to engage with members of the public who have disabilities.	Littleton Staff understands that interactions with first responders can be greatly influence by a first responder's training related to the ADA and common disabilities. Currently the Littleton Police Department has specific annual training

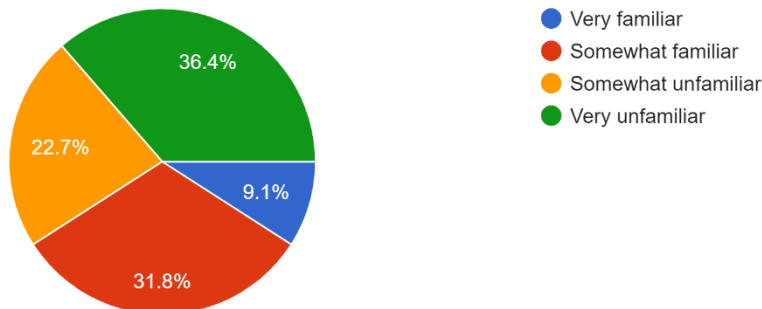
		<p>related to the ADA which will continue in the future. Additionally, the City's ADA Staff Advisory Team will be committed to researching current best practices for this type of role specific ADA training for all City Departments.</p> <p>It is also important to note that South Metro Fire Rescue is a standalone self-taxing special district that is completely separate from the City of Littleton and would not be required to participate in City of Littleton ADA training. However, regular correspondence with South Metro Fire Rescue seems to indicate they have regular ADA training as well.</p>
32	Suggest any ADA plan has a separate component related to law enforcement, justice, and first responders -- so it gets adequate attention and focus.	See staff response to comment #31.
33	Would also include a section on accessibility in Littleton Municipal Court - not just physical access, but auditing processes like availability of ASL interpreters and etc	The availability of ASL interpreters at the Littleton Municipal Court will be examined and reviewed as part of the auxiliary aids and services. This was added to the list of primary focuses for the ADASAT.

Public Engagement Survey Results

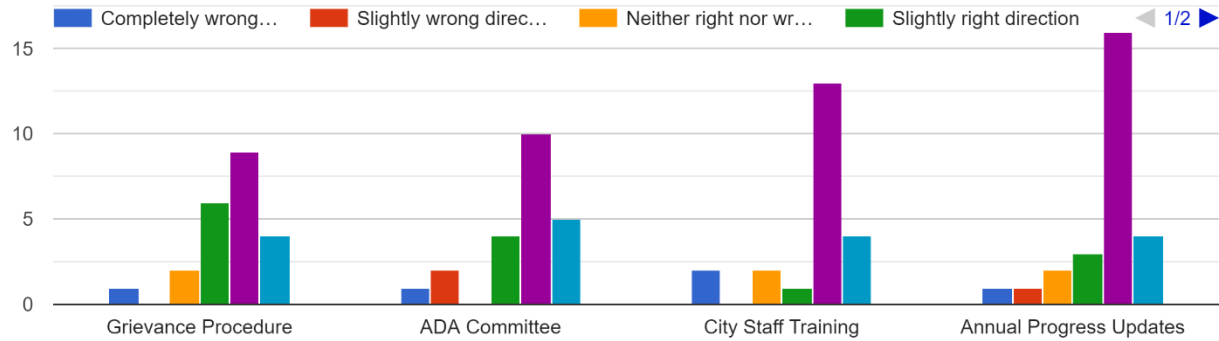
How did you become familiar with the recommendations in Littleton's Draft ADA Transition Plan?
22 responses



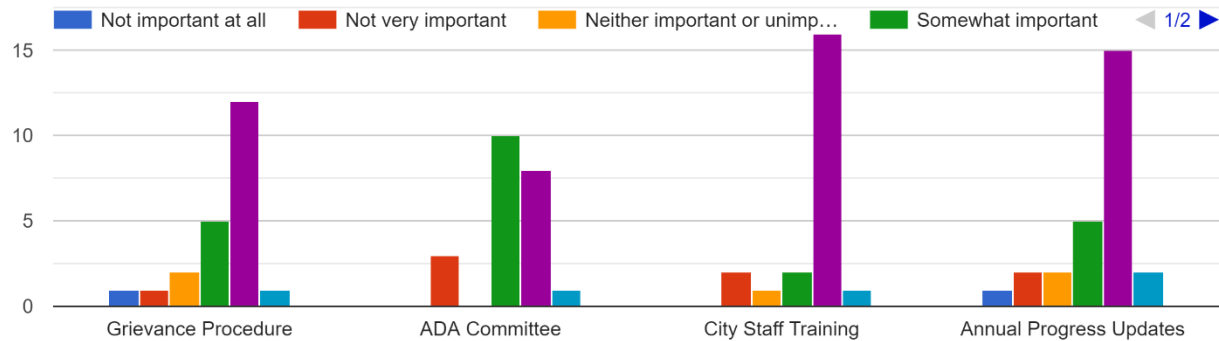
How familiar are you with the recommendations outlined in Littleton's Draft ADA Transition Plan?
22 responses



Generally speaking, do you think the proposed policies in the Draft ADA Transition Plan are headed in the right direction?

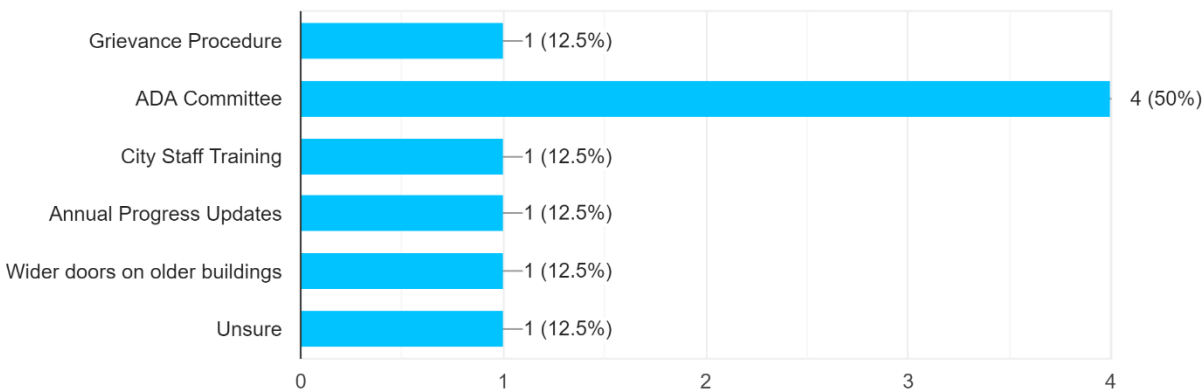


How important do you think each of these policy areas is?



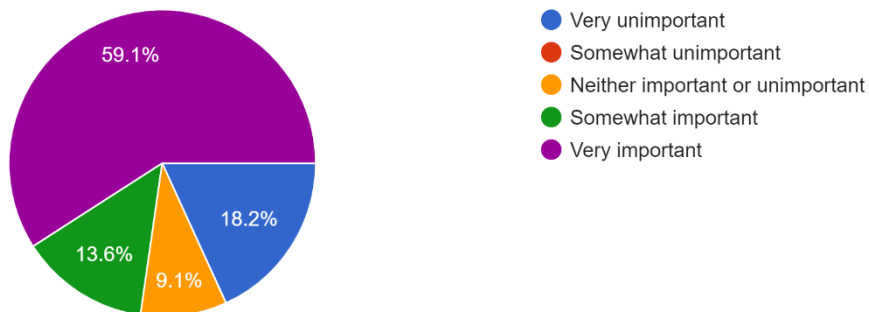
Do you have additional feedback to provide regarding the proposed policies in the ADA Transition Plan (excluding city-owned buildings and the public ...way)? If so, please indicate which set of policies.

8 responses



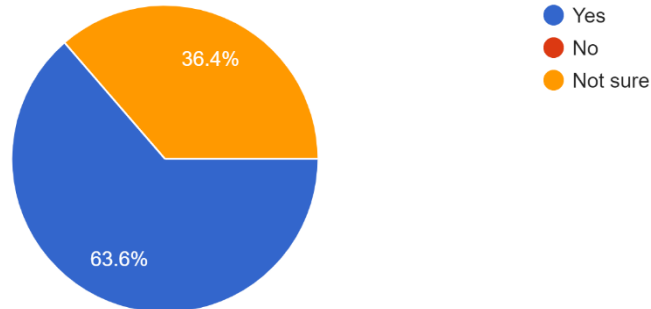
How important do you think it is to address accessibility at City of Littleton buildings and facilities?

22 responses



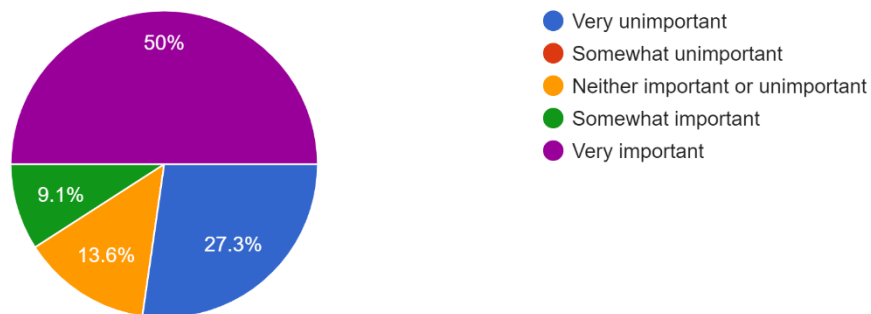
Do you think Littleton's Draft ADA Transition Plan properly prioritizes the areas and features of Littleton buildings and facilities that should be fixed first?

22 responses



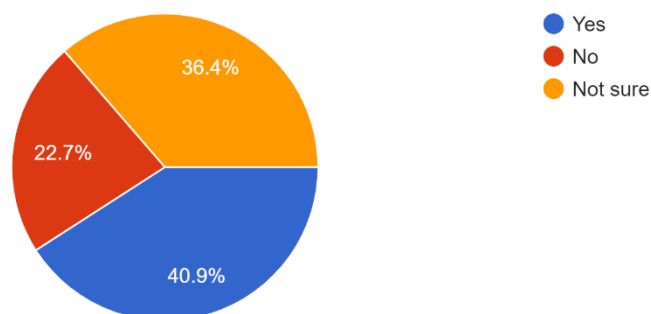
How important do you think it is to address accessibility in the Littleton public right-of-way?

22 responses



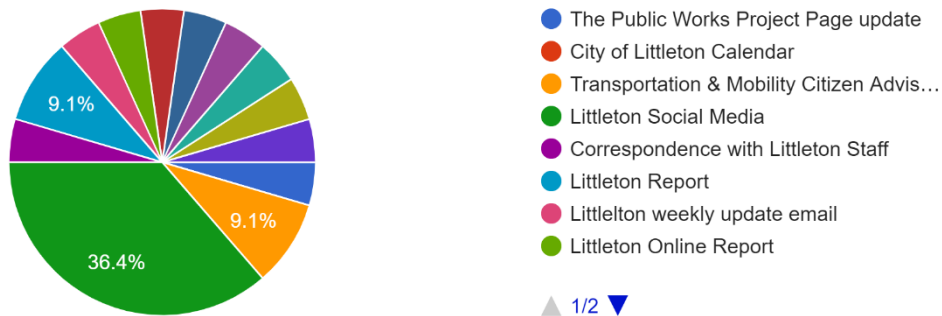
Do you think Littleton's Draft ADA Transition Plan properly prioritizes the non-compliant points in the public right-of-way?

22 responses



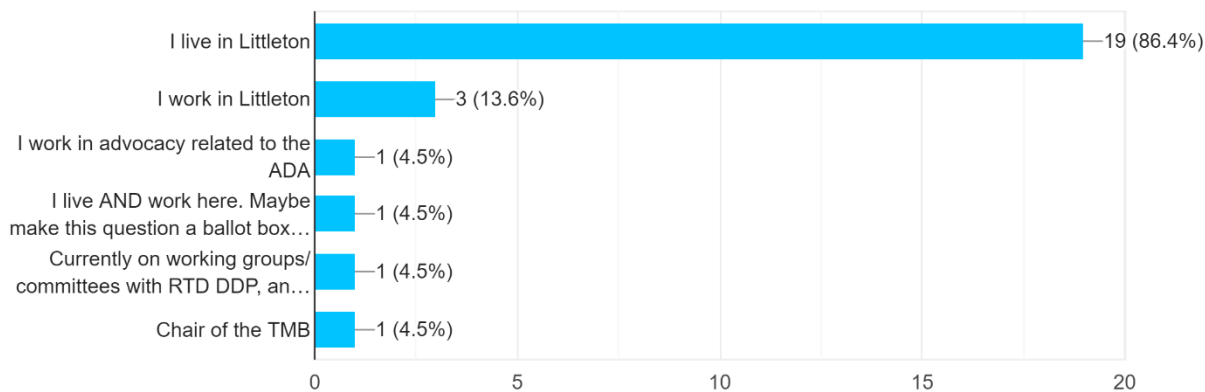
How did you hear about this survey?

22 responses



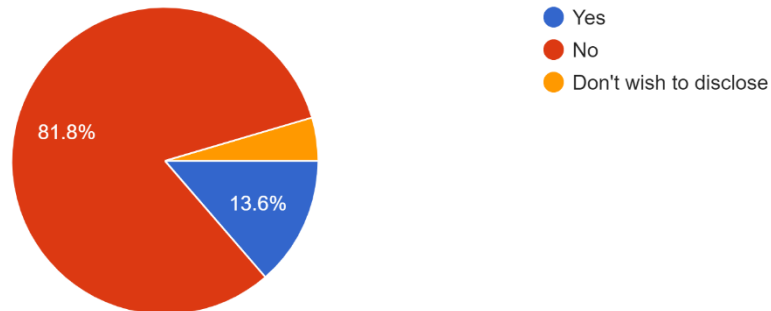
What is your connection to the City of Littleton?

22 responses



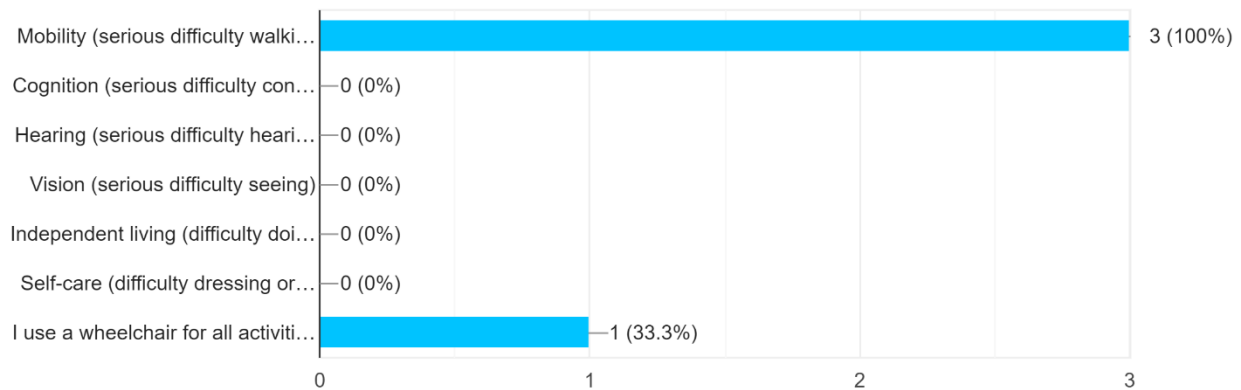
Do you have a disability that is relevant to the policies and actions laid out in this draft plan? (This survey does not ask for personally identifying information unless you would like to be contact by staff.)

22 responses



If you answered "yes" to above question, are you willing to share which category your disability best fits into? (categories based on CDC reporting and research)

3 responses



11.2 City of Littleton – Website Tester/WCAG 2.1 Audit Report

CITY OF
LITTLETON –
WEBSITE
TESTER/WCAG
2.1 AUDIT
REPORT

February 6, 2020

Geoff Ames
games@mtc-inc.com

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City of Littleton- Website Tester/WCAG Audit Report

Prepared by Meeting the Challenge, Inc., A CP&Y Company – February 6, 2020

Introduction

Meeting the Challenge, Inc. (MTC) has been engaged by City of Littleton, as part of its Americans with Disabilities Act (ADA) self-evaluation process to evaluate/audit the City's compliance with WCAG (Web Content Accessibility Guidelines) digital accessibility guidelines. To assist in this audit, MTC has assigned a group of individuals (three contractors and one MTC consultant) with disabilities to access a specific set of URLs on the City of Littleton website. While individual assessment of all City webpages/URLs is not feasible, within the scope of this project, a random cross-section of webpages/URLs and interactive tasks were assigned to these testers and MTC technical sub-consultant Ron Stauffer/Lieder Digital.

The testers are not seeking specific technical issues, though they do discover some, but rather, they are tasked with evaluating the navigability, accessibility, and ease of use of the content on the City's websites. Testers were asked to access a number of webpages that require user interaction, for example, filling out forms, or requesting to be put on an email contact list. In addition, MTC asked each tester to navigate the website, beginning at the URL: <https://www.littletongov.org>, complete a variety of functional tasks, and to find and report the ADA Coordinator's name, address, email, and phone number. The specific tasks and instructions given to each tester will be detailed in their section of this report.

The significance and relevance of actual user testing of websites presumes that, regardless of compliance with the abstract, technical guidelines (WCAG 2.0 Level AA) stipulated by DOJ in its settlement agreements, actual user experience might vary depending on the abilities of individuals and any assistive technologies (such as JAWS® or ZoomText) they use. Access to information on websites is necessary to fulfill the basic title II requirement to ensure that services, programs, and activities of state and local governments are accessible to and usable by qualified people with disabilities. Public entities must also ensure that their communication with people with disabilities is as effective as their communication with others. As the guidelines for accessible web content have expanded, Lieder Digital now assesses 17 additional success criteria found in [WCAG 2.1](#), as the best practices available.

One of MTC's testers is blind. The second has low-vision. The third has Cerebral Palsy. And the fourth is deaf. Each tester is more than a casual user of technology with average or better skill at using computers and the Internet.

MTC instructed each tester to access the URLs and complete the tasks specified below, linking directly from their task orders or by copying and pasting the URL into their browsers.

The following general directions/suggestions were given to the testers, specific to their abilities and limitations:

The Testers will complete an accessibility assessment for webpages within the scope identified by MTC. MTC will provide the URLs (see below) of third-party websites or webpages to be investigated. The Testers will, using their own equipment, assistive technology devices, and applications, navigate the web pages within the scope of the task. The Testers will navigate through the pages, test hyperlinks, and evaluate accessibility of content including but not limited to functional performance with screen-reading software. Specifically, the Testers will determine whether any features or web content in the

task scope are inaccessible to them, personally, or, in general, to individuals who are blind or have other limitations that prevent visual interaction with web content; and/or require the use of a mouse. The Testers will document any barriers to navigation or lack of functional accessibility, indicating the URL of any pages where such barriers are encountered.

Site URL to be Evaluated and Tested

Begin assessment with the City of Littleton's homepage URL, <https://www.littletongov.org>. Complete a general assessment of navigational links on the homepage. Complete additional assigned functional tasks. Including the following:

- Find the City's ADA Notice of non-discrimination on the basis of disability and Grievance procedure. Can you complete a Grievance form? Report the URL where you find any of this information.
- Find the ADA Coordinator's name, address, phone number, and email. Report the URL where you find any of this information.

See attached, *Work Order URLs and Task Detail for Littleton Website Testing*, for detailed instructions.

Testers are instructed to use more than one of the following browsers and indicate instances where accessibility or usability varied noticeably between browsers:

- Internet Explorer
- Firefox
- Chrome
- Edge

Editor's Note

In this report, aside from some minor edits for punctuation and spelling, each tester's report will be presented in his or her own words, to ensure the most candid expression of the experience each tester had in exploring the City's website.

Technical Reviewer's Note

In this report, references will be made to the specific success criterion ("WCAG SC") as applicable for the complaints that the testers have experiences. References will also be made to assistive technology ("AT") which is defined as "hardware and/or software that acts as a user agent, or along with a mainstream user agent, to provide functionality to meet the requirements of users with disabilities that go beyond those offered by mainstream user agents" ([source](#)). This generally means screen readers, text magnification programs, or other interfaces that allow users with various disabilities to navigate and understand a website.

Summary Comments

As will be noticed in the reports from our testers, this is not a technical report. Specific coding changes are not suggested or dictated by the testers. Each tester finds different barriers or hurdles to overcome. For example, a page that presents no barriers for our tester who is deaf may present numerous issues for our tester who is blind or our tester who has low-vision. The absence of alternative text on images will not impede our user who is deaf or our user who has Cerebral Palsy. Conversely, the absence of captions on audible content does not impact our users who are blind and have low-vision, as their ability to hear is not an issue. Navigation that is facile for a user who is blind, using JAWS® (Job Access With Speech), may be extremely difficult to access for someone who has limited muscular coordination.

The City's website provides consistent navigation, design, and structure that enhances continuity of branding across the City's web presence, as well as improving accessibility for users of all abilities.

Many of the issues that are identified in this report can be resolved globally for those pages that source the same templates and/or cascading style sheets. When different areas of websites rely on different sources of design code, resolving accessibility design issues will require separate efforts to resolve similar problems. For example, contrast deficiencies ([SC 1.4.3](#)) (i.e., between text and background) that present access barriers to individuals who are color-blind or have low-vision, can typically be resolved by correcting those color values in one template. However, when different areas of a website depend on different templates to standardize text colors (as well as font and size) and background colors, every template will need to be corrected.

Notably, none of our testers was totally excluded from investigating the City's website. Each of them found features that they liked and of which they encouraged the use. This report should be used in conjunction with the technical report to be provided by MTC's sub-consultant, Ron Stauffer. Our testers can also provide answers to specific questions regarding their observations, upon request.

Observations by Tester Who Is Blind

Our first tester, who is blind and uses JAWS® (Job Access With Speech), a screen-reading application, was given the general instructions in the *Introduction* above, as well as the those in the attached, *Work Order URLs and Task Detail for Littleton Website Testing*.

TASK 1. <https://www.littleongov.org>

Are there any navigation difficulties on this page?

When following the link: “My Littleton”, under: “I want to” ...

There’s a link graphic. Down arrowing once then up arrowing once, I get different things, i.e., high school graduation, community development, Hudson gardens concert, gateway signage on Santa Fe, etc. The scrolling is not consistent. The “I want to” seems to be weird in other places as well when I checked.

Technical Reviewer's Note: on this page, the user is experiencing (without knowing it) an auto-scrolling background header image, which confuses the screen reader since it reads out the alt attributes as the images are rendered on the screen. Since there's no way to stop this type of content, it can disorient the user. This is a failure of the [WCAG SC 2.2.2 Pause, Stop, Hide](#), which states that the user should be able to pause auto-scrolling or auto-updating content at will. It is recommended to either disable the "image_rotate_container" JavaScript widget and instead serve just one static image, or offer a pause functionality for all users, sighted or not.

Upon first glance on the home page, all links seem to work. The layout is easy to navigate. This is one of the best websites I’ve seen, yay!

TASK 2. *Check out the City’s “Comprehensive Plan.” (Hint: look under “Envision Littleton.”)*

Do you have any accessibility or usability difficulties with this PDF file?

Well, under, “Comprehensive Plan and Design Requirements” so far, I’m failing at downloading to a PDF file format. Went farther down the page and found a second link. Here I could download the document; however, I can’t seem to “Open Parent document.” I tried several times and couldn’t get into it.

Switched to Firefox: pressing the “My Littleton” link, goes to the bottom of the next page instead of the top. Did this several times with the same result.

Looking on the “Comprehensive Plan.” Link, I was linked directly to the 58 plus page document.

Does the Table of Contents page provide links to section headings within this document?

In Firefox, I don’t see a clear “Table of contents” There are numbers from 1 – 89; however, they are not links and don’t go anywhere when pressed. When scrolling through the document, reads, 1, 2, 3, 7, 15, 29, 39 etc. Not sure how come they aren’t in sequential order.

Microsoft Edge: Couldn’t even get into the website with that browser.

Back to Internet Explorer. Still couldn’t get the 98-page document to open or read.

