



# ADA Transition Plan

**August 11, 2023**

Developed by: USI Consultants, Inc.

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## **I. Statement/Mission**

In 1990, the Federal Government enacted the Americans with Disabilities Act ("ADA"). The City of Bluffton, Indiana recognizes its legal obligation to comply with Title II of the ADA and hereby establishes a transition plan to ensure compliance of this federal law, rules, and regulations. Therefore, the City of Bluffton will identify barriers that exist and state how and when the barriers are to be removed by providing a means to address complaints of discrimination, by encouraging public input to assess, address and meet access needs, and by establishing periodic reviews of the plan to monitor progress and compliance. The purpose of the Plan is to ensure that the citizens of Bluffton are provided full access to the City of Bluffton programs, services, and activities in a timely manner. The Bluffton elected officials and staff believe the ability to accommodate disabled persons is essential to good customer service, the quality-of-life Bluffton residents seek to enjoy and to effective governance. Title II of the ADA requires that each of the City of Bluffton services, programs, and activities, when viewed in their entirety, be readily accessible and usable by individuals with disabilities.

## **II. Non-Discrimination Notice**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Bluffton will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

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

**Effective Communication:** The City of Bluffton will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Bluffton programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Bluffton, should contact the Office of the Clerk Treasurer at 260-824-0612, as soon as possible but no later than 48 hours before the scheduled event.

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

Complaints that a program, service, or activity of the City of Bluffton is not accessible to persons with disabilities should be directed to Briana Lautzenheiser, ADA Coordinator & Deputy Clerk Treasurer/HR, 260-824-0612 or [bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov).

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

#### Designation of an ADA Coordinator

Pursuant to Resolution 2018-4 adopted on the 27th day of February, 2018, by the Board of Public Works and Safety of the City of Bluffton the position of ADA Coordinator for the City of Bluffton was modified. The following individuals were appointed to serve in such capacity:

Kelly White, PE  
Title VI Program Manager, ADA Program Manager  
128 E. Market - Bluffton, IN 46714  
260-824-0071  
[kelly.white@BlufftonIndiana.gov](mailto:kelly.white@BlufftonIndiana.gov)

Briana Lautzenheiser  
128 E. Market - Bluffton, IN 46714  
260-824-0612  
[bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov)

Tim Simpson  
1205 S. Wayne – Bluffton, IN 46714  
260-824-0714  
[Tim.simpson@blufftonindiana.gov](mailto:Tim.simpson@blufftonindiana.gov)

Briana Lautzenheiser holds such position concurrently with her appointment as the Deputy Clerk Treasurer/HR of Bluffton and is responsible for overseeing compliance with the ADA and Tim Simpson holds such position concurrently with his appointment as Street Commissioner and is also responsible for overseeing compliance with the ADA.

### **III. Grievance Procedure**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). 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 the City of Bluffton. The City of Bluffton 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:

Briana Lautzenheiser  
Deputy Clerk Treasurer/HR & ADA Coordinator  
128 E. Market St.  
Bluffton, IN 46714  
260-824-0612  
[bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov)

The city will also notify INDOT of the complaint within 10 calendar days.

Within 15 calendar days after receipt of the complaint, a city representative will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, The City of Bluffton will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Bluffton and offer options for substantive resolution of the complaint.

If the response by The City of Bluffton does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Board of Public Works or its designee. Within 30 calendar days after receipt of the appeal, the Board of Public Works or its designee will meet with the complainant to discuss the complaint and possible resolutions. Within 30 calendar days after the meeting, the Board of Public Works or its 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 City of Bluffton appeals to the Board of Public Works or its designee, and responses from these two offices will be retained by the City of Bluffton for at least three (3) years. **Appendix A** contains the Grievance Form.

#### **IV. Design Standards**

***Sidewalks:*** Sidewalk curbs constructed as part of planned development, sidewalk curbs replaced by or for the City of Bluffton, or sidewalk curbs replaced by or for a property owner through a City of Bluffton match funding program shall be constructed in accordance with the PROWAG (Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way) regulations and standards.

