



# Town of Mooresville

413 N. Main Street  
Mooresville, North Carolina 28115

## EXECUTIVE SUMMARY

Americans with Disabilities Act

and Section 504 of the Rehabilitation Act

SELF-EVALUATION AND TRANSITION PLAN UPDATE



**2019-2020**

**Disability Access Consultants, LLC**

**DAC**

800.743-7067

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The Town of Mooresville ADA/504 Self-evaluation and Transition Plan was prepared by Disability Access Consultants, LLC (DAC) with the collaboration and assistance of Town of Mooresville staff and input by other interested individuals and community members.

Christopher Russell, Risk and Safety Manager, served as the primary contact and facilitator for the Americans with Disabilities Act (ADA) and Section 504 Self-evaluation under the direction of the Town of Mooresville. Christopher Russell is the designated Americans with Disabilities Act (ADA) and Section 504 Coordinator for the ADA/504 Self-evaluation and Transition Plan.

Disability Access Consultants, LLC (DAC)  
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## ADA/504 Self-evaluation and Transition Plan Executive Summary

To further the Town of Mooresville's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the Town of Mooresville (Town) decided to conduct an updated Americans with Disabilities Act (ADA) and Section 504 Self-evaluation of programs, services, activities, parks and facilities. The updated ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the Town and provides an updated framework for implementation. The goal of the Town is that all potential physical and programmatic barriers for accessibility for persons with disabilities are identified and removed.

The Town of Mooresville ADA/504 Self-evaluation and Transition Plan of policies, procedures, activities, events, and facilities was conducted in 2019-2020 under the direction of Christopher Russell, Risk and Safety Manager and ADA Coordinator for the Town of Mooresville.

Disability Access Consultants, LLC (DAC) was contracted to conduct a comprehensive survey of all Town programs, services, activities, polices, buildings, parks, parking lots and public rights-of-way. The scope of work included 40 facilities and parks, 106 linear miles of sidewalk, 4 bus stops, 1480 curb ramps, 17 on-street parking spaces and 13 signalized intersections.

The current ADA/504 Self-evaluation and Transition Plan incorporates recent updates in the ADA, North Carolina Building Code and other related standards and regulations. The review included accessibility requirements for the Americans with Disabilities Act (ADA) Title II, the ADA 2010 code updates, the North Carolina Building Code, the Manual on Uniform Traffic Control Devices and the Public Right-of-Way Accessibility Guidelines (PROWAG). PROWAG was adopted by the North Carolina Department of Transportation.

The Town of Mooresville ADA/504 Self-evaluation and Transition Plan Executive Summary contains findings regarding the extent to which the Town of Mooresville's policies and practices provide access to the Town's programs, services, and activities for persons with disabilities. Both programmatic and physical barriers are discussed in the Town of Mooresville Executive Summary. Recommendations may not necessarily indicate corrective action, but in many cases are recommendations that may enhance the current compliance activities.

Findings and recommendations for potential physical barriers are found in the online DACTrak secure accessibility management software program. DACTrak contains photographs of physical barriers, GIS information, findings, recommendations, estimated costs, and other information. Custom reports and transition plan information can be generated from DACTrak to monitor and track the implementation of the plan. Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the updated Town of Mooresville ADA/504 Transition/Barrier Removal Plan that is contained in the DACTrak Accessibility Management Software. Access to information contained in the DACTrak program is available from the Town of Mooresville ADA/504 Coordinator. The Town of Mooresville Executive Summary serves as a roadmap to assist the Town with ongoing compliance. Policies and procedures that govern the administration of the programs, services, activities and events of the Town are documented as findings and recommendations in this executive summary.

The results from the ADA/504 Self-evaluation and Transition Plan demonstrate a commitment by the Town to provide access to Town facilities, programs, services, and activities. The recommendations contained in the executive summary serve as an initial framework to outline activities for the Town of Mooresville to achieve compliance with Title II of the Americans with Disabilities Act.

Noncompliant findings regarding physical barriers that may deny access for persons with disabilities are documented in the updated Town of Mooresville ADA/504 Transition/Barrier Removal Plan that is contained in the DACTrak Accessibility Management Software. Access to information contained in the DACTrak program is available from the Town of Mooresville ADA/504 Coordinator. The Town of Mooresville Executive Summary serves as a roadmap to assist the Town with ongoing compliance.

The results from the ADA/504 Self-evaluation demonstrate not only the commitment by the Town to provide access to Town programs, services and activities, but documentation of the overall compliance by the Town of Mooresville.

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

The purpose of the Town of Mooresville Americans with Disabilities Act (ADA) Title II and Section 504 (504) Self-evaluation is to document the results of the Town of Mooresville's review of access to programs, services, activities, events, facilities, parks, and public rights-of-way by individuals with disabilities in order to determine if any discriminatory or potentially discriminatory practices, policies or procedures exist that may deny access for individuals with disabilities. This report contains findings and recommendations based on the ADA/504 review of the Town of Mooresville and includes a review of potential programmatic and physical barriers that may deny access for persons with disabilities.

As evidenced by this study and update, the Town of Mooresville (Town) has made a commitment to comply with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 (504), and other federal, state statutes and regulations to provide accessible for persons with disabilities. The current update further serves to demonstrate the ongoing compliance efforts by the Town.

The Town of Mooresville contracted with Disability Access Consultants, LLC (DAC) to conduct a review of programs, services and activities of the Town in accordance with Title II of the ADA. Town buildings, parks, and public rights-of-way were assessed to update the Town of Mooresville ADA Self-evaluation and Transition Plan. The study included accessibility requirements for the Americans with Disabilities Act (ADA) Title II, the North Carolina Building Code, Department of Transportation requirements, North Carolina Manual on Uniform Traffic Control Devices (CAMUTCD) and the Public Right-of-Way Accessibility Guidelines (PROWAG).

The 2010 ADA updates added accessibility requirements for areas such as recreational sites, golf facilities, play areas, recreational boating sites, fishing piers, swimming pools, wading pools, and judicial facilities. Accessibility requirements were also changed for items such as reach range, water closets, assembly areas and other areas. The current plan updates standards and provides safe harbor for those areas and items that were compliant under prior accessibility codes.

As public input is important to develop and prioritize the plan, the Town conducted public outreach as described in the public outreach portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable and realistic plan. As additional input from stakeholders is received, the ADA Coordinator or designated person is responsible to evaluate the input and incorporate into the ADA plan as appropriate.

To further the Town's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the Town is conducted an updated ADA/504 Self-evaluation of facilities, programs, services, activities and policies to identify any potential barriers that may deny access for persons with disabilities. The Town's Transition Plan identifies any physical barriers, the

proposed method to remove the barriers, the designated responsible person to oversee and implement the plan and the projected schedule for barrier removal. As evidenced in the current updated ADA/504 Report, the Town of Mooresville understands that the ADA/504 Compliance Plan is not a static document but requires ongoing implementation and periodic updates.

The ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the Town and provides an updated framework for implementation. The current study also incorporates recent code changes, updates in accessibility standards and regulations in addition to accessibility trends. The ADA Self-evaluation and Transition Plan activities work together to address the requirements of the ADA.

## **Requirements to Conduct and ADA Self-evaluation and Transition Plan**

Part 35.105 of Title II of the ADA establishes a requirement, based on the Section 504 regulations for federally assisted and federally conducted programs, that a public entity evaluate its current policies and practices to identify and correct any that are not consistent with the requirements of this part. All public entities are required to do a self-evaluation. However, only those that employ 50 or more persons are required to maintain the self-evaluation on file and make it available for public inspection for three years.

Several regulatory agencies require the development and implementation of an Americans with Disabilities (ADA) plan and a Section 504 Rehabilitation Act plan. The United States Department of Housing and Urban Development requires an ADA/504 Self-evaluation and Transition Plan that includes the oversight of the use of Community Development Block Grant (CDBG) funds in a nondiscriminatory manner. The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

The CDBG program requires public agencies to develop, maintain and implement an Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act ADA/504 Self-evaluation and Transition Plan to ensure that programs, services, activities and facilities are accessible for persons with disabilities. The Town became an Entitlement Community in 2009 and qualified to receive federal funding from the U.S. Department of Housing and Urban Development to specifically address the needs of low and moderate-income individuals.

## **Duties and Fundamental Alterations**

ADA Part 35.164 does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. If the public entity believes that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance would result in such alteration or burdens.

The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity and must be accompanied by a written statement of the reasons for reaching that conclusion.

## Methodology for the Self-evaluation and Transition Plan

A Town of Mooresville staff member was designated to provide oversight representation and direction regarding the study of Town facilities, public right-of-way, programs, services, activities, and events. Christopher Russell was designated as the contact for the Town of Mooresville ADA/504 Self-evaluation and Transition Plan. Christopher Russell is the designated as the ADA Coordinator.

Several methods have been used to provide comprehensive input regarding the public's accessibility to facilities, programs, services and activities offered by the Town, including:

- A kick-off meeting was held on October 28, 2019 with DAC and Town staff.
- A start date of October 29, 2019 was established for the surveys of facilities, parks, sidewalks and signalized intersections.
- Several methods have been used to provide comprehensive public and staff input regarding the public's accessibility to facilities, programs, services and activities offered by the Town. Information regarding the current study and requests for input from the public were posted on the website and other publications.
- Public postings and notices requesting input were placed in high-use areas of the Town
- A survey of community members and organizations representing persons with disabilities was conducted by hard copy and online.
- Individual calls with selected community members
- A survey for selected Town staff and administrators was conducted online.
- Inspection of Town sites, facilities, parks, recreational areas, public rights-of-way, and bus stops and other areas. The list of specific sites is included in Appendix C.
  - 40 facilities and parks
  - 106 sidewalk miles and 1397 curb ramps
  - 4 bus stops
  - 13 signalized intersections
  - 17 on-street parking spaces
- A review of the previous accessibility efforts by the Town
- A review of prior and current complaints regarding access for persons with disabilities
- A review of documents from regulatory authorities regarding the Town's compliance
- A review of accessibility related policies, procedures and documents were reviewed for compliance with the requirements of Title II of the ADA and Section 504 of the Rehabilitation Act



- A review of programs, services, activities, and events
- An accessibility Website review was completed for compliance with WCAG 2.0 Level AA.

Using the features available in the DACTrak accessibility management software, the Town can generate compliance assessment reports that provide the following information:

- A description of the noncompliant physical element
- Identification of the reason(s) a physical element is considered noncompliant
- Applicable federal and state accessibility code references that apply to the element
- Digital photographs of the noncompliant physical element
- Summary and detail aerial maps depicting the location of the noncompliant physical element, which can be exported into an ArcGIS file format
- Recommended method to bring the item into compliance
- A construction cost estimate when applicable
- A list of compliant elements found for each facility

The Town of Mooresville ADA/504 Self-evaluation and Transition Plan Executive Summary documents findings and recommendations by area reviewed for compliance. Findings are indicated as “compliant”, “partially compliant” or “not compliant”. In selected cases the findings may be marked as “exceeds compliance” when compliance activities exceed the minimum requirements. Recommendations may include corrective action or activities that designate corrective action to enhance accessibility or are recommended to be continued for ongoing compliance activities.

Some areas reviewed overlap in terms of findings and recommendations and the area they are reported in the executive summary. Some areas overlap as they are a part of the overall accessibility of the Town. For example, if accommodation statements or procedures for requesting a reasonable accommodation by a person with a disability is not available, access to programs, services and activities may not be available. Another example of overlap is the request for a reasonable accommodation for persons with disabilities in housing that is reported in the category of “Statement of Accommodations”, but is also discussed in “Access to Programs, Services and Activities.”

Barriers to services may exist if physical barriers deny access to the services in the nonaccessible area of the building and are reported in the transition plan, as well as noted within the Town’s ADA/504 Self-evaluation and Transition Plan Executive Summary.

## **Background of the ADA and Section 504**

Title II of the Americans with Disabilities Act (ADA) Part 35 requires nondiscrimination on the basis of disability in state and local governments as amended by the final rule published on August 11, 2016. Part 35.101 outlines the purpose and broad coverage. The purpose of this part is to implement subtitle A of Title II of the Americans with Disabilities Act of 1990 (42 U.S. C. 12131–12134), as amended by

the ADA Amendments Act of 2008 (ADA Amendments Act) which prohibits discrimination on the basis of disability by public entities.

Part 35.102 of Title II of the ADA describes the application of the ADA and Section 504 of the Rehabilitation Act which requires state and local governments, such as Town and governments (referred to as public entities in this document) to ensure that their facilities, public rights-of-ways, policies, procedures and practices are accessible and do not discriminate against persons with disabilities. The ADA and Section 504 require the Town to provide access to Town programs, services, and activities. Buildings and public rights-of-way are assessed for compliance with accessibility standards and regulations as a noncompliant building may, for example, deny access to a program, service, or activity of the Town.

The ADA has five separate titles:

- Title I: Employment
- Title II: Public Services: State and Local Government
- Title III: Public Accommodations and Services Operated by Private Entities
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

The focus of the ADA/504 Self-evaluation and Transition Plan is Title II (owned by the public and open to the public) of the ADA to provide access to public areas of facilities and access to all Town programs, services and activities. Title III (privately owned and open to the public) requirements are reviewed in selected cases due to the Town's use of outside vendors and private groups and agencies during the provision of Town programs, services, and activities. Thus, requirements of Title III do overlap and integrate into the current study in cases where Town contracts with outside vendors. Title I of the ADA provides requirements for employees and is not the focus of this study. Individual employee access accommodations are handled on a case-by-case basis.

Section 504 requires public entities that receive federal or state funding to ensure that they do not have any discriminatory practices. The requirements of Section 504 are very similar to those of the ADA that was passed by congress in 1990. Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112) prohibits discrimination based on disability in federally assisted programs and the flow through sub-recipients, including contractors. The Americans with Disabilities Act passed in 1990 (Public Law 101-336) is a broader civil rights statute that prohibits discrimination against people with disabilities. In addition to the Department of Justice (DOJ), the Federal Highway Administration's (FHWA) and the United States Department of Transportation (USDOT) have requirements for accessibility in accordance with the Americans with Disabilities Act (ADA) and Section 504. Pedestrians with disabilities should have an equal opportunity to use the pedestrian access routes in an accessible and safe manner.

As part of FHWA's regulatory responsibility under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (504), the FHWA is required to ensure that recipients of federal aid and state and local entities that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any highway transportation program, activity, service or benefit they provide to the general public; and to ensure that persons with disabilities have equitable opportunities to use the

public rights-of-way system. Furthermore, laws and regulations require accessible planning, design, and construction to integrate persons with disabilities and that the public entity does not discriminate.

As the North Carolina Department of Transportation is a recipient of federal funds and cities, counties and other public entities are subrecipients of the flow through funding, public entities are required to demonstrate their compliance with the ADA and Section 504 of the Rehabilitation Act. A component of the DOT requests is the development of a comprehensive ADA/504 Self-evaluation and Transition Plan. Completion of a comprehensive ADA Self-evaluation and Transition Plan is an accepted practice to take the place of an updated Section 504 plan.

The Town's ADA/504 Self-evaluation and Transition Plan meets the requirements of not only the ADA plan, but the Section 504 plan as well. By completing this comprehensive plan, the Town will not only meet its ADA and Section 504 compliance requirements but will have a sustainable plan that can be updated, monitored, managed, and will document progress for ongoing accessibility compliance.

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

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

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

North Carolina law provides similar protections to Title II and Section 504 of the Rehabilitation Act. State law or other federal laws such as Section 504 may provide a higher level of protection than Title II of the ADA. The higher standard should be applied, whether state or federal.

## Differences Between a Self-evaluation and Transition Plan

The self-evaluation component of the ADA/504 plan identifies any barriers or potential barriers for persons with disabilities and includes a review of policies, programs, activities, services, and facilities. Barriers identified may include policies or procedures that may inadvertently discriminate against persons with disabilities. An example of a self-evaluation component that was reviewed is the Town's website. The accessibility review of the website was conducted to determine if changes are needed to make the website more accessible. Many persons with disabilities use the information on the website to view activities, enroll in courses or to provide input. Another example unintentional discrimination may be the use of inappropriate terminology such as the word "handicapped" instead of the term person with a disability. A key and required component of the self-evaluation is the opportunity for input by the public, organizations that represent persons with disabilities, staff, and other interested persons.

The transition plan on the other hand, assigns estimated dates for the removal of all physical barriers identified in the plan as required by the ADA for public entities with more than 50 employees. The Town, using DAC's recommended priority worksheet, has assigned dates for barrier removal in the Town Transition Plan and is developing an implementation plan over time that will incorporate priorities identified by the public and staff, concerns or complaints, prevalence of use by persons with disabilities, current remodeling and construction projects, funding sources, resources and other variables related to the removal of physical barriers.