[Editor’s note: the link [Envision Littleton Comprehensive Plan \(Adopted 10.15.2019\)](#), opens in a new window. The PDF has a table of contents, however, as it is not a properly tagged file, the contents are not linked within the document.]

TASK 3. *Check out the City’s “City of Littleton Three Mile Plan” (Hint: look under “Envision Littleton.”)*

Do you have any accessibility or usability difficulties with this PDF file?

Internet Explorer doesn't work like before!

Firefox: can't even find, Envision Littleton; and get locked in the *loading search bar*.

Back to Internet Explorer: did a search for *Three Mile Plan*; have tried documents, PDF files, I can't seem to make much progress with these items.

Can you navigate this document using the TAB key?

No, I can't even tell if I'm in the document and/or still on the website.

[Editor's note: the PDF City of Littleton Three Mile Plan is not a properly tagged file, making keyboard navigation within the document impossible.]

TASK 4. Access one or more of the meeting videos found at:

<https://www.littleongov.org/connect-with-us/city-leadership/meeting-videos-documents>

Is audio description provided?

If there happens to be a Live Session when you access this site, does the live session have real-time captions and/or audio description?

With Internet Explorer:

I found in the calendar, "Licensing Authority meeting, Wednesday, 12/11/19." I listened to two segments of music, no meeting, no audio description.

[Editor's note: This meeting began at 6:11 into the video.]

Licensing Authority meeting 11/13/19: just music; again no audible meeting or description.

[Editor's note: This meeting began at 5:47 into the video.]

Some links didn't even go to YouTube.

LIFT meeting on 12/12/19: music only; no audible meeting or description.

[Editor's note: This meeting began at 6:15 into the video.]

LIFT meeting 10/10/19: same, music only; no audible speech or description.

[Editor's note: This meeting began at 4:49 into the video.]

City Council Meeting 11/19/19; tried to go to the Littleton TV channel 8; that was a YouTube disaster.

Wanted me to comply with children's privacy rights, blah, blah, blah! I left that program.

When I hit the normal play button, like before, just music no meeting or description.

[Editor's note: This meeting began at 8:49 into the video.]

Guess I'd surmise, they aren't done and/or accessible, or YouTube is having an issue.

[Editor's note: As to find the time in the videos where these meetings actually begin, requires either listening for four to six minutes (or longer?) or scrolling through the video with the time bar at the bottom of the screen, without some audio description (e.g., "the meeting will begin in five minutes") these meetings are not easily accessible to people who are blind, have low-vision, or have limited manual mobility.]

Technical Reviewer's Note: *this accessibility challenge is a failure of [WCAG SC 1.2.3 \(Audio Description or Media Alternative\)](#) which, as suggested above, would alert the user to the fact that a video is indeed playing and will begin shortly, or after a certain number of minutes. Otherwise, the user may believe the video is defective, broken, or missing, or assume he/she has clicked on the wrong element, when in fact they simply need to wait.*

Note: *for the sake of all users, with or without visual impairments, it may be very helpful to link to a specific time in the video. Rather than embed the YouTube video at the 0:00 mark, the video could be embedded to begin playing at a timestamp just before the meeting begins.*

For example, *the video embedded in the page [Licensing Authority Meeting - 12/11/2019](#) would be linked to the 6:10 mark, when the dialogue begins. To see the difference, visit both links below:*

- [Licensing Authority Meeting - 12/11/2019 at 0:00 mark](#)
- [Licensing Authority Meeting - 12/11/2019 at 6:10 mark](#)

TASK 5. *Looking at City Events & Meetings, from the calendar at:*

<https://www.littletongov.org/connect-with-us/calendars/city-events-meetings>

On the calendar, can you access the City Council Study Session at 6:30 on December 10 or the City Council Regular Meeting at 6:30 on December 17? If so can you follow the link to the meeting agenda – Do you have any accessibility or usability difficulties with this PDF file?

Firefox, link takes me to the bottom of the page, stuck in the search bar, upon entering the website; not the top as one would expect.

Found an agenda from 11/19/19 and it seemed readable, surprising enough (maybe Firefox wins here).

Navigation is still odd with Firefox. When arrowing down through the page that is supposed to be Calendar, one does not find anything of substance, i.e., main home links and the search bar that I keep getting locked in. However, if I use the tab key, then, I find all kinds of things like: print, feedback, city events and meetings.

Technical Reviewer's Note: *while individual computers, operating systems, and web browsers have their own quirks and nuances which cannot always explain why AT will act the way it does, this user is experiencing a frustration that the active focus used by the screen reader is reading the ancillary text links above the calendar, including: RSS, Font Size, Share and Bookmark, Feedback, and Print. These links, while helpful, can be very irritating to a user relying on a screen reader unless an option is provided to skip over this section and go directly to the calendar items.*

Providing "skip links" for this purpose would be highly recommended in this case. Although the page does feature one main skip link which send the user here: <https://www.littletongov.org/connect-with-us/calendars/city-events-meetings#sitebody>, it does not appear to be working properly. If this is indeed the case, this would be a failure of WCAG SC 2.4.1 (Bypass Blocks). It is advisable to add a better skip link to help users navigate directly to the calendar of events rather than having to press "down" or "tab" over 60 times in order to find the first event on the calendar (which is what I experienced during my audit.

Frustrating that in Firefox the down arrows and up arrows are not the same text.

I could find March 3, 2019 City Council Meeting-not sure how-however, the previous and next buttons did not seem to take me anywhere. I never found the December 17, 2019 meeting.

TASK 6. Go to the Littleton Channel 8 page (Hint: under the “My Littleton” drop down menu).

Is audio description provided?

Internet Explorer:

I found a video entitled “Littleton Video Reports” actually had dialog! It didn’t have any audio description however.

Under, Share It with Friends, Littleton Gov; same results, i.e. narrative, no audio description.

Same for Arts and culture; no audio description.

Same for Always Shop Littleton; text, no audio description.

TASK 7. <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Can you complete and submit the form to subscribe to City News? [OK to use my name & email – games@mtc-inc.com]

Microsoft Edge: down arrowing, I don’t see subscribe to City news; however, there it is upon up arrowing.

Regarding the form:

After Link Share and Bookmark, there is one word per line for the next sentence:

Press Enter to show all options, press Tab go to next option Press Enter to show all options, press Tab go to next option.

The form itself, I could do (inserting your email and name) however, there wasn’t any feedback from JAWS while typing or afterwards. The only way I knew the information was present, was, I had to go back to the top of the page. With that said, I couldn’t get the submit button to submit, thus, inaccessible. This form needs lots of work.

Technical Reviewer's Note: this form does indeed present challenges to users relying on screen readers. The audio-captcha is difficult to use as the screen reader speaks instructions over the audio clip the user must listen to and decipher. This is not unique to the City of Littleton's website, but it still a frustration nonetheless. If possible, it would be helpful to remove the CAPTCHA altogether, or provide a different way (such as email verification) to filter out spam. As it currently stands, one could argue that this form is inaccessible in practice, if not in theory.

In addition, upon completion of the form, the page simply refreshes, sending the user's active focus back to the very top of the screen again, which may require (as with the calendar) skipping past 60 links to get to the form again. This appears to a failure of WCAG SC 4.1.3 (Status Messages). A user needs to know very quickly whether their submission was successful or not. Due to this page using an Iframe that pulls in a separate form, this presents an inherent challenge that may not be able to be remedied. Creating a separate page that does not use an Iframe may be the only solution.

Annoying in Microsoft Edge, if I switch screens between the website and taking notes, I get totally spit out of the website. Internet Explorer keeps my place, which makes my life easier.

TASK 8. Does the City have any current job openings? <https://careers.littletongov.org>

What positions are listed?

There’s a video here:

Is audio description provided?

Internet Explorer. The link provided actually goes to the direct page. I don't believe this is true in the slightest for Firefox or Microsoft Edge. Nice! (One more point for Explorer)

Jobs are available in Public Safety and Public works.

On this main page, the watch video doesn't work.

Technical Reviewer's Note: I was unable to replicate this error: the video worked just fine for me.

If I press, All jobs, I get into a loop between Service Center and City Hall and can't get out.

Same for Public works, end up in the above same loupe.

However, If I pressed the City Hall title and found one Civil Engineer job available.

And, discovered, if I pressed City Services, enter and series of tabs I eventually found: Equipment operator I, and Grounds Maintenance Worker.

They didn't make that easy or evident.

I still can't find the video at the moment.

TASK 9. Did you experience any accessibility or usability difficulties with any of the City's social media sites (find links in page footers)?

Yes all social sites are found in footers.

Internet Explorer:

Twitter: <https://twitter.com/CityofLittleton>

Works, wanted an account.

Facebook: <https://www.facebook.com/CityofLittleton>

The footer took me to my Facebook page.

I imagine if I pecked around enough I could have found a way to sign up for the Littleton Facebook page.

YouTube: <https://www.youtube.com/user/LittletonGov#g/u>

The footer took me to the last video for Littleton I watched. I'm not sure how to sign up for YouTube (though I use it here and there), however, the linked worked and if I were more savvy, I could sign up I'm sure. (Hope I don't sound old, for that's not my intent!)

TASK 10.

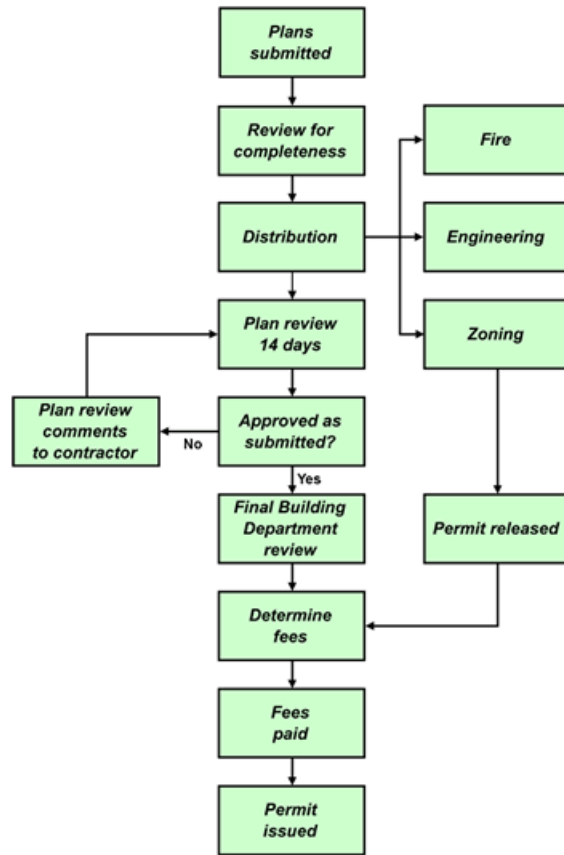
<https://www.littletongov.org/building-development/building-services/building-permits>

According to the flow chart found on this page, to which three departments are submitted plans distributed, prior to release for determination of fees?

Sorry, I have no idea what you are asking. I read everything on the flow chart and nothing sounded like what you were looking for. Guess, it wasn't truly accessible to me!

Technical Reviewer's Note: this is an excellent example of how infographics, flow-charts and other graphic images intended to convey meaning are completely hidden from users relying on AT (assistive technology) unless the website is built with AT in mind. For example, this specific flowchart (636033003872770000.gif) is quite valuable for sighted users, but a screen reader cannot discern any information from it at all. In this case, this web page fails the WCAG's SC 1.1.1 (Non-text Content). the

recommended course of action is to provide a "longdesc attribute" which would provide a text alternative that conveys the same meaningful information that a sighted user would receive.]



[Editor's note: The graphic above, the City's Building Permit flowchart, without a detailed narrative provided in alternative text, specifically the arrows drawn between text boxes, is marginally perceivable or understandable to users who are blind or have low-vision. Editor has taken the liberty of adding suggested alternative text to the above graphic in this report.]

TASK 11. <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Did you experience any accessibility or usability difficulties with the Littleton Visitors Guide?

Yes, still couldn't open it. Parent button not working. Probably something on my end to be checked out.

Technical Reviewer's Note: the visitor's guide is provided via two methods: a PDF download, and an embedded JavaScript tool called FlipBook, which is a third-party plugin from <http://www.flipbuilder.com>. While the FlipBook option is very fancy and provides a nice experience for sighted users, none of the text in the actual visitor's guide is provided to users: it is only images of text. This renders screen readers essentially useless in conveying the information in the visitor's guide. While this fact itself presents an accessibility challenge, the City of Littleton is doubly-challenged in that it appears the the PDF alternative is not properly tagged for screen readers ([view screenshot](#)). This would mean that some users relying on AT will not be able to access the visitor's guide no matter the selection they choose. [Learn more about properly tagging PDFs.](#)

TASK 12. Are you able to confirm compliance with the three basic administrative requirements of title II of the ADA listed below:

1. **Find ADA coordinator name, address, email, phone number**
2. **Find notice of nondiscrimination on the basis of disability**
3. **Find ADA grievance procedure**

Found this at the bottom of one page.

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

Grievances are to the same place.

Human Resources Director
City of Littleton
2255 W. Berry Avenue
Littleton, CO 80120
303-795-3857

I have not found so far: ADA coordinator name or email

ADA grievance procedure is on the same page as well as notice of nondiscrimination on the basis of disability. They didn't make that easy to find. The only way I discovered it was by searching for disability.

[Editor's note: Title II regulation specifies that public entities must "make available to all interested individuals the name, office address, and telephone number of the employee or employees" designated to coordinate the entity's efforts to meet its ADA obligations, [§ 35.107\(a\)](#). While the regulation does not state a requirement to provide an email address, it is clear that the provision of all relevant contact information, in the 21st century, would include an email address.]

Observations by Tester Who Has Low-Vision

Our tester, who has low-vision, completed the following evaluation using 2019 ZoomText and the most current Chrome, Firefox, and Internet Explorer 11 browsers. She was given the general instructions in the *Introduction* above, as well as the those in the attached, *Work Order URLs and Task Detail for Littleton Website Testing*.

General Observations

Investigator Introduction

The websites were examined from a laptop PC running ZoomText Magnifier-Reader version 2019. While the speech feature was on, it does not always run. ZoomText defaults to the “Speak It” tool that works within webpages when one shifts modes and highlights the text to be read. In Littleton webpages, the SpeakIt tool read more comprehensively than in some other sites. App Reader does run when items are alt-tagged, but only reads the tag, no surrounding text.

Observation on the Browsers

Chrome and Internet Explorer 11 are virtually identical. Their use of color, sometimes low in contrast, make both much easier to use with impaired vision. Firefox has much better text contrast with its use of black rather than grey fonts, but the color lack makes it more difficult spotting or locating the different elements on the pages. Additionally, both opportunities for searching that the other two browsers read by tabbing are missing. I found no general “search” box on this browser.

Additionally, the App Reader does run when items are alt-tagged in Chrome and IE11, but fewer of the headings alt-tagged in those browsers seem not to be tagged in Firefox, or Firefox does not read them for some reason.

Specific comments on the browsers will be made below only when a given task worked differently among the browsers.

Overall Effective Accessibility Features

The Littleton website has four features across the website that very effectively enhance accessibility.

1. Extensively alt-tagging so much material makes it identifiable verbally as well as visually. Navigation is, thereby, greatly improved.
2. Widespread use of tagged photographs is helpful, particularly as topic-related photo montages are used to introduce most of the main headings on the site.
3. Generally well-contrasted and consistent color use throughout the website increases visibility due to a larger than usual font with relatively thick lettering.
4. The ability to increase the font size on each page also makes the website much more accessible to those with less than perfect vision who are not yet required to use specific alternative technology to use computers.

Overall Accessibility Problems

1. Especially in Chrome, the tab key mostly returns to the top of the banner and then starts over at “home” without moving into the subheadings’ dropdown menus. There is no “skip to content text” or similar option to forego all the reading of the headers. If the cursor is moved manually into the text, tabs again work as expected. None of the text is read in any

browser unless the Speak It tool is turned on, which then prevents navigation around the page and site.

2. The videos are not closed captioned, nor audio described. I was unable to check in during live streaming of any committee meeting as most have been cancelled this time of year. Non –governmental Channel 8 programs that were being streamed live provided neither closed captioning nor audio description.

Technical Reviewer's Note: almost all the videos embedded or linked to on the City of Littleton's website fail multiple criteria for accessibility due to lacking captions, transcripts, and audio narrations. For more information, please review the following WCAG Success Criteria:

- [SC 1.2.1 Audio-only and Video-only \(Prerecorded\)](#)
- [SC 1.2.2 Captions \(Prerecorded\)](#)
- [SC 1.2.3 Audio Description or Media Alternative \(Prerecorded\)](#)
- [SC 1.2.4 Captions \(Live\)](#)
- [SC 1.2.5 Audio Description \(Prerecorded\)](#)

Also, please note that relying on a third-party service to host "time-based media" does not remove the legal obligations of an entity to provide accessible content. While this is not legal advice and I am not an attorney, I have seen many entities try to say, in essence: "That's the video host provider's problem," and as far as I understand the law, an entity that is required to provide accessible content cannot simply shift all responsibility to the third-party vendor such as YouTube even if that third-party does have some measure of accessibility options baked into its platform.

TASK 1. <https://www.littletongov.org>

Are there any navigation difficulties on this page?

Yes, using the tab feature, the top banner and the next line of headings can be accessed, but when choosing a header like "I want to" the next tab goes back to the top and repeats the headers and does not move down to the subheadings on the chosen header. When visually moving the cursor down, it does tab through the sub-headings.

Did you notice any contrast problems on this page?

Chrome, IE11: Most of the links within the text that are alt-tagged are in a pink text. Pink is a low contrast color, the worst possible for the many who are partially or totally colorblind. A different, dark color would make it easier for everyone to see. The fact that main headers when tabbed or just "moused" over turn bright yellow is great and their outlining in red (which may be a Zoom Text App Reader feature) makes it so nice to know exactly where one is on the screen.

Firefox: Without color images, this browser is very difficult to use. The visible text is, yes, black, but many of the navigation markers that enhance reading, like the colors on the dropdown menus, are missing. Worse than most websites using Firefox, alt-tagged text is medium to light blue text that is very hard to see against the pure, bright white backgrounds.

TASK 2. Check out the City's "Comprehensive Plan." (Hint: look under "Envision Littleton.")

That link is on both the My Littleton and on the Government Services dropdown menus.

Do you have any accessibility or usability difficulties with this PDF file?

Accessibility, not very easy. The search box worked to find the plan fairly directly when searching “Comprehensive Plan”, but using the title “Envision Littleton” gave a plethora of items about the plan and its introduction to the residents before the document itself was found. There are several “Envision Littleton” headers on various dropdown menus that make it fairly easy to find when looking at related services, like Planning or City Services.

Usability—definitely. The PDF would not read aloud on the webpage nor in Adobe Acrobat. The text has little contrast and is “shadowed” so it is almost impossible to read at any magnification useful to me.

Does the Table of Contents page provide links to section headings within this document?

Neither the blue level headers nor the green subheadings acted as alt-tagged links for me in either the opening within ZoomText using the URL <https://www.littletongov.org/home/showdocument?id=21312> nor when switching to Adobe Acrobat Reader.

TASK 3. Check out the City’s “City of Littleton Three Mile Plan” (Hint: look under “Envision Littleton.”)

Do you have any accessibility or usability difficulties with this PDF file?

I could not locate it within or beyond the “Envision Littleton” document.

Can you navigate this document using the TAB key?

Most likely not, as the tab key did not work in the PDF document in Task 2.

TASK 4. Access one or more of the meeting videos found at:

<https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents>

A comment on the ease of accessing any particular part of a meeting.

The agenda appears on the right side of the screen and by clicking on any item it will go there. The bottom of the screen identifies as the the type of action (public comment, member report, etc.) helps keep the activity in perspective. Very useful feature!

Can you access closed captions?

After some searching about, I found the “transcript” button that gave the verbatim text of the meeting to the right of the screen. It is not exactly coordinated with the video, but provided visual access to the meeting’s verbal content. I’m not sure if this is, therefore, technically closed captioning, but it is certainly the spirit of it.

Is audio description provided?

Not that I could find.

If there happens to be a Live Session when you access this site, does the live session have real-time captions and/or audio description?

No live sessions were available. A chart of all the committees that are videotaped showed if there was a live session in progress. Nice note on the most recent City Council meeting listing dated 12/17/2019 showing it would next be live in 2 days and giving the option of setting a reminder. I was not able to view this due to a previous commitment.

TASK 5. Looking at City Events & Meetings, from the calendar at:

<https://www.littletongov.org/connect-with-us/calendars/city-events-meetings>

On the calendar, can you access the City Council Study Session at 6:30 on December 10 or the City Council Regular Meeting at 6:30 on December 17? If so can you follow the link to the meeting agenda ?

I was able to find the December 10, meeting, click on the calendar, go to the opening page of the meeting, click on the agenda and then click on any of the items. A very handy chart showing the status of any action with links to full reports or any other related actions, complete with votes and videos of the meeting link, when applicable.

Do you have any accessibility or usability difficulties with this PDF file?

No access issues. On the somewhat low contrast, headers and contents of the charts were all alt-tagged, if there was information in the category. Very nice access!

TASK 6. Go to the Littleton Channel 8 page (Hint: under the “My Littleton” drop down menu).

Does the livestream have closed captions?

Not on “Live@Levitt - Redbone” on 12-15-19 c. 8:15 pm. There are no City meetings until 12-17-19 6:30 p.m. to see if the most mission-driven programs are live captioned. (Sorry, could not observe this.)

Is audio description provided?

Not that I can find.

TASK 7. <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Did you notice any contrast problems on this page?

Only the small squares for checking type of eNews or “all email” were illegible, but both, like all the edit boxes, read aloud. Rest was quite visible.

Can you complete and submit the form to subscribe to City News? [OK to use my name & email – games@mtc-inc.com]

Easily filled out the well-tagged form. In Chrome, I only had to check the “I am not a robot” box, without a reCaptcha “puzzle,” maybe as the system sends an email that must be answered in a timely manner to activate the request. All went well. After submission, the system said I (games@mtc-inc.com) already had an account—and it provided a “change my eNotifications link. In IE11, the reCaptcha puzzle looked simple, but I failed it. Then I tried two audio puzzles. Both just sent me back to the top of the “enter your email” edit boxes.

In Firefox, I could fill out the edit boxes by tabbing, but the options as to which News to send would not check. After checking “I am not a robot,” there was no visible reCaptcha response nor a visible “submit” button, but a tab took me to an invisible one, which I clicked on with no effect, except to return to the top of that subscribe page.

TASK 8. Does the City have any current job openings?

<https://careers.littletongov.org>

What positions are listed?

Chrome: Yes, one: Equipment Operator I

Immediately thereafter, all browsers showed four: Grounds Maintenance Worker, Custodian, Civil Engineer, Equipment Operator 1.

The single entry appeared after following the provided URL. The longer list was found by clicking on the “I want to” header and then clicking on “Jobs”. Not sure why the variation.

There’s a video here:

Can you access closed captions?

No

Is audio description provided?

No.

TASK 9. Did you experience any accessibility or usability difficulties with any of the City’s social media sites (find links in page footers)?

Twitter: <https://twitter.com/CityofLittleton> - not checked, no account

Facebook: <https://www.facebook.com/CityofLittleton> - rarely use this. Initial totally visual video was nice, but without any script it does not mean much unless you know the town already. “Events” button just gave the notice that none were scheduled. It seemed to work as expected on all browsers.

YouTube: <https://www.youtube.com/user/LittletonGov#g/u> – worked fine visually. The opening video had some titles, not closed captioning, but better than nothing. No descriptive audio apparent.

Clickn Fix: <https://www.littletongov.org/city-services/click-fix-littleton> —from the footer it opened but tabbing did not work. When chosen from the “My Littleton” header dropdown, it did tab. Nice way to be responsive quickly to citizen issues—especially handy with the mobile app where a photo of an issue can be sent.

TASK 10. <https://www.littletongov.org/building-development/building-services/building-permits>

According to the flow chart found on this page, to which three departments are submitted plans distributed, prior to release for determination of fees?

Fire, engineering, and zoning are the three departments. No audio access to this page is available. Curiously, the flowchart on Firefox appeared in the same pale blue as on both of the other browsers, but the other colors on the page were just black text.