***Buildings:*** Any City of Bluffton owned buildings that are constructed, remodeled or updated shall be constructed in accordance with the most current ADAAG (Accessibility Guidelines for Buildings and Facilities) regulations and standards.

## **V. Sidewalks & Ramps Inventory**

In an effort to remove barriers to streets and sidewalks, the City of Bluffton has inventoried all curbs and sidewalks within City of Bluffton's jurisdiction. The inventory procedure is intended to identify a comprehensive list or inventory of all curbs and sidewalks in the City of Bluffton jurisdiction that are not ADA compliant. This is composed of an effort to both fully inventory all infrastructure that is present and then to identify those items in the system which are not compliant with ADA requirements.

The following attributes were collected for sidewalks and ramps.

- Measured width
- Cross slope observation (2% maximum)
- Heaving
- Continuity
- Joint condition
- Ramp width
- Ramp slope
- Ramp turning space
- Ramp clear space
- Detectable warnings

The above items were considered and a summary "Condition Rating" was given as follows:

- A** ADA Compliant, no concerns (green)
- B** Minor problem noted, but no immediate needs (orange)
- C** One major problem or multiple minor problems, needs some attention (yellow)
- D** Multiple major problems, possibly impassible for wheelchairs (purple)
- F** Broken, impassable by wheelchairs, difficult for pedestrians (red)

Examples of sidewalk and ramp ratings are provided on the following pages.

## Examples of Curb Ramp Grade Ratings

Grade A – Complies with all standards.



Grade B – Minor Deficiency: The ramp shown has no detectable warning.



Grade C – Major Deficiency: The ramp shown here is too narrow, doesn't have a detectable warning, and has a joint displacement.



Grade D – Multiple Major Deficiencies: The ramp shown here is too narrow, is too steep, has a bad cross slope, and no detectable warning.



Grade F – Not present, broke, and/or impassable.



## Examples of Sidewalk Grade Ratings

Grade A – Complies with all standards.



Grade B – Minor Deficiency: For instance, the sidewalk shown here has a cross slope greater than 2%.



Grade C – Major Deficiency: For instance, the sidewalk shown here is too narrow and has joint displacements making it complicated to navigate by wheelchair, though still passable for someone walking.



Grade D – Multiple Major Deficiencies: For instance, the sidewalks shown here are too narrow, they have joint displacements, rough/cracked surfaces, and gaps making it likely impassable by wheelchair, though a fit walker could still navigate the sidewalk.



Grade F – Not present, broke, and/or impassable.



Currently there are 1,431 ramps in Bluffton. The number of non-compliant ramps is 1,097. Of the 1,097 non-compliant ramps, 64 are rated a B, 170 are rated a C, 238 are rated a D, and 625 are rated a F.

Currently there are 764 sidewalks in Bluffton. The number of non-compliant sidewalks is 713. Of the 713 non-compliant sidewalks, 251 are rated a B, 255 are rated a C, 136 are rated a D, and 71 are rated a F.

### **Assessment Procedures**

The assessment procedure is intended to establish the relative importance or priority of the various obstacles that are identified in the Inventory Phase.

This procedure will use four different evaluation factors. Each factor will have a score, with higher values indicating greater importance. Scores are then to be totaled to assist in the identification of which facilities are highest in priority.

#### Condition of Sidewalk or Ramp

- 1 point = Rating of B
- 2 points = Rating of C
- 3 points = Rating of D or F

#### Vicinity of Pedestrian Destinations

Pedestrian Destination includes commercial businesses, schools, parks, government buildings/offices, libraries, churches.