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

To effectuate Title II of the ADA, Department of Justice regulation 28 CFR 35.150(d) Transition Plan requires public entities to review and identify physical barriers and steps needed to enable accessible programs when viewed in their entirety. Public entities must ensure that people with disabilities are not excluded from programs, activities, and services because of inaccessible facilities. Each facility is not necessarily required to be accessible. A public entity's services, programs, or activities, when "viewed in their entirety," must be accessible. This standard is known as "program accessibility" and is a key requirement under Title II of the ADA. A comprehensive transition plan should contain the following:

1. A list of the physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
3. The schedule for taking the necessary steps to achieve compliance with Title II of the ADA and the plan should identify the interim steps that will be taken during each year of the transition period; and,

4. The name of the official responsible for the plan's implementation (usually referred to as the ADA Coordinator).

Structural changes are not always required where there are other feasible solutions such as moving a recreational class to an accessible location. However, structural changes leading to increased integration should be considered where feasible. Where structural modifications are required to achieve program accessibility, a public entity with 50 or more employees must complete a transition plan that provides for the removal of these barriers. Any structural modifications must be completed as expeditiously as possible and are required to be in the Town's transition plan.

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

The 2019-2020 ADA Self-evaluation and Transition Plan conducted by Disability Access Consultants, LLC (DAC) updates and/or augments accessibility surveys and studies that were conducted previously. Some records reference an ADA Self-evaluation and Transition Plan from 1993, but the plan was not located. The Town worked to complete an ADA Self-evaluation and Transition Plan in 2011 with the assistance of the Centralina Council of Government. Following a review of the 2011 ADA Self-evaluation and Transition Plan by the Town and the Civil Rights Division of the North Carolina Department of Transportation, the Town decided to update the plan to include components that were not included in the 2011 plan. In addition, as accessibility codes were updated in 2012, the Town desired to have a comprehensive plan that incorporated all the ADA Title II requirements and accessibility updates.

### **Date of Current of Self-evaluation and Transition Plans**

The current Town of Mooresville ADA/504 Self-evaluation and Transition Plan was prepared using information and input during 2019-2020.

### **Regular Self-evaluation and Transition Plan Updates**

The ADA/504 plan is a living, on-going document and requires regular updates to keep it current. As barriers are removed it is important to update the plan to reflect the current barrier removal progress. If for some reason existing sites are acquired by the Town, new facilities are built, sidewalks are added or other factors change, the Town will need to update the ADA Plan. Many town, city and county governments have a practice of updating their plan on an ongoing basis to prepare regular progress updates. The understands that the ADA/504 plan is a living, on-going document and requires regular updates to keep it current.

## **FINDINGS**

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- ✓ In its continuing efforts to maintain compliance, the Town has several mechanisms in place to provide for an ongoing update of the self-evaluation and transition plan to provide a realistic and manageable plan to remove barriers. The Town has the use of a secure online accessibility management software called DACTrak, to update, document and track the findings and the implementation of the plan, including progress reports. Accessibility standards and regulations may change and will be incorporated into the plan as appropriate. DACTrak can be updated as codes change, which allows the ADA plan to stay current without the need to do any re-inspections.
- ✓ The Town's designated ADA Coordinator is empowered with oversight responsibility for implementation of the requirements of the ADA, 504 and related accessibility standards and

regulation. As the Town understands the commitment for regular updates and annual reports, the Town has committed to a process to update its plan on a regular basis. The ADA Coordinator, in collaboration with Town administration, is responsible to ensure that the plan is updated on a regular basis. The Town can update its plan frequently by entering the removal of barriers into DACTrak as they occur. The Town understands that an annual update is recommended to incorporate progress and changes that occurred during the year.

- ✓ Although the Town actively solicited comments and surveys of programs, services and activities from Town staff, community organizations and members of the public from July 2019 to November 2019, it is anticipated that additional comments and input may be received and incorporated into the plan as appropriate. As public input is important to develop and prioritize the plan, the Town solicited input from the public and staff as described in the public outreach portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable and realistic plan.
- ✓ Updates may also be necessitated by changes in the ADA, the North Carolina Building Code, and other accessibility standards and requirements for the public right-of-way. An example requiring updates that was facilitated by litigation is on-street parking. Another example is the FHWA and DOT memorandum clarifying what is maintenance and what is an alteration and when alterations trigger curb ramp installations.

## **RECOMMENDATIONS**

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- It is recommended that the Town develop and internalize a process to provide annual updates to the ADA/504 Self-evaluation and Transition Plan.
- In addition to overseeing the implementation of the ADA/504 Self-evaluation and Transition Plan, it is recommended that the ADA/504 Coordinator be responsible to maintain and update the ADA/504 Self-evaluation and Transition Plan and provide annual updates.

## **Classification of the Town of Mooresville**

The Town of Mooresville is classified as a "public entity" pursuant to Title II of the Americans with Disabilities Act which applies to state and local governments. A public entity covered by Title II is defined as a state or local government. As defined, the term "public entity" does not include the federal government. Title II, therefore, does not apply to the federal government, which is covered by sections 501 and 504 of the Rehabilitation Act of 1973. Title II is intended to apply to all programs, activities, and services provided or operated by state and local governments. It also applies to contractors and vendors of the public entity. As Section 504 of the Rehabilitation Act applies to programs or activities receiving Federal financial assistance, the Town understands that compliance with Section 504 is required.

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

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

## **General Information about the Town of Mooresville**

According to information contained in the Town's Employee Handbook:

John Franklin Moore, the man for whom our Town was named, had a vision for Mooresville long before it ever became a town. He has been gone a long time, but he left behind a heritage that will last forever. On August 18, 1856, seventeen years before Mooresville was incorporated, the Atlantic, Tennessee and Ohio Railroad completed the track from Charlotte to Statesville. The company wanted a location somewhere in South Iredell County to build a depot and side track to take care of the large shipments of cotton that was produced in this area. A big rally was held at Shepherd's Crossroad. This affair brought the first passenger train ever seen by most of the natives. This train had many of the officials of the new railroad, gifted speakers and a brass band.

Pictures of a glorious future for the planned town were painted by the promoters, but the land owners around Shepherd's were not moved by the oratory. The promoters got nowhere. Mr. John Moore then offered a depot site to the company and offered to sell land and lots to parties interested in building a town. The offer was accepted, the depot built and a side track was put down. For his generous gift the officials of the railroad named this place Moore's Siding, a name that was used until the town was incorporated, and then the name of Mooresville was adopted still honoring our founder.

The country was near the brink of Civil War. In 1861, fighting did start between the North and South. The struggling community felt the effects of this war so much that its growth was hampered by the fact that in 1863, the rails were removed to Danville, Virginia to build a railroad to the Confederate Capital in Richmond. It was not until 1872 that these rails were returned and the railroad reactivated. In the meantime the depot stood as a ghost for nine years.

Men coming back from the war, who had been left homeless, saw in the community an opportunity to re-establish themselves. They settled here and they began to push forward in their chosen fields. There was a one room, one teacher school here, which was also used as a meeting place for the only Sunday school that had been organized by Mr. J.R. McNeely, a son-in-law of Mr. Moore. It was in this one room school these men along with Isaac Harris, Robert McPherson, John V. Melchor and Joseph A. Templeton met and applied for a charter for the town. The legislature appointed these men as Mooresville's first commissioners.

Once again John Moore stepped forward to give land for the First Presbyterian Church, Methodist Church and for a school. The school site was on the corner of Moore Avenue and Academy Street. The names being derived from its donor and for the Academy that stood on the land given by Mr. Moore. The Methodist Church site was across the street on Moore

Avenue, where the present church now stands. The Presbyterian site was on South Church Street where the Baptist Church now stands. Church Street was evidently named because this was the site of the first church in Mooresville.

Mr. Moore was the first merchant here, his store being across the street from the depot. The store was known as Moore-McLean Co. Mr. Moore's home was located where S.A. Hart & Co. is now, across the street from City Hall. He insisted when Main Street was laid out, it remains exactly as the wagon trail coming by his home. That is why the curve is in the street. This enabled Mr. Moore to sit on his front porch and have a clear view of his store and also keep track of the wagons passing his home. The S.A. Hart & Co. now has the front door of the Moore home in their building as a memento to the man who had the vision and determination to make this place, the fine town it is.

## **Town Government**

The Town of Mooresville operates under the council-manager form of government. The citizens elect a Mayor and Board of Commissioners as the Town's governing body. Mooresville has a seven-member Board (one mayor and six commissioners). The mayor is elected every two years. The commissioners are elected every four years on staggered terms, with two ward commissioners and one commissioner-at-large elected during the staggered elections. Ward commissioners are required to live within the ward they serve, and residents vote only for their ward representative, commissioner-at-large, and mayor. The Town Manager is appointed by the Board to serve as the chief operating officer administering all municipal affairs. The Board meets at 6:00pm on the first and third Mondays of each month at the Mooresville Town Hall.

The Mayor presides at all meetings and serves as Chief Executive and official head of the Town government. He may cast a vote in the case of a tie. The Mayor is elected to serve a two-year term. The Mayor Pro Tempore performs the duties of the Mayor in the Mayor's absence or disability. One of the Town Commissioners is selected by his or her fellow commissioners to a term of two years and serves in such a capacity at the discretion of the remaining members of the Board.

The Town Manager serves as the Town's Chief Administrative Officer. The position is responsible for implementing the policies of the Board of Commissioners, directing business and administrative procedures, and appointing department officers. The Town Manager is assisted by two Deputy Town Managers, Town Clerk, Town Attorney and twelve staff departments.

## **Town Departments**

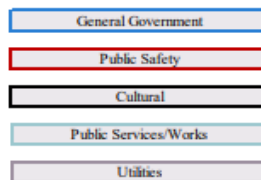
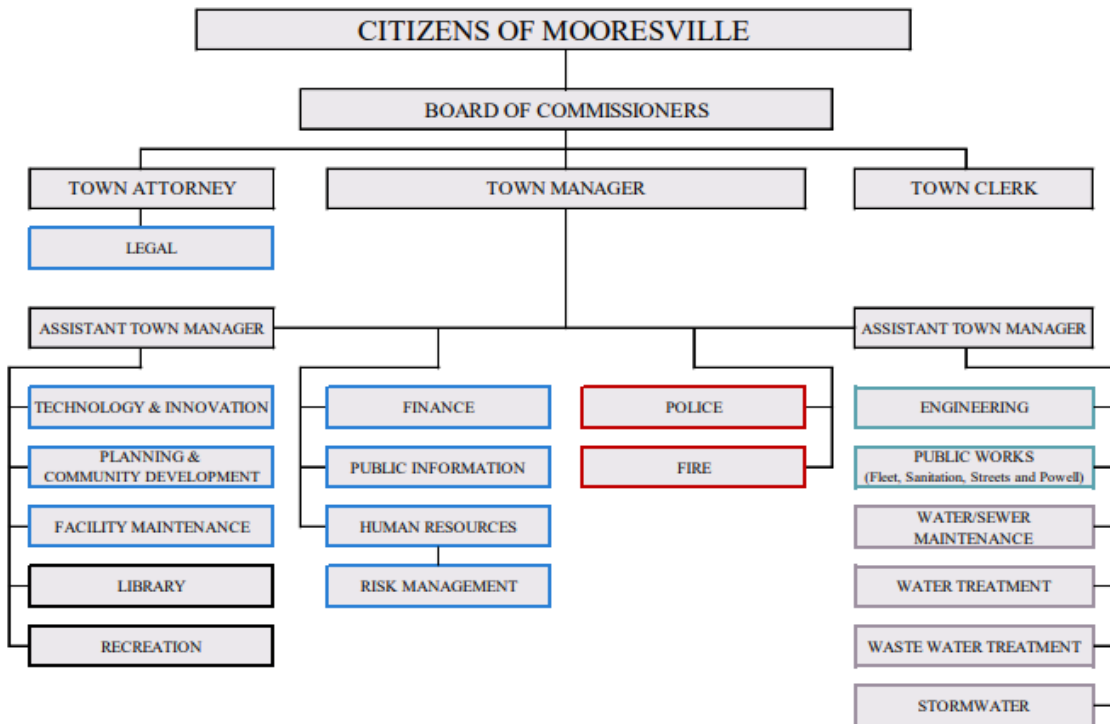
- Administration
- Cemetery
- Engineering
- Finance
- Fire-Rescue
- Golf Course
- Human Resources
- Library
- Parks & Recreation
- Planning & Community Development
- Police Department



- Public Information Office
- Public Utilities
- Public Works
- Risk Management & Safety
- Sanitation
- Technology and Innovation
- The Charles Mack Citizen Center
- Water Department

The following organizational chart is from the 2020-2021 approved budget:

**TOWN OF MOORESVILLE, NORTH CAROLINA  
ORGANIZATIONAL CHART**



## Advisory Bodies, Committees and Taskforces

Although not currently active, the Town had a Mayor’s Council for Individuals with Disabilities until 2014. The primary role of the Council was to assist the Town to provide access to facilities, programs, services, activities and events as evidenced in their mission statement. The Council also served outreach functions between the community and the Town.

**Town of Mooresville**

**Mayor’s Council for Individuals with Disabilities**

**MISSION**

**The mission of Mooresville’s Mayor’s Council for Individuals with Disabilities is to promote and advocate, throughout all aspects of the community, for equal, accessible, inclusive opportunities for individuals with disabilities; and to recognize and collaborate with all businesses, agencies and individuals who contribute to this purpose.**

The Mayor’s Diversity & Inclusion Taskforce description states that it strives to advance the Town’s efforts to embody the spirit of harmony and inclusion. The goal, as seen in the information from the Town’s website is to unite people from diverse backgrounds regardless of race, ethnicity, age, religion, gender or economic status. Reference to disability or persons with disability is not included. The Mayor’s Diversity & Inclusion Taskforce appears to be active as recording were available for 2020.

[Home](#) › [Government](#) › [Boards and Commissions](#) › Diversity & Inclusion Taskforce

## DIVERSITY & INCLUSION TASKFORCE

### Diversity & Inclusion Taskforce

Apply

Board Details

Member Roster

**Description**

The Mayor's Diversity & Inclusion Taskforce strives to advance the Town's efforts to embody the spirit of harmony and inclusion. The goal is to unite people from diverse backgrounds regardless of race, ethnicity, age, religion, gender, or economic status with the purpose of building relationships, healing, learning, and growing together.

## Town Boards and Commissions

- ✓ ABC Board
- ✓ Beautification
- ✓ Board of Adjustment
- ✓ Environmental Protection
- ✓ Historic Preservation
- ✓ Housing Authority
- ✓ Lake Norman Transportation
- ✓ Mooresville Youth Council
- ✓ Parks & Recreation Advisory
- ✓ Planning Board
- ✓ Travel & Tourism

## Location of Self-Evaluation

The ADA/504 Self-evaluation and Transition Plan will be maintained and made available for public inspection by the Town's ADA Coordinator, Christopher Russell. The ADA/504 Self-evaluation and Transition Plan is available in alternate formats, as requested.

## Designated of ADA and 504 Coordinator

The regulations implementing the ADA and 504 require any public entity with fifty or more employees to designate at least one employee to coordinate ADA/504 compliance (28 CFR §35.107(a)). In addition, federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. Furthermore, in providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160. The requirements for effective communication and other ADA and 504 requirements are discussed in more detail in this executive summary report.

## FINDINGS

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### Compliant

- ✓ Christopher Russell is designated as the ADA Coordinator for the Town of Mooresville.
- ✓ The address and contact information are noticed and posted for the ADA Coordinator and includes:
  - Christopher Russell, ADA Coordinator
  - Town of Mooresville
  - 413 N. Main Street
  - Mooresville, NC 28115
  - 704-662-3524 (office)
  - 704-662-9726 (office)
  - [crussell@mooresvillenc.gov](mailto:crussell@mooresvillenc.gov)
- ✓ Due to the similarities with the ADA and Section 504 of the Rehabilitation Act of 1973, the Town is considering appointing Christopher Russell as the Section 504 Coordinator to meet the requirements of both the ADA and Section 504.

- ✓ The ADA Coordinator's contact information is also posted on the website, on the public notice and posting and on the public survey provided to community members, organizations and volunteers.
- ✓ The ADA Coordinator provides centralized oversight and coordination of ADA compliance efforts with Town departments.
- ✓ The identity of the ADA Coordinator as well as the address, phone number, and email address were noticed and posted on the Town's website and on grievance procedures and forms.
- ✓ Requests for information from the ADA Coordinator can be sent by email, phone, and/or mail. The ADA Coordinator currently does not have a direct TTY number but can be reached by using the North Carolina Relay Service. Information is available in alternate formats upon request.
- ✓ Requests for copies or information about the Town of Mooresville ADA/504 Self-evaluation and Transition Plan can be obtained from the ADA Coordinator. The Town offers alternate methods and accommodations (e.g., enlarged print, Braille) to provide access to review or provide input into the Town's ADA/504 Plan.
- ✓ The Town has an ADA Accessibility page on the website to facilitate communication and information regarding accessibility issues.