TASK 11. <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Did you experience any accessibility or usability difficulties with the Littleton Visitors Guide?

Yes, it is a 72-page pdf file. While better than most pdf documents as it is laid out to be eye-catching and, thus, uses larger and bolder fonts than most simple documents, it is still visually unreadable. I cannot get it to read neither on the website nor on Adobe Acrobat. Some of the photos are minimally captioned (in often minimally contrasting colors), which is some help.

TASK 12. Are you able to confirm compliance with the three basic administrative requirements of title II of the ADA listed below:

1. Find ADA coordinator name, address, email, phone number

No name nor e-mail address is given
Address: Human Resources Director
City of Littleton
2255 W. Berry Avenue
Littleton, CO 80120

Telephone: 303-795-3857

2. Find notice of nondiscrimination on the basis of disability

Yes, it appears on its own dropdown link on the City Departments/Human Resources menu at <https://www.littletongov.org/city-services/city-departments/human-resources/americans-with-disabilities-act>

3. Find ADA grievance procedure

Yes, it is its own button on the City Departments/Human Resources drop down menu at <https://www.littletongov.org/city-services/city-departments/human-resources/grievance-procedure-americans-with-disabilities-act>

[Editor’s note: Title II regulation specifies that public entities must “make available to all interested individuals the name, office address, and telephone number of the employee or employees” designated to coordinate the entity’s efforts to meet its ADA obligations, § 35.107(a). While the regulation does not state a requirement to provide an email address, it is clear that the provision of all relevant contact information, in the 21st century, would include an email address.]

This is the end of my assigned investigations into the City of Littleton website. If there are any questions about these comments and suggestions, you are welcome to contact me by telephone at 303-443-1665 or by e-mail at pdfoss@gmail.com. Thank you for the opportunity to examine these websites. It is a fascinating and engaging activity. The design of this website makes it overall acceptably accessible for visual low-vision users. Color contrast is the primary accessibility issue.

Observations by Tester Who Has Cerebral Palsy

Our third tester has Cerebral Palsy and uses no assistive technology to access websites. He was given the general instructions in the *Introduction* above, as well as the those in the attached, *Work Order URLs and Task Detail for Littleton Website Testing*.

Introductory Remarks:

For clarity, it should be noted that I live with a mild case of cerebral palsy, which limits my muscular coordination. Individuals with more severe cases will experience greater difficulty accessing this site than I did. Those with less severe cases will experience less difficulty. The challenge to make this website accessible to as many as possible should be taken into account when reading this report. These findings reflect only my experience with this website.

Most specifically, I am quite skilled at using a computer mouse. When using a mouse, my arm is generally resting on the table or desk I am sitting at. This provides great stability for my hand while using a mouse. By contrast, when touching the screen on my computer, my arm is in the air, and I have nothing to stabilize my hand. Because my hand is, for lack of a better term, shaky, touching a specific location on the screen can be more difficult. Therefore, I generally prefer to use a mouse, rather than touching the screen on my computer.

With that said, I realize that the use of touchscreens is increasing in popularity. I am also aware that the WCAG recommends the use of touchscreen as an alternative to using a mouse. Therefore, in testing this website for accessibility, I alternately used both techniques for browsing the website.

In using the touchscreen, I have been mindful of the fact that people with more steady hands will have an easier time with using a touchscreen than I do. Therefore, in my assessment of how the client's website incorporates touchscreen technology into its ADA compliance, I have sought to effectively ignore how unsteady my own hand can be. Instead, I have sought to assess how well someone with a steadier hand will be able to use this technology.

I draw attention to this because, on one hand, if the hyperlinks on a web page are too small, with little or no spacing between them, they will be difficult for users to access, no matter how steady their hand. On the other hand, if a user's hand is excessively shaky (as mine can sometimes be), it does not matter how well certain techniques are incorporated by the client. That user will have difficulty using touchscreen technology.

Other specific tasks I've been asked to perform will be addressed throughout this report.

Specifics:

I was asked to do accessibility testing on several specific URLs within the web domain owned by the client. This report will reflect my experience with each, in turn. The client should be aware that I am not assessing either the content or aesthetics of their website. I am only reflecting the ease with which I can navigate the site, using the links contained therein.

TASK 1. <https://www.littletongov.org>

Are there any navigation difficulties on this page?

All of the primary buttons on this page are of adequate size and spacing to accommodate ease of access. The page features a series of links at the very top of the page. The font used in these links is rather small. However, the spacing is sufficient to allow for ease of access.

Within the header just below these links, each of the drop-down menus are activated by either hovering the mouse over the menu heading, or by using the touchscreen (tapping the menu heading). Within each menu, the spacing between links is well-suited for ease of access via the mouse. Accessing them via touchscreen is relatively easy. I myself had no problems here. However, if there had been any less spacing between the links, I most likely would have had an issue. And I am not sure how well someone with more serious coordination issues will handle the spacing as it exists. The client might want to consider adding a little more spacing between links in these menus for their sake. But, if the client does add more spacing, the client should be advised that adding only a minimal amount of additional spacing should be necessary.

Did you notice any contrast problems on this page?

No, I did not notice any contrast problems on this page.

Note: These comments reflect my experience with this page in both Chrome and Firefox.

TASK 2. Check out the City's "Comprehensive Plan." (Hint: look under "Envision Littleton.")

Do you have any accessibility or usability difficulties with this PDF file?

The page containing the link to this document features a number of links to PDF files. The size of the font used in these links, combined with no spacing between them, makes accessing them difficult, particularly for touchscreen users. It will be difficult for such users to accurately select the link they want to activate. With a mouse, this is not quite as problematic. But even for mouse users, some spacing between these links would be beneficial.

Clicking the link to this document opens it in a new window, using Adobe Acrobat Reader to present the content. Within this new window, the zoom buttons are rather large buttons on the right of the window, which are invisible until the mouse is hovered over that area of the window, or any portion is touched. These buttons are large enough to be well-suited for ease of access. In the upper right corner are the buttons for rotating the document, downloading the document, or printing it. These buttons are smaller, but spaced far enough apart to allow for ease of access.

The above comments reflect my experience of this document with Chrome. In Firefox, all of the buttons appear across the top of the window. They're all about the same size as the ones that appear at the top of Chrome's window. However, less space is present between them. For this reason, they are more difficult to access via touchscreen. Unfortunately, I believe this is simply due to how Firefox handles the code in such web pages, and this page is effectively generated by Adobe. I do not know if, or how, the client would be able to remedy this issue.

Does the Table of Contents page provide links to section headings within this document?

No, the Table of Contents page does not provide links to section headings within this document.

TASK 3. Check out the City's "City of Littleton Three Mile Plan" (Hint: look under "Envision Littleton.")

Do you have any accessibility or usability difficulties with this PDF file?

The process of accessing this PDF file is identical to that of accessing the City's Comprehensive Plan, under Task 2. Please see above.

Can you navigate this document using the TAB key?

No, the TAB key does nothing with respect to navigating this document. The TAB key does, however, work for accessing Adobe's buttons for downloading, printing, and zooming. To activate one of them, I just have to hit the TAB key until the appropriate button is selected, and then hit the ENTER key.

Navigation within this document is as simple as scrolling up and down within it, from one page to the next. This is accomplished either by using the up and down arrows on the keyboard, using the scroll wheel on the mouse, using one's finger to drag up or down, or by using the browser's vertical scroll bar.

Note: These comments reflect my experience with this page in both Chrome and Firefox.

TASK 4. Access one or more of the meeting videos found at:

<https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents>

Can you access closed captions?

Because this is a YouTube video, yes, I can access closed captions.

Note: This comment reflects my experience with this page in both Chrome and Firefox.

TASK 5. Looking at City Events & Meetings, from the calendar at:

<https://www.littletongov.org/connect-with-us/calendars/city-events-meetings>

On the calendar, can you access the City Council Study Session at 6:30 on December 10 or the City Council Regular Meeting at 6:30 on December 17? If so can you follow the link to the meeting agenda – Do you have any accessibility or usability difficulties with this PDF file?

On the calendar, accessing the City Council Study Session at 6:30 on December 10 was easy. The page to which it redirects features a link to the "CC Agenda," and a link to the "CC Meeting Documents." Both are PDF files. On the page, no white space separates the two. And the font used here is relatively small. This creates a problem with accessing them. It is too easy to click one, when intending to click the other, especially via touchscreen. I highly recommend inserting a line of white space between these two links.

Technical Reviewer's Note: this presents a challenge, and would be a failure of [WCAG SC 2.5.5 \(Target Size\)](#), but this is a AAA-level criterion and represents a higher level of conformance than what we've outlined so far (which is level AA). Having said that, providing more space between links to download PDFs is highly recommended.

The usability of this PDF file is identical to that of the documents tested under Tasks 2 & 3.

Note: These comments reflect my experience with this page in both Chrome and Firefox.

TASK 6. Go to the Littleton Channel 8 page (Hint: under the "My Littleton" drop down menu).

Does the livestream have closed captions?

At 1:30 PM (Pacific Time), on December 18, 2019, the livestream does not have closed captions. It also does not have any control by which captions may be activated.

[Editor's note: In order to comply with title II requirements for equally effective communication ([§35.160](#)), the audio portion of live-streamed video content must provide CART (Communication Access Real-time Translation). In addition, audio description of video action must be available for people who are blind or have low-vision. Closed captions and audio description must be added to video content that is archived and available for public access. Typically, closed captions and audio description of recorded content must meet a higher level of accuracy than live-streamed content.]

TASK 7. <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Did you notice any contrast problems on this page?

Below is a portion of the screenshot from this page, which I have taken down to 50% scale. The two areas I have circled in yellow may present contrast problems for some users.

In the first instance, it is not necessarily because a bad font color is used. In my opinion, this red font color needs to be used with a larger font. Increase the font size, even by just a small factor, and there should be no contrast problems.

In the second instance, we have a rather light gray font over a white background. In my opinion, this will always create contrast problems, regardless of font size.



Technical Reviewer's Note: this is a failure of [WCAG SC 1.4.3 \(Contrast\)](#) (see an example screenshot). Text with this very low contrast should be enlarged in size and/or made darker via CSS files.

Can you complete and submit the form to subscribe to City News? [OK to use my name & email – games@mtc-inc.com]

Using Geoff Ames' name and e-mail address, I had no problems with completing and submitting this form. The text fields are easily selected via both mouse and touchscreen, as are the required checkboxes. As a matter of fact, I did not test accessing these items with the mouse, knowing that if I can access them via touchscreen, doing so with the mouse is even easier.

Note: These comments reflect my experience with this page in both Chrome and Firefox.

TASK 8. Does the City have any current job openings? <https://careers.littletongov.org>

What positions are listed?

Currently, four (4) positions are listed: Civil Engineer, Custodian, Equipment Operator, and Grounds Maintenance Worker.

There's a video here: Can you access closed captions?

Because this is a YouTube video, yes, I can access closed captions.

TASK 9. Did you experience any accessibility or usability difficulties with any of the City's social media sites (find links in page footers)?

Twitter: <https://twitter.com/CityofLittleton>

I do not detect any accessibility issues on Littleton's Twitter account page.

Facebook: <https://www.facebook.com/CityofLittleton>

On December 17, the City of Littleton did a live video feed of its City Council Meeting on Facebook. As with all such events, the post is still present on Facebook and can be watched as a recorded event. There are no closed captions accompanying this video. I presume the same will be true of all such videos found here. Beyond that, I did not experience any difficulties with the City's Facebook page.

[Editor's note: Facebook does allow users to enable captions, by clicking on the "Setting" icon at the lower left corner of the video player, then "More Video Settings"; select "Always Show Captions." However, Facebook's default setting does not enable captions. In addition, "Captions Display" can be modified for background color (black, blue, green, cyan, red, magenta, white, or yellow), background opacity (100%, 75%, 45%, 25%, or 0%), text color (black, bleu, green, cyan, red, magenta, white, or yellow), and text size (200%, 175%, 150%, 125%, 100%, 75%, or 50%). Users can choose combinations of background and text colors that do not provide compliant color contrast.]

YouTube: <https://www.YouTube.com/user/LittletonGov#g/u>

My experience with the videos under Tasks 4 and 8 had me thinking that all YouTube videos are enabled with closed captions. Looking at this URL, and the videos posted here, I discovered this is not true. The toolbar at the bottom of any YouTube video includes the button for turning closed captions on, ONLY if the user has embedded them into the video. Within Littleton's YouTube channel, I found a number of videos that have no closed captioning with them.

TASK 10. <https://www.littletongov.org/building-development/building-services/building-permits>

According to the flow chart found on this page, to which three departments are submitted plans distributed, prior to release for determination of fees?

Prior to release for determination of fees, submitted plans are distributed to the Fire Department, the Engineering Department, and the Zoning Department.

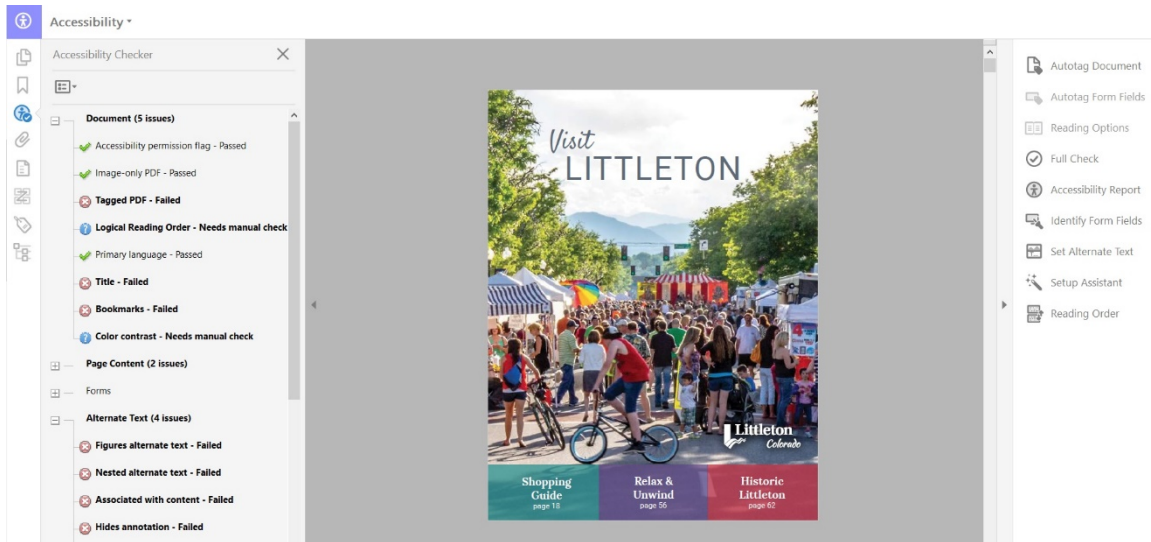
TASK 11. <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Did you experience any accessibility or usability difficulties with the Littleton Visitors Guide?

There are two methods by which the Littleton Visitors' Guide may be accessed. For users with disabilities, the secondary method is preferable to the primary method. Here, I will briefly describe the secondary, preferable method first. Then I will address the less usable primary method.

The URL featuring the Visitors Guide has, near the top of the page, a link to the PDF format of the Guide. Clicking it opens a new window in which Adobe Acrobat Reader is used to present the Guide. The features in such windows are designed and implemented by Adobe. I never have any problem with using them. Even if I did, I do not believe the client would be able to do much about it. Such issues would have to be addressed by Adobe.

[Editor's note: It is possible to view and download a PDF file of the Visitors Guide. Employing the Adobe Accessibility Checker reveals more than ten accessibility failures in the document. Because the PDF is not properly tagged, it is not accessible for many who are blind or have low-vision. See screenshot below.]



Going back to the initial URL, I find what appears to be the primary method of accessing the Visitors' Guide, which is less preferable, though it does contain some fun and interesting features. Here, the Guide is presented in book form, quite literally. The user sees an image of the Guide's Cover. Forward and Back buttons appear to the left and right of the screen. Clicking them navigates the user from one page to the next. This presentation is designed in such a way that you literally see AND HEAR the pages turn. This fun feature simulates the look and feel of actually reading a book.

Turning the pages of this virtual book can also be done with the Right and Left navigation buttons on the user's keyboard. Via a mouse that has a scroll wheel, rotating the wheel up and down also turns the pages. Unfortunately, this means that if you want to actually scroll up and down within the web page, you have to position the mouse to the outer edges of the window, outside the area featuring the Visitors' Guide.

The font used in this presentation is, by default, small and difficult to read. The lower left corner of the window presents the zoom function, whereby the whole thing can be magnified for easier reading. When in this mode, the magnification is increased/decreased via the scroll wheel on the mouse. This means the scroll wheel will not turn the pages until the zooming feature is deactivated.

I found that deactivating the zoom feature cannot be done by clicking the zoom button a second time. Instead, activating the zoom also activates a transparent menu bar near the top of the window in which the Guide is presented. Here, clicking the "Zoom Out" button in the middle of the menu deactivates the zooming feature. Then the scroll wheel will again turn the pages of the Guide.

On one hand, some of these features are nice. However, they can also be problematic. I, for one, am accustomed to using the mouse's scroll wheel to scroll up and down within a web page. The fact that I have to position the cursor somewhere outside a certain portion of the web page in order to use it this way—or, rather, the fact that I have to remember to do so—can be annoying. Likewise, not being able to turn the zooming feature off by clicking the zoom button (lower left corner) a second time is annoying.

I would advise the client to design that button in such a way that it truly acts as a toggle button. Click it once, and the zoom feature is turned on. Click it again, and this feature is turned off. As for the scroll wheel turning the pages, rather than traversing up and down within the page, the annoyance is a slight one. I mention it as an annoyance, but do not recommend any changes, other than perhaps adding a disclaimer about how the use of such devices as a scroll wheel are affected.

Finally, I did find that the up and down navigational buttons on my keyboard do, at all times, traverse up and down the web page. They do not turn pages within the Visitors' Guide, nor do they increase or

decrease the zoom when that feature is active. They just move the whole page up and down within the window. This is a positive feature.

Note: These comments reflect my experience with this page in Chrome. In Firefox, activating the zoom feature literally freezes everything. I cannot turn the pages of the book. I cannot zoom in any further than the initial zoom, and I cannot zoom out. No matter what buttons I push, I cannot deactivate the zoom that was activated by clicking the icon in the lower left corner. If I use the up and down arrows on the keyboard, or Firefox's scroll bar, I can move the page up and down. So too, with the mouse's scroll wheel, if positioned outside the area featuring the Guide. But in order to reset the view of the page, and its functionality, I have to reload the entire web page.

TASK 12. Are you able to confirm compliance with the three basic administrative requirements of title II of the ADA listed below:

The web page detailing Littleton's compliance with the ADA is at the URL, <https://www.littletongov.org/city-services/city-departments/human-resources/americans-with-disabilities-act>.

1. **Find ADA coordinator name, address, email, phone number**

According to this page, Littleton does not actually have an ADA Coordinator. Instead, it says, "Complaints that a program, service, or activity of City of Littleton is not accessible to persons with disabilities should be directed to: Human Resources Director, City of Littleton, 2255 W. Berry Avenue Littleton, CO 80120, 303-795-3857.

2. **Find notice of nondiscrimination on the basis of disability**

I believe the main body of this page constitutes the notice. Including what was just cited above, it consists of 7 paragraphs, the first being, "In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Littleton will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities." The next three paragraphs state the city's compliance with the ADA, concerning Employment, Effective Communication, and Modification to Policies and Procedures, respectively.

3. **Find ADA grievance procedure**

Other than stating that any complaints should be directed to the city's Human Resources Director, no grievance procedure is described or outlined on this page.

Observations by Tester Who Is Deaf

Our fourth tester, who is deaf and uses no assistive technology to access websites. He was given the general instructions in the *Introduction* above, as well as the those in the attached, *Work Order URLs and Task Detail for Littleton Website Testing*.

Introduction

I opened <https://www.littletongov.org> on all 4 of the above browsers and did Task 1 in each of the browsers and saw that they were all similar and did the rest of the tasks in Firefox.

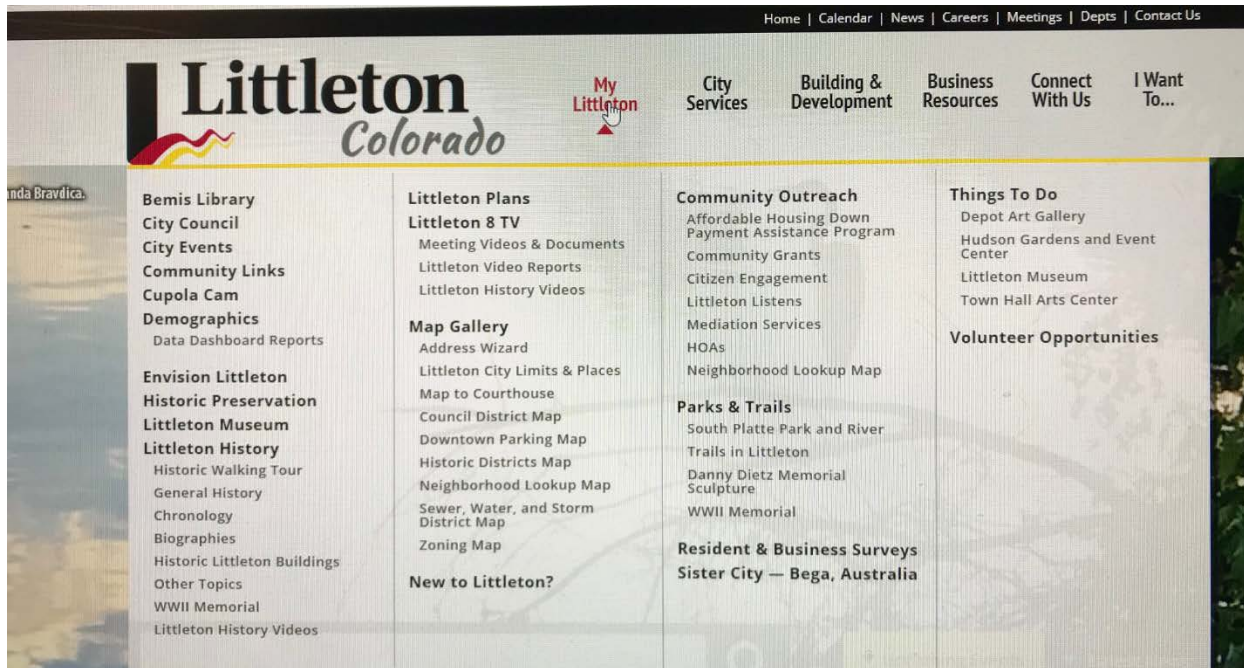
TASK 1. <https://www.littletongov.org>

Are there any navigation difficulties on this page?

None across all 4 browsers.

Did you notice any contrast problems on this page?

On all 4 browsers, I noticed that the gray letterings against slightly transparent (instead of solid) white background for menu sub-choices does not appear to provide enough contrast, I would suggest retaining black lettering as for main menu choices



Technical Reviewer's Note: this is a failure of [WCAG SC 1.4.3 \(Contrast\)](#) (see an [example screenshot](#)). Text with this very low contrast should be made darker via CSS files.

TASK 2. Check out the City's "Comprehensive Plan." (Hint: look under "Envision Littleton.")

Do you have any accessibility or usability difficulties with this PDF file?

None as it was easily accessible across all 4 browsers.

Does the Table of Contents page provide links to section headings within this document?

No across all 4 browsers.

TASK 3. Check out the City's "City of Littleton Three Mile Plan" (Hint: look under "Envision Littleton.")

Do you have any accessibility or usability difficulties with this PDF file?

None

Can you navigate this document using the TAB key?