- 0 points = Nothing nearby
- 1 point = Within 1 block of pedestrian destination
- 2 points = Within 1 block of multiple pedestrian destinations
- 3 points = Adjacent to a park, school, government building or library

#### Public Interest

- 0 points = No comments
- 1 point = Multiple public comments received
- 2 points = Subject of a formal ADA grievance filing

#### Local Priority

This is intended to be a local decision-makers tool to provide emphasis to a specific need based on a special concern, especially one of public safety, anticipated heavy pedestrian traffic, or special site condition.

- 0 points = No special concerns noted at or near location
- 1 point = Some special concern exists at or near location
- 2 points = Special local emphasis exists at or near location

By totaling these factors, the highest score achievable would be a ten (10), with the lowest being at least a one (1).

Each obstacle identified in the Inventory phase will be evaluated under this procedure. A total score for each need can thus be provided, with higher scores revealing higher priority repairs and improvements.

## **VI. Buildings & Park Inventory**

**Buildings:** The City of Bluffton owns a limited number of properties. These facilities are as follows:

- 1) **City Hall**, 128 E. Market Street, Bluffton, Indiana 46714
- 2) **City of Bluffton Police & Fire**, 204 E. Market Street, Bluffton, Indiana 46714
- 3) **City of Bluffton Street Department**, 630 E. Springs Street, Bluffton, Indiana 46714
- 4) **City of Bluffton Water Department**, 612 E. Springs Street, Bluffton, Indiana 46714
- 5) **City of Bluffton Sewer Department**, 702 N. Main Street, Bluffton, Indiana 46714
- 6) **City of Bluffton Electric Department**, 514 E. Washington Street, Bluffton, Indiana 46714

**Parks:** The City of Bluffton owns a limited number of parks. The park facilities are as follows:

- 1) Jefferson Park
- 2) Kehoe Park
- 3) Lions Park
- 4) Pickett's Run Park
- 5) Community Pool
- 6) Roush Park
- 7) Washington Park

A self-evaluation/assessment of each of the City of Bluffton's facilities has been conducted. The current ADAAG and PROWAG standards have been used to evaluate and collect the data on the buildings.

## **Funding & Schedule**

The City of Bluffton will use the following funding sources the Sidewalk Fund and Community Crossings Grant Fund to repair, modify or reconstruct sidewalks and ramps. The City of Bluffton intends to spend \$50,000 annually to repair, modify or reconstruct sidewalks and ramps to meet current ADA standards. ADA ramps are upgraded annually using MVH funds ranging from \$2,500 to \$100,000 annually depending on roads selected and budget allocation. ADA upgrades in buildings will be paid for out of the annual building maintenance budget.

## **Prioritization Schedule**

Sidewalk replacements or upgrades will be prioritized based on proximate to schools, downtown, the parks, and the trail. ADA ramp upgrades will be prioritized based on schools, downtown, the parks, and businesses. Building upgrades will be prioritized based on building accessibility and room accessibility. Park upgrades will be based on entryways into the park, access to park amenities, and bathrooms.

Complaints or feedback from citizens could move items higher on the priority list after an evaluation of the citizen comments.

## **Review & Evaluation**

Each year the mayor will meet with the ADA Coordinator to review the City of Bluffton's efforts put forth the previous year to comply with the ADA and the implementation of the Transition Plan. At this time an update to the Transition Plan will be made. This shall include any adjustment to the number of sidewalks and ramps that are non-compliant, building modifications needed, park issues to be addressed, any changes to funding sources and changes to the schedule, if needed. The Mayor and ADA Coordinator shall review the prioritization of repairs, modifications or replacement of sidewalks and curbs, building upgrades, and park upgrades for the upcoming year. At this time, they will also determine the number of sidewalks and curbs that can be brought into compliance with ADA standards (if different than previously stated in Transition Plan).

The review and evaluation will continue each January until all sidewalks and ramps are ADA compliant, and the Transition Plan is completed.

## VII. Public Involvement Opportunities

The general public is encouraged to participate in identifying needs or barriers to accessibility. This may be done by contacting the ADA Coordinator.