### **Partial Compliance**

- ✓ Input from the surveys of the community indicated that the identity of the ADA or 504 Coordinator was not known by 59% of the respondents.
- ✓ According to respondents of the community of the community, only 80% said they did not know who to contact if they needed assistance for an accessibility concern or needed an accommodation to access a facility, service or event.
- ✓ 48% of the staff surveyed stated they did not know the identity of the ADA Coordinator. However, 52% knew the identity of the ADA Coordinator.

### **RECOMMENDATIONS**

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Additional recommendations listed will maintain and enhance the requirements and do not reflect corrective action, except for the need to provide more information in multiple methods regarding the identity of the ADA/504 Coordinator.

- Additional methods should be implemented by the Town to increase the knowledge of the identity of the ADA and 504 Coordinator.
- It is recommended that the Town continue to publish the name, address, e-mail address and phone numbers of the Town ADA Coordinator in appropriate public notices, brochures, pamphlets, press releases and other documents frequently distributed to the general public. Publications should also include a TDD/TYY and/or the North Carolina relay phone number.

- Information regarding the identity of the Town's ADA Coordinator should continue to be provided to staff, posted at all Town locations, incorporated into new employee orientation and volunteer packets, and placed in frequently used publications, on the website and in staff and public directories.
- Publications should be updated if the identity of the ADA/504 Coordinator changes or if more than one ADA Coordinator is designated.
- Information regarding the identity of the Town's ADA/504 Coordinator should continue to be provided to staff, posted at all Town locations, incorporated into new employee orientation packets, and placed in frequently used publications, on the website and in staff and public directories.
- It is recommended that the Town continue to publish the name, address, e-mail address and phone numbers of the Town of Mooresville ADA/504 Coordinator in appropriate public notices, brochures, pamphlets and other documents frequently distributed to the general public. Publications should also include the Telecommunications Device for the Deaf or Teletypewriter (TDD/TTY) and/or the North Carolina relay phone number.
- The Town should consider adding an ADA information page to the website to provide easy access to not only the identity of the ADA Coordinator, but the resources that are available to include reasonable accommodations and grievance procedures and forms.
- The Town should consider adding a "How do I" section to the website to assist with finding items such as the identity of the ADA Coordinator, how to request a reasonable accommodation and other items such as providing accessibility input regarding a concern or compliment.
- Town staff should receive information or training regarding the requirements and role of the ADA Coordinator and the 504 Coordinator.

## Grievance/Uniform Complaint Procedures

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

The term "grievance procedure" is used by the Department of Justice. Town governments may use the term "complaint" or "uniform complaint procedures" which may be identical or very similar. The current Town grievance procedures and forms are included in Appendix A.

A public entity that employs 50 or more people shall designate at least one employee to coordinate its efforts to comply with and fulfill its responsibilities under Title II of the ADA, including the investigation of complaints. A public entity shall make available the name, office address, and telephone number of any designated employee. In addition, the public entity must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by Title II of the ADA.

Section 35.107(b) requires public entities with 50 or more employees to establish grievance procedures for resolving complaints of violations of this part. Similar requirements are found in the section 504 regulations for federally assisted programs (*see, e.g.,* 45 CFR 84.7(b)).

## FINDINGS

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### Compliant

- ✓ The "Risk Management & Safety" website includes a link to the ADA grievance form may be filled out electronically. This section also states, "If you have additional questions please contact the ADA Coordinator at 704-662-3524."

#### RISK MANAGEMENT & SAFETY

The Risk & Safety Management Department provides comprehensive Risk and Safety programs that contribute to the safety and well-being of all Town of Mooresville employees, as well as protect the Town's physical and financial resources.

The department provides important services to both Town employees and citizens through the administration of Commercial Liability Insurance, Workers' Compensation Claims and Processing, Citizen Claims, Contract Reviews, Safety Management Systems, Loss Control, Hazard Mitigation, Industrial Hygiene, Internal Risk and Safety Auditing, and the American's with Disabilities Act (ADA) services for the public. Risk Management exists primarily to ensure that the Town of Mooresville can continue to provide excellent services to our citizens by ensuring adequate insurance coverages, compliance with regulatory agencies, and that our employees are trained, empowered, and equipped to conduct their work safely and professionally every day.

If you have been involved in an accident involving Town property, Town employees, or if you have incurred losses for which you feel the Town is responsible, please complete the [Citizen Claim Form](#). You can do so by clicking the link, or by contacting the Risk & Safety Department at 704-799-4183.

If you wish to fill out a grievance for an ADA claim please complete the [ADA Grievance Form](#). If you have additional questions please contact the ADA Coordinator at 704-662-3524.

- ✓ A copy of the grievance form is included in Appendix B.
- ✓ The Town's website did provide employee grievance policies and procedures, which includes a section on Grievance and Adverse Action Appeal Procedure for Discrimination and referenced disability.

### Partial Compliance

- ✓ There was no evidence found that grievances are tracked by the Town.

### Not Compliant

- 60% of the staff surveyed were not familiar with the Town's grievance procedures for persons with disabilities and only 18% said they were familiar with the Town's grievance procedures.
- 80% of the public and organizations surveyed stated that they did not know who to contact for assistance regarding a concern, complaint or an accommodation.

## RECOMMENDATIONS

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- The Town should develop grievance/uniform complaint procedures for the public and inform staff and the public of the procedures and forms.
- Information regarding complaint procedures should be readily available to members of the public, as well as to employees and applicants. Procedures should outline the steps needed to resolve a complaint.
- The Town should make efforts to inform staff and the public of the existence of the Town's ADA/504 Coordinator.
- Grievance procedures should be available in accessible alternate formats.
- A method to collect data and collect a profile of complaints and grievances should be developed. The status of the complaint and the time from complaint to resolution should be documented to assist with interventions and staff development to reduce or eliminate repeated complaints.
- Grievance/complaint procedures and forms should be available at all Town buildings and in all departments.
- Training should be provided to staff regarding the requirement and purpose of the grievance procedure.
- The Town might consider the centralization of complaint handling to assist with the tracking of complaint resolution. A centralized database and analysis of types and locations of complaints may also assist with developing profiles to assist with targeting quality control and training measures. Centralized record keeping of such information will help the Town to regularly update its compliance efforts, and plan for additional compliance implementation for training and budget considerations.
- The ADA/504 Coordinator or designated staff can develop updated reports based on a profile of concerns or complaints to determine the needs for proposed training materials, agenda items, and proposed budget expenditures.
- Procedures should continue to be developed, implemented and institutionalized to provide consistency for complaint resolution and record keeping.
- Grievance procedures should also provide an alternate point of contact other than the ADA/504 Coordinator.

## **Notice of Rights and Protections Afforded by Title II of the ADA and Nondiscrimination Statements (Notice of ADA Provisions)**

The Notice of ADA Provisions includes the rights afforded to persons with disabilities. Public entities are required to provide information to applicants, participants, beneficiaries, employees and other interested persons of the rights and protections afforded by Title II of the ADA (26 CFR §35.106). In providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160. The notice of rights afforded to persons with disabilities includes a nondiscrimination statement and the method to request a reasonable accommodation.

The notice is required to include relevant information regarding Title II of the ADA, and how it applies to the programs, services, and activities of the public entity in a nondiscriminatory manner. The notice should include the contact information for the ADA Coordinator.

As recommended in the ADA Tool Kit published by the Department of Justice (DOJ):

Public notice about the ADA is required in accordance with 28 C.F.R § 35.106. The notice is required to include relevant information regarding Title II of the ADA, and how it applies to the programs, services, and activities of the public entity. The notice should not be overwhelming. An effective notice states the basics of what the ADA requires of the state or local government without being too lengthy, legalistic, or complicated. It should include the name and contact information of the ADA Coordinator.

### **FINDINGS**

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#### **Compliant**

- ✓ The Mooresville Volunteer Program Guide contains the statement “The Town of Mooresville is committed to creating and maintaining an environment in which all individuals are treated with respect and dignity. Employees and volunteers have the right to work in an atmosphere which promotes equal opportunities and prohibits discriminatory practices including harassment. Harassment or discrimination on the basis of race, color, religion, sex, age, disability, national origin, or any other characteristic protected by law, arising in Town of Mooresville facilities or at Town of Mooresville sponsored or endorsed functions is unacceptable and will not be tolerated. The Town of Mooresville encourages volunteers to promptly report to the Human Resources Director all information concerning workplace harassment without regard to the identity of the harasser or victim. Appropriate disciplinary action, which may include dismissal, will be taken against any individual found to be engaging in discriminatory behavior, harassment of any type, or found retaliating against persons filing a complaint.”

#### **Partial Compliance**

- ✓ When asked if a “Notice under the Americans with Disabilities Act” or a nondiscrimination statement is available and posted for program participants who may be persons with disabilities, 20% answered “yes”, while 80% answered “no”, “don’t know” or “not applicable”.

#### **Not Compliant**

- The required notice of rights afforded by the Americans with Disabilities Act and nondiscrimination statements were not readily available and were evident in only limited cases.



## RECOMMENDATIONS

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- The Town should provide ongoing notice of the identity of the ADA/504 Coordinator on its website and in frequently used publications or documents accessed by the public and by recipients of programs, services, and activities.
- The notice may also be provided on applications, at program sites, in program handbooks, in regular mailings, on legal notices, in requests for proposals/qualifications, on facility use agreements, and in contracts
- The notice should include the name, title, address, and phone numbers of the ADA/504 Coordinator. The notice should include a TDD/TTY number and/or North Carolina Relay number to ensure equally effective communication. Although not required, it is recommended that the notice include the email address for the ADA/504 Coordinator.
- Notices should be posted on the website in multiple locations and in conspicuous locations at Town sites.
- Information regarding the requirement to post the identity of the ADA/504 Coordinator, notice of rights in accordance with the ADA/504 and related information should be sent to each department by the ADA/504 Coordinator or other appropriate official. A standard notice should be given as an example. Each department could add specific information applicable to the provision of programs, services, and activities.
- Posting and notice requirements should be updated if the identity of the ADA/504 Coordinator changes or if more than one ADA/504 Coordinator is designated.
- Nondiscrimination statements should be posted on frequently used publications for the public.
- Policies, practices, and procedures for nondiscrimination should refer to members of the public, in addition to employees, and address nondiscrimination regarding access to all programs, services and activities for individuals with disabilities and not be limited to employment. The Town should consider adopting a general nondiscrimination policy for access to programs, services, activities, applicants, and employees.
- Statements of nondiscrimination should be included on selected publications, brochures describing programs, services and activities offered by the Town, new employee materials, recruitment materials, publications and frequently used forms and documents.
- Departments should be directed to include the statement in selected publications, documents, and forms.
- Contracts and vendors that provide printing and publication services should be notified of required statements, required font, and required contrast for accessible publications.
- The new employee orientation packet and volunteer information should include a statement of nondiscrimination by the Town regarding the public's access to programs, services, activities, recruitment, and employment.

## Opportunities for Input into the Development of the ADA/504 Self-evaluation and Transition Plan

Public entities are required to provide an opportunity for interested persons and organizations to participate in the ADA self-evaluation and transition plan process. For three years after completion of the Self-evaluation, the public entity must keep records of any problems identified (28 CFR §35.105 (a)(b)).

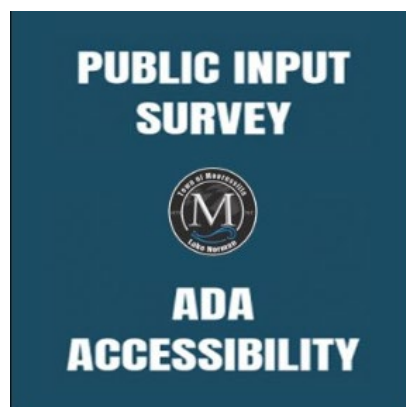
Input from the public, organizations and staff provide valuable and realistic information to assist with the development and prioritization of the self-evaluation and transition plan. Opportunities for input should include multiple methodologies to ensure access and input by persons with disabilities. Stakeholder input enhances the individual needs of the community and visitors for persons with disabilities and ultimately the community overall. As elderly citizens may have similar input regarding accessibility to programs, services and activities of the Town, stakeholder input is of paramount importance.

### FINDINGS

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#### Compliant

- ✓ The Town of Mooresville provided opportunities using different methodologies to solicit input into the Town plan.
- ✓ Public input surveys were available in hard copy format at several high public use Town facilities. Links were provided on the Town's website. In addition to formal surveys, the phone number, email address and mailing address of the Town of Mooresville ADA/504 Coordinator was posted publicly offering several further methods for citizens to offer comments.
- ✓ The Town solicited input into the development of the Town's ADA Self-evaluation and Transition Plan for the community and organizations by providing an opportunity to submit an online survey or a hard copy survey.
- ✓ The Town provided public notice on the Town's website and on social media sites.



- ✓ Input could be provided by phone, online, email or via written documents.

- ✓ Twenty-eight (28) online surveys were received from the public. The timeframe for public response was from November 11, 2019 to March 13, 2020.
- ✓ Sixty-seven (67) online surveys were received from Town staff. The timeframe for Town staff responses was from July 2, 2020 to September 3, 2020.

## **RECOMMENDATIONS**

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- Although no additional activities are required, the Town may wish to conduct periodic customer satisfaction surveys or gather input from recipient of services as an ongoing activity. An additional emphasis may include outreach activities to collect and integrate input from individuals with disabilities and organizations representing individuals with disabilities on an ongoing basis.
- The Town should consider the formation of a disability advisory committee to assist with access to programs, services and activities by persons with disabilities.

## **Summary of Results of Opportunities for Input**

Two (2) types of surveys were used to solicit input and include:

1. Public and organizations serving persons with disabilities
2. Town staff

It is important to note that some survey comments may or may not apply to Town owned property or Town programs, services and activities and may include references to businesses, county services or other services and activities that may take place in the Town of Mooresville.

Respondents were given the opportunity to provide comments using either an online survey option or by completing and returning a hard copy survey to the Town.

Survey respondents were given the opportunity to provide comments using either an online survey option or by completing and returning a hard copy survey to the Town. Respondents could also contact the ADA/504 Coordinator and provide input by phone or email.

A total of ninety-five (95) responses through the online survey and hard copy options were received. The complete survey responses are in Appendix B. Survey responses are the actual comments and have not been redacted or changes made in spelling or grammar. A summary and highlights of the survey comments are included in this section.

Twenty-eight (28) online surveys were received from the public. The timeframe for public response was from November 11, 2019 to March 13, 2020.

Sixty-seven (67) online surveys were received from Town staff. The timeframe for Town staff responses was from July 2, 2020 to September 3, 2020.

Input from the community and organizations was accepted after the targeted timeframe to provide for ongoing input into the plan. The ADA/504 Coordinator will continue to accept input on an ongoing basis.

Input was also received from two community members by phone.

Some of the general comments from the public and from organizations included:

- One response indicated, "The ramp at the rear parking at Town Hall is too steep, lacks handrails and has no resting pad along its length, also the steps at the side of town hall require handrails. Too many risers per code. The ramps between us the pedestrian bump outs on Main St accumulate water during rains that can be inches deep making them impassable for persons who cannot jump across the water. They also accumulate mud and detritus."
- A few public respondents cited a lack of accessible public rights-of-way
- A few respondents commented on the need to focus on the quality or adequacy of sidewalks and street crossings.
- Better enforcement of unlawful parking in spaces designated for persons with disabilities.

Responses from the public note that they participate in programs and services such as:

- Activities at Talbert Recreation Center
- Activities at the senior center
- Library programs
- Parades, Movies on Main, Food Truck Fest
- Town board meetings
- 38% of respondents answered, "yes" when asked, if they participate in programs, services or activities offered by the Town, while 62% responded "no".
- Survey respondents were asked, "Do you know who to contact if you need assistance, have a concern, a complaint, or need an accommodation to access a facility, service or event?" 80% of respondents indicated "no", while 13% responded yes. 7% responded "not applicable".
- 100% of respondents stated, "no", when asked, if they have ever requested an accommodation for a disability from the Town.
- 50% of survey respondents stated "yes" when asked if the attitude of the Town staff towards persons with disabilities generally is helpful, supportive, positive, and proactive in solving accessibility issues. 17% stated "somewhat" and 33% responded "don't know".
- 67% of respondents indicated "no" and 33% stated "yes" when asked if they are aware of any specific concerns, complaints, or problems regarding access for persons with disabilities to any of the programs, services, or activities provided by the Town. The respondents also

commented and listed the area of concern that include inaccessible public rights-of-way and visual aids on library computers.