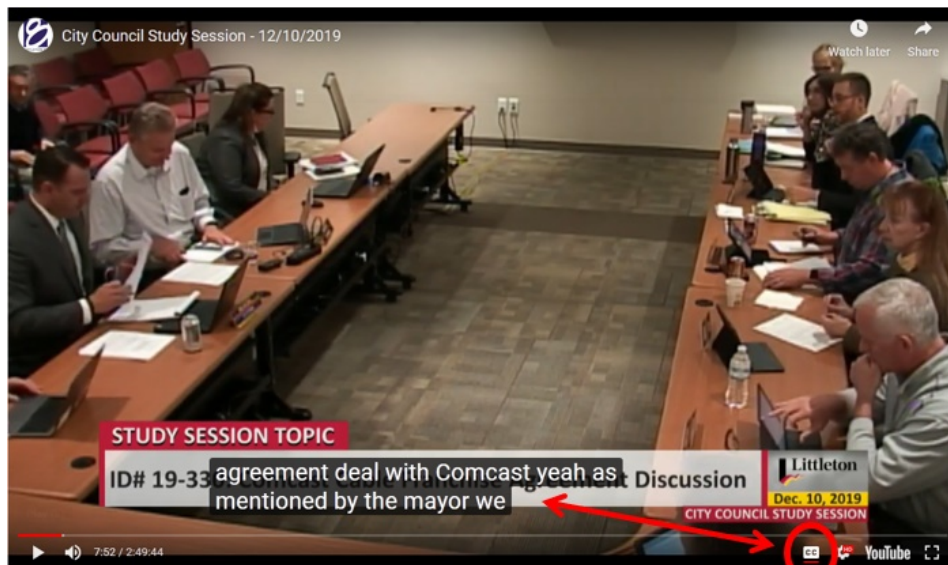
No. This appears to be an older pdf version (2015)

TASK 4. Access one or more of the meeting videos found at:

<https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents>

Can you access closed captions?

I watched part of the YouTube video of the City Council Study Session - 12/10/2019 and clicked the CC button and autogenerated CC is available:



I watched part of the YouTube video of the City Council Meeting – 10/15/2019 and clicked on the CC button as for above video snapshot:



Is audio description provided?

Unsure as I am a Deaf person and cannot hear anything

If there happens to be a Live Session when you access this site, does the live session have real-time captions and/or audio description?

Unsure as watched only the prerecorded versions however, the scrolling captions show it was recorded as real-time live captions

TASK 5. Looking at City Events & Meetings, from the calendar at:

<https://www.littletongov.org/connect-with-us/calendars/city-events-meetings>

On the calendar, can you access the City Council Study Session at 6:30 on December 10 or the City Council Regular Meeting at 6:30 on December 17? If so, can you follow the link to the meeting agenda – Do you have any accessibility or usability difficulties with this PDF file?

None for both documents and links within

TASK 6. Go to the Littleton Channel 8 page (Hint: under the “My Littleton” drop down menu).

Does the livestream have closed captions?

No. This video platform does not have any CC feature available



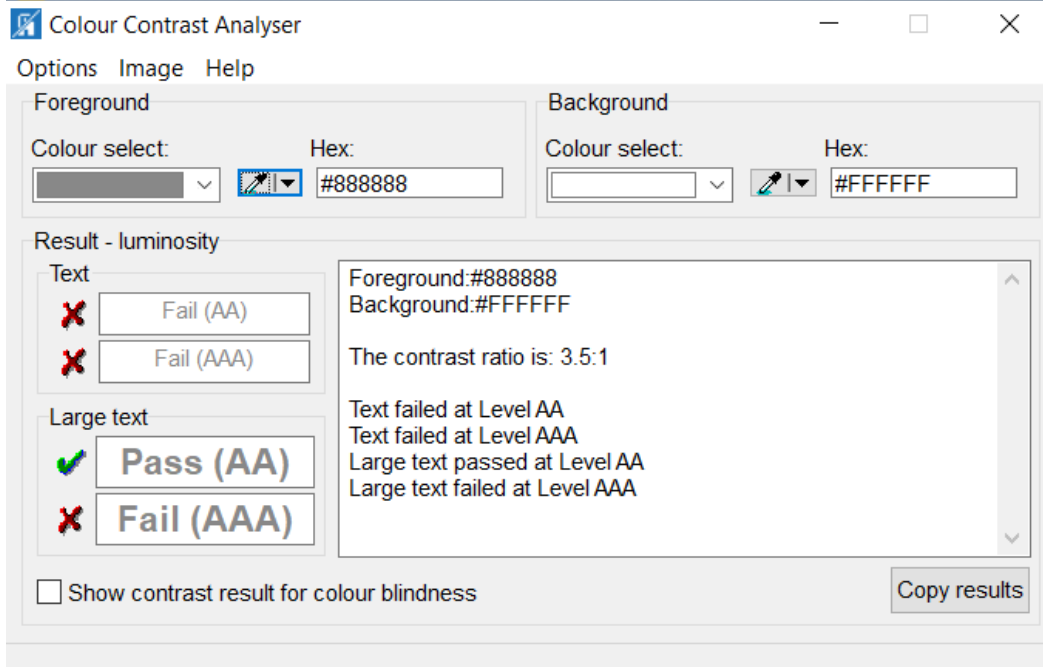
Is audio description provided?

Unsure as I am a Deaf person and cannot hear anything

TASK 7. <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Did you notice any contrast problems on this page?

Fonts are too thin and gray letterings do not provide enough contrast (see screenshot and Colour Contrast Analyser, below).



Can you complete and submit the form to subscribe to City News? [OK to use my name & email – games@mtc-inc.com]

Yes.

TASK 8. Does the City have any current job openings? <https://careers.littletongov.org>

What positions are listed?

Showing 1-4 of 4 jobs

Civil Engineer

Custodian

Equipment Operator I

Grounds Maintenance Worker

There's a video here:

Can you access closed captions?

Yes, most YouTube videos on individual webpages have auto generated captions as below and refer to Appendix 1 for examples of captions on YouTube videos and none on the Littleton Channel 8 streaming video (I am unable to identify which streaming platform)

Is audio description provided?

Unsure as I am a Deaf person and cannot hear anything

TASK 9. Did you experience any accessibility or usability difficulties with any of the City's social media sites (find links in page footers)?

Twitter: <https://twitter.com/CityofLittleton>

None.

Facebook: <https://www.facebook.com/CityofLittleton>

None.

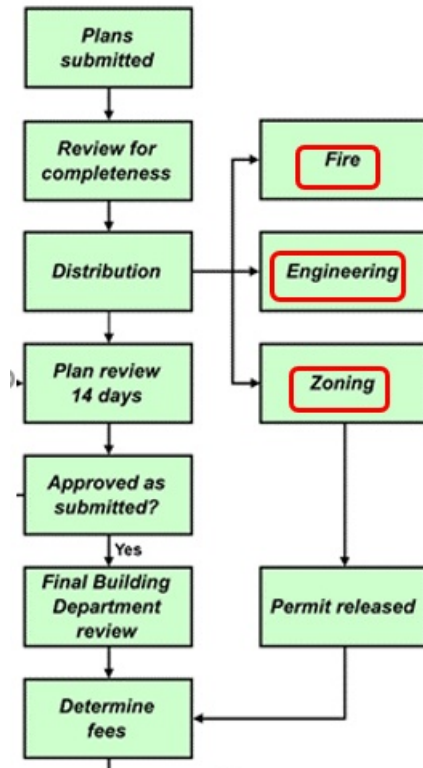
YouTube: <https://www.youtube.com/user/LittletonGov#g/u>

None.

TASK 10. <https://www.littletongov.org/building-development/building-services/building-permits>

According to the flow chart found on this page, to which three departments are submitted plans distributed, prior to release for determination of fees?

Fire, Engineering, and Zoning (see image below).



TASK 11. <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Did you experience any accessibility or usability difficulties with the Littleton Visitors Guide?

None.

TASK 12. Are you able to confirm compliance with the three basic administrative requirements of title II of the ADA listed below:

1. Find ADA coordinator name, address, email, phone number

No specific person named, just:

Human Resources Director
 City of Littleton
 2255 W. Berry Avenue
 Littleton, CO 80120
 303-795-3857

After entering “Human Resources Director” in the search bar at the top of the page, I was able to locate: Noël Mink is named as the Human Resources Director with same address and phone number as above.

No email address provided for either.

2. Find notice of nondiscrimination on the basis of disability

None found. Closest alternative is the Americans With Disabilities Act webpage at <https://www.littletongov.org/city-services/city-departments/human-resources/americans-with-disabilities-act>

3. ***Find ADA grievance procedure***

The ADA grievance procedure is located at: <https://www.littletongov.org/city-services/city-departments/human-resources/grievance-procedure-americans-with-disabilities-act>

Appendix 1

Captioned and non-captioned videos

Figure 1

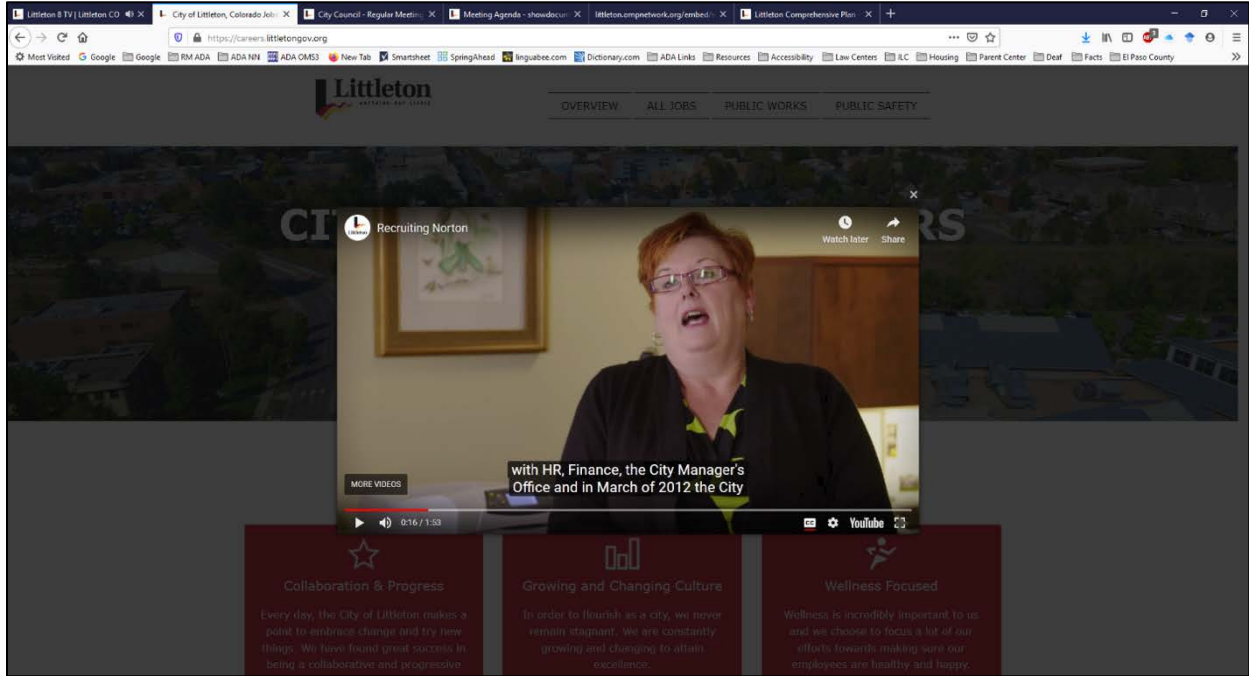
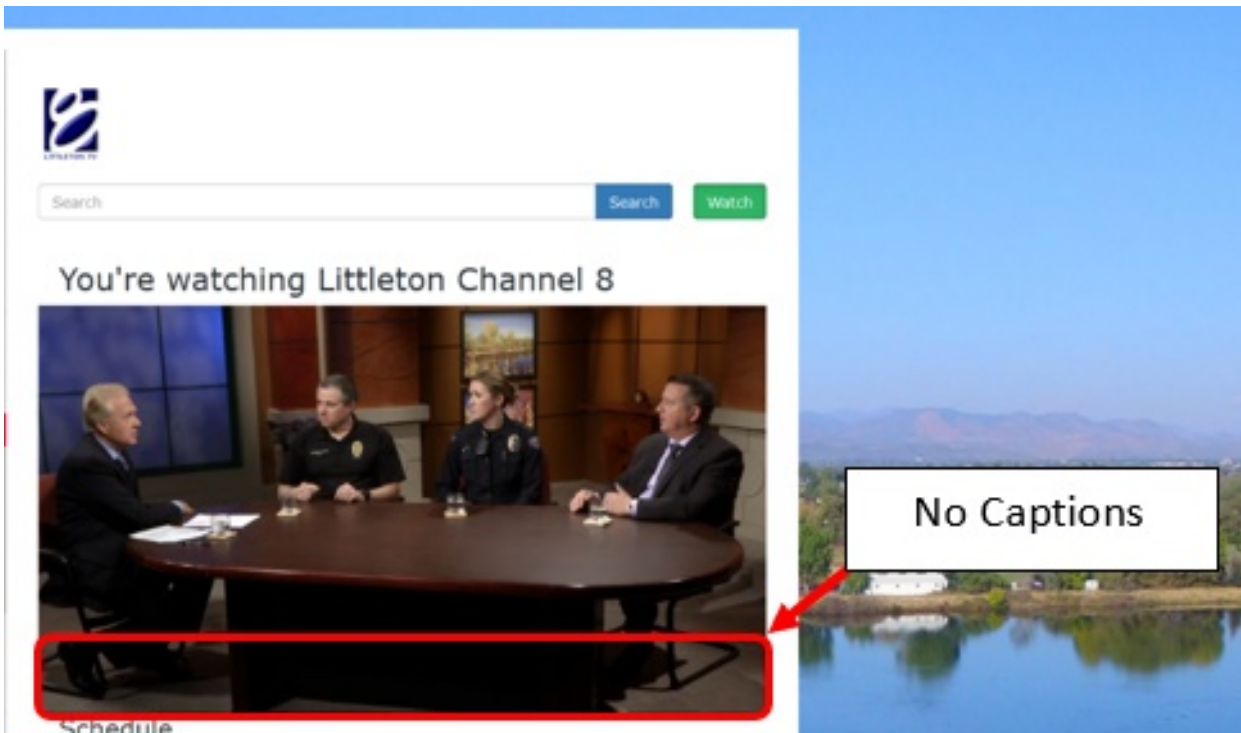


Figure 2



Sources:

Spangler, T. (2017-Feb. 16). YouTube Has 1 Billion Videos With Closed-Captioning, but Not All of Them Are Accurate. In Variety. Retrieved from <http://variety.com/2017/digital/news/youtube-1-billion-videos-closed-captioning-accuracy-1201990083/>

City of Littleton – Website WCAG 2.1 Audit Report

(www.littletongov.org/)

Report Creator: Ron Stauffer, January 24, 2020

Evaluation Commissioner: Geoff Ames

Summary of the Evaluation Findings

Please see accompanying user test report for more information on specific challenges encountered by human testers.

Scope of the Evaluation

Website name	City of Littleton
Scope of website	www.littletongov.org/
WCAG Version	WCAG 2.1
Conformance target	Level AA
Relied upon technologies	<ul style="list-style-type: none">• CSS• WAI-ARIA• DOM• HTML5

Overview of Audit Results

Principle	
1. Perceivable	17 Failed
2. Operable	5 Failed
3. Understandable	2 Failed
4. Robust	5 Failed
Total	29 Failed

Detailed Audit Results

Principle 1 Perceivable

1.1 Text Alternatives

1.1.1 Non-text Content: (Level A) [1.1 success criterion](#)

Results for: (<https://careers.littletongov.org> and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>)

Outcome: Failed

Findings: Images must have alternate text

1.2 Time-based Media

1.2.1 Audio-only and Video-only (Prerecorded): (Level A) [1.2.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.2 Captions (Prerecorded): (Level A) [1.2.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.3 Audio Description or Media Alternative (Prerecorded): (Level A) [1.2.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.4 Captions (Live): (Level AA) [1.2.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: No live media encountered during audit—verification is needed to ensure conformance with this criterion when live media is shared.

1.2.5 Audio Description (Prerecorded): (Level AA) [1.2.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.6 Sign Language (Prerecorded) Level AAA [1.2.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.7 Extended Audio Description (Prerecorded) Level AAA [1.2.7 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.8 Media Alternative (Prerecorded) Level AAA [1.2.8 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.2.9 Audio-only (Live) Level AAA [1.2.9 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.3 Adaptable

1.3.1 Info and Relationships: (Level A) [1.3.1 success criterion](#)

Results for <https://careers.littletongov.org>, <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>, and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: and must only directly contain , <script> or <template> elements; missing form labels; form <input> elements must have labels

1.3.2 Meaningful Sequence: (Level A) [1.3.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.3.3 Sensory Characteristics: (Level A) [1.3.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.3.4 Orientation: (Level AA) [1.3.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.3.5 Identify Input Purpose: (Level AA) [1.3.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.3.6 Identify Purpose Level AAA (Added in 2.1) [1.3.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4 Distinguishable

1.4.1 Use of Color: (Level A) [1.4.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.2 Audio Control: (Level A) [1.4.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.3 Contrast (Minimum): (Level AA) [1.4.3 success criterion](#)

Results for the entire sample:

Outcome: Failed

Findings: Multiple contrast errors on all pages. Text elements must have sufficient color contrast against the background.

1.4.4 Resize text: (Level AA) [1.4.4 success criterion](#)

Results for: <https://careers.littletongov.org>, <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>, and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: Zooming text 200% causes loss of content and functionality. Zooming and scaling must not be disabled.

1.4.5 Images of Text: (Level AA) [1.4.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.6 Contrast (Enhanced) Level AAA [1.4.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.7 Low or No Background Audio Level AAA [1.4.7 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.8 Visual Presentation Level AAA [1.4.8 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.9 Images of Text (No Exception) Level AAA [1.4.9 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.10 Reflow: (Level AA) [1.4.10 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.11 Non-text Contrast: (Level AA) [1.4.11 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.12 Text Spacing: (Level AA) [1.4.12 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

1.4.13 Content on Hover or Focus: (Level AA) [1.4.13 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

Principle 2 Operable

2.1 Keyboard Accessible

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.1.2 No Keyboard Trap: (Level A) [2.1.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.1.3 Keyboard (No Exception) Level AAA [2.1.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.1.4 Character Key Shortcuts: (Level A) [2.1.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.2 Enough Time

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.3 Seizures and Physical Reactions

2.3.1 Three Flashes or Below Threshold: (Level A) [2.3.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.3.2 Three Flashes Level AAA [2.3.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.3.3 Animation from Interactions Level AAA (Added in 2.1) [2.3.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4 Navigable

2.4.1 Bypass Blocks: (Level A) [2.4.1 success criterion](#)

Results for: <https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents> and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: Iframe element requires a non-empty title attribute that identifies the frame.

2.4.2 Page Titled: (Level A) [2.4.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.3 Focus Order: (Level A) [2.4.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.4 Link Purpose (In Context): (Level A) [2.4.4 success criterion](#)

Results for: <https://careers.littletongov.org>, <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>, and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: Links must have discernible text.

2.4.5 Multiple Ways: (Level AA) [2.4.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.6 Headings and Labels: (Level AA) [2.4.6 success criterion](#)

Results for: <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Outcome: Failed

Findings: – Multiple form labels

2.4.7 Focus Visible: (Level AA) [2.4.7 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.8 Location Level AAA [2.4.8 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.9 Link Purpose (Link Only) Level AAA [2.4.9 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.4.10 Section Headings Level AAA [2.4.10 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5 Input Modalities

2.5.1 Pointer Gestures: (Level A) (Added in 2.1) [2.5.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5.2 Pointer Cancellation: (Level A) (Added in 2.1) [2.5.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5.3 Label in Name: (Level A) (Added in 2.1) [2.5.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5.4 Motion Actuation: (Level A) (Added in 2.1) [2.5.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5.5 Target Size Level AAA (Added in 2.1) [2.5.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

2.5.6 Concurrent Input Mechanisms Level AAA (Added in 2.1) [2.5.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

Principle 3 Understandable

3.1 Readable

3.1.1 Language of Page: (Level A) [3.1.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.1.2 Language of Parts: (Level AA) [3.1.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.1.3 Unusual Words Level AAA [3.1.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.1.4 Abbreviations Level AAA [3.1.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.1.5 Reading Level Level AAA [3.1.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.1.6 Pronunciation Level AAA [3.1.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.2 Predictable

3.2.1 On Focus: (Level A) [3.2.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.2.2 On Input: (Level A) [3.2.2 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.2.3 Consistent Navigation: (Level AA) [3.2.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.2.4 Consistent Identification: (Level AA) [3.2.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.2.5 Change on Request Level AAA [3.2.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.3 Input Assistance

3.3.1 Error Identification: (Level A) [3.3.1 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.3.2 Labels or Instructions: (Level A) [3.3.2 success criterion](#)

Results for: <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news> and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: Multiple form labels. Form <input> elements must have labels.

3.3.3 Error Suggestion: (Level AA) [3.3.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.3.4 Error Prevention (Legal, Financial, Data): (Level AA) [3.3.4 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.3.5 Help Level AAA [3.3.5 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

3.3.6 Error Prevention (All) Level AAA [3.3.6 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

Principle 4 Robust

4.1 Compatible

4.1.1 Parsing: (Level A) [4.1.1 success criterion](#)

Results for: <https://careers.littletongov.org>, and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: ID attribute values must be unique.

4.1.2 Name, Role, Value: (Level A) [4.1.2 success criterion](#)

Results for: <https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents> , <https://careers.littletongov.org>, and <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Outcome: Failed

Findings: Frames must have title attribute. 1) Frames must have title attribute, 2) Links must have discernible text.

4.1.3 Status Messages: (Level AA) (Added in 2.1) [4.1.3 success criterion](#)

Results for the entire sample:

Outcome: Not present

Findings: None encountered in sample during audit.

Sample of audited web pages

Home <https://www.littletongov.org>

City Events & Meetings <https://www.littletongov.org/connect-with-us/calendars/city-events-meetings>

Meeting Videos & Documents <https://www.littletongov.org/connect-with-us/city-leadership/meeting-videos-documents>

Building Permits <https://www.littletongov.org/building-development/building-services/building-permits>

Americans with Disabilities Act <https://www.littletongov.org/city-services/city-departments/human-resources/americans-with-disabilities-act>

Grievance Procedure - Americans With Disabilities Act <https://www.littletongov.org/city-services/city-departments/human-resources/grievance-procedure-americans-with-disabilities-act>

City of Littleton Careers <https://careers.littletongov.org>

Click & Fix Littleton <https://www.littletongov.org/city-services/click-fix-littleton>

Subscribe to City News <https://www.littletongov.org/connect-with-us/city-news/subscribe-to-city-news>

Littleton Visitors Guide <https://www.littletongov.org/connect-with-us/littleton-visitors-guide>

Recording of Evaluation Specifics

Browsers:

- Safari
- Chrome
- Firefox

Tools:

- WebAIM WAVE
- Deque aXe
- HTML CodeSniffer
- Chromevox
- Colour Contrast Analyser
- W3 Validator (Nu Html Checker)

Related WCAG 2 resources

- [Web Content Accessibility Guidelines \(WCAG\)](#)
Overview: www.w3.org/WAI/intro/wcag
- [How to Meet WCAG 2.1 Quick Reference](#)
www.w3.org/WAI/WCAG21/quickref/
- [WCAG Evaluation Methodology \(WCAG-EM\)](#)
Overview: www.w3.org/WAI/eval/conformance

11.3 ADA Staff Knowledge Survey Results

March 9, 2020

City of Littleton, Colorado

ADA Knowledge Surveys of Staff and City Council

Prepared by:



Geoff Ames, RAS

Meeting the Challenge, Inc., A CP&Y Company

3630 Sinton Road, Suite 103, Colorado Springs, Colorado 80907

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30. Can individuals who are deaf or hard of hearing participate in all programs and activities offered by your organization?..... 34

31. Can individuals who use wheelchairs or have limited mobility participate in all programs and activities offered by your organization? 35

32. Do you have any final comments about the ADA? Your comments will be anonymous. 36

Appendix38



Introduction and Summary Comments

Meeting the Challenge (MTC) assisted City of Littleton in the development and distribution of a survey intended to assess the Americans with Disabilities knowledge of City of Littleton employees. The survey was deployed on-line using the SurveyMonkey® application. A significant purpose of this survey is to identify gaps in knowledge for which the City needs to develop and provide better policy and procedure support to its employees. In addition, MTC will develop targeted training materials to underscore the City’s ADA policies and provide the City’s employees with training that will inform them of appropriate procedures and practices to prevent discrimination against people with disabilities when participating in the City’s services, programs, and activities.