Briana Lautzenheiser  
Deputy Clerk Treasurer/HR & ADA Coordinator  
128 E. Market St.  
Bluffton, IN 46714  
260-824-0612  
[bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov)

Citizens are also encouraged to bring their concerns to City officials. The City of Bluffton Board of Public Works and Safety meets weekly, and the City of Bluffton Council meets bimonthly, and those meetings are open to the public. Any meetings that are open to the public are published on the City of Bluffton's website and distributed to local media outlets. All City of Bluffton public meetings are held in locations accessible to individuals with disabilities. Upon request, translators can be provided free of charge to those individuals with limited English proficiency. Auxiliary aids are also available upon request. All such requests must be made at least forty-eight (48) hours in advance of the public meeting. **Appendix B** contains the Public Involvement Survey.

## APPENDIX A: Grievance Form

ADA Coordinator Contact Information: Briana Lautzenheiser  
 128 E. Market St., Bluffton, IN 46714 | 260-824-0612 | [bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov)

<b>COMPLAINANT INFORMATION:</b>	
Name:	
Address:	
Daytime Phone:	
Email:	
<b>LOCATION INFORMATION:</b>	
Address (If Known):	
Location Description:	
<b>NATURE OF GRIEVANCE:</b>	
Sidewalk, Ramp:	
Crosswalk, Pedestrian Signal:	
Building Access:	
Programming:	
Other:	
Describe the Grievance/Complaint/Problem:	
Date of Incident, If Applicable:	
<b>FOR LOCAL/ADA COORDINATOR USE ONLY</b>	
City Representative Preparing the Form if not by Complainant and Date Complaint Received:	
Date Received by Department Head, If Appl.:	
Date Received by ADA Coordinator:	
Date of Initial Contact:	

Date of Meeting or Site Visit:	
Date Assigned to Department Head/Who:	
Date Returned from Department:	
Date ADA Coordinator's Decision Mailed:	
Date Appeal Received by Council:	
Date First on City Council Agenda:	
Date City Council Decision:	
Date Council Decision Mailed:	

**APPENDIX B: Public Involvement Survey**

**CITY OF BLUFFTON VOLUNTARY TITLE VI  
PUBLIC INVOLVEMENT SURVEY**

The City of Bluffton is required to develop a procedure for gathering statistical data regarding participants and beneficiaries of its programs and activities (23 CFR §200.9(b)(4)). The city is distributing this voluntary survey to fulfill that requirement to gather information about the populations affected by a proposed project.

You are not required to complete this survey. Submittal of this information is voluntary. This form is a public document that the City of Bluffton will use to monitor its programs and activities for compliance with Title VI of the Civil Rights Act of 1964, as amended, and its related statutes and regulations. If you have any questions regarding City of Bluffton’s responsibilities under Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act, please contact:

**Bri Lautzenheiser, Title VI/ADA Coordinator, 128 East Market Street, Bluffton, IN 46714, [bri@BlufftonIndiana.gov](mailto:bri@BlufftonIndiana.gov), or 260.824.1299.**

You may return the survey by folding and placing it on the registration table (if you received it at a public hearing or meeting) or by mailing, faxing, or emailing it to the address above.

<b>Date (month, day, year)</b>	
<b>Project Name</b>	
<b>Proposed Project Location</b>	
<b>Gender:</b> <input type="checkbox"/> Female <input type="checkbox"/> Male	<b>Ethnicity:</b> <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino
<b>Race (Check one or more)</b>	
<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Black or African-American
<input type="checkbox"/> Native Hawaiian or other Pacific Islander	<input type="checkbox"/> White <input type="checkbox"/> Multiracial
<b>Age:</b> <input type="checkbox"/> 1-21 <input type="checkbox"/> 22-40 <input type="checkbox"/> 41-65 <input type="checkbox"/> 65+	<b>Disability:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Household Income:</b>	
<input type="checkbox"/> \$0 - \$12,000 <input type="checkbox"/> \$12,001 - \$24,000 <input type="checkbox"/> \$24,001 - \$36,000 <input type="checkbox"/> \$36,001 - \$48,000	
<input type="checkbox"/> \$48,001 - \$60,000 <input type="checkbox"/> \$60,001 +	