- Respondents were asked, "Do you know who the designated ADA Coordinator is for the Town?" 59% stated "no", 33% stated "no, I have not had a need or reason to seek out this person" and 8% stated "yes".
- Respondents were asked what they feel should be the highest priority of the Town to improve accessibility for persons with disabilities. Responses included:
  - Increased accessibility for sidewalks and curb ramps
  - Installing accessible sidewalks where there are currently no sidewalks
  - Additional accessible parking and enforcement of unlawful use of accessible spaces
  - Accessible entrances to downtown buildings
  - Access to pools
- 80% of public respondents stated that they did not know who to contact if they needed assistance or a special accommodation or to voice a concern or complaint. 13% said they would either contact Town Hall or contact a specific facility site.
- 100% of respondents indicated that they had never requested an accommodation for a disability from the Town.
- 50% of respondents stated that the attitude of the Town staff towards persons with disabilities is generally helpful, supporting, and positive while 17% stated, somewhat. 33% said that they didn't know.
- 58% of respondents indicated that they did not know who the designated ADA Coordinator is for the Town of Mooresville while 33% stated they had no reason to seek out this person. 8% claimed to know who the ADA Coordinator is but none of the 8% provided a name.

### **Comments by Two (2) Community Members by Phone Call with DAC**

Two (2) DAC had a phone conference with two (2) community members in June 2020 to collect input regarding accessibility in the Town. One of the primary concerns from the community members was that sidewalks were frequently blocked by cars that parked on the sidewalk. The community members also stated that Town police do not enforce parking on the sidewalk and that they ignore the parking on the sidewalk. The community members stated that they felt that corrective action was needed by the police and that staff training was needed regarding the ADA. They both stated that they had talked to the Town on many occasions. They stated that the police were called to Autry Avenue to address a car parked across the sidewalk but no action was taken by the police. They also stated that they have seen police cars parked in the sidewalk.

Another area of concern was on Plantation Ridge where sidewalks are frequently blocked. They said the Town sprayed white paint marking barriers on the sidewalks that are in poor condition.

They stated that the clubhouse at Plantation Ridge is not compliant and the public can access the facilities as guests.

The community members both stated that all Town staff should be training regarding accessibility requirements and that the awareness of ADA requirements should be raised.

They stated that food trucks frequently block parking spaces designated for persons with disabilities and this noncompliant practice is not corrected or enforced.

Another area of concern was the new construction of a bus shelter at Joe Knox Avenue and Plantation Ridge South that the community members stated was not compliant.

Following the phone conference, an email was received from the two citizens. The contents of the email are summarized below for brevity and does not include the entire content. Summary comments include:

- We have engaged the town at every level concerning ADA problems and compliance concerns for several years.
- In the case of sidewalks, the town didn't even recognize it was their responsibility to enforce codes.
- Problems arose over ordinance wording.
- Police did not want to respond to complaints at first for lack of clarity and questioned our motives.
- Town insisted we call police when we saw a problem, no emails with offenses.
- No "teeth" to policing efforts
- No records of the self-assessment from circa 1993 available, destroyed, lost? No benchmark.
- We have met with town officials and it was questioned if the money spent was worth the fine. We also discussed settlements and fines for other cities.
- We were told we were the only ones complaining.
- Took months to get a note in water bill and do an infomercial on town web site.
- There is no sense of urgency and a proactive attitude.
- Morrison Plantation HOA president declares in yearly neighborhood meeting when asked if police would enforce Not parking on sidewalks said "he did not think so" where did this come from?
- City was requested on our behalf to engage Morrison Plantation HOA on several issues. Police provide security as HOA blocks handicapped parking spaces for HOA hired food trucks.
- Police called to Middleton address for same problem 10 times with no resolution to problem.
- City acknowledgement of decades long noncompliance issues.
- Cost is always an issue. But 30 years of noncompliance must be made up with a sense of urgency.

- Approximately 512 people work for town... ALL should be trained in ADA protocol, just like sexual harassment training. Focus on most bang for buck right out of gate.
- Require commercial entities who constructed buildings with compliance problems to immediately fix them in a timely manner.....no cost to city except for follow up.
- Enforce Codes.
- Support police efforts.

## **Summary Results of Staff Input**

Response surveys received: Sixty-seven (67) total staff survey responses were received by completing an online survey.

- Responses from 80% staff indicated that they have regular interaction with the public.
- Responses from 48% of staff indicated that they did not know the identity of the Town's ADA Coordinator. 52% stated "yes", and all but two respondents correctly named Chris Russell.
- 28% of respondents stated that they had received training and information regarding the requirements of the ADA. 37% said that they have received information only, 2% stated they had only received training and 33% stated they had not received training or information.
- 68% of respondents stated they had not received training on providing service or activities for persons with disabilities. 32% responded that they have received training.
- 75% of respondents stated that they were not aware of any specific concerns, complaints or problems regarding access for persons with disabilities. 25% responded "yes" and included some of the following comments:
  - Golf course and location of accessible parking at the golf course
  - Lack of accessible ramps throughout Town
  - Need for an elevator at Talbert Recreation Center
- When asked what they would consider to be the highest priority to make programs, services, activities or events offered by the Town more accessible for individuals with disabilities, staff comments included:
  - Training for staff and management
  - Accessible sidewalks and crossings
  - More accessible parking
  - Prioritized action plan resulting from assessments
  - Accessible recreational facilities, such as parks, libraries and pools
  - Ensuring all Town facilities and buildings are accessible
- When asked if there a policy in place for responding to requests from the general public for accommodations to the program allowing persons with disabilities to participate, 73% of

respondents stated, "don't know", 15% responded "yes" and 12% responded "no" or "not applicable".

- When asked if their program charges an additional fee for modifying the program for a person with disabilities that is not charged for a person without a disability, no respondents answered "yes". 27% of respondents answered "no" and 73% responded "don't know" or "not applicable".
- When asked if the department tracks accommodation requests, 10% answered "yes", while 90% answered "no", "don't know" or "not applicable".
- When asked the department offers any programs, services, activities, or events specifically for persons with disabilities, 36% answered "yes", while 64% answered "no", "don't know" or "not applicable". Examples provided included the following:
  - Special Olympics
  - Cooking classes for individuals with disabilities
  - Sensory story times for children with disabilities
  - Installation of smoke detectors for persons with hearing impairments
- When asked if a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement is available and posted for program participants who may be persons with disabilities, 20% answered "yes", while 80% answered "no", "don't know" or "not applicable".
- When asked if the nondiscrimination statement includes information about the Town's ADA coordinator and how to contact them or file a grievance, 4% answered "yes", while 96% answered "no", "don't know" or "not applicable".
- When asked if they are familiar with the Town's grievance or complaint procedures for persons with disabilities, 60% responded "no", and 18% answered "yes", while 22% answered "don't know" or "not applicable".
- When asked if grievance or complaint procedures are available, 39% responded "yes, for employees and the public", 6% answered "yes, for employees only" and 55% responded "don't know".
- When asked how forms are made available if participants are required to fill out a form to participate in department programs, 39% answered "both online and hard copy", 11% stated "hard copy only", 11% stated "online only" and 39% responded "not applicable".
- When asked if the department periodically include images of persons with disabilities in their printed materials and publications, 20% answered "yes", 24% answered "no" and 56% stated "not applicable".
- When asked if the department requires that public meetings and conferences be held in accessible locations, 50% answered "yes" while 50% responded "no" or "don't know".
- When asked if assistive listening devices or systems are available for public meetings, 2% answered "yes" while 98% responded "no" or "don't know".



- When asked if the department has a policy for service animals, 19% answered "yes" while 81% responded "no" or "don't know".
- When asked if they are aware of any persons with disabilities currently serving on any of the department advisory boards or committees, 4% answered "yes", 23% responded "no" while 73% responded "don't know" or "not applicable".
- When asked if the department publishes the Town's text telephone relay service in all materials where a phone number is listed, 4% answered "yes" while 96% responded "no" or "don't know".
- When asked if department staff receive training on how to place a relay call as well as receive one when a third-party relay system is used, 2% answered "yes" while 98% responded "no" or "don't know".
- When asked if the Town's website includes information about the accessibility of its programs, services, and activities, 100% responded "no".
- When asked if the Town's website home page includes easily located information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services and information, 38% replied "yes" and 62% replied "no" or "don't know."
- When asked if the department provides transportation to volunteers, visitors, or students, 13% replied "yes", 32% replied "no" and 55% replied "don't know" or "not applicable."
- When asked if the department has procedures to make transportation accessible to persons who have visual, hearing, mobility and learning disabilities, 17% responded "no", 9% responded "yes" and 74% responded "don't know" or "not applicable".
- When asked if the department provides facility tours or organizes trips for members of the public, 46% of respondents replied "yes" while 54% responded "no", "don't know" or "not applicable".
- When asked if the evacuation route or instructions are posted in a visible and accessible area of each floor in all facilities used by the department, 83% of respondents answered "yes" while 17% of respondents answered "no" or "don't know."
- When asked if the emergency procedures include instructions for persons with disabilities, 20% of respondents answered "yes" while 80% answered "no" or "don't know".
- When asked if the department hosts any public special events on public property, 52% answered "yes", 22% answered "no" and 26% answered "don't know" or "not applicable".
- When asked if the department has staff notify vendors and third-party entities of obligations to facilitate participation of persons with disabilities in special events or private events held on public property, 4% answered "yes" while 96% answered "no" or "don't know".
- When asked if there are policies and procedures for selling tickets and assigning seating for persons with disabilities, 2% responded "yes", 9% replied "no" while 89% replied "don't know" or "not applicable."

- When asked if department staff are informed of the department's obligations and policies that enables persons with disabilities to participate in the program, 13% responded "yes", 11% responded "no" and 76% of respondents answered "don't know" or "not applicable".
- When asked if the respondents are aware of any areas or elements of the facilities that the department utilizes which are not accessible to persons with disabilities, 62% answered "no", 22% answered "yes" while 16% answered "not applicable."
- When asked if there are any procedures in place for monitoring and/or maintaining accessible features, 16% of respondents answered "yes", 20% answered "no" and 64% answered "don't know."
- When asked if the Town has a facility use or lease agreement, 27% replied "yes" and 73% responded "not applicable".
- When asked if the department rents or lease facilities or space to individuals, groups or organizations, 31% replied "yes", 31% responded "no" and 38% responded "not applicable".
- When asked if the respondent has input or involvement with design and construction activities for new or altered space, 27% replied "yes", 49% responded "no" and 24% responded "not applicable".
- When asked if there are procedures or standards in place which ensure accessibility compliance and best practices are incorporated into design and construction activities, 29% replied "yes" and 7% answered "no", while 64% responded "don't know" or "not applicable".
- When asked if there is a budget for improving accessibility for facilities, 16% replied "yes" and 7% replied "no", while 77% responded "don't know" or "not applicable".
- When asked if there is a there a policy in place for other power-driven mobility devices, 2% replied "yes" and 9% replied "no", while 89% responded "don't know" or "not applicable".
- When asked if respondents have responsibility for creating web page content, 13% replied "yes", while 87% responded "no".
- When asked if respondents have responsibility for website accessibility, 9% replied "yes", while 91% responded "no".

## Statement of Accommodations on Public Notices, Agendas and Documents

Statements of accommodations should be available on public notices, agendas, and other documents. A statement regarding reasonable accommodations or modifications that can be provided by the Town generally affords persons with disabilities an opportunity to participate in meetings, events, and programs of the Town. For example, a sign language interpreter or assistive listening device may be needed to participate.

A public entity must administer services, programs, and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities, *i.e.*, in a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible, and that

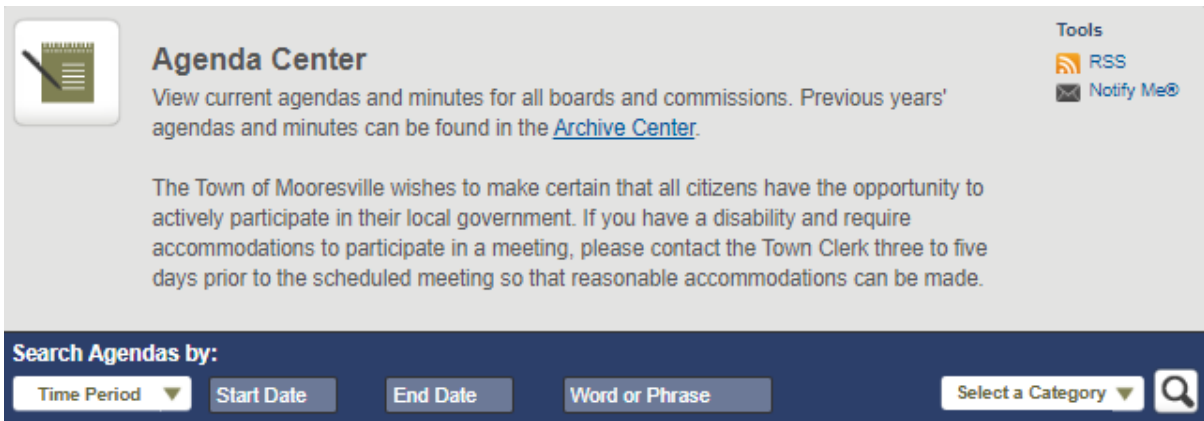
persons with disabilities must be provided the option of declining to accept a particular accommodation (§ 35.130(d)(e)).

## FINDINGS

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### Compliant

- A nondiscrimination statement is included in the Agenda Center section on the Town website stating that, "All citizens have the opportunity to actively participate in their local government. If you have a disability and require accommodations to participate in a Board meeting, please contact the Town Clerk three to five days prior to the scheduled meeting so that reasonable accommodations can be made."



### Partial Compliance

- ✓ The "Establishing a Model City for Individuals" document states that regarding "newly hired Town employees receive an explanation of their rights regarding ADA reasonable accommodations during the orientation process. Additionally, reasonable accommodations are provided for employees with disabilities who request job modifications. Protocol is in place for the Town's Human Resources Director to receive requests for accommodation from all employees." Provisions for ADA accommodations for the members of the public are not referenced in the document, but the study does recommend that "the Town promote the existing ADA accommodations policy for employees and citizens with disabilities."
- ✓ The advertisement for bids states that "A qualified interpreter for the hearing impaired is available upon request at least 10 (ten) days in advance of the bid opening date. Please call the Public Services Department at (704) 663-7282 for more information".
- ✓ Statements of accommodations are present in some public-facing documents, such as agendas, and are not consistent in regard to content and timeframes.
- ✓ Statements of accommodations are not consistent and some statements only address specific areas for accommodation and some provide different timeframes (instead for 48 to 72 hours) that are required to request an accommodation. Some accommodations statements require that the request must be in writing.
- ✓ The Parks and Recreation Department has guidelines for providing reasonable accommodations and has recently updated their request for modifications form and procedures.

- ✓ An accommodations statement is included on the Town of Mooresville Board of Commissioners Agenda.
- ✓ 73% of the staff surveyed stated they did not know if there was a policy for providing accommodations.
- ✓ Policy # 3, Section 2: Employment, Americans with Disability Act with an effective date of July 1, 2011 establishes guidelines for compliance with the Americans with Disabilities Act. The policy focuses on the Town providing reasonable accommodations and grievances for employees, but not the general public.
- ✓ Employment Policy # 3, states: "The Americans with Disabilities Act prohibits discrimination in any terms or conditions of employment for qualified individuals with disabilities. The Americans with Disability Act requires that employment decisions be based on the ability of a person to perform the essential functions of a job and not the person's disability or limitations. Further, it requires management to reasonably accommodate individuals with disabilities, if possible". It also states, "To comply with the employment provisions of the Americans with Disabilities Act, the Town will:
  - Evaluate whether a person with a disability is qualified to perform the essential functions of his or her position with or without reasonable accommodation: and
  - Determine whether a reasonable accommodation can be made for a qualified individual.
  - If an employee believes he or she is protected by the provisions of the American with Disabilities Act and needs some type of accommodation, the Human Resources Director should be notified. The Town will work with the employee to determine if a reasonable accommodation is necessary or possible.
- ✓ Policy #2, effective July 1, 2011, establishes equal employment opportunity guidelines and includes the provisions of the ADA and Section 504 of the Rehabilitation Act. The policy provides for equal opportunity in employment and human resources management for all persons; to provide access to, and full utilization and benefit of, training and promotional opportunities without discrimination because of race, color, national origin, religion, age, disability, marital status, military status, gender, or based on any other consideration made unlawful by applicable federal, state or local laws; and to encourage that persons applying for or currently employed by, or applying for future vacancies in the employ of the Town shall be considered on the basis of individual ability and merit without discrimination.

**Not Compliant**

- ✓ 90% of the staff state that they do not track accommodation requests.