The survey data are mostly self-explanatory. We will not delve into detailed analysis of each question and its range of responses. There are not, per se, right or wrong answers as the purpose here is to assess the degree of ADA awareness common to City employees. We wanted to know what employees think about the ADA. We are willing to meet and discuss the results of the survey at length, if the City has questions. Anonymous staff comments are found, by question, in the Appendix at the end of this report

Parameters of the Survey

A total of 217 employees responded to the survey. The responses were broadly distributed across departments (with the exception of Fire Rescue, with 0 responses, and Bemis Library staff with 46 responses – 21.2 percent of all responses) and different offices/locations (though 59 percent of responses came from employees who work at the Littleton Center). Based on the total number of City employees (364) the number of responses is statistically significant (59.6 percent). While 27.7 percent (60) of responses came from employees who have worked for the City for 16 or more years, statistically meaningful numbers of employees who have worked for less than one year (15.7 percent – 34), between one and three years (25.8 percent – 56), from four to six years (11.5 percent – 25), from seven to ten years (8.3 percent – 18), and from 11 to 15 years (11.0 percent – 24), responded to the survey. Not all 217 respondents responded to every question.

Five (5) members of City Council also responded to the survey. Their responses will be reported/displayed separately.

What Did We Learn from the Survey?

In general, City employees have limited awareness, knowledge, and understanding of the ADA, as more than 50 percent of the total number of responses from employees to nine (9) of the survey questions, was: *Unsure*. And, for example, while only 34 percent responded *unsure*, an additional 27.6 percent responded *yes*, to #11 (*If in doubt that an animal is a service animal, should you request proof that the animal is a service animal?*). This means that there is considerable likelihood that nearly two-thirds (61.6 percent) of respondents might ask for proof that an animal is a service animal – which could violate the ADA rights of a qualified individual with a disability.

On six (6) questions 100 percent of City Council members gave the *unsure* response.

That so many respondents are unsure of their answers to questions commonly asked about the ADA, it is not surprising. Typically, the correct response would depend on having more information.

Most respondents (84.1 percent – 174) did not know the name of the City’s ADA Coordinator (#5). When asked, “Where would the public find contact information for your ADA Coordinator?” 29.5 percent of employees and 60 percent of City Council members replied, “website.” And while contact information for the ADA Coordinator’s office can be found on the City’s website, the ADA Coordinator’s name is not on the website (as required by title II regulation [§35.107\(a\)](#)). See names given in comments to #5, in the Appendix at the end of the report.

Most of the survey data are presented in tables and graphic representation. Additional comments and narrative responses are provided in #32, at the end of this report. A brief overview of those comments appears to have a common thread – the City’s employees would like to have more understanding of the ADA.

Comments

MTC concludes that City employees typically would take actions necessary to give an opportunity to individuals with disabilities to participate in the City’s services, programs, and activities. That said, specific knowledge of title II regulatory requirements does not necessarily inform such intentions or actions. The fact that more policy support and training are necessary is succinctly stated in the following comment (see #32):

Judging by how little I was able to answer in the questionnaire, I assume there will be some quality training in our near future.

Another comment stated: *This survey made me aware that I need more information about this organization’s ADA policy and procedures.*

MTC believes that the survey indicates, overall, a substantial need for development of ADA-implementing policies and procedures and targeted training on the intent and letter of the ADA, as well as disability etiquette and implicit bias training. The development and adoption of policies and procedures, as well as an opportunity for public comment on results of facility assessments and the program evaluation process should be completed prior to employee training sessions. In MTC’s experience, face-to-face training, offering an environment welcoming interaction and discussion between trainer and audience, is most effective. However, MTC can also provide training through webinars and/or on-line interactive training modules that permit certification of employee engagement in the training. Alternatively, archived webinars and on-line training modules can serve the need for ongoing training for new hires and refresher training for existing employees.

Text and graphic details of the survey follow.

Respondents additional comments in response to survey questions, are provided in the Appendix at the end of this report.

Questions and Responses

Section One: About You

1. In which of these departments do you work?

Answer Choices	Responses
Bemis Public Library	46
City Attorney's Office	2
City Clerk's Office	5
City Manager's Office	4
Municipal Courts	2
Communications	7
Community Development	15
Economic Development and Business Services	4
Finance Department	10
Fire Rescue	0
Littleton Museum	18
Human Resources	8
Information Technology	10
Police Department	45
Public Works	38
Other	3
Total	217

2. In which of these locations do you work?

Answer Choices	Responses
Littleton Center	128
Art Depot	3
Belleview Service Center	24
Bemis House	3
Bemis Library	52
Littleton Museum	20
Municipal Courthouse	10
Town Arts Center	3
Other	6
Total	217

3. Which best describes your position?

Answer Choices	Responses
Staff – High Public Interaction	94
Staff – Low Public Interaction	45
Facility Maintenance	7
ROW Maintenance	3
Supervisor/Manager	43
Public Safety	25
Total	217

4. How many years have you worked for this organization?

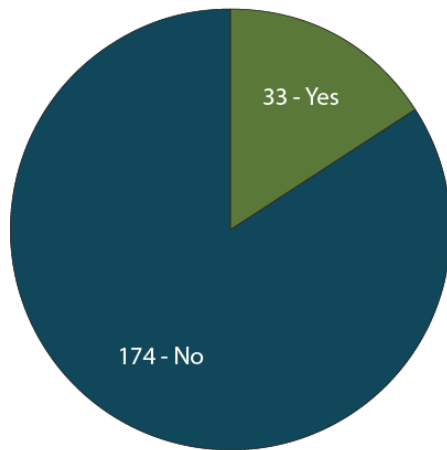
Answer Choices	Responses
Less than 1 Year	34
1-3 Years	56
4-6 Years	25
7-10 Years	18
11-15 Years	24
16 or More Years	60
Total	217

How many years have you been on City Council?

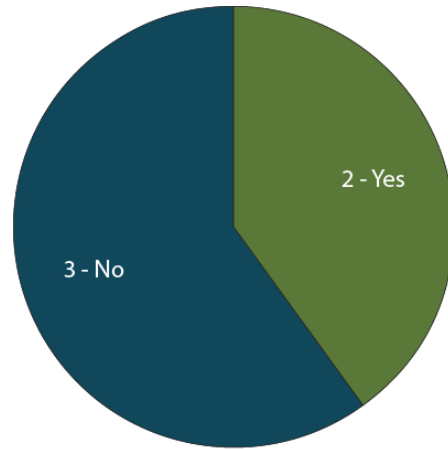
Answer Choices	Responses
Less than 1 Year	2
1-3 Years	2
4-6 Years	0
7-10 Years	1
11-15 Years	0
16 or More Years	0
Total	5

Section Two: Administrative

5. Do you know the name of your organization’s ADA coordinator?



Staff

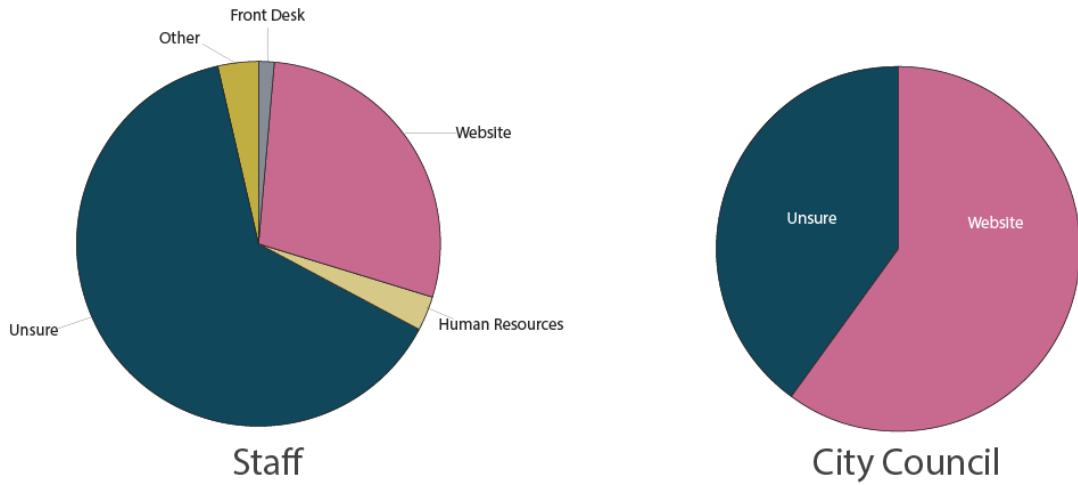


City Council

Answer Choices	Staff Responses	City Council Responses
Yes	33	2
No	174	3
Total	207	5

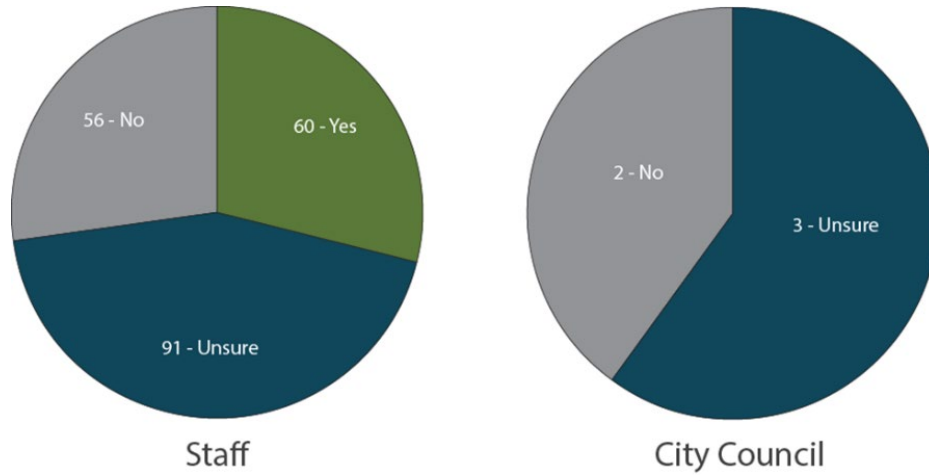
Respondent Comments for Question 5.

6. Where would the public find contact information your ADA Coordinator?



Answer Choices	Staff Responses	City Council Responses
Front Desk	3	0
Website	59	3
Human Resources	6	0
Unsure	132	2
Other	7	0
Total	200	5

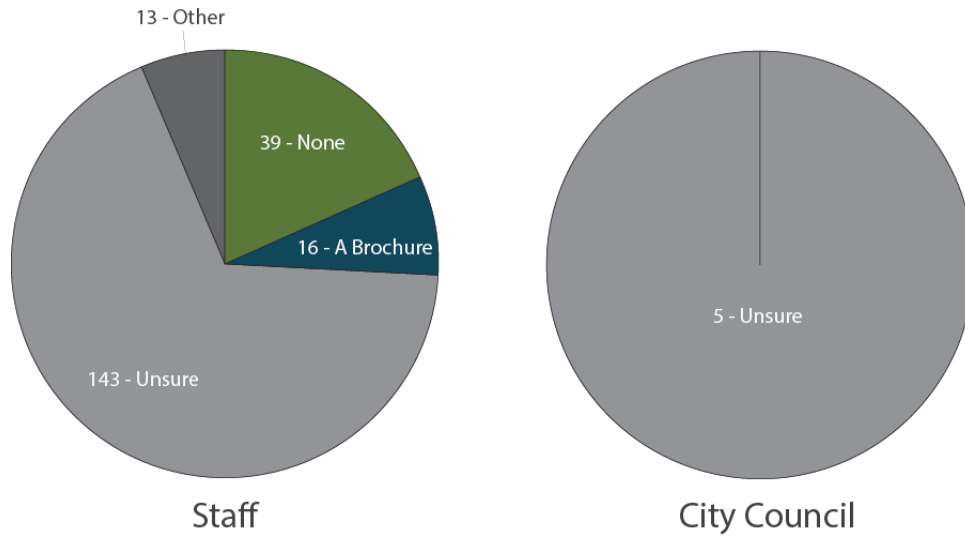
7. Have you seen notice indicating nondiscrimination with regard to disability at your facility?



Answer Choices	Staff Responses	City Council Responses
Yes	60	0
Unsure	91	3
No	56	2
Total	207	5

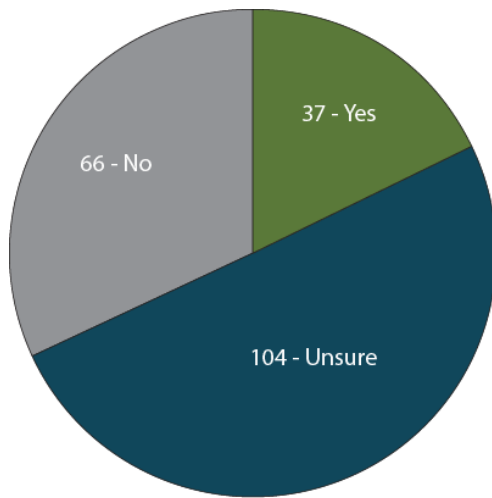
[Respondent Comments for Question 7.](#)

8. What type of disability accessibility information is available at your front desk and/or service counter?

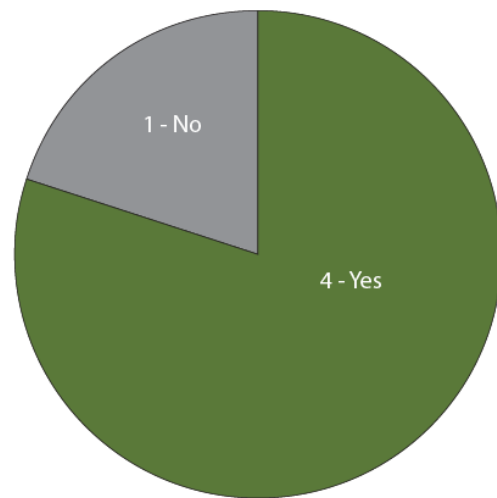


Answer Choices	Staff Responses	City Council Responses
None	39	0
A Brochure	16	0
Unsure	143	5
Other	13	0
Total	207	5

9. Do you know how to assist a customer with a disability complaint or accommodation?



Staff



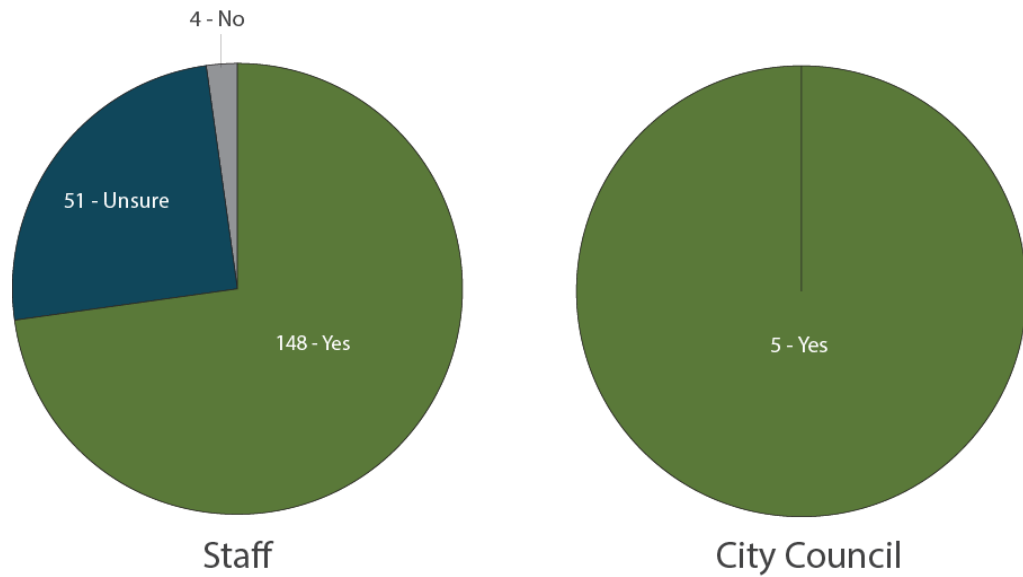
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	37	4
Unsure	104	0
No	66	1
Total	207	5

[Respondent Comments for Question 9.](#)

Section Three: Service Animals

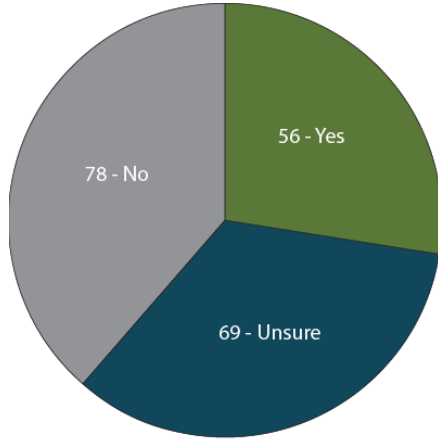
10. Are service animals allowed anywhere in your facilities?



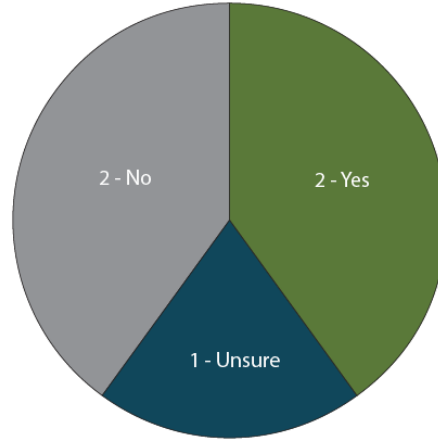
Answer Choices	Staff Responses	City Council Responses
Yes	148	5
Unsure	51	0
No	4	0
Total	203	5

[Respondent Comments for Question 10.](#)

11. If in doubt that an animal is a service animal, should you request proof that the animal is a service animal?



Staff



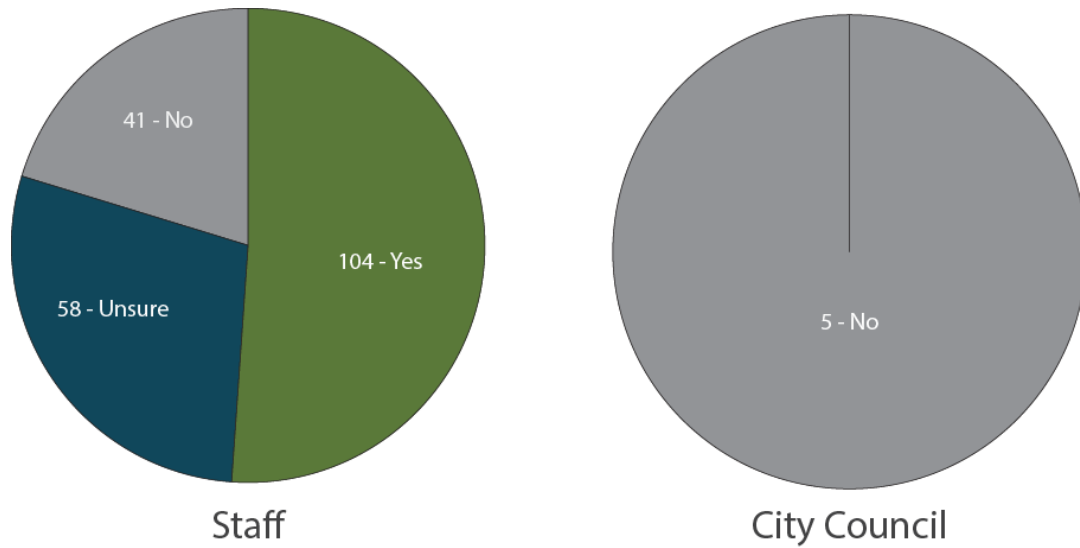
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	56	2
Unsure	69	1
No	78	2
Total	203	5

[Respondent Questions for Question 11.](#)

Section Four: Emergency Management

12. Are you familiar with your primary office location’s emergency plan?



Answer Choices	Staff Responses	City Council Responses
Yes	104	0
Unsure	58	0
No	41	5
Total	203	5

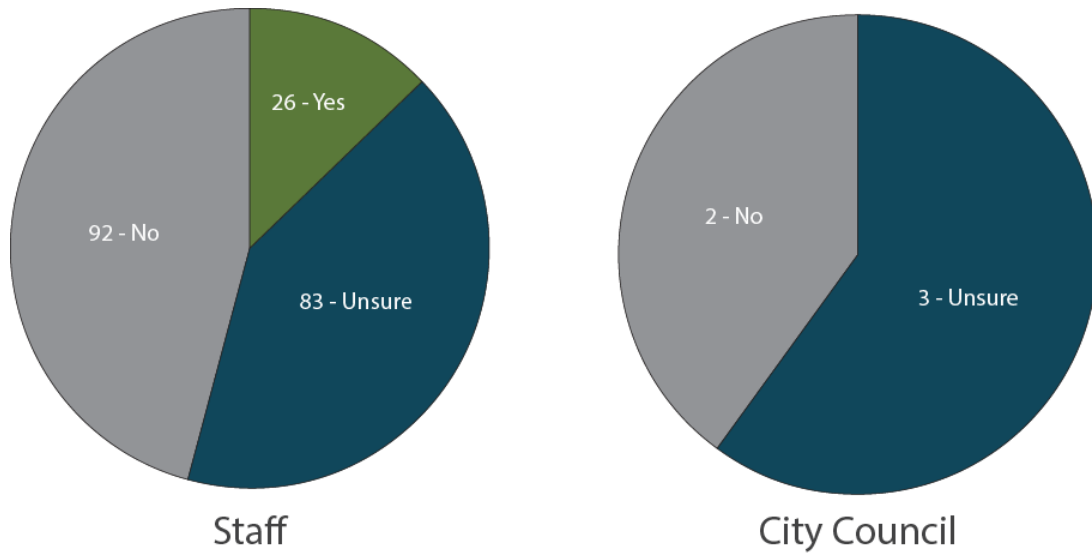
13. In an emergency situation, such as fire in the office, what procedures are in place for notification, evacuation assistance, and transportation for clients or employees with disabilities? (A selection of responses)

- Unknown/Unsure (66 Responses)
- Begin evacuation immediately and call 911
- We have a PA system which alerts staff but not sure what is in place for employees with disabilities.
- Didn't ask or look for because I never thought I will need it "sorry"
- We have areas to take people with disabilities in an emergency situation. Example landings to wait for emergency personnel.
- PA System, notification code, provide assistance to disable person to remove from area of concern. Utilize the buses to transport clients to a safe area if necessary
- Flashing lights and sound. Staff are to assist ADA patrons/employees to specific doors and safe havens where they can be further assisted by emergency staff upon arrival.
- We have alarms for notifications. We have an ADA provided exit. We have accessible fire and emergency kits provided. We have all undergone an emergency evacuation.
- See our location's procedures manual
- Call 911; evacuate patrons to nearest building exit or area of refuge where they can await further assistance should they be disabled; move patrons 100' away from building towards Library Lane or Datura St; do not patrons re-enter bldg until deemed safe by fire dept
- kindness and good conscience of others
- maps of exit points in the buildings, fire alarms, lighted exit signs.
- Evacuate people in wheelchairs to Areas of Refuge (Lower Level--side door in Meeting Room;
- Upper Level--outside stairs by Tech Services); notify emergency personnel as to their whereabouts
- Officers would escort any visitors or prisoners out of the the building and notify SMFR
- Since I am new to the agency, I might have missed the last training on this exercise.
- I know the City Center has a detailed emergency plan, but I don't know of any special evacuation assistance plan at the library
- As for notifications, the fire alarm is all we have we don't have a PA system, if anyone ADA needs are present, will carry them out, take them to an area of refuge, alert emergency personnel for evacuation!
- Informal assistance if we realized someone needed help. We would verbal say "There is a fire, get out".
- There are fire alarms throughout the building and there is an intercom system too. Each area also has a designated area to go in an emergency.
- None that I know of besides the PA system. There are two safe ways for a person in a wheelchair to leave this building. One is the front door. The other is the door by council chamber. Employees could carry a wheelchair to safety. A second floor evacuation would require more employees to assist since the elevator is not reliable or advised to use in an emergency situation.