Available in alternative format upon request

## APPENDIX C: Building Inventory

City Hall

Overall Rating: B+

ADA Coordinator Contact Information: Briana Lautzenheiser

128 E. Market St., Bluffton, IN 46714 | 260-824-0612 | [bri@blufftonindiana.gov](mailto:bri@blufftonindiana.gov)

Item	Rating	Comments	Cost Estimate	Anticipated Completion Date
<b>Accessible Approach/Entrance</b>				
Route of Travel	B	Bike rack and bench on sidewalk (accessible pathway)	\$100	
Ramps	n/a			
Parking and Drop-Off Areas	B		\$2,500	
Entrance	A			
<b>Access to Goods and Services</b>				
Horizontal Circulation	A	Doorway in hallway is acceptable width		
Doors	A			
Rooms and Spaces	A			
Emergency Egress	A			
Signage for Goods and Services	A			
Vertical Circulation	A			
Elevators	A			
Countertop	B	Provide alternate countertop area	\$500	
<b>Usability of Restrooms</b>				
Getting to the Restrooms	A			
Doorways and Passages	A			
Stalls	A			
Lavatories	A			
<b>Additional Access</b>				
Drinking Fountains	B	Additional drinking fountain	\$3,000	

**Total Expense for City Hall = \$6,100**

**Police & Fire Building****Overall Rating: B+**

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Item	Rating	Comments	Cost Estimate	Anticipated Completion Date
<b>Accessible Approach/Entrance</b>				
Route of Travel	A			
Ramps	B			
Parking and Drop-Off Areas	B		\$3,000	
Entrance	A			
<b>Access to Goods and Services</b>				
Horizontal Circulation	A			
Doors	A			
Rooms and Spaces	A			
Emergency Egress	C	Emergency systems should have flashing lights and audible signals	\$1,000	
Signage for Goods and Services	C	Does not meet requirements	\$150	
Countertop	B	Provide alternate countertop area	\$500	
Vertical Circulation	n/a			
Elevators	n/a			
<b>Usability of Restrooms</b>				
Getting to the Restrooms	A			
Doorways and Passages	A			
Stalls	A			
Lavatories	A			
<b>Additional Access</b>				
Drinking Fountains	B		\$3,000	

**Total Expense for Police and Fire = \$7,650**



## APPENDIX E: Non-Discrimination Notice

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**APPENDIX F: Ramp Inventory/Assessment (See Separate Document)**

**APPENDIX G: Sidewalk Inventory/Assessment (See Separate Document)**

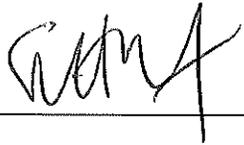
**APPENDIX H: Park Inventory/Assessment (See Separate Document)**

**APPENDIX J – City of Bluffton ADA Transition Plan Adoption**

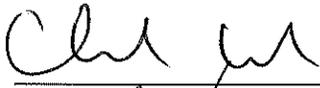
Adopted by the Common Council of the City of Bluffton, Indiana, this 15<sup>th</sup> day of August, 2023, by the following vote:

AYES 5, to-wit:    NAYS    , to-wit:    ABSENT    , to-wit:

 \_\_\_\_\_

 \_\_\_\_\_

 \_\_\_\_\_

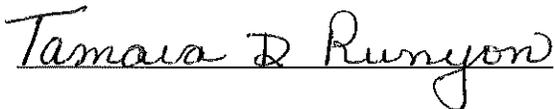
 \_\_\_\_\_

 \_\_\_\_\_



Mayor John Whicker

ATTEST:



Tamara D. Runyon, IAMC, MMC, CPFA, CMO  
Municipal Clerk-Treasurer