**RECOMMENDATIONS**

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

- Social media platforms should be reviewed to make sure that they are accessible for persons with disabilities.
- Additional and ongoing training should be provided regarding the requirements of the ADA and accommodations that provide equal access to programs, services and activities.
- Meetings and events open to the public should be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.
- Information regarding the facility should include information regarding accessible features and elements of the site. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the website. Indicating accessible paths of travel and accessible entrances also provides valuable information for individuals with disabilities. A contact number and email address should be provided for additional assistance.
- Information about how to request accommodations should appear on all public notices, announcements and agendas. Information should be disseminated to all departments and divisions regarding the statement for accommodations requirement.
- The Town should provide training for staff and volunteers regarding accommodations for individuals with disabilities. All staff, and in particular frontline staff such as receptionists and staff with high public contact, should receive training on interacting and accommodating individuals with disabilities.
- Additional training materials and videos should be purchased or developed to assist with training efforts.
- Currently, individuals requesting ADA/504 Accommodations are directed to contact the Town's ADA/504 Coordinator by phone fax or email. The Town of Mooresville does not currently have an ADA/504 accessibility or accommodation request form on their website. This form could be added to the Town's dedicated Americans with Disabilities Act page and be available using several methods and alternate formats upon request. The ADA/504 Coordinator should maintain records of requests, concern and comments and the status and method to resolve the concerns.
- Citizens requesting ADA/504 Accommodations specifically for participation in a Town Meeting are directed to contact the Town Clerk by phone with their request.
- The Town should assist departments with planning and budgeting for selected accommodations, such as large print, CD-ROMs and Braille materials.
- A centralized method for producing alternate formats may provide a cost savings and reduce the timelines to produce alternate formats.

## Access to Programs, Services, Activities and Events

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

requires public entities to ensure that all public meetings and events sponsored are readily accessible to persons with disabilities and provide opportunities for participation. Policies and procedures need to ensure that persons with disabilities are provided equal opportunity to access programs, services, and activities of the Town. Part 35.149 specifically requires nondiscriminatory practices to have program accessibility. The ADA/504 does not specifically state how a public entity provides for accessibility to programs, services, and activities.

Under the ADA, the Town is required to “make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability.” The Town is required to do so unless it can demonstrate “that making the modifications would fundamentally alter the nature of the service, program, or activity” [28 CFR § 35.130 (7)]. Public entities are subject to all applicable state and federal laws that govern accessibility for persons with disabilities. These laws include the Americans with Disabilities Act, the federal Section 504 of the Rehabilitation Act of 1973, and state constitutional provisions.

Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by persons with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity. Special events sponsored by the Town are considered a program, service or activity of the Town and are required to be accessible in accordance with ADA requirements.

A few general examples to increase access to programs, services and activities include, but are not limited to:

- Public entities that adopt website postings as an alternative method of notice must ensure that the website is readily accessible to people with disabilities, including persons who use screen readers.
- Applications should be available in other methods and not only online.
- All open meetings of public entities must be accessible to persons with disabilities. Meeting locations must be accessible without the need for special assistance.
- Sign language interpreters for deaf or hearing-impaired persons must be provided, subject to reasonable advance notice.

## **FINDINGS**

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### **General Comments**

- 80% of the staff surveyed said they have regular interaction with the public.
- When Town staff were asked what they would consider to be the highest priority to make programs, services, activities or events offered by the Town more accessible for individuals with disabilities, staff comments included:
  - Training for staff and management
  - Accessible sidewalks and crossings
  - More accessible parking
  - Prioritized action plan resulting from assessments

- Accessible recreational facilities, such as parks, libraries and pools
- Ensuring all Town facilities and buildings are accessible
- 75% of respondents stated that they were not aware of any specific concerns, complaints or problems regarding access for persons with disabilities. 25% responded “yes” and included some of the following comments:
  - Golf course and location of accessible parking at the golf course
  - Lack of accessible ramps throughout Town
  - Need for an elevator at Talbert Recreation Center

**Compliant**

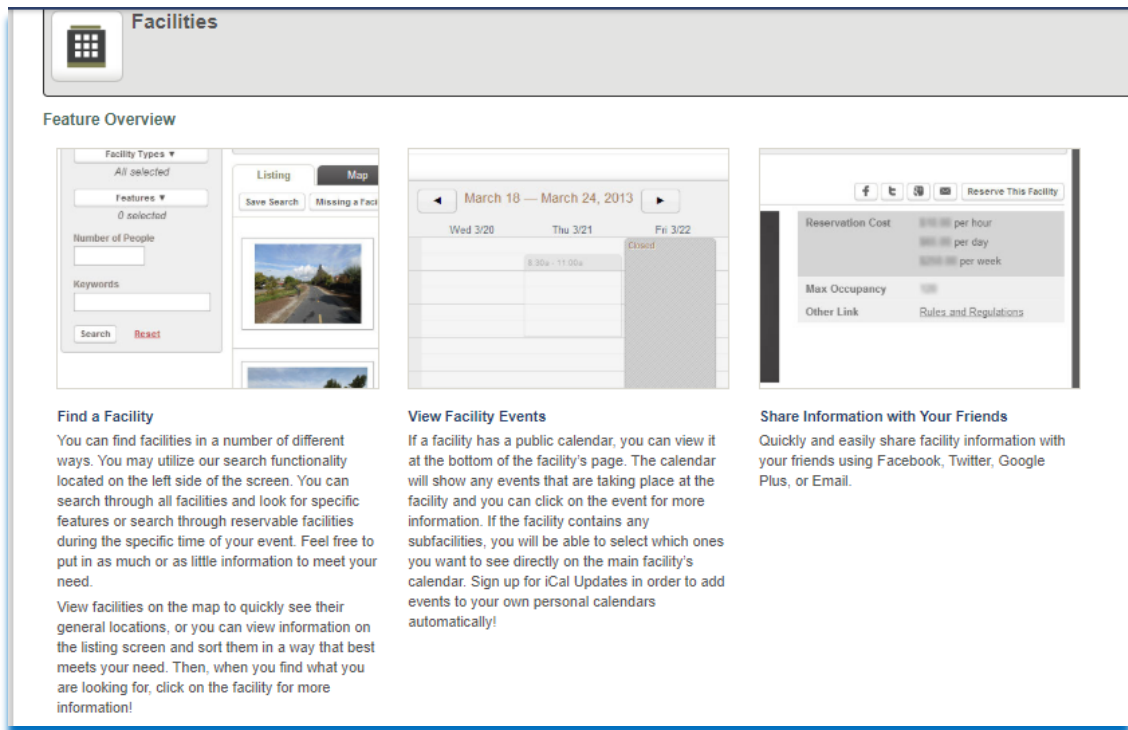
- ✓ No intentional discriminatory practices were found regarding access to programs, services, and activities.
- ✓ The Town distributes information for programs, services, activities and events by hard copy, on the Town’s website and by social media.
- ✓ When asked the department offers any programs, services, activities, or events specifically for persons with disabilities, 36% answered “yes”, while 64% answered “no”, “don’t know” or “not applicable”. Examples provided included the following:
  - Special Olympics
  - Cooking classes for individuals with disabilities
  - Sensory story times for children with disabilities
  - Installation of smoke detectors for persons with hearing impairments
- ✓ There is a section in Events on the Town website with a category for “Special Needs Programs – Youth”. Although the special needs program is offered, it does not segregate or isolate based on the child’s disability but offers more individualized services. There were no indications that students were restricted from participating in other programs, therefore providing inclusionary practices.

SPECIAL NEEDS PROGRAMS - YOUTH		
<a href="#">BOCCCE BUDDIES - AGES 14+ INCLUSION BASED</a>	① Join us every other Friday October 9...	\$5
<a href="#">BUSY BUILDERS SOCIAL GROUP - AGES 7-9 - INCLUSION</a>	① Hang out with friends and enjoy an h...	\$10
<a href="#">LITTLE BUILDERS SOCIAL GROUP - AGES 4-6 - INCLUSION</a>	① Hang out with friends and enjoy an h...	\$10

- ✓ In September of 2012 the Town of Mooresville Board of Commissioners established a goal to become a “model city” for addressing the needs of individuals with disabilities. With the mission to “promote and advocate for equal, accessible, and inclusive activities for the disabled population” appointment of the Mayor’s Council for Individuals with Disabilities followed. Bylaws were adopted and members of the Mayor’s Council identified six major focus areas: infrastructure, public awareness, culture and recreation, workforce development, public education, and healthcare. To assist in achieving the goal of becoming a model city, in January of 2013, Town Manager, Mr. Erskine Smith, asked the Gerald G. Fox Master of Public Administration program at UNC Charlotte to conduct a study of best practices for serving individuals with disabilities. Because the goal of the study was to provide short- and long-term recommendations for future efforts, tasks involved analyzing current practices in Mooresville and identifying practices other local governments have deemed worthwhile. The objectives of the study included: interviewing key stakeholders (Mayor’s Council representatives and Town personnel), surveying Mooresville residents, reviewing applicable websites and literature, and interviewing communities that have won special distinctions for their disability practices. In conducting the study, several members of the Mayor’s Council requested specific recommendations on how to best organize their activities to achieve success. The results of the study revealed that many practices would provide significant benefits to individuals with disabilities. Many practices can be easily implemented by the Town while others will require larger financial investments and collaboration with outside jurisdictions and agencies.

**Partial Compliance**

- ✓ A search of key words “ADA”, “Accessibility” and “Disability” on the facility overview portion of the website brought up one park. In the description of Liberty Park, the description states that there is a “Handicapped” accessible play area.






**Facilities**

[Feature Overview](#)

[View search results](#)   [View all facilities](#)

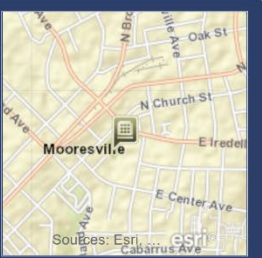
**Liberty Park**

[f](#)   [t](#)   [e](#)



**Features**

- Baseball / Softball Diamond
- Basketball Court
- Free WIFI
- Picnic Shelters
- Playground



[Get Directions](#)

**Liberty Park**  
225 East Iredell Ave.  
Mooresville, NC 28115

17' x 17' reservable shelter seats 16 - Wi-Fi  
 Outdoor basketball courts with 4 goals - natural area with creek Handicap accessible play area - adjacent to War Memorial Center  
 Farmer's Market venue May-October  
 One youth baseball field with dirt infield, bases at 60' - portable pitching mound, permanent fence at 175'

- ✓ A statement of accommodations to access programs, services and activities for persons with disabilities was found on some, but not all public facing documents.
- ✓ Accommodation statements were not consistent in content. Some statements did not provide a method to request an accommodation other than a phone number. Others provided an email address. Some mentioned special equipment for the hearing impaired but not for other areas for accommodations. Some statements of accommodation required the information to be submitted in writing with no alternative format.

### **Not Compliant**

- Policies and procedures for the provision of accessible events were not found for special events or meetings.
- Limited accessibility information pertaining to special events is indicated on the website or in the recreation information for persons with disabilities.

### **RECOMMENDATIONS**

- The Town's special events policies, procedures, applications, and event safety plan should be updated to include ADA accessibility information.
- Planning for accessible provisions should include a checklist and training for Town staff regarding the ADA requirements for special events.
- ADA accessibility requirement should be included in the Town's Public Safety Plan for Special Events, which provides event organizers a guide to identify and address potential hazards or safety issues. For example, information regarding accessible parking, accessible restrooms and

accessible emergency communications should be included in the Town's Special Event Application and the Public Safety Plan for each event.

- Policies should be reviewed and developed so that they are not potentially discriminatory, such as a program stating that "no outside food is allowed" when the outside food brought to a site or event may be a reasonable accommodation for a person with a disability that may be on a special diet and is prohibited from consuming the food provided at the Town facility.
- ADA accessibility information should be added to the Special Events section of the Town's website.
- Accessible features and elements for facilities, special events and activities should be indicated in publications, brochures and on the website. For example, accessible features may include accessible parking, accessible routes, accessible restrooms and other features for persons with disabilities. Information regarding the facility and the location of accessible features and elements should be indicated. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the website. Indicating accessible paths of travel and accessible entrances also provides valuable information for individuals with disabilities. A contact number and email address should be provided for additional assistance.
- The addition of information regarding accessible features at facilities for persons with disabilities should be added to the website in the facility information section and in other locations as applicable on the website and in publications.
- A statement of accommodation should be included on the website and on flyers and publications regarding the special event or activity.
- The Town should continue to disseminate information in a variety of locations and methodologies with accessible formats to enhance the access to programs, services, and activities.
- The ADA/504 Coordinator should continue to monitor and receive information regarding concerns or issues about access to programs, services and activities and take the appropriate action regarding any potential discriminatory practices for persons with disabilities.
- Social media platforms should be reviewed to make sure that they are accessible for persons with disabilities.
- The ADA/504 Coordinator should continue to monitor programmatic access.
- Additional and ongoing training should be provided regarding the requirements of the Americans with Disabilities Act and accommodations that provide equal access to programs, services, and activities.
- Meetings and events open to the public should be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.

- Information about how to request accommodations should appear on all public notices, announcements, and agendas. Information should be disseminated to all departments and divisions regarding the statement for accommodations requirement.
- The Town should provide training for staff and volunteers regarding accommodations for individuals with disabilities. Staff, and in particular frontline staff such as receptionists and staff with high public contact, should receive training on interacting and accommodating individuals with disabilities.
- Additional training materials and videos should be purchased or developed to assist with training efforts.
- The Town should assist departments with planning and budgeting for selected accommodations, such as large print, Braille materials and other accessible formats.
- A centralized method for producing alternate formats may provide a cost savings and reduce the timelines to produce alternate formats.

## Outreach Materials and Activities

The ADA/504 does not specifically state how a public entity provides for outreach activities for accessibility to the Town’s programs, services and activities for persons with disabilities. One method is to disseminate information in a variety of locations and formats to enhance the access to programs, services and activities of the Town. The ADA/504 does not require the Town staff or teams to directly participate with organizations representing persons with disabilities. The Town, however, has an opportunity to network and develop collaborative partnerships with individuals and organizations representing persons with disabilities. Through the network, partnerships, the Town has provided an additional mechanism for public input to ensure that current and future programs, services and activities are accessible.

### **FINDINGS**

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#### **Compliant**

- ✓ The Town uses social media, the website, local publications such as “The Voice”, activities such as the development of a master plan and collaboration with community groups to enhance their outreach efforts.

#### **Partial Compliance**

- ✓ Limited targeted outreach activities were found regarding individuals with disabilities. Some areas such as parks and recreational activities included some outreach activities.
- ✓ Information regarding the representation of individuals with disabilities on committees and boards and other participation was not available, but there was some evidence of participation of individuals with disabilities.

## RECOMMENDATIONS

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- The Town should increase their outreach activities to include individuals with disabilities on committees and advisory boards and conduct outreach activities to increase representation of persons with disabilities.
- The Town should consider the reformation of a disability advisory committee, such as the prior Mayor's Council for Individuals with Disabilities. A review of the published goals and objectives of the Mayor's Council for Individuals with Disabilities state that the principal objective of the Council is to improve and enhance the quality of life of individuals with disabilities in the Mooresville area and the reduction and elimination of barriers in the community for individuals with disabilities, including, but not limited to, barriers related to employment and workforce development, healthcare, infrastructure, public education, public awareness, and culture and recreation. Examples included:
  - Educate the public on abilities, challenges and needs
  - Improve access to all levels of education through partnerships with local education entities
  - Conduct public relation activities and coordinate services for individuals with disabilities
  - Promote utilization for workers with disabilities
  - Act as a liaison between citizens and community businesses
  - Provide resources
  - Achievement recognition and efforts by individuals and organizations to create an inclusive community that embraces the skills, talents and contributions of individuals with disabilities
- The Town should consider including additional pictures and references to individuals with disabilities in publications, brochures and materials.
- Organizations representing individuals with disabilities and areas with an increased population of individuals with disabilities could be targeted for input regarding additional methods to disseminate information regarding programs, services and activities of the Town.
- In Town publications, areas or services that are accessible should be indicated with descriptive text and the International Symbol of Accessibility (ISA). For example, accessible restrooms and routes can be designated on the website, on maps and in publications.

## Ticketing and Seating

The Department of Justice published revised final regulations implementing the Americans with Disabilities Act (ADA) for title II (State and local government services) and title III (public accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated, requirements, including the 2010 Standards for Accessible Design (2010 Standards).

Providing equal opportunity to people with disabilities is the fundamental principle of the Americans with Disabilities Act (ADA). This publication provides guidance on the Department's new

nondiscrimination requirements that apply to selling tickets for assigned seats at events such as concerts, plays, and sporting events. The requirements, which are identical for title II and title III entities, apply to tickets sold for single events and those sold for a series of events (e.g., subscriptions or season tickets).

A public entity that sells tickets for a single event or series of events shall modify its policies, practices, or procedures to ensure that individuals with disabilities have an equal opportunity to purchase tickets for accessible seating (28 CFR § 35.138).