- Notify supervisor and fire/police of patron/person with disability who needs evacuation assistance. Assist any patrons to exit if on ground floor. If in basement, advise patron to wait for fire/police assistance. Have staff member stay until evacuated.
- Fire alarms with loud sound and flashing lights, PA system. Assist clients or employees on a route compatible with their abilities or find additional assistance to aid in transport on available non-compatible routes
- Emergency exit Meeting place so "emergency contact/leader" can do a head count and also ensure all individuals are accounted for Fire extinguisher
- We have a flashing fire alarm system, but it frequently does not give off an audible sound. Staff would assist patrons with disabilities. For patrons in wheelchairs who are in the lower level of the building, we would assist them to the outside of the building through the door in the meeting room. Outside of that door is a small concrete pad with stairs leading up to the street level of the property. It would be impossible to push a wheelchair up the stairs to get a patron away from the building. There is a wheelchair ramp on the main level, but not on the lower level.
- No clue. I do not remember anything specifically called out for persons with disabilities.
- When the fire alarm sounds, evacuate the building immediately, even if you know it is a false alarm. Refer to the evacuation plan, p.. Take no personal items with you. If you actually see a fire, pull the nearest fire pull-box and call 9-911. Do not attempt to put out the fire, even if it is small. If possible, the person-in-charge should stay near the telephone to answer the phone when the alarm company calls. He/she should tell the alarm company what is occurring in the building and then should leave the building. Do not attempt to silence the alarm. The Fire Department will take care of that. After leaving the building, the person-in-charge should stay near the front entrance, if it is safe to do so, to meet the Fire Department staff when they arrive and answer any questions that they may have. Do not re-enter the building until the Fire Department states that it is safe to do so. The Fire Department will reset the alarm and reset the pull- boxes; person-in-charge should check to be sure that this is done.
- Detailed instructions are listed in the dept Emergency/Disaster Preparedness Guide for evacuating all areas of Library and Museum
- In case of a fire, call 9-1-1, then follow our department's evacuation plan. Do not use the elevator. Get outside. We don't have staff with any mobility disabilities, but we could potentially have visitors with disabilities.
- Staff coordinate to notify all patrons, to ensure that anyone with hearing loss, etc., is aware of the situation. There are not sufficient procedures in place to ensure the safe evacuation of the lower level of the library in case the elevator is out of service or unsafe.
- Alarms and IRIS. No known assistance available.
- Assist clients who need it to evacuate, if they are in wheelchair, take them to area of refuge.
- To my knowledge, there are no special plans
- We have no employees who require assistance at the Service Center. I am, however, aware of where we need to stage, so employees would assist in getting that particular employee to the staging area.
- Email, Call, Text alerts for mobile.

Section Five: Mobility Devices

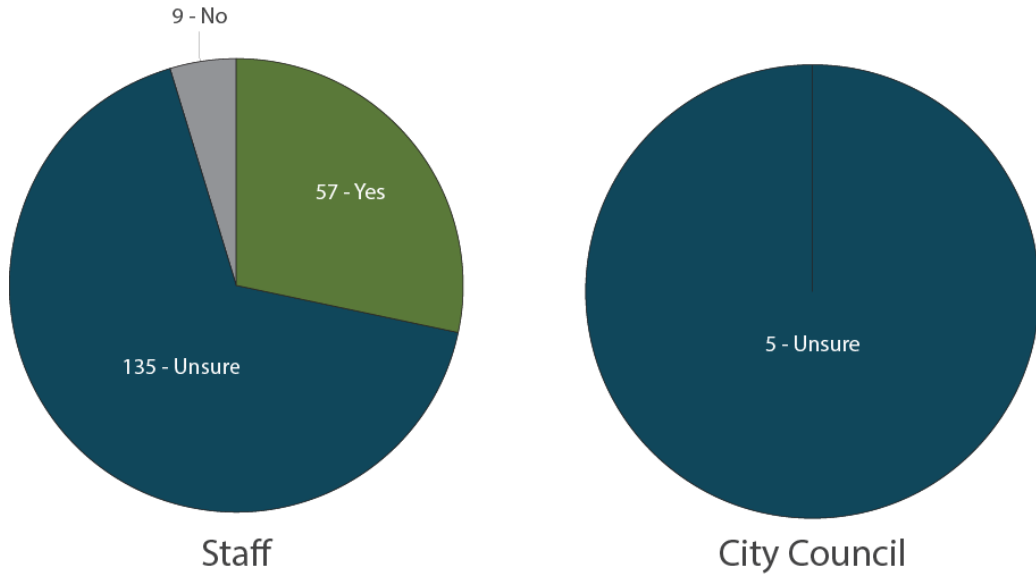
14. Are powered scooters, used by people with disabilities, restricted from some areas of your facilities?



Answer Choices	Staff Responses	City Council Responses
Yes	26	0
Unsure	83	3
No	92	2
Total	201	5

Respondent Comments for Question 14.

15. Are Segways, when used by people with disabilities, allowed in all public areas of your facilities?

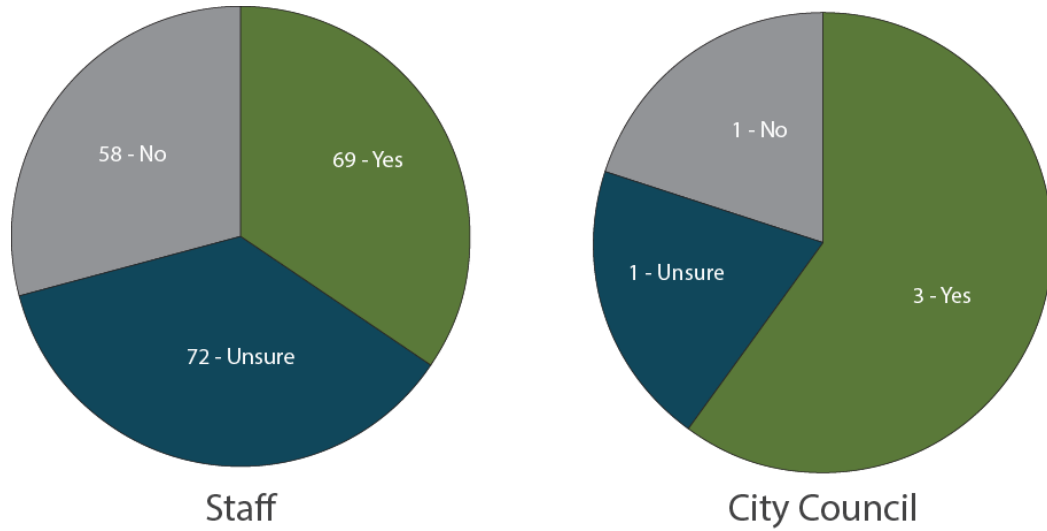


Answer Choices	Staff Responses	City Council Responses
Yes	57	0
Unsure	135	5
No	9	0
Total	201	5

[Respondent Comments for Question 15.](#)

Section Six: Employment

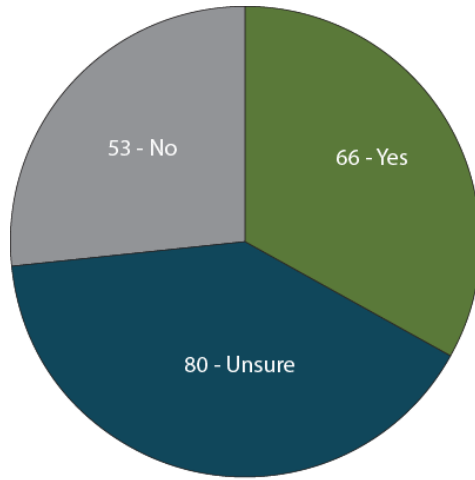
16. Could a wheelchair user be hired for any position in our organization?



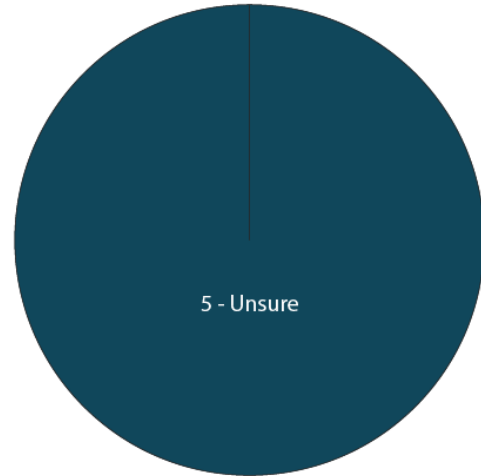
Answer Choices	Staff Responses	City Council Responses
Yes	69	3
Unsure	72	1
No	58	1
Total	199	5

Respondent Comments for Question 16.

17. Do you currently have employees in your organization who have visible disabilities?



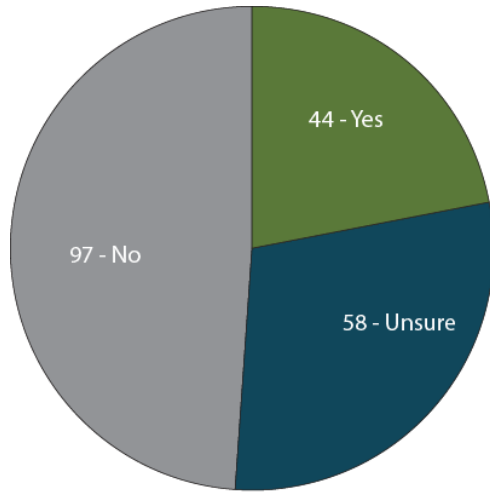
Staff



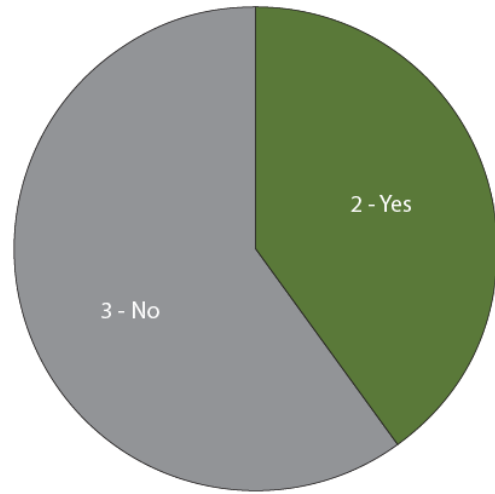
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	66	0
Unsure	80	5
No	53	0
Total	199	5

18. Do you know how to file a complaint related to your employment?



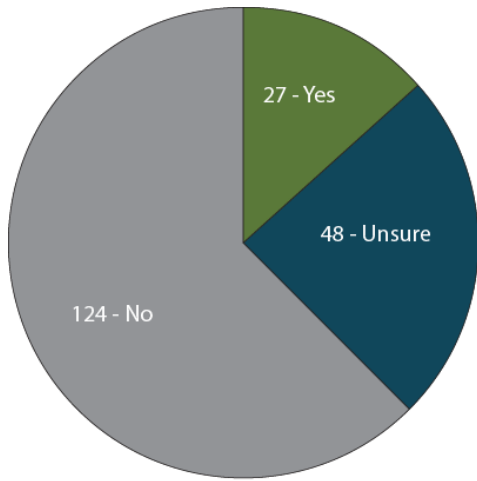
Staff



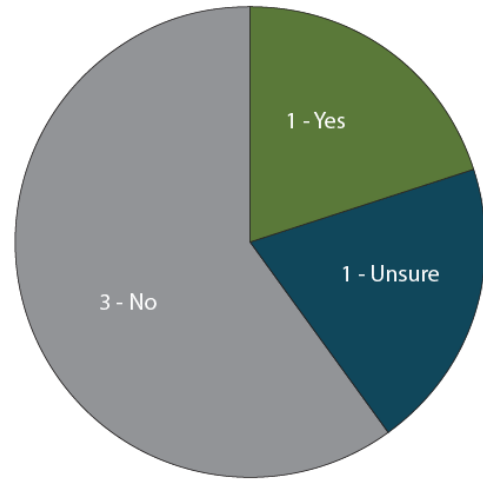
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	44	2
Unsure	58	0
No	97	3
Total	199	5

19. Is pregnancy a disability?



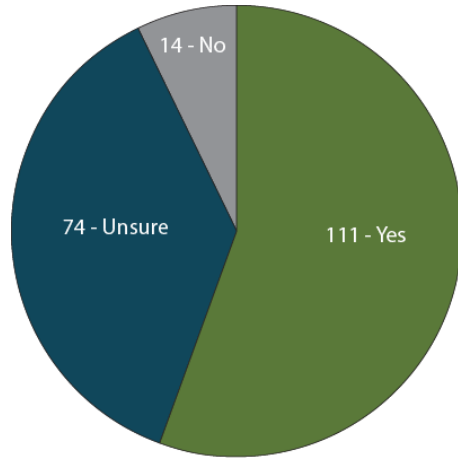
Staff



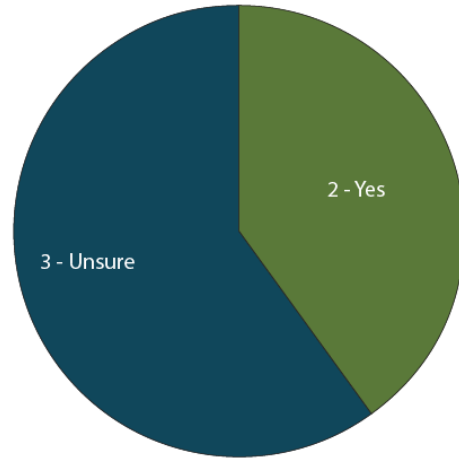
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	27	1
Unsure	48	1
No	124	3
Total	199	5

20. Is providing a sign language interpreter for an employee a reasonable accommodation?



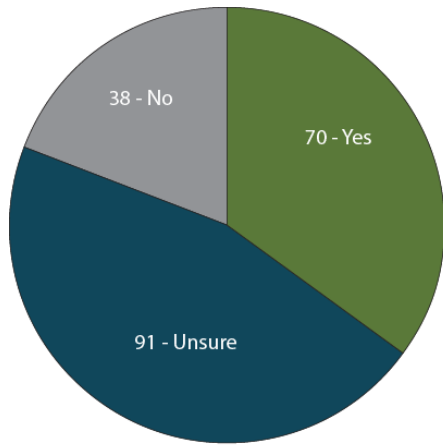
Staff



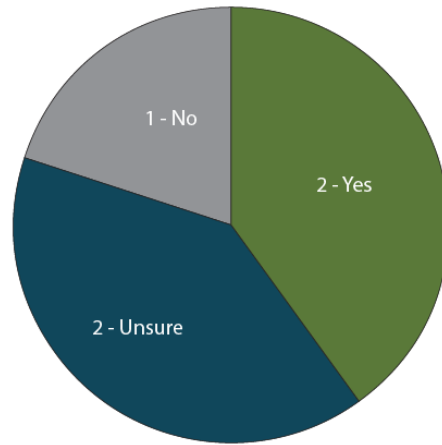
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	111	2
Unsure	74	3
No	14	0
Total	199	5

21. Do you know how you would handle a disabled employee’s request for an accommodation?



Staff

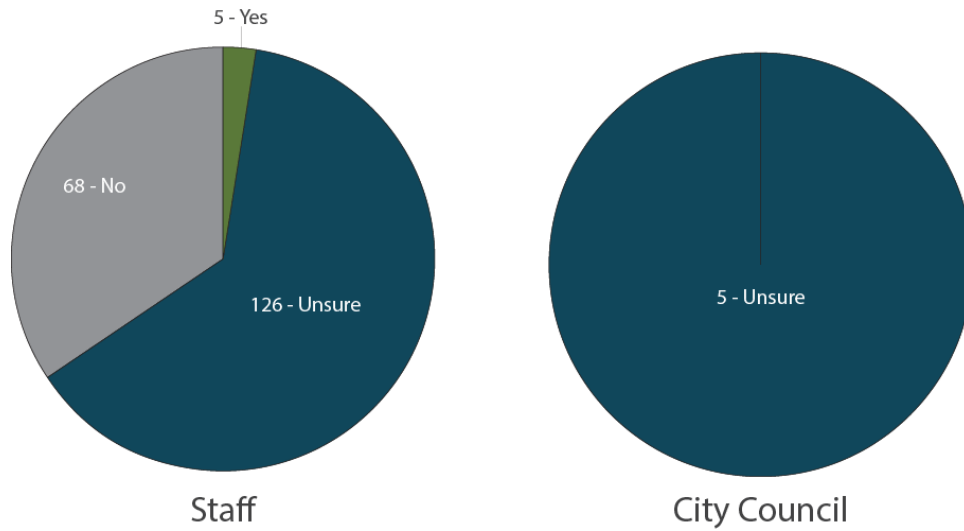


City Council

Answer Choices	Staff Responses	City Council Responses
Yes	70	2
Unsure	91	2
No	38	1
Total	199	5

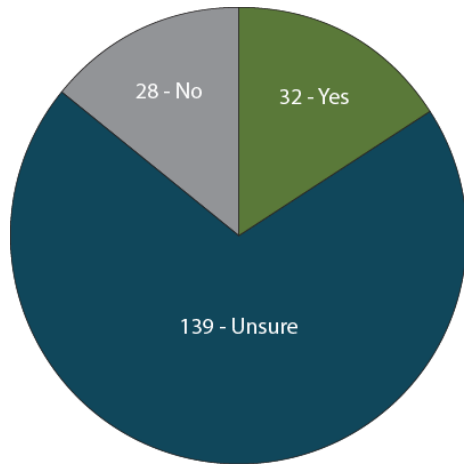
Section Seven: Effective Communication

22. Are your organization’s brochures available in large print and Braille?

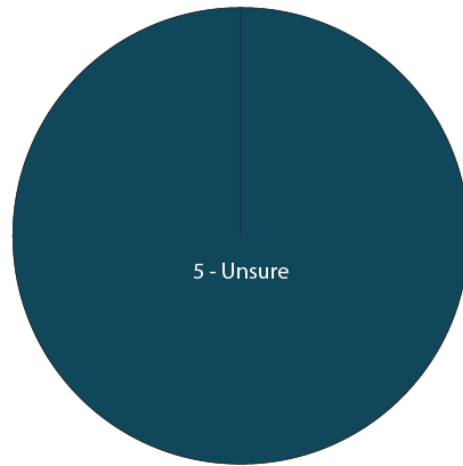


Answer Choices	Staff Responses	City Council Responses
Yes	5	0
Unsure	126	5
No	68	0
Total	199	5

23. Do you have TTY devices at various locations in your organization?



Staff

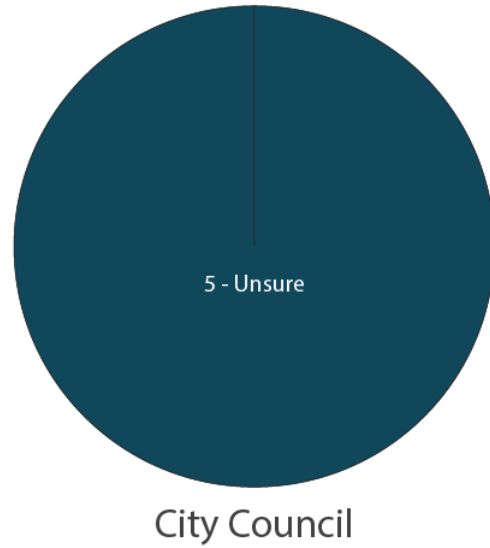
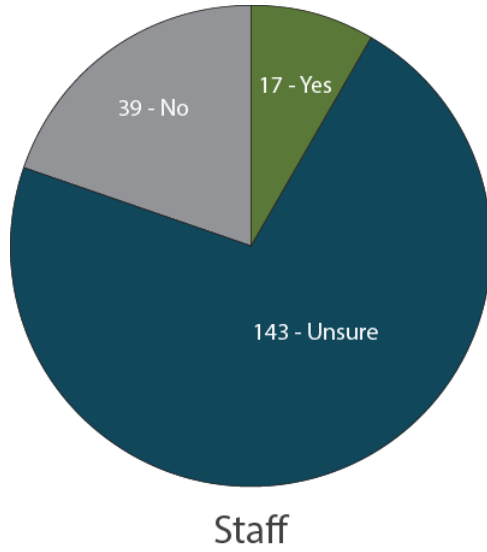


City Council

Answer Choices	Staff Responses	City Council Responses
Yes	32	0
Unsure	139	5
No	28	0
Total	199	5

[Respondent Comments for Question 23.](#)

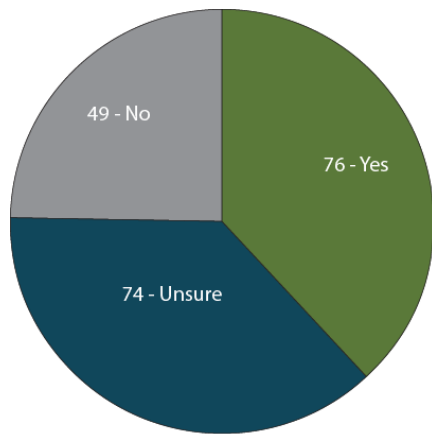
24. Do all your organization's media, such as films or DVDs, have captioning?



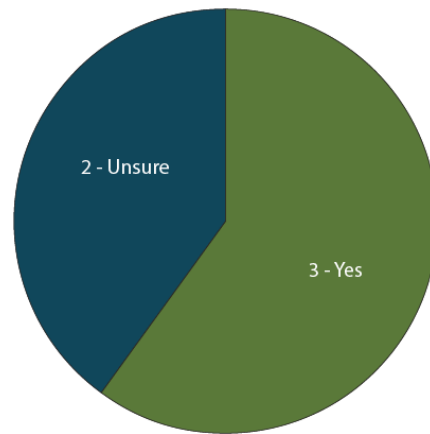
Answer Choices	Staff Responses	City Council Responses
Yes	17	0
Unsure	143	5
No	39	0
Total	199	5

Section Eight: Transportation

25. Does your organization offer transportation to your customers as part of some of your programs and activities?



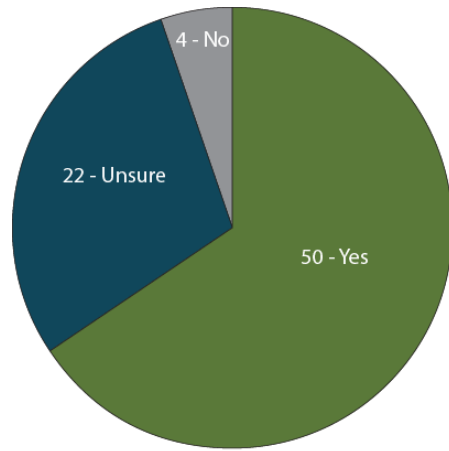
Staff



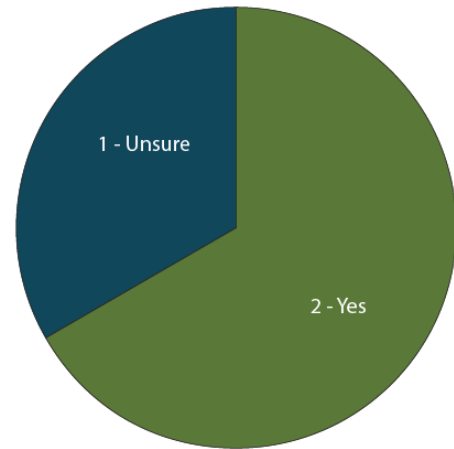
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	76	3
Unsure	74	2
No	49	0
Total	199	5

26. Does the transportation provided to your customers, such as buses, have lifts?



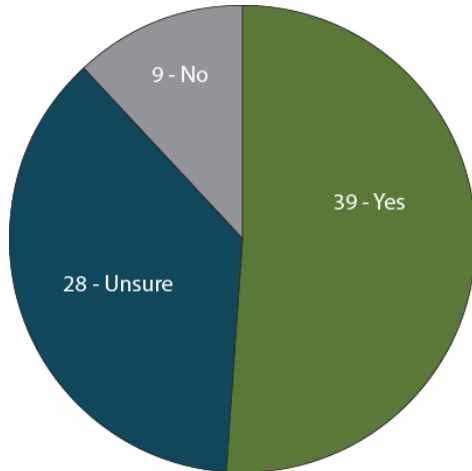
Staff



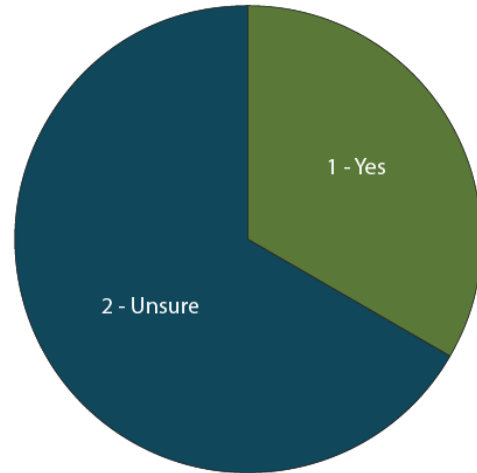
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	50	2
Unsure	22	1
No	4	0
Total	76	3

27. Are all transportation vehicles, used to transport customers as a part of your organization's program or activity, accessible to people with disabilities?