## **FINDINGS**

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### **Partial Compliance**

- ✓ Although a specific policy regarding ticketing and seating was not provided, the Town states it will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to its programs, services, and activities.

### **Not Compliant**

- No current policy regarding ticket sales and seating was found.

## **RECOMMENDATIONS**

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- The Town should develop policies regarding ticketing and seating for persons with disabilities.
- The Town should describe the features of available accessible seating to permit a person with a disability to assess independently whether a given accessible seating location meets their accessibility needs.
- Provide materials, such as seating maps, plans, brochures, pricing charts, or other information identify the location and type of accessible seating.

## **Eligibility Criteria**

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

## **FINDINGS**

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### **Compliant**

- ✓ There was no evidence of discriminatory practices regarding eligibility criteria for access to programs and services.

## **RECOMMENDATIONS**

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

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

## **Fees and Surcharges**

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

### **FINDINGS**

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#### **Compliant**

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

#### **Partial Compliance**

- ✓ 27% of the staff surveyed stated they do not charge or add a surcharge or fee that is not charged for persons without a disability and 73% responded that they did not know.

### **RECOMMENDATIONS**

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

## **Emergency Evacuation Procedures**

Under Title II of the ADA, emergency programs, services, activities, and facilities must be accessible to people with disabilities and generally may not use eligibility criteria that screen out or tend to screen out people with disabilities. The ADA also requires making reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination against a person with a disability and taking the steps necessary to ensure effective communication with people with disabilities. The ADA generally does not require state or local emergency management programs to take actions that would fundamentally alter the nature of a program, service, or activity or impose undue financial and administrative burdens (28 CFR § 35.130(b)(1)) (28 CFR § 35.149). The Town is required to plan to meet the needs of persons with disabilities in an emergency and provide access to emergency shelter services. The Town is required to plan to meet the needs of persons with disabilities in an emergency and provide access to emergency shelter services.

### **FINDINGS**

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#### **Compliant**

- ✓ The Town a policy for an Emergency Action Plan (EAP) with an effective date of December 15, 2016 and designates Emergency Plan Coordinators to ensure the safety of employees and visitors. The policy currently requires training for all staff regarding the procedures contained in the policy.

- ✓ Town staff surveyed stated that the evacuation route or instructions are posted in a visible and accessible area of each floor in all facilities used by the department, 83% of respondents answered "yes" while 17% of respondents answered "no" or "don't know."

### Partial Compliance

- ✓ When asked if the emergency procedures include instructions for persons with disabilities, 20% of respondents answered "yes" while 80% answered "no" or "don't know".

### Not Compliant

- The Town's disaster preparedness, emergency alert and community outreach information does not include emergency and evacuation procedures pertaining to individuals with disabilities.

**Form Center**

Search Forms:  
 Select a Category ▼

By [signing in or creating an account](#), some fields will auto-populate with your information and your submitted forms will be saved and accessible to you.

**Special Needs Registry** Sign in to Save Progress

Steps	Step One
1. <a href="#">Step One</a>	<p>The Special Needs Registry is a free safety tool maintained by the Mooresville Police Department. This program allows Mooresville Residents with disabilities or special needs and their families, friends or caregivers an opportunity to provide information to the Police so that we can better plan to serve them in the event of an emergency. It can be vitally important to know that a resident at an address where help is needed, may have a visual, hearing or mobility condition; or any other special needs that officers need to be aware of.</p> <p><input type="button" value="Continue"/></p>
2. <a href="#">Personal Information</a>	
3. <a href="#">Emergency Contact Information</a>	
4. <a href="#">Special Instructions or Notes</a>	

\* indicates a required field

### RECOMMENDATIONS

- The Town should provide additional training and information regarding emergency evacuation procedures, particularly regarding the evacuation of persons with disabilities.
- The Town should track employees that have received training and update the training for new employees or employees that have been reassigned.
- The Town should continue to post evacuation routes and procedures continue to be posted at all Town sites and on the website.
- The Town should develop procedures and a mechanism to monitor the posting of emergency evacuation routes and procedures.
- Procedures should be developed for evacuating persons with disabilities and information offered in accessible and alternate formats to provide for effective communication.

- The Town should consider the development of a voluntary registry for individuals that may need additional assistance that may not have access to technology.
- Shelters should be surveyed to determine that they are accessible for individuals with disabilities prior to be designated as an evacuation shelter. A provision should be noted to allow service animals and training should be provided to shelter staff to understand the difference between pets and service animals.
- Designated evacuation shelter sites should also be inspected on a regular basis to determine that the shelter continues to be accessible for persons with disabilities. Noncompliant findings for designated shelters can be found in the Town Transition Plan.
- Staff should be made aware of the location of the posted evacuation routes within their facilities.

## Policies for the Use of Town Facilities

The use of Town facilities cannot discriminate against persons with disabilities and applications for the use of Town facilities should include nondiscrimination statements. Town facilities that are leased should be accessible for persons with disabilities.

### FINDINGS

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#### Partial Compliance

- ✓ The Town’s website and documents include terms and conditions for reserving a facility or park as well as a facility conduct policy. However, there is no nondiscrimination notice or information regarding accessibility in the terms.
- ✓ Although the terminology includes the word “handicapped”, the facility use application states that animals are not permitted, but provides a provision for service animals and states “those serving the needs of handicapped persons and those used in public demonstrations as approved by the Town Manager.

#### Not Compliant

- Use of facility information provided on the website does not include accessibility information that would inform users of the accessible features to provide access for persons with disabilities.
- The Town’s facility rental applications and application for use of facilities do not address accessibility, nor does it provide assurances that use of the facility will not be used in a discriminatory manner.

### RECOMMENDATIONS

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



- It would be beneficial to persons with disabilities if information on accessible routes, maps, accessible parking locations, restrooms, and wayfinding was available for all facilities on the Town’s website.
- The Town should make provide the application form and facility use agreement available in multiple formats, ensuring at least one is accessible, and offer multiple methods to submit the application. A policy that would prohibit pets in a facility or park should include a notice allowing service dogs, when appropriate.

## Selection of Contractors and Contracted Services

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

### FINDINGS

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#### Compliant

- ✓ A sampling of contracts for services with the Town were reviewed and no discriminatory or exclusionary practices were found. The contracts sampled for review included “Miscellaneous Provisions” that stated that “The contract shall be governed by, and construed in accordance with, the laws of the State of North Carolina. The contractor shall comply with all Federal, State, and local laws, ordinances and regulations applicable to the services provided herein” and therefore would include the Americans with Disabilities Act.
- ✓ Discriminatory or exclusionary practices were not found regarding the selection of contractors and contracted services.
- ✓ The Town’s Advertisement for Bids includes information regarding qualified interpreters for the hearing impaired and a nondiscrimination policy statement that includes “disability.”

**ADA Compliance** – A qualified interpreter for the hearing impaired is available upon request at least 10 (ten) days in advance of the bid opening date. Please call the Public Services Department at (704) 663-7282 for more information.

**Non-Discrimination Policy** - Bidders will ensure that employees and applicants for employment are not discriminated against because of their race, color, religion, sex, national origin, disability, or veteran's status.

### RECOMMENDATIONS

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- The Town should continue to monitor use of standard agreements and leases by all Town departments and agreements that are not standardized.
- It is recommended that the Town consider one or more of these avenues to maintain compliance when contracting for services or when leasing facilities:
  - Include ADA/504 compliance requirements in new requests for proposals.

- Review ADA/504 requirements when contracts or leases are negotiated, revised, or renewed.

## **Lease and Joint Use Agreements**

Under Title II of the ADA, the Town is responsible for providing access to its programs, services, and activities in both owned and leased facilities. Leased sites should be accessible and have provisions in the lease to ensure accessibility.

### **FINDINGS**

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#### **Partial Compliance**

- ✓ A sample of lease agreements were reviewed for language regarding requirements to lease facilities that are accessible, and it was noted that ADA accessibility provisions were not evident in terms of maintenance, repairs, and improvements. Agreements, however, state that the Lessee can construct or make improvements with the Town's prior written approval. As such, if the Town has an approval process to ensure that ADA improvements or remodeling are compliant, there is a higher probability that the improvements will be compliant.
- ✓ Some noncompliant findings for leased spaces can be found in the Town ADA/504 Transition Plan.
- ✓ A sample of lease agreements did not include accessibility and nondiscrimination provisions.

### **RECOMMENDATIONS**

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- The Town should review the accessibility of sites that are and may be leased in the future prior to engaging in a lease or renewal and establish a procedure for a pre-lease inspection.
- When considering a leased space, the ADA/504 Coordinator, or designated staff member, should be trained to conduct or have a designee or consultant conduct a field inspection of the prospective building to assess the building for a general, functional level of accessibility. The ADA/504 Coordinator could utilize an abbreviated checklist to determine general accessibility of facilities that the Town is considering a lease. A more comprehensive inspection could be conducted if the initial review appears to be favorable.
- Language in lease agreements should be reviewed to clearly delineate the responsibility for accessibility and if it lies with the lessee or lessor or both.
- A pre-lease inspection process should be implemented for buildings that are not Town owned but may be leased by the Town.
- Language in lease agreements should be reviewed for ongoing compliance standards.

## Building and Construction

Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by persons with disabilities, if the construction was commenced after January 26, 1992 (35.151). Building and construction policies require that the construction of each new facility or part of a facility, or the alteration of existing facilities after January 26, 1992, conforms to the standards designated under the Title II of the ADA regulation. Buildings constructed after January 26, 1992 are considered new buildings and should be compliant with the current accessibility standards and state accessibility standards and requirements at the time of construction.

Existing buildings are defined as those buildings or sites that were constructed prior to 1992 and that have not had any major remodeling or renovation. If an existing building has had major remodeling or renovation, portions of the building would need to be brought up to the new standards. In addition, the path of travel to the building may be "triggered" and require renovation or remodeling to meet the current accessibility standards. A public entity may comply with the requirements for "existing buildings" by making programmatic changes. Full compliance of existing buildings may not be required where a public entity can demonstrate that it is structurally impracticable to meet the requirements.

The standard that provides the greatest level of accessibility would apply, but in no way can a lesser standard less than that required by the ADA be used. For example, in cases where a State of North Carolina requirement requires scoping to a standard that provides a greater level of accessibility than that required by the ADA, the Massachusetts standard would apply.

## FINDINGS

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### Compliant

- ✓ The Town demonstrates the intent to comply with applicable accessibility requirements, codes, standards and regulations in addition to local codes and ordinances.
- ✓ The Town utilizes accessibility standards and regulations that include, but are not limited to, the North Carolina Building Code (CBC), the ADA Standards, North Carolina Manual on Uniform Traffic Control Devices, Proposed Right-of-way Accessibility Guidelines (PROWAG) and DOT standards.
- ✓ The Town Zoning Ordinance states that the Town uses Chapter 6: Building Form Standards.
- ✓ The Town has a Board of Building Review Committee with representative membership for compliance and oversight. The Board of Building Review Committee addresses building codes, adoptions of codes and ordinances, and local codes.
- ✓ Plan reviews are part of the application process for submittal of any development proposal to the Town and include follow-up compliance inspections.

### Partial Compliance

- ✓ Evidence of monitoring of construction for ADA compliance or general review of remodeling for ADA compliance was limited.

- ✓ The Town has an established, detailed Town of Mooresville Land Development Process Manual dated June 3, 2010. The process includes a sketch plan phase, a concept plan phase, a construction drawing phase and an implementation phase. Although the process includes the construction phases, there is limited information and requirements for accessibility. The manual also states that "the Town assumes that the Design Engineer will perform a Quality Assurance/Quality Control level of review prior to each submittal. The Town has a designated review consultant.
- ✓ The Mooresville Fire-Rescue Department Fire Marshall's Office has a plan review process and sign-off. The plans review form states that "The issuance of a permit or approval of plans or specifications shall not be deemed or construed to be approval of any violation of any provisions of the North Carolina State Building Code or Local ordinances or regulations.
- ✓ The Town has a driveway permit application and requires approval. The requirements for approval do not contain assurances of compliance with accessibility standards.

### **Not Compliant**

- Some of the inspections of new construction and major remodeling had noncompliant findings. New construction (defined as after January 26, 1992) should be compliant with applicable accessibility codes, requirements and standards.

### **RECOMMENDATIONS**

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- Due to the number of noncompliant findings of new construction and remodeling, the Town should enhance their oversight of projects to ensure that remodeling and new construction meet applicable accessibility standards.
- In selected cases, it is recommended that the Town contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA), the North Carolina Building Code and other applicable building standards and regulations to provide additional oversight. It is important and required that the accessibility barrier removal efforts for new and remodeled buildings, parks and public rights-of-way meet federal and state accessibility codes.
- The Town should review policies, practices, and procedures to review remodeling and construction activities to ensure that they meet the applicable accessibility standards.
- Internal policies and procedures focusing on the review of design and construction activities specific to ADA compliance and Accessibility compliance should be added.
- The Town should ensure that accessibility inspections are conducted as work progresses and is completed.
- Language in contracts with outside vendors should state that work will be performed with all applicable state and federal accessibility standards and regulations.
- The Town should ensure that contractors are informed when performing construction activities adjacent to or within the public right-of-way that accessible and safe pedestrian routes must be

maintained throughout the project. Information on alternate accessible pedestrian routes and detours should be posted on the Town's website, as well as at the site during construction.

- Procedures should be established to ensure alteration projects which affect usability of facilities containing a primary function; that the path of travel to the altered area including restrooms, telephones, and drinking fountains serving the altered area be brought into compliance with ADA Standards to the extent of 20% of the cost of the alteration.

## **Maintenance of Accessible Features**

The ADA requires that accessible features be maintained (35.133). Accessible features and elements may include examples such as maintaining door pressures, elevators, trimming vegetation so that it does not encroach on accessible paths of travel, maintaining clear areas to access display areas, access to brochures, access to posted agendas and replacing damaged or missing signage. Another example of maintaining accessible features includes keeping sidewalks clear of obstructions and parked vehicles to maintain the accessible pedestrian route.

The ADA requires that, to the maximum extent feasible, facilities must be accessible to, and usable by, persons with disabilities. The ADA recognizes that it is not sufficient to provide features such as accessible routes, elevators, or ramps, if those features are not maintained in a manner that enables persons with disabilities to use them. Inoperable elevators locked accessible doors, or "accessible" routes that are obstructed by furniture, filing cabinets, plants or displays, for example, are neither "accessible to" nor "usable by" persons with disabilities.

## **FINDINGS**

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### **Compliant**

- ✓ The Town has other designated staff with job responsibilities to maintain accessible features, such as public works, engineering and maintenance staff. Some Town job descriptions include preventative maintenance and job responsibilities to maintain the accessible features, such as trimming trees that hang down lower than 80 inches or clearing vegetation that encroaches on an accessible path of travel.

### **Partial Compliance**

- ✓ Although a specific policy is not evident for the maintenance of accessible features, the Town has staff assigned to this duty and demonstrates compliance.

## **RECOMMENDATIONS**

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- The Town should provide information and training regarding the requirements of the Town under Title II of the ADA (35.133) to maintain accessible features. Policies should include procedures to enforce policies to maintain the accessible features.
- The Town should continue to monitor accessible items and elements that are required to be accessible and therefore need to be maintained in an accessible manner.

- The Town should consider developing internal policies and procedures to maintain and track accessible features which require general maintenance. A few examples include re-stripping of parking, trimming vegetation or items that interfere with sidewalks and paths of travel, and adjusting the push/pull force and closing speeds of door closers.
- The Town should continue to interface with other local jurisdictions to coordinate ADA efforts and staff training.
- The Town should consider integrating the maintenance of accessible features into other Town committees, such as the safety committee.

## Other Power-Driven Mobility Devices

According to the Department of Justice: "Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines whether or not designed primarily for use by persons with mobility disabilities that is used by persons with disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices (EPAMDs), or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of this section."

A public entity is required to make reasonable modifications to their policies, practices, and procedures when necessary to enable an individual with a disability to use a power-driven mobility device to participate in its services, programs, or activities unless doing so would result in a fundamental alteration of their services, programs, or activities (28 CFR § 35.137(b)).

A public entity shall permit persons with mobility disabilities to use wheelchairs and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by persons with mobility disabilities in any areas open to pedestrian use, unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements that the public entity has adopted pursuant to 35.130. In determining whether a particular other power-driven mobility device can be allowed in a specific facility as a reasonable modification, a public entity may consider:

- The type, size, weight, dimensions and speed of the device;
- The facility's volume of pedestrian traffic;
- The facility's design and operational characteristics (*e.g.*, whether its service, program, or activity is conducted indoors, its square footage, the density and placement of stationary equipment, furniture or devices);
- If legitimate safety requirements can be determined to permit the safe operation of the other power-driven mobility device; and
- If the use of the other power-driven mobility device creates a substantial risk of serious harm to the environment.

## **FINDINGS**

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### **Partial Compliance**

- ✓ Although Municipal Code-Parks and Recreation: Sec. 17-1. (Horses, motor vehicles in parks) does not contain an exception for service animals and states "It shall be unlawful for any person to ride a horse or drive a minibike, motorcycle, automobile or any other type of motorized vehicle in any public park, except on roadways especially laid out and developed for such purposes and specifically designated by the director of recreation", it could be revised to provide an exception for other power-driven mobility devices (OPDMD) by persons with disabilities.

### **Not Compliant**

- Information, policies and procedures regarding other power-driven mobility devices (OPDMD) by persons with disabilities were not found.

## **RECOMMENDATIONS**

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- It is recommended that the Town develop of a policy for OPDMDs and disseminate the information.
- The ordinance regarding shared mobility devices should be reviewed and consideration given for use in certain cases by persons with disabilities as a reasonable accommodation. The Town should consider developing an overall policy regarding "other power-driven mobility devices" (OPDMD) in accordance with the Department of Justice (DOJ) requirement for OPDMDs.

## **Service Animals**

Individuals with disabilities shall be permitted to be accompanied by their service animals in all areas of a public entity's facilities where members of the public, participants in services, programs or activities, or invitees, as relevant, are allowed to go (28 CFR § 35.136(g)).

The Department of Justice (DOJ) published revised final regulations implementing the Americans with Disabilities Act (ADA) for Title II (State and local government services) and Title III (public accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated, requirements, including the 2010 Standards for Accessible Design (2010 Standards).

Beginning on March 15, 2011, only dogs and miniature horses are recognized as service animals under Titles II and III of the ADA. A service animal is a dog (in some cases a miniature horse) that is individually trained to do work or perform tasks for a person with a disability. Public entities, such as the Town, must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

## **FINDINGS**

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### **Partial Compliance**

- ✓ A Town-wide policy for service animals was not found, but references to policies for service animals were found in selected policies and documents. For example, the Town's Facility Use

Application has a reference to items that are strictly prohibited and includes a statement about animals being prohibited “with the exception animals of those serving the needs of handicapped persons and those used in public demonstrations as provided by the Town Manager”.

- ✓ The Town’s Municipal Code, Chapter 17 -Parks and Public Places, does indicate that Service Animals are allowed in areas that are generally prohibited. Sections 17-28 reference animals and states that “Domesticated animals are prohibited in the clubhouse and on the golf course” but clarifies cases in which the restrictions do not apply. The Town has an ordinance regarding where animals are prohibited and it includes provisions for service animals but appears to be specific to the golf course. The Town’s Municipal Code from Chapter 17 is shown below:

(Ord. No. 83-4A, 6-6-83; Ord. No. 2019-2-4, § 1, 2-4-2019)

Sec. 17-28. - Animals.

Domesticated animals are prohibited in the clubhouse and on the golf course. This restriction does not apply to:

- (1) Any service animal that is individually trained to provide assistance to an individual with a disability;
- (2) Dogs associated with law enforcement or fire department operations;
- (3) An animal that provides a service to the golf course and is approved by the parks and recreation director.

## RECOMMENDATIONS

- Staff should be provided information regarding service animals to understand the definition of a service animal and that service animals must be permitted to go to all public areas, with the exception of aquatic/pool. Information should be provided to staff to assist them to recognize a service animal and to understand the questions that they can ask. It should be clarified that it is never acceptable to ask about the person’s disability.
- Staff should be provided information regarding service animals to understand the definition of a service animal and that service animals must be permitted to go to all public areas with a few exceptions such as spas. Information should be provided to staff to assist them to recognize a service animal and to understand the questions that they can ask. It should be clarified that it is never acceptable to ask about the person’s disability.
- The Town should develop policies regarding service animals.
- The Town should not exclude certain breeds of dogs as restrictions for a particular breed may be discriminatory and may exclude a qualified, trained service animal.
- Information about service animals should be provided to Town staff in addition to training regarding service animals.
- Language in any pet ordinance should be updated to be more inclusive and not limited to only dogs or guide dogs or to a specific type of disability.



- No reference to the use of service animals listed on the Town of Mooresville Animal Control web page on the Town's website. It is recommended that information regarding service animals be added.

## Equally Effective Communication

Public entities must ensure that applicants, participants, and members of the public with disabilities have communication that is equally effective as that provided to persons without disabilities in accordance with 35.160. The ADA requires that a public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others.

A public entity is required to furnish appropriate auxiliary aids and services where necessary to afford qualified persons with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity. When determining what types of auxiliary aids and services are necessary, a public entity is required to give primary consideration to the requests of persons with disabilities. Auxiliary aids and services should be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.

Video remote interpreting (VRI) service means an interpreting service that uses video conference technology over dedicated lines or wireless technology offering high-speed, wide-bandwidth video connection that delivers high-quality video images as provided in 35.160(d). VRI provides real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication.

Where a public entity communicates by telephone with applicants and beneficiaries, text telephones (TTYs) or equally effective telecommunications systems shall be used to communicate with persons who are deaf or hard of hearing or have speech impairments.

When a public entity uses an automated-attendant system, including, but not limited to, voice mail and messaging, or an interactive voice response system, for receiving and directing incoming telephone calls, that system must provide effective real-time communication with persons using auxiliary aids and services, including TTYs and all forms of FCC-approved telecommunications relay system, including Internet-based relay systems. A public entity shall respond to telephone calls from a telecommunications relay service established under Title IV of the ADA in the same manner that it responds to other telephone calls.

Often persons with disabilities, including persons who are deaf or hard of hearing, are unable to use such automated systems. Some systems are not compatible with TTYs or the telecommunications relay service. Automated systems can and often do disconnect calls from TTYs or relay calls, making it impossible for persons using a TTY or relay system to do business with Title II entities in the same manner as others. The Department proposed language that would require a telecommunications service to permit persons using relay or TTYs or other assistive technology to use the automated-attendant system provided by the public entity.

Telephone emergency services (35.162), including 911 services, shall provide direct access to persons who use TDD's and computer modems and should be accessible to persons with disabilities. Many public

entities provide telephone emergency services by which persons can seek immediate assistance from police, fire, ambulance, and other emergency services. These telephone emergency services, including 911 services are clearly an important public service whose reliability can be a matter of life or death.

Part 35.162 requires public entities to take appropriate steps, including equipping their emergency systems with modern technology to promptly receive and respond to a call from users of TDD's and computer modems. Entities are allowed the flexibility to determine what is the appropriate technology for their needs.

Information and signage (35.163) are required so that persons with disabilities can obtain information regarding services, activities, and facilities and their location. Signage at all inaccessible entrances to each of its facilities should direct users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

## **FINDINGS**

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### **Compliant**

- ✓ The Risk Management and Safety Policies on the website state that each document found on their page is provided in a PDF format as well as provides viewers information and what to download if a PDF viewer is needed.

#### **RISK MANAGEMENT & SAFETY POLICIES**

Choose the desired links below to download that particular policy. Each are in a PDF format. Do you need a PDF Viewer? Download [Adobe Acrobat Reader](#).

- ✓ Town information, meeting information, surveys and public notices are provided in alternate formats by contacting the ADA Coordinator.

## **RECOMMENDATIONS**

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- The Town should provide staff training and information regarding auxiliary aids and effective communication to employees and volunteers.
- In addition to the Adobe Acrobat Reader, the Town should post "accessible" PDF documents on the website.
- The Town's policy directives should require equally effective communications for programs, services and activities provided for the public by the Town of Mooresville.
- The Town could purchase a portable indoor-outdoor assistive listening system that could be checked out from the ADA/504 Coordinator on an as-needed basis. Information should be sent to departments regarding the availability of assistive listening systems.
- The Town should consider training for staff regarding assistive technology.
- The Town should provide staff with information regarding assistive technology that is available.

## Auxiliary Aids and Services

The ADA uses the term “auxiliary aids and services” (“aids and services”) to refer to the ways to communicate with people who have communication disabilities. There are many ways that the Town can provide equal access to communications for people with disabilities. These different ways are provided through “auxiliary aids and services.” “Auxiliary aids and services” are devices or services that enable effective communication for people with disabilities.

Title II of the ADA requires government entities to provide appropriate auxiliary aids and services to ensure effective communication. Information about the location of accessible services, activities, and facilities available in a format that is accessible to people who are deaf or hard of hearing and those who are blind or have low vision. Generally, the requirement to provide an auxiliary aid or service is triggered when a person with a disability request it.

Auxiliary aids and services include, for example:

- Qualified interpreters on-site or through video remote interpreting (VRI) services; notetakers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to persons who are deaf or hard of hearing; Qualified readers; taped texts; audio recordings; Braille materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered material is available to persons who are blind or have low vision.

## FINDINGS

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### Compliant

- ✓ The nondiscrimination notice states, “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 Town should contact the ADA Coordinator.”

## RECOMMENDATIONS

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- Persons with disabilities may not participate in or participate as frequently in Town sponsored programs, services, or activities if they do not understand what is being communicated. Information on the availability of auxiliary aids and services should be included in departmental, e.g. Library, policies, procedures, and guidelines.
- When equipment is used, as part of a public entity's program, activity, or service, an assessment should be completed to safeguard that the equipment is usable by persons with disabilities, particularly persons with hearing, visual, and manual impairments. In addition, a public entity should have policies in place to ensure that its equipment is well maintained and in operable working order.

- Training should be provided so that staff are aware of and understand how to arrange for auxiliary aids and services, such as sign language interpreters, material in Braille and assistive listening systems; to support effective communication with persons with disabilities.

## Qualified Interpreter Services

The definition of "qualified interpreter" includes, but is not limited to, sign language interpreters, oral interpreters, and cued-speech interpreters. Not all interpreters are qualified for all situations. For example, a qualified interpreter who uses American Sign Language (ASL) is not necessarily qualified to interpret orally. In addition, someone with only a basic familiarity with sign language or finger spelling is not qualified, nor is fluent in sign language but unable to translate spoken communication into ASL or to translate signed communication into spoken words.

Different situations will require different types of interpreters. For example, an oral interpreter who has special skill and training to mouth a speaker's words silently for persons who are deaf or hard of hearing may be necessary for an individual who was raised orally and taught to read lips or was diagnosed with hearing loss later in life and does not know sign language. An individual who is deaf or hard of hearing may need an oral interpreter if the speaker's voice is unclear, if there is a quick-paced exchange of communication, or when the speaker does not directly face the individual.

Video Remote Interpreting is a technology composed of a video phone, video monitors, cameras, a high-speed Internet connection, and an interpreter. The video phone provides video transmission to a video monitor that permits the individual who is deaf or hard of hearing to view and sign to a video interpreter who is live in another location and can see and sign to the individual through a camera located on or near the monitor, while others can communicate by speaking. The video monitor can display a split screen of two live images, with the interpreter in one image and the individual who is deaf or hard of hearing in the other image.

Both VRI and VRS use a remote interpreter who can see and communicate with a deaf person and a hearing person, and all three persons may be connected by a video link. VRI is a fee-based interpreting service conveyed via videoconferencing where at least one person, typically the interpreter, is at a separate location. VRI normally involves a contract in advance for the interpreter who is usually paid by the covered entity. VRS is a telephone service that enables persons with disabilities to use the telephone to communicate using video connections and is a more advanced form of relay service than the traditional voice to text telephones (TTY) relay systems.

## FINDINGS

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### Compliant

- ✓ Although the Town does not post specific information regarding sign-language interpreters, the Town posts information regarding requesting an accommodation in overall terms on the website and in some selected publications.
- ✓ The Town includes a provision for qualified interpreters during the advertisement of bids which states "ADA Compliance: A qualified interpreter for the hearing impaired is available upon request at least 10 (ten) days in advance of the bid opening date. Please call the Public Services Department at (704) 663-7282 for more information."

## RECOMMENDATIONS

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- Interpreters should be provided as determined through the request for accommodation process or in circumstances where an interpreter is known to be required.
- The Town may want to inquire about a contract for Town-wide interpreter services for departments to utilize as needed to provide a quicker response at a lower cost.
- The Town must ensure that those individuals utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.
- The Town may consider the use of a video relay interpreter system to augment the current contract and arrangements for interpreters.
- Notices for public input should include information on the availability of interpreter services and other services.

## Telecommunications Devices for the Deaf and Hard of Hearing

If a public entity communicates with applicants and beneficiaries by telephone, it should ensure that TDD's or equally effective telecommunication systems are used to communicate with persons with impaired hearing or speech. If a public entity provides telephone emergency services, it should review its policies to ensure direct access to persons who use TDD's/TTY's and computer modems.

When a public entity uses an automated-attendant system, including, but not limited to, voicemail and messaging, or an interactive voice response system, for receiving and directing incoming telephone calls, that system must provide effective real-time communication with persons using auxiliary aids and services, including TTYs and all forms of FCC-approved telecommunications relay systems, including Internet-based relay systems. Employees who communicate with the public should become familiar with the use of TDD/TTY communications or relay communications. Assistive Listening Systems for the Deaf and Hard of Hearing or the relay system.

## FINDINGS

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### Compliant

- ✓ The Town utilizes TTY's in some documents and uses the North Carolina Relay System.

## RECOMMENDATIONS

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- All staff responsible for responding to incoming telephone calls should be trained in the proper use and protocol of TDD/TTYs. Information and training should be provided on an ongoing basis.
- The Town should install additional telecommunications devices for the deaf (TTY/TDD) phone lines in several areas or purchase a network compatible system that would reside on the server.
- Departments with high public use should purchase a unit or a network system. The Town might consider the purchase of a network PC compatible TTY/TDD system that would allow individual computers to be networked and access TTY/TDD calls, instead of purchasing separate TTY/TDD

units that require a dedicated line. The advantages of the networkable system are allowing the user to transfer calls, conduct conference calls and utilize voice mail.

- Employees who communicate with the public should become familiar with the use of TDD/TTY communications and how to maintain the TDD/TTY in an operable condition. The development of TDD/TTY help sheets noting abbreviated words commonly used in TDD/TTY communications would be helpful to staff when communicating via TDD/TTY. Posting the help sheet near TDD/TTY's would also be helpful to the user.
- Procedures should be developed and institutionalized to ensure that TDD/TTY and other communication devices are maintained in working and operable order at all times.
- The Town may wish to purchase additional back up TDD/TTYs for replacement (unless another method is provided), in the event that permanently located TDDs may be temporarily out of commission.
- If available, publication of all TDD/TTY numbers can be provided in program literature, in phone directories and on selected publications.

## **Assistive Listening Systems**

Assistive listening systems should be available for public meetings to ensure effective communication. Assistive listening systems are required in assembly spaces where audible communication is integral to the use of the space. Signs are to be provided informing patrons of the availability of the assistive listening systems.

### **FINDINGS**

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#### **Partial Compliance**

- ✓ Assistive listening systems were found in only limited cases, but it was noticed that the ADA Coordinator could be contacted to request an accommodation which may include an assistive listening system.

### **RECOMMENDATIONS**

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- Information regarding assistive listening systems should be readily available.
- Signs should be posted in prominent places at or near the assembly area entrance stating "Assistive-Listening System Available" and include the International Symbol of Access for Hearing Loss.

## **Alternate Formats**

Information regarding programs, services and activities should be available in alternate formats to assist persons with disabilities and include information on how to request an accommodation. Statements of accommodations and nondiscrimination notices regarding the rights afforded to persons with disabilities should inform persons with disabilities that alternate formats are available.

## **FINDINGS**

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### **Partial Compliance**

- ✓ Some Town notices did not contain information regarding how to request documents in alternative formats.

## **RECOMMENDATIONS**

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- The Town should provide notice regarding the method and availability for alternate formats.
- The Town should provide staff training regarding the requirements for accessible alternate formats, what accessible alternate formats are and how to provide accessible alternate formats. Procedures should be put in place for the development of accessible alternate formats to constituents.
- The Town should produce accessible alternate formats for high use areas, such as libraries, where the probability for a request for an alternate format is high. Examples include provision of audiocassettes, CDs, large print, information sent via e-mail, screen readers, Braille, and pictograms.
- Online public notices and publications should have a statement of accommodations which includes who to contact for an accommodation.
- A TTY/TDD and/or Relay number should also be included on Town notices which allow for public input.

## **Accessible Fonts and Documents**

Some fonts are more accessible for screen readers and for printed documents. Use of an accessible font allows text to be transformed into sound through voice synthesizers when using screen readers. Text can also be enlarged by screen enlargement or magnification without any loss of quality. Use of an accessible font with sufficient contrast between the text and the background makes text easier to read for users with low vision and other disabilities such as dyslexia.