Staff

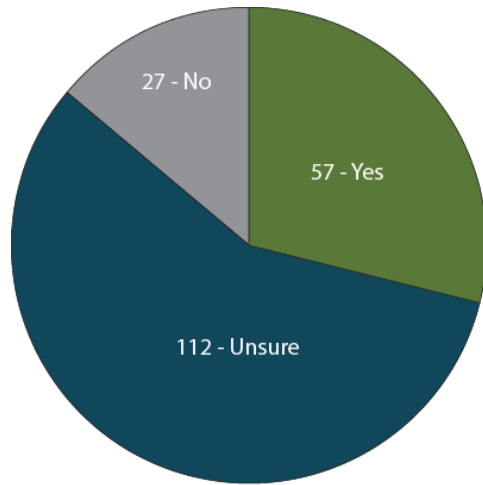


City Council

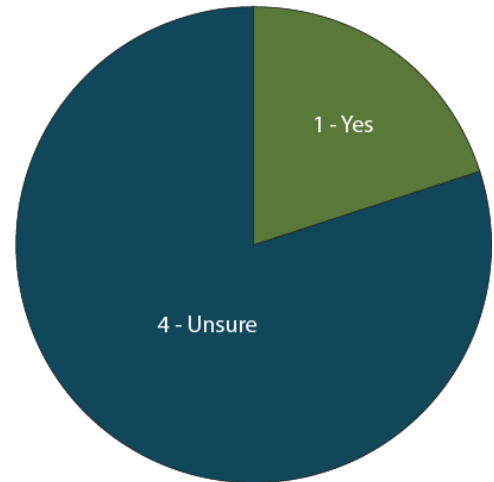
Answer Choices	Staff Responses	City Council Responses
Yes	39	1
Unsure	28	2
No	9	0
Total	76	3

Section Nine: Eligibility for Services, Programs, and Activities

28. Do some of your programs and services have eligibility criteria for participants?



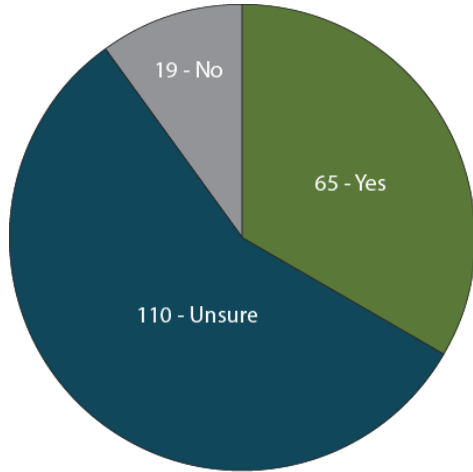
Staff



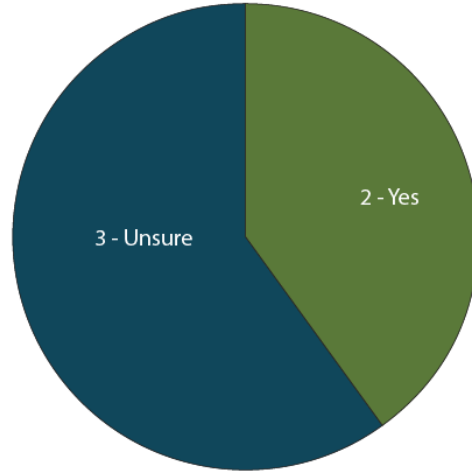
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	57	1
Unsure	112	4
No	27	0
Total	196	5

29. Can individuals who are blind or have limited vision participate in all programs and activities offered by your organization?



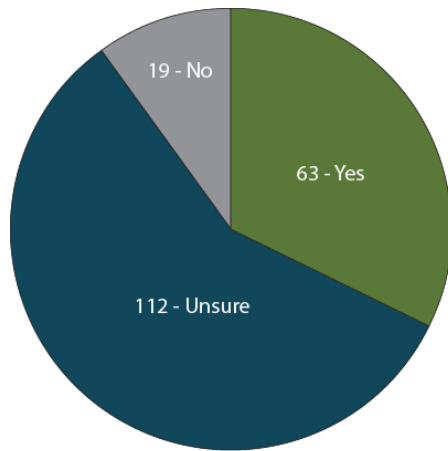
Staff



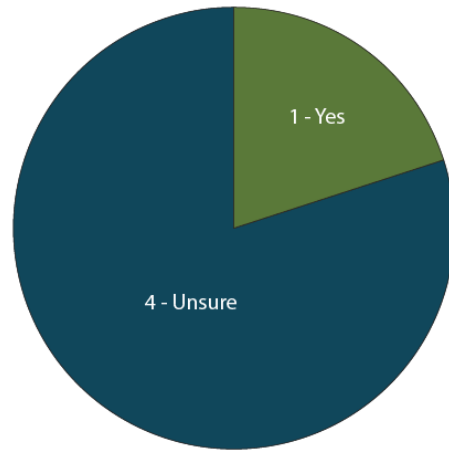
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	65	2
Unsure	110	3
No	19	0
Total	194	5

30. Can individuals who are deaf or hard of hearing participate in all programs and activities offered by your organization?



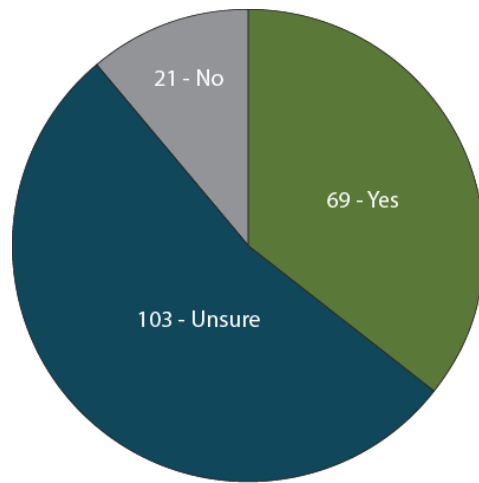
Staff



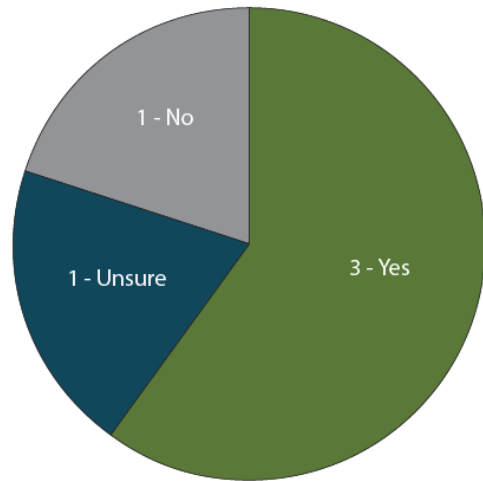
City Council

Answer Choices	Staff Responses	City Council Responses
Yes	63	1
Unsure	112	4
No	19	0
Total	194	5

31. Can individuals who use wheelchairs or have limited mobility participate in all programs and activities offered by your organization?



Staff



City Council

Answer Choices	Staff Responses	City Council Responses
Yes	69	3
Unsure	103	1
No	21	1
Total	193	5

32. Do you have any final comments about the ADA? Your comments will be anonymous.

- I certainly have a lot to learn about ADA
- Most of the library is ADA Accessible, but the friends of the library leave carts & chairs and trash behind the fiction section, rendering that section impassable.
- I need to learn more about ADA
- I am sorry I am not much help on this survey
- I believe with the questions asked in this survey we as a municipality should provide training and information regarding the ADA to all our staff.
- I would like to learn more about if we have accommodations for anyone with sight or hearing disabilities and if our website or printed content are all ADA compliant. thank you!
- reasonable accommodations can be made for activities, some jobs are just not able to be done by people in wheelchairs, such as police or paramedic positions, public works such as heavy machinery operations
- I've never seen anything about ADA compliance at the City.
- I clearly need training in this subject as it pertains to the City of Littleton and my job specifically.
- This survey made me aware that I need more information about this organization's ADA policy and procedures.
- We need updated information on this, obviously.
- People seeking accommodation for our programs need to call the library in advance
- I selected quite a few "Unsure" items since I am new to public sector and might have missed related training in the past. Looking forward to learning a lot as I spend more time working for the city. Thank you.
- I believe there are a lot of items that need to be addressed to be ADA compatible including closed captioning all videos and Channel 8 programming as well as making the Council Chamber wheelchair accessible, but the cost of those upgrades are high.
- We can do better.
- Fake service dogs make it harder for those who genuinely rely on service animals for full participation in public life, but it is easier and feels safer not to press people on whether their animals are service animals as defined under ADA.
- Feel the need for more training in this area.
- I'm concerned that the Library's elevator has been unreliable in the past. There is no other way for people with mobility concerns to access or leave the basement and that would limit our services.
- Just that the elevator is not ADA compliant, but that will soon be remedied hopefully!
- There are obvious jobs like police and fire where front line jobs are not and SHOULD NOT have to be ADA accessible. Our organization does a good job accommodating employees with temporary impairments by giving them light duty until they can get back to their normal job.
- I believe we can always improve our facilities both internal and external related to ADA.
- To the best of my knowledge, there is only one handicap accessible restroom in this building which is on the first floor by council chamber. The turn required to enter the door to the restroom is not easily maneuvered. We should be better designed as a government facility. The lighting in the restrooms is unacceptable as well. Only two areas have a handicap counter in the Littleton Center which is shameful. I realize our facility is old and outdated but we are not offering basic accommodations for wheelchair users.
- I used to work with ADA's at other departments but being only 6 months on the job here, I do not know but would like to learn more.
- Part of my uncertainty is based on not be aware of fellow employees that require accommodations. Secondly, I deal with the public daily and customers that require accommodations are rare. I never have seen anyone in a wheelchair or on a scooter? The school of the blind has brought students here and I have never witnessed an issue.

- Please note what I mentioned above about wheelchairs and the elevator. We have also had many mechanical problems with the elevator. There was an incident last year where a patron in a wheelchair was stuck inside the elevator in the lower level of the building due to the elevator malfunctioning. The fire department was able to get the patron out of the elevator, and then had to carry the wheelchair, with the patron in the wheelchair, up the stairs to the main level of the building. Research was being done last year regarding having a new elevator installed in a different area of the building, but no further action has been taken, and things seem to be in limbo regarding that.
- We have lots of opportunities to improve our ADA compliance and offerings... looking forward to helping the City improve on this!
- Extra and continual care needs to be taken with snow and ice remediation.
- I believe that while the ADA enables persons with disabilities to become more involved with professions and activities, both recreational and professional, there definitely are some limitations, such as working on utilities, streets or grounds maintenance. I believe that beside these departments, the City would be able to accommodate somebody with a disability. I also believe that as more cities become involved with becoming ADA compliant, the design standards, philosophies and actions will evolve and change and therefore, the City of Littleton must strive to not only think about how we will hit the present day requirements, but also those of the future.
- I know most compliance standards for Learning D's, less for Physical D's. But feel IF I became disabled, this is where I would want to work as I believe staff is very responsive and sensitive to unique needs of its employees.
- The Bemis Library is an invaluable resource for our community. As the building was built 25 years before the creation of the Americans with Disabilities Act, it's not surprising that elements of its design have proven not to be friendly for ADA patrons. Between the permanently installed shelving creating lanes too thin for patrons requiring mobility devices, the elevator stalling/breaking while patrons are attempting to enjoy our programs, and more, there are so many ways that this important service for our community has proven it's in dire need of reworking to accommodate our patrons. Stopgap measures will only go so far in a building that was never designed for all, and it will perpetually frustrate our differently abled patrons until we can offer a place that is truly inclusive for all.
- We've had a fire drill once in the 3 years I've been here. We could use another. If a fire broke out, and the elevator was not running, a disabled patron or wheelchair bound patron would not make it out of the building.
- I think I need to learn more about ADA in my workplace.
- Our website has very serious accessibility issues we should be more concerned about.
- I'm very under informed. Definitely need to be brought up to speed.
- Thanks for doing this survey! Also, the Littleton Arts Guild, which rents (free) the Depot, has been asking for upgrades to the pathways around the buildings.
- We're working to make our Economic Development website ADA compliant. Additional training would be appreciated.
- Judging by how little I was able to answer in the questionnaire, I assume there will be some quality training in our near future.
- There is definitely no direction or communication regarding ADA. There have been several city personnel over the years who have been "in charge", but I believe we made need a two-person team specifically to head up the challenges we face with the older buildings, pre ADA structures, etc. This is not something that is going to change overnight. And again, it costs money; which we all know the City is running out of. Good luck!
- I'd like to know much more about it than I do now.

Appendix

Q5. Do you know the name of your organization's ADA coordinator?

- Shane Roberts or Monica in HR
- Keith Reester
- Noel Mink
- Noel Mink
- Monica Lanzi
- Monica Lanza
- MONICA LANZA AND/OR GRIFFIN LADD
- MONICA LANZI AND/OR GRIFFIN LADD
- Nancy Trimm
- Monica Lanzi
- Noel Mink, HR Director
- Shane Roberts
- shane
- Shane
- Shane Roberts
- Monica Lanzi
- Shane Roberts
- I assume Noel Mink is the coordinator but I am not positive
- Jaclyn Stewart
- Monica
- Monica Lanzi???
- Jacqlyn Stewart
- Keith Reester?
- I assume Keith
- Shane Roberts
- Shane Roberts
- HR Director - Noel Mink
- Monica Lanzi
- Shane Roberts?
- Monica Lanzi
- Monica Lanzi
- Last time I heard it was Monica Lanzi
- Noel Mink
- Keith Reester/PW & Geoff Ames, consultant
- Shane Roberts
- Jaclyn Stewart

[Back to Question 5 Results.](#)

Q7. Have you seen notices indicating nondiscrimination with regard to disability at your facility? If yes, please list locations.

- I believe I saw info on this in paper work received from H R when hired
- front desk
- Building 2 Grounds Department
- In all public information for our programs.
- Employee break room in Littleton Museum
- Staff break room
- Breakroom
- HR Office
- On the Legal Notices Board in our entry area.
- staff bulletin board in break room
- in the lobby
- the front desk
- Staff lounge, HR
- Break Rooms
- newsletter; website
- Break room
- Stated in the Bemis Public Library Rules
- staff lounge
- Posted in public areas on boards.
- Near entrances to the building and in HR
- Lunch room but the notices have not been updated in 10 plus years in our area
- In a lobby.
- around city center, emails
- Library rules placard?
- I believe at entrance just recall seeing
- Near employee break area, near office entrance, employee bulletin board
- Entryway
- Break Room
- everywhere at the library
- Breakrooms
- Littleton Center, Bemis Library, Littleton Museum
- Copy/Break room
- lunch room
- City lunch room
- Employee breakroom
- Staff Commons
- HR
- Staff lounge, front lobby
- Bemis
- Break room
- dispatch
- break room?
- Inclusive restroom signage in the City Center breakroom.
- HR, Employee Breakroom

[Back to Question 7 Results.](#)

Q9. Do you know how to assist a customer with a disability or accommodation complaint?

- I would refer them to HR
- HR Dept.....computer web site
- HR-ADA COORDINATOR
- I WOULD REFER THE CUSTOMER TO ONE OF THE TWO HR STAFF MEMBERS LISTED ABOVE.
- We have a customer comment/complaint form at the front desk.
- Will find the info. and get back to the customer who complained.
- Our patron comment forms at information desks could be used. I would also notify my supervisor of any complaint.
- Our customers with mobility impairments use the elevator to access the lowest level of Bemis. A circulation staff member is usually the first contact and direct them. The same for the blind. No special assistance is available for the deaf. We do not have any member trained in ASL and hiring a professional when needed is not included in our budget and is expensive.
- With an older building like the Library, its like a maze! I like to talk to the person, to see what they need,if I cant help them I will find someone who can!
- City of Littleton website, I assume for a complaint. As far as accommodating, approach the visitor and help in every way possible.
- Try to accommodate and if complain send to HR
- I do the best I can to understand, acknowledge and accommodate the disability
- Front desk
- Ada website
- I would suggest they go to littletongov.org and help them search. I have never looked.
- front desks
- Human Resources
- I would always listen and follow up until I connect them with the right person or resource irregardless of whether I could inform them directly about this or any issue.
- Send complaint to Human Resources Director City of Littleton 2255 W. Berry Avenue Littleton, CO 80120 <https://www.littletongov.org/city-services/city-departments/human-resources/grievance-procedure-americans-with-disabilities-act>
- HR
- Unsure, but I have arranged ASL (American Sign Language) interpreters for events at Museum recently
- Library policy manual has procedure. Complaints and requests for accommodation go to Office Administrator.
- I had someone complain about our handicapped automatic door opener and asked building maintenance to look into it. Nothing has changed

[Back to Question 9 Results.](#)

Q10. Are service animals allowed anywhere in your facilities? If you know them, please enter areas in your facility where service animals are not allowed.

- gallery
- Private offices
- Holding cells
- Public service animals are allowed in all public areas. Staff service animals are allowed in all areas.
- police holding cell
- Everywhere, except n the livestock's enclosures.
- Public areas
- all areas open to the public
- unknown
- staff areas
- Probably dispatch, police labs, council chamber
- Wherever the public is allowed.
- no areas where service animals are not allowed.
- Holding cells and probably the evidence vault
- holding cells
- inside exhibits,
- Don't recall seeing a notice/posting in any of the entrances
- Anywhere that they public is allowed
- all overwhere
- service animals are allowed in all areas
- Likely certain areas of LPD and anywhere regulated for safety purposes.
- All public areas allowed?
- Anywhere with brick floor. Carpet stains...
- I believe that real "service animals" are allowed anywhere that their handler is allowed.
- Places where K9 dogs train
- Yes, but only ADA recognized service animals, due to museum facilities and safety of farm animals on site
- Staff areas, unless the animal belongs to a staff member
- All areas
- Staff only areas

[Back to Question 10 Results.](#)

Q11. If in doubt that an animal is a service animal, should you request proof that the animal is a service animal? If yes, what questions might you ask to determine if the animal is a service animal?

- Can I see the paperwork for your service animal
- is the animal a service animal? what type of work the animal has been trained to do?
- Is the animal a service animal?
- What exactly does the animal do to assist the person.
- What function the animal helps with.
- Is the animal a service animal and what service does it perform?
- What type of service does your animal provide for you?
- Is your service animal required because of a disability? What work or task is the animal trained to perform?
- You can ask, "What specific task is your animal trained for?"
- Is the animal a service animal required because of a disability? What work or task has the animal been trained to do?
- What service is your animal trained to provide for you?
- We can ask the person with a service animal what task the animal is trained to perform. Therapy pets are not considered to be a service animal.
- I've seen animals that definitely aren't service animals in this building and have even brought my own in on the weekends when the offices are closed (as well as for visits when the building is open.)
- What disability does this animal provide support for you?
- We can ask if it is a service animal that is required for a disability and what type of work or task it has been trained to do.
- What service does the animal provide?
- Is this a service animal necessary because of a disability? What is the nature of the work this animal performs?
- What service does your animal provide?
- 1. Is the animal required because of a disability? 2. What work or task has the animal been trained to perform?
- A person's word or actions should be good enough. Many disabilities are not visible and it is not appropriate to question someone's intentions or beliefs.
- Is this animal a service animal? What kind services your animal trained to do?
- Ask them: "Is this a service animal?" and "What task has this animal been trained to perform?"
- Is the dog a service animal required because of a disability? what work or task has the dog been trained to perform?
- Is this a trained service animal? What task is this animal trained to do?
- What service or task does your service animal perform?
- What tasks is it trained to perform
- What task is this service animal helping them complete?
- I believe people who have service animals have a card providing proof of "service"
- no you can't ask for documentation you can only ask two question is the animal required because of a disability and has the animal been trained to perform specific work or task
- With Mayor Brinkman's dog visiting so often, I assumed the City Center was a pet-friendly location.
- What
- You may ask if it's a service animal and ask what service it provides.
- We are legally allowed to ask if the dog is a service animal that is required due to a disability, and what type of work or task the dog has been trained to do.
- Provide some form of certification.
- Is the animal a service animal required by a disability? What work or task has the animal been trained to do?
- Usually a certificate of service pet is available by legit owners.. vs therapy/support animals.
- Can I see the dog's drivers license?

- But may ask (1) if it's a service animal, and (2) what tasks it has been trained to perform.
- "Is your animal a service animal?" and "What service is the animal trained to provide?"
- Business owners and staff are only allowed to ask two questions regarding service dogs. They may ask if the dog is a service animal that is required due to a disability and what type of work or task the dog has been trained to do. The ADA prohibits

them from asking about a person's disability.

- REQUESTING TO SEE SUCH DESIGNATION IN WRITING.
- 2 questions can be asked: 1) Is the dog a service animal required because of a disability? 2) What work or task has the animal been trained to perform?
- Is that a service animal. What type of service does the animal provide.
- Unsure

[Back to Question 11 Results.](#)

Q14/15. Are powered scooters/segways, used by people with disabilities, restricted from some areas of your facilities?

- Holding cells
- We have no ramps to the historic house, blacksmith building, ice house, school house, or 60s barn. Some chairs are two wide to allow access to the historic buildings.
- For public areas, I believe all are permitted, however none of our counters are compatible with access to those who are in a powered scooter. I would also think the bathroom nearest the Finance department would be difficult/impossible to access if one was using a powered scooter. (including the sinks and paper towel dispensers)
- Historical buildings
- some areas are not in ada compliance for space I believe
- But it is hard for the patron to get in and out of the multi-person restrooms because the doors are heavy/no automation.
- Elevator size may created difficulty use of some scooters
- Does the Bemis Library elevator accommodate the larger mechanical assists?
- Not enough room in conference rooms
- Steps to basement would preclude use of a power scooter
- Part of the police department.
- Holding cells
- To gain access inside a few of our historic buildings at the museum, there are steps to enter them so scooters or other accommodations with wheels are unable to access them.
- Historic buildings that have a threshold that require stepping up.
- Powered scooters are not necessarily restricted in the main floor bathrooms -- many just can't fit through the door opening.
- The basement
- Not officially just because of space purposes
- Though not restricted, the Bemis Library elevator has proven a barrier for patrons requiring the use of powered mobility devices
- some historic building pose accessibility problems for powered scooters
- Likely anywhere except likely some restricted areas in LPD for safety or security.
- staff areas
- At Museum, in most of the historic farm buildings, but this is mainly due to the high thresholds into buildings. At the Depot, the front door has a high threshold that scooters likely can't get through. Inside the Depot are numerous rugs and tight corners, in addition to all the art and furniture from the Littleton Art Guild. The back door of the Depot has a couple narrow steps and cannot be used by anyone in a scooter. The caboose is completely inaccessible by anyone in a wheelchair, walker, scooter, etc. The walkways and ramps into the Depot are steep and need to be significantly altered to make accommodations.
- Not directly, but not all areas of the library are accessible - narrow aisles, etc., make it hard for patrons in larger scooters, and the current elevator is too small to fit most modern power scooters.
- SOMEONE IN A POWERED SCOOTER WOULD NOT BE ABLE TO BE FINGERPRINTED IN OUR HOLDING AREA.
- Depending on scooter size/type, the elevator and some bathrooms would be difficult to use.
- The woman's restroom at the south east corner of the building does not have an accessible stall for a person using a powered scooter.
- No access to basement of Bldg 1
- the 1890's farm house
- unknown
- some historic buildings pose accessibility problems for segways

- If they fit in doorway and had physical handicapped modifications, I would not question.
- Sometimes the farms get muddy, and wheelchairs and strollers can get easily stuck. I've never seen anyone on a Segway

at the Museum, but they would likely get stuck, too.

- The woman's restroom at the south east corner of the building does not have an accessible stall for a person using a powered scooter.
- No access to basement of Bldg 1

[Back to Question 14 Results.](#)

[Back to Question 15 Results.](#)

Q16. Could a wheelchair user be hired for any position in your organization? If you know of some, please enter some jobs that a wheelchair user could not perform in your organization.

- Inspectors that have to drive a city vehicle and walk around a site for inspections
- Grounds Maintenance, Streets Maintenance, Fleet Maintenance Mechanic
- And we have them. We have volunteers that use a wheelchair and answer our phones and office work.
- reasonable accomadations can and should be made...
- if the essential functions of the job could not be performed by a wheelchair- bound person, then they would not be hired. ie. Police Patrol Officer
- Equipment Operators
- police
- Police Officer, Fire Fighter
- POLICE OFFICER, FIRE FIGHTER.
- Street maintenance, Landscaping
- Police Officer, Building Maintenance, Street Department (some jobs)
- A wheelchair user may have some difficulties in performing some tasks done by our facilities maintenance person & possibly some tasks performed by staff in the Circulation workroom and Technical Services processing area.
- Streets and Park Maintenance Services where they have to mow and pave streets, etc.
- I assume police patrol and fire fighters-- or any job that requires walking, running, climbing, heavy lifting
- police officer
- historical site interpreter
- Police Officer
- While it is not impossible, it would be very challenging for a wheelchair user to work in the circulation department. The space in the backroom is tight and it would be hard for the person to shelve on the highest and lowest shelves.
- Many jobs in public works could not be performed by someone in a wheelchair
- Shelving/circulation would be difficult - some shelves are high/low; workroom is tight
- some Grounds Maintenance may not work, but it would be based on capabilities, not discrimination
- Using a weed whip on step slopes. Putting on protective gear and entering a manhole.
- Police Officer on the road
- Any BFOQ jobs (police officer, firefighter, probably some jobs in streets)
- Sworn police
- You cannot be a police officer, custodian, groundskeeper, etc while reliant on a wheelchair.
- Firefighter. Police officer.
- Re-shelving of library materials
- It depends! Possibly CDL positions where this person would need to drive a snowplow or other heavy machinery.
- Police officer
- Sworn police officer
- There would be difficulty with a wheelchair user completing tasks in the role police officer, crime scene/lab and some evidence functions.
- POLICE OFFICER
- I would assume that the City does not discriminate against hiring of handicap individuals. Accommodations would need to be made.
- Our elevator is not large enough to accommodate some of the larger wheelchairs, so that person would not have access to all areas of our building, which could hinder performing certain job duties.
- Police Officer, Public Works streets department crew member
- although our spaces are not set up in a way to meet ADA standards
- We have job requirements that require being able to lift objects up to certain weights
- Some field positions requiring physical exurtion

- Just about all except jobs in grounds and facilities doing labor and maintenance.
- I don't know that a wheelchair user would be able to shelve books because of the uppermost shelves and lowermost shelves.
- Running cables in the ceiling. Changing overhead lights. Grabbing anything over 5-6 feet high. Cleaning mirrors in bathrooms.
- If the disability prevented the person from doing the actual job (for example shoveling snow from the sidewalk in front of the Littleton Museum), they would probably not be hired. If the reason for the wheelchair did not prevent the person from doing the job in the job description, they should be eligible just like anyone else.
- Public Works streets, labor intensive positions
- Only ones where they can still perform the necessary functions and duties of the job.
- Police Officer
- Business Support Specialist
- Streets positions, CDL drivers
- Police Officer
- streets, ground keepers, building maintenance, Omni bus driver (getting in and out of cars and assisting others)
- Most positions at the library could be performed while in a wheelchair except perhaps for the custodian/facilities maintenance job.
- Building Inspector, Police Officer, Street Maintenance, Building Maintenance.

[Back to Question 16 Results.](#)

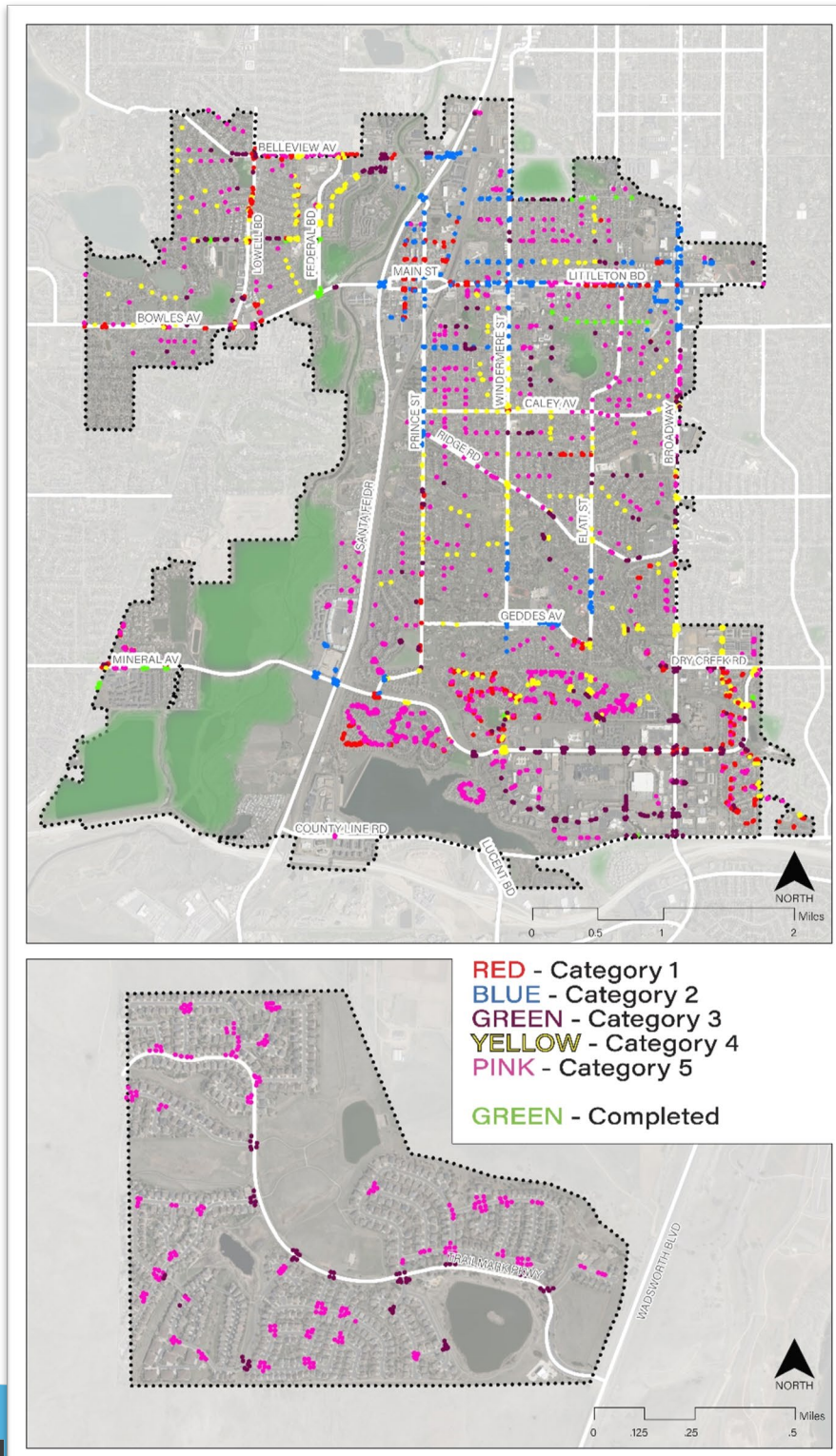
Q23. Do you have TTY devices at various locations in your organization?

- the 911 center
- You can request the accommodation.
- Office Manager's office
- Dispatch
- Probably available at the library and museum. However, signs say if you need the TTY you can ask for it so it's not an issue. It could be provided.
- Main desks for the buildings and some departments
- radio room
- Dispatch Investigations
- Dispatch
- Police dispatch
- Dispatch
- Library
- downstairs
- admin
- Administrative Office Main Floor
- Littleton Center
- Council chambers where public activity, and likely as needed via HR and IT
- dispatch
- Library

[Back to Question 23 Results.](#)

11.4 Complete PROW GIS Analysis Results

Prioritization for non-compliant points in the public right-of-way can be found in section 4.2 Public Right-of-Way Prioritization. The results of the prioritization as they relate to individual non-compliant points are shown in the map below and at www.littleton.gov/ada. Staff is currently working on a public facing interactive GIS dashboard that will be made available later in 2022.



11.5 Complete Facilities Prioritization Analysis

Littleton Center ADA Priority Assessment							
Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	48	32	21	9	12	7	3
2-Services	110	4	24	21	15-21	85	8
3-Restrooms	131	12	27	37	18	82	9
4-Other	14	1	N/A	7	21	6	12
Total	303	49		74		180	

Littleton Center ADA Priority Assessment Completions			
Priority	# Completed	Mitigation Difficulty	
1-Entry	0	N/A	
2-Services	13	8 Mod./ 5 Low	
3-Restrooms	0	N/A	
4-Other	8	4 Mod./ 4 Low	
Total	21		

Courthouse ADA Priority Assessment

Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	3	0	N/A	1	12	2	3
2-Services	28	5	24	10	15	13	6
3-Restrooms	48	2	27	7	18	39	9
4-Other	4	0	N/A	2	21	2	N/A
Total	83	7		20		56	

Courthouse ADA Priority Assessment Completions

Priority	# Completed	Mitigation Difficulty
1-Entry	1	Low
2-Services	1	Low
3-Restrooms	0	N/A
4-Other	4	Moderate
Total	6	

Library ADA Priority Assessment

Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	2	0	N/A	0	N/A	2	6
2-Services	20	2	24	2	15	16	6
3-Restrooms	88	5	27	22	18	61	9
4-Other	6	0	N/A	1	33	5	18
Total	116	7		25		84	

Library ADA Priority Assessment Completions

Priority	# Completed	Mitigation Difficulty
1-Entry	18	12 High/ 6 Moderate
2-Services	3	Low
3-Restrooms	1	Low
4-Other	3	Moderate
Total	25	

Museum ADA Priority Assessment

Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	21	12	21	4	12	5	3
2-Services	14	1	24	1	15	12	6
3-Restrooms	55	0	N/A	4	18	51	9
4-Other	10	0	N/A	8	21	2	14
Total	100	13		17		70	

Museum ADA Priority Assessment Completions

Priority	# Completed	Mitigation Difficulty
1-Entry	0	N/A
2-Services	0	N/A
3-Restrooms	0	N/A
4-Other	0	N/A
Total	0	

BSC ADA Priority Assessment							
Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	5	0	N/A	1	12	4	3
2-Services	35	4	36	10	N/A	21	6
3-Restrooms	74	9	27	17	18	48	9
4-Other	7	0	N/A	5	21-33	2	N/A
Total	121	13		33		75	

BSC ADA Priority Assessment Completions		
Priority	# Completed	Mitigation Difficulty
1-Entry	0	N/A
2-Services	7	1 Mod./ 6 Low
3-Restrooms	5	Low
4-Other	1	Moderate
Total	13	

Town Hall Arts Center ADA Priority Assessment							
Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	7	3	21-33	1	12	3	9
2-Services	10	1	24	5	15	4	6
3-Restrooms	40	6	27	12	18	22	9
4-Other	4	0	N/A	3	21	1	12
Total	61	10		21		30	

Town Hall Arts Center ADA Priority Assessment Completions			
Priority	# Completed	Mitigation Difficulty	
1-Entry	0	N/A	
2-Services	0	N/A	
3-Restrooms	0	N/A	
4-Other	0	N/A	
Total	0		

Art Depot ADA Priority Assessment							
Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	16	10	21	1	12	5	3
2-Services	0	0	N/A	0	N/A	0	N/A
3-Restrooms	7	3	27	2	18	2	9
4-Other	0	0	N/A	0	N/A	0	N/A
Total	23	13		3		7	

Art Depot ADA Priority Assessment

Priority	# Completed	Mitigation Difficulty
1-Entry	0	N/A
2-Services	0	N/A
3-Restrooms	0	N/A
4-Other	0	N/A
Total	0	

Rail Station ADA Priority Assessment

Priority	# of Tasks	Mitigation Difficulty (High)	Milestone Months	Mitigation Difficulty (Moderate)	Milestone Months	Mitigation Difficulty (Low)	Milestone Months
1-Entry	6	1	21	3	12	2	3
2-Services	1	0	N/A	1	15	0	N/A
3-Restrooms	0	0	N/A	0	N/A	0	N/A
4-Other	0	0	N/A	0	N/A	0	N/A
Total	7	1		4		2	

Rail Station ADA Priority Assessment Completions

Priority	# Completed	Mitigation Difficulty
1-Entry	0	N/A
2-Services	0	N/A
3-Restrooms	0	N/A
4-Other	0	N/A
Total	0	

11.6 Notes on Facilities Survey and Policy Review



NOTES ON FACILITIES SURVEY AND POLICY REVIEW

City of Littleton

Prepared by Meeting the Challenge, Inc.
August 23, 2016

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Littleton: Notes on Facilities Survey and Policy Review

1.0 Overview of Facilities Survey

MTC surveyed 18 facilities belonging to the City of Littleton. The collection of data and the subsequent findings have been listed in a transition plan data table (TPD). The TPD includes the basic requirements of a transition plan for the City.

- Analysis of the collected data identified 1,302 findings of deficiency (1,298 not compliant and 4 not best practice).
- As many as 882 of the findings are identified as potential barriers to program access.
- Conversely, 420 of the findings do not currently present barriers to program access.

The following tables matrix the findings based on their intrinsic priority and degree of difficulty (rough order of magnitude) for mitigation. Table 1 includes all findings. Table 2 includes only those findings identified as potential barriers to program access. Table 2 also displays MTC’s recommended time, in months, for scheduling removal of architectural barriers. For those findings not *considered* to be barriers to program access, MTC recommends “Pending” for the number of months and “TBD” (to be determined) for the *Milestone Date*.

Table 1– Summary of Findings

Intrinsic Priority	Mitigation Difficulty				Total	
	3-Low	2-Moderate	1-High	Total		
1-Entry	82	38	127	247	19%	
2-Services	241	75	35	351	27%	
3-Restrooms	400	161	57	618	47%	
4-Other	34	48	4	86	7%	
Total	757	322	223	1302	100%	
	58%	25%	17%	100%		
	836	195	219	52	1302	
	64%	15%	17%	4%	100%	

Table 1 shows all findings by degree of intrinsic priority and estimated mitigation difficulty. Findings in the cells shaded orange (the *orange zone*), to the upper left, are those that need to be addressed first. Findings in the cells shaded light blue (the *blue zone*), to the lower right, are those that can wait the longest.

Table 2 – Barriers to Program Access

Intrinsic Priority	Mitigation Difficulty				Total	
	3-Low	2-Moderate	1-High			
1-Entry	79 3 - 15 mos	38 3 - 18 mos	123 21 - 33 mos	240	18%	
2-Services	124 6 - 24 mos	45 15 - 21 mos	22 24 - 36 mos	191	15%	
3-Restrooms	282 9 - 21 mos	90 18 mos	29 27 mos	401	31%	
4-Other	19 12 - 24 mos	30 21 - 33 mos	1 36 mos	50	4%	
Total	504	203	175	882	100%	
	57%	23%	20%	100%		
	568 64%	109 12%	174 20%	31 4%	882 100%	

Table 2, shows the findings that remain after the elimination of those barriers that probably do not currently prevent program access. An analysis of spaces where program access is provided by alternative methods and means, and can be provided without removing architectural barriers, eliminates a total of 420 findings from current consideration. This leaves 882 findings – a reduction of 32 percent.

Findings in the cells shaded orange (the *orange zone*), to the upper left, are those that need to be addressed first. Findings in the cells shaded light blue (the *blue zone*), to the lower right, are those that can wait the longest. Nearly two thirds of the remaining findings (64 percent), most requiring minimal effort to mitigate, are in the orange zone, requiring the earliest attention.

The ADA’s title II regulations do not necessarily “require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities.” A public entity must operate its services, programs, or activities so that its services, programs, or activities, when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

1.1 Limitations of This Analysis

MTC has made program access determinations that deferred the need to remove some barriers, subject to the current facility conditions and construction information available to us, at this time. MTC might have made different determinations, if more precise and detailed information regarding construction and alteration dates had been available at the time of this analysis. New construction and alterations to existing facilities completed since January 26, 1992, regardless of program access evaluation, must comply with the accessible design standards in effect at the time of construction.

Similarly, regardless of program access evaluation, MTC might have made different determinations if more precise and detailed information specific to original lease and renewal dates had been available at the time of this analysis. In determining the site or location of a

facility – in essence the location of a program – public entities are prohibited from *making selections that have the effect of excluding individuals with disabilities from those facilities, denying them the benefits of those facilities, or otherwise subjecting them to discrimination.*

1.2 Safe Harbor, New Construction, and Alterations

Identification of elements having safe harbor is not possible, in the absence of specific, detailed information as to the dates and locations of construction and alterations to facilities. Generically, there are a limited number of elements having *as-is* conditions that adhere to previous standards that would not also be compliant with the 2010 ADA Standards. Most of the elements, for which safe harbor may be applied, have relatively low mitigation difficulty. Among the features that may qualify for safe harbor are the following:

- Surfaces of doors up to ten inches that are not smooth
- Water closets centerlines between 18 and 18.5 inches from the near wall
- Single wheelchair accessible (i.e., low) drinking fountains
- Operable parts between 48 and 54 inches or between 9 and 15 inches

1.3 Barriers Not Necessarily Required to Be Removed

It is not necessary to schedule structural barrier removal, where program access, *viewed in its entirety*, is provided in the most integrated setting appropriate to the needs of qualified individuals with disabilities, regardless of built-elements of existing facilities that do not adhere to accessible design standards. As noted above, 420 findings are recognized as presenting no current barrier to program access.

While a transition plan must include these barriers, removal of such barriers is not necessarily required until certain events trigger structural barrier removal. Events that might trigger structural barrier removal include, but are not limited to the following:

- Request for a reasonable accommodation under title I of the ADA
- Alterations to these built elements
- Relocation of a program or repurposing of the space
- General renovation of a facility
- A determination that a barrier was created by new construction or alteration after January 26, 1992, not covered by safe harbor
- A specific complaint from the public

It is important to consider a review of any construction in City facilities since January 26, 1992. Findings that do not currently present barriers to program access, built since that date, must be removed. Any structural barrier that is the subject of a public complaint, unless it can be circumvented through alternative methods or means, must be removed.

2.0 Overview of Policy Review

MTC inventoried and reviewed policies and program materials, submitted by the City, for the purpose of determining whether the City has policies in place to address specific regulatory requirements and to evaluate whether those policies have language sufficient to ensuring that the City does not discriminate against people with disabilities in the delivery of the City's services, programs, or activities.

The findings of this review and recommended actions are the basis for the City’s self-evaluation. MTC can facilitate the self-evaluation process through a review of programs and policies, but only City staff can revise existing or develop new policies that will serve the unique needs of the City. Ultimately, the City’s policies and procedures must be imparted to City staff, who serve the public, to ensure that practices do not either intentionally or inadvertently exclude people with disabilities from the City’s programs or otherwise limit the opportunity of people with disabilities to experience the benefits and advantages of those programs.

2.1 Inventory of Key Policies & Procedures

The key policies and procedures for our review are:

- ❌ Self-Evaluation (§35.105)
- ✓ Notice of compliance (§35.106)
- ❌ Appointment of ADA Coordinator (§35.107(a)) **In the “Policies and Procedures” document, it is hand-written notated that no official coordinator has been designated. But it does list the Human Resources Director as the contact for complaints.**
- ✓ Grievance policy (§35.107(b))
- ✓ General program access (§35.130) (In “Policies and Procedures”)
- ✓ Contractor Reps & Certs (§35.130(b))
- Reasonable accommodation program policy (§35.130(b)(7))
- Eligibility criteria (§35.130(b)(8))
- ✓ Service animal policy (§35.136)
- ✓ Powered mobility policy (§35.137)
- ❌ Ticketing policy (§35.138)
- ✓ Equal employment policy (§35.140)
- ✓ Reasonable accommodation employment policy (§1630.9)
- ✓ Effective communication policy (§35.160)
- ❌ Transportation access policy (§37.5)
- ✓ Emergency management plan

MTC bases this list on regulation for accessibility compliance included in the ADA Amendments Act, as well as review of DOJ Project Civic Access settlement agreements. We base the order of the list on the [Part 35 regulations](#) for title II from DOJ.

2.1.1 Notes:

- ✓ Indicates that this requirement was located.
- ❌ Indicates that this requirement was not located.

Files: Professional Services; Purchasing Procedures; and Interpreting (Spoken) Services were reviewed, but were not applicable to the ADA.

Files: COOP_part two; Notice Under the Americans with Disabilities Act; South Suburban Parks & Recreation OPDMD Policies were reviewed: the weight limit of *300 pounds* is deemed to be unnecessarily restrictive.

It is not clear whether the City actually sells tickets for events at venues that have required accessible seating. A compliant ticketing policy ensures that people with disabilities who need accessible seating have a choice of seating comparable to other patrons. Where such seating is

available ticketing policy must be able to reserve such seats through the same means – by phone, on-line, etc. – as others.

It was noted during the kick-off meeting that the City does provide some transportation service. In fact, one of the City's Omnibus vehicles was observed in the City's parking lot that afternoon. The omnibus program is a demand responsive system that must comply with the U.S. Department of Transportation' Part 37 regulations. MTC recommends that the City develop policies and procedures to ensure that the operating practices for the Omnibus service fully comply with nondiscrimination requirements of that part.

2.2 Language Interpreting Policies

MTC reviewed both the Interpreting policies in your email of Thursday, June 23, 2016. They both are very well written, especially the Interpreting Services – American Sign Language (ASL) policy. Our only concern is that both of the policies have named a single entity as the provider of such services. MTC recommends that the City consider an open ended policy whereas, people can refer to a list of interpreting agencies instead of a single provider. From experience, it will help to have a local agency providing ASL Interpreting Services. For example, we use The Interpreting Agency who serves Colorado for ASL interpreters. Purple Communications is a national company that MTC uses for Video Relay Services, and Video Remote Interpreting. They are often in trouble with the FCC and fined for infractions. There is another good ASL interpreting agency in Denver - PSLI (Professional Sign Language Interpreting, Inc.). There are several sign language interpreting agencies in Colorado. In fact, there were 2,344 businesses providing translation and interpretation services in 2012, including sign language services.

For example, the Spring Institute for Intercultural Learning's website looks impressive Denver has quite a number of agencies providing Foreign spoken language interpreting services. As always, MTC believes that it is good to have alternative sources, rather than be tied to a single entity as one can never know what the future holds.

It is imperative that the City of Littleton emphasize, in this policy, that all sign language interpreters that they hire must be certified as per Title 6, Article 1: Colorado Consumer Protection Act. It is important to note that the Consumer Protection act is a Colorado State Law and not an ADA requirement. The ADA states "Qualified" Sign Language Interpreter whereas Colorado states "Certified" Sign Language Interpreter.

2.3 Miscellaneous Brochures and Documents

In addition, MTC reviewed a wide variety of program brochures and documents submitted by the City. Typically, these documents lack public notice of nondiscrimination on the basis of disability and a point of contact to request assistance or auxiliary aids and services. The flyer for the Littleton Museum's "Walking with the Dead" exhibit contains eligibility criteria that states: *You must be able to walk and stand for this amount of time.* At face value, this language excludes or might exclude individuals with disabilities, including those who use wheelchairs.