## **FINDINGS**

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### **Partial Compliance**

- ✓ It was noted that nonaccessible fonts and contrast were used in some Town documents and in selected areas of the website.
- ✓ A policy for accessible fonts and documents, although not required, was not found.

## **RECOMMENDATIONS**

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- The Town should continue to provide information on its website and publications regarding the Town's branding policy, if available.

- The possibility of a central Town-wide department or method to provide Braille and other accessible documents should be assessed to assist with providing accessible alternate formats.
- The Town should consider having an existing contract with one or more firms or organizations to provide accessible documents, such as Braille in a timely manner.

## Acceptable Terminology

Terminology should be in "person first language" such as person with a disability or individual with a disability instead of "disabled person" or the term "handicapped." Other negative terms such as retarded, confined to a wheelchair, crippled and handicapped should not be used.

### FINDINGS

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#### Partial Compliance

- ✓ Some documents reviewed contained the word "handicapped" instead of the term "disabled" in person first language such as individual with a disability or persons with a disability. For example, the Facility Use Application uses the term "handicapped person".

### RECOMMENDATIONS

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- Town publications should be reviewed to see if the word "handicapped" is used. The words "individuals with disabilities" or "persons with disabilities" should replace "handicapped". The term "disabled person" should also be avoided. Information regarding acceptable terminology in "people first language" should also be provided to Town staff. Publications should be updated as they are reprinted.
- It is recommended that the ADA/504 Coordinator disseminate information or provide training regarding acceptable terminology to be utilized by departments and staff.

## Website Accessibility

Websites are required to meet accessibility standards and comply with Web Content Accessibility Guidelines (WCAG 2.0) standards for compliance. Websites for Title II of the ADA public entities such as the Town currently required to comply with WCAG 2.0 Level AA.

Persons with disabilities frequently use the internet to access information about the Town. Persons who are blind and persons with low vision may employ screen access software that reads the code of a website and then renders it in whatever format is accessible to that person (speech, refreshable braille, etc.). Deaf users rely on captioning of aural (sound or spoken) content. Users with limited manual dexterity or motion use dictation software to give commands instead of mouse and keyboard control.

The World Wide Web Consortium (W3C) sets the main international standards for the World Wide Web and its accessibility. There are three levels of WCAG 2.0 website accessibility recognized by the World Wide Web Consortium (W3C):

1. Level A is the minimum level of conformance with the fewest requirements. A couple examples of Level A requirements are that all non-text components such as images include an alternative text component and that captions are provided for all prerecorded audio content.



2. Level AA compliance must satisfy all the Level A requirements and additional criteria such as providing captions for all live broadcasted audio content.
3. Level AAA satisfies all Level A and Level AA criteria as well as additional requirements such as providing sign language interpretation for all prerecorded audio content.

An updated version of the guidelines (WCAG 2.1) was published on June 5<sup>th</sup>, 2018. The updates are mainly related to mobile devices, disabilities that affect vision and cognitive function, criteria addressing text spacing, and criteria addressing timeouts and animations from interactions. While public entities are encouraged to begin applying compliance with WCAG 2.1 success criteria into their website design, it is not yet the required standard.

While Section 508 only *directly* applies to federal organizations, its impact is much farther reaching. Section 508 is extended to any company that conducts business with a federal agency, including private contractors, the financial industry, healthcare, many legal organizations, and others, and may also be extended to universities (including private universities) that receive funding through grants.

## **FINDINGS**

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### **Compliant**

- ✓ The Town's website hosts a website accessibility page which specifies accessibility design guidelines, browser accessibility information, browser accessibility and supported assistive technology.
- ✓ The website accessibility section on the Town website states, "If you use assistive technology (such as a Braille reader, a screen reader, or TTY) and the format of any material on this website interferes with your ability to access information, please contact us. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address of the requested material, and your contact information. Users who need accessibility assistance can also contact us by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.
- ✓ Information is included on the Town's website regarding its accessibility features, accessibility design guidelines, browser information, and supportive assistive technology.

### **Partial Compliance**

- ✓ The website for the Town of Mooresville was reviewed for compliance with WCAG 2.0 Level AA standards in December 2019 and March 2020 using the Dyno Mapper and SortSite Website Accessibility Testing Software to evaluate the website's HTML content by testing against published website accessibility guidelines. The Town of Mooresville's homepage, major web pages, links and sub-links were reviewed for accessibility for persons with disabilities. Links that direct users to external sites and web pages were not evaluated.
- ✓ The most prevalent error found during the review was numerous instances of broken links. Broken links frequently occur when the page, document or file has been removed from the site, or possibly renamed, which prevents the link from taking the user to the correct target. A website user would receive an error message when clicking the link.

- ✓ The accessibility check also returned several findings for images where the alternative text is placeholder text or a file name, instead of a description of the image. This would result in meaningless or confusing image descriptions when read aloud by a screen reader. The review also returned several findings for links that have generic "click here" labels that do not properly identify where clicking the link will take the user.
- ✓ The review covered the evaluation of three thousand two hundred and eighty (3,280) individual web pages, links, and sub-links. The format concluded a summary and a detailed outline of issues that included:
  - a) Accessibility – Issues regarding accessibility for persons with disabilities
  - b) Compatibility – Issues regarding browser-specific behavior
  - c) Usability - Issues regarding navigation problems for all users

## **RECOMMENDATIONS**

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- Correct accessibility errors in the Town's website.
- Develop procedures to maintain the accessibility of the Town's website and provide training to staff.
- If the accessibility and maintenance of the Town's website is contracted to an outside vendor, contractual language should be included regarding the website accessibility requirements and that the responsibility for the development of and maintenance of an accessible website.

## **Social Media**

Website accessibility also extends to social media platforms that are used by a Title II entity to deliver information and notices to the public. Content and information created and shared via social media by a Title II entity is required to comply with WCAG 2.0 Level AA requirements. Level AA requirements include all minimum standards of Level A as well. It is the responsibility of the Title II entity to design accessible content that will be shared via a social media platform.

## **FINDINGS**

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### **Compliant**

- ✓ The Town uses social media as a form of communication. The compliance of accessibility of social media is dependent upon the third-party vendor that provides the service.
- ✓ Through the Town of Mooresville's social media hub, users have the opportunity to link with the community on multiple platforms. Users can connect directly to the Town of Mooresville on Twitter, Facebook, Instagram, Vimeo, Pinterest, & You Tube. Social media can provide feedback and stay up to date with the latest news and Town sponsored events.

## GOMOORESILLENC

GoMooresvilleNC is the official mobile app for the Town of Mooresville, NC. The app provides a connection between the Town of Mooresville, NC and its citizens and visitors. Enjoy convenient access to local officials, Town services & events, and social media outlets. Whether a resident or visitor, the app delivers access to community news, events and emergency alerts.

GoMooresvilleNC is available for [iPhones](#) and [Android](#) devices.



## RECOMMENDATIONS

- Provide the information through more than one platform.
- Avoid using acronyms and abbreviations that would not be understandable if read by a screen reader.
- Post or upload a captioned video instead of relying on automatic captioning tools that may be inaccurate.
- Before linking to content that was created by a third party, test the content for accessibility, such as videos that start automatically, missing alternative text for photos and available captioning. If the content is not fully accessible, but the entity choosing to link the content regardless, a disclaimer should be added that explains the limitations for the linked content to the user.

## Staff Training

On-going compliance with the ADA/504 can only be achieved if Town staff and officials receive ongoing and updated training about the rights of persons with disabilities and the obligations of public employees under the ADA/504. Although training is not required by the ADA/504, training regarding the requirements of the ADA/504 is recommended.

## FINDINGS

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### Partial Compliance

- ✓ There is evidence of some staff development training indirectly related to the ADA and accessibility, but not specifically target to ADA and accessibility.
- ✓ 28% of the staff surveyed said they had received ADA training or information.
- ✓ 68% of the staff surveyed said they had not received training on providing service and programs for persons with disabilities.

## RECOMMENDATIONS

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- The Town should continue to provide ongoing training regarding the ADA/504 for facilities, public rights-of-way and outdoor recreation standards. Suggested training topics should include, but are not limited to:
  - Requirements of the ADA/504 for the Town of Mooresville
  - Individuals with Disabilities
  - Providing Services for Individuals with Disabilities
  - Acceptable Terminology and Expressions
  - Noncompliance Consequences
  - Accessible vs. Compliant
  - Barriers – Programmatic or Physical
  - Service animals
  - Leased Sites
  - Special Events and Activities
  - Accessible Locations for Meetings
  - Events and Voting
  - Auxiliary Aids and Services
  - Construction and Remodeling
  - Maintenance of Accessible Features
  - Community Donations and Construction Projects
  - Notice of the ADA/504 Coordinator
  - Notice and Rights Posted for individuals with disabilities

- TDD/TTY
  - Assistive Listening
  - Grievance Complaint Procedures
  - Statement of Accommodations
  - Individuals with Disabilities Outreach and Participation
  - Use of Town Facilities by Organizations and Individuals
  - Reasonable Accommodations
  - Statement of Accommodations
  - Effective Communication
  - Alternate and Accessible Formats
  - Accessible Websites
  - Volunteers
  - Accessibility standards and regulations
- The Town should provide staff training in additional formats other than a classroom session, if needed. Training methodologies could include videos (captioned) that could be viewed at the training or checked out by departments and agencies.
  - Handouts and training materials should be prepared, if needed, in alternate accessible formats.
  - The ADA/504 Coordinator should continue to provide or coordinate additional ADA/504 training to all management and staff who have regular contact with the public.

## New Employee and Volunteer Orientation

Although the focus of the ADA Self-evaluation was not on employment, it is important to review employment practices to ensure that they comply with other applicable nondiscrimination requirements, including 504 and the ADA regulation issued by the Equal Employment Opportunity Commission. It is unlawful to discriminate against a qualified applicant based on disability in any aspect of employment including applications, interviewing, testing, hiring, evaluating, compensation, benefits, promotion, discipline, and termination.

### **FINDINGS**

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#### **Partial Compliance**

- ✓ New hire training and orientation is required by all fulltime and part time employees but includes limited ADA training and information regarding the requirements of employees and the Town to provide access to the Town’s programs, services and activities to persons with disabilities.
- ✓ Volunteers are provided general training and a Volunteer Guide, but specific references and training regarding persons with disabilities and nondiscrimination statements were not found.

- ✓ The Town of Mooresville Volunteer Program Information Guide does include information on equal opportunities for employees and volunteers and states that, "The Town of Mooresville is committed to creating and maintaining an environment in which all individuals are treated with respect and dignity. Employees and volunteers have the right to work in an atmosphere which promotes equal opportunities and prohibits discriminatory practices including harassment. Harassment or discrimination on the basis of race, color, religion, sex, age, disability, national origin, or any other characteristic protected by law, arising in Town of Mooresville facilities or at Town of Mooresville sponsored or endorsed functions is unacceptable and will not be tolerated. The Town of Mooresville encourages volunteers to promptly report to the Human Resources Director all information concerning workplace harassment without regard to the identity of the harasser or victim. Appropriate disciplinary action, which may include dismissal, will be taken against any individual found to be engaging in discriminatory behavior, harassment of any type, or found retaliating against persons filing a complaint." The nondiscriminatory statement has provisions for employees and volunteers but does not reference nondiscriminatory practices regarding the public.
- ✓ Some volunteer applications were able to be filled out and submitted online and others were required to be printed out and turned in by person. Applications should have options for filling them out online or in person or by making an alternate request for an accommodation.

### **Noncompliant**

- The volunteer information/application does not include a nondiscrimination statement or a statement about accommodations or modifications for persons with disabilities.
- Evidence of ADA training provided for new employees and volunteers was limited.

### **RECOMMENDATIONS**

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- The Town should add information as to the identity, title, address, phone number and e-mail address of the ADA/504 Coordinator in the new employee orientation and volunteer information.
- The Town should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and Section 504.
- Materials should also be offered on providing accommodations for individuals with disabilities.
- The Town should add information as to the identity, title, address, phone number and email address of the ADA/504 Coordinator to new employee orientation and volunteer information.
- New employees and volunteers should be provided materials and/or training regarding nondiscriminatory practice and the requirements for access to programs, services, and activities of the Town.
- The Town should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and Section 504. Materials could also be offered on providing accommodations for individuals with disabilities.
- Counters and areas that are lowered for access by individuals with disabilities should be maintained and kept clear of display and work items.

## **Planning, Budgeting, Implementation and Strategies for Ongoing Compliance**

There is not a specific requirement in the ADA or Section 504 for planning and budgeting for barrier removal. There is a requirement for public entities to incorporate a projected schedule for barrier removal into the transition/barrier removal plan. A Town that is budgeting for ADA/504 barrier removal and to improve access to programs, services and activities shows intent to implement the barrier removal/transition plan and to enhance access to programs, services, activities, and facilities by persons with disabilities.

The Town is required to provide a projected schedule with estimated dates for barrier removal in the ADA Self-evaluation and Transition Plan. The projected schedule is an estimate or planned date for barrier removal. Projected dates, however, may change due to a variety of factors. Developing an ADA plan and a schedule for implementation and removal of barriers provides clear documentation of the Town's ongoing efforts to remove barriers and to provide access to Town programs, services, and activities.

Implementation of the recommendations in the Self-evaluation will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public. As the Town recognizes that compliance with the ADA is not a "one-time" event and requires strategic planning and an ongoing commitment to provide equal access to its programs, services and activities to maintain and enhance compliance with the requirements of the ADA.

### **FINDINGS**

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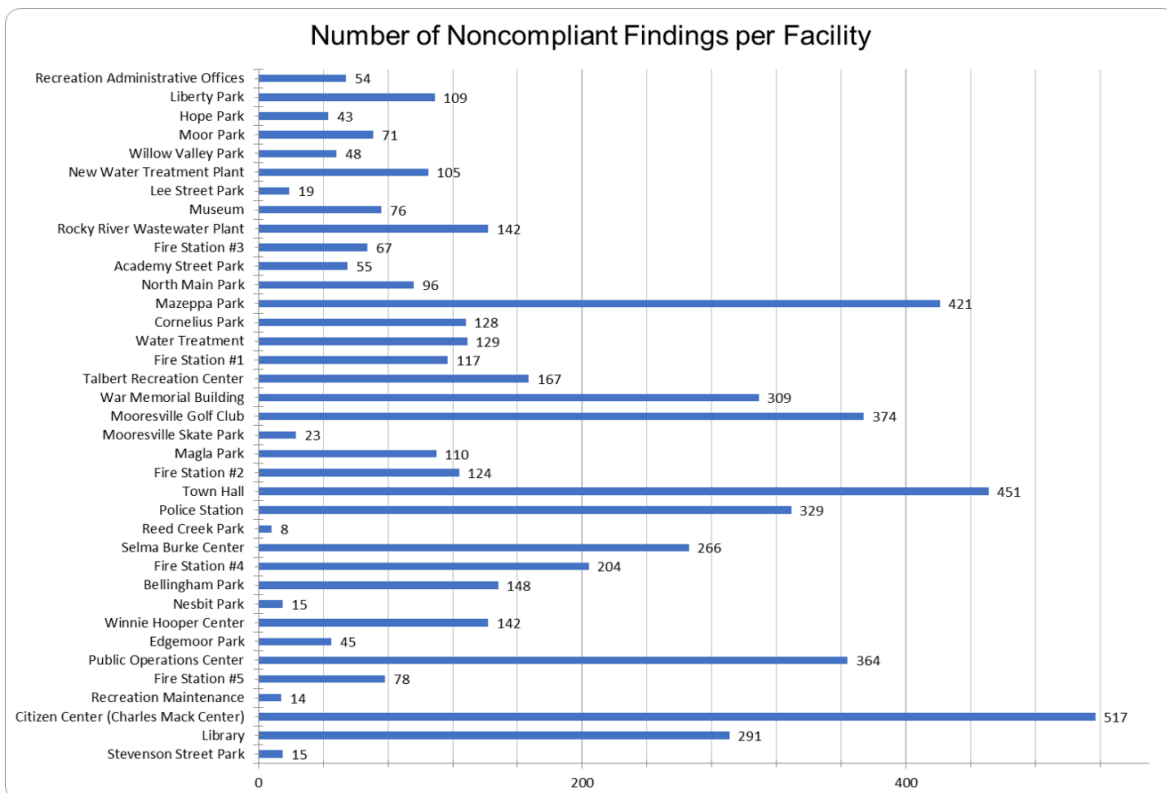
#### **Compliant**

- ✓ The Town has allocated and utilized funds to remove barriers that may deny access for persons with disabilities regarding facilities, programs, services and activities using a variety of funding sources.
- ✓ The Town is currently working with a committee to apply Community Development Block Grant (CDBG) funding for the removal of qualified ADA barriers. The implementation committee has developed worksheets to prioritize barriers and include the information in the DACTrak Accessibility Management Software.

#### **Partial Compliance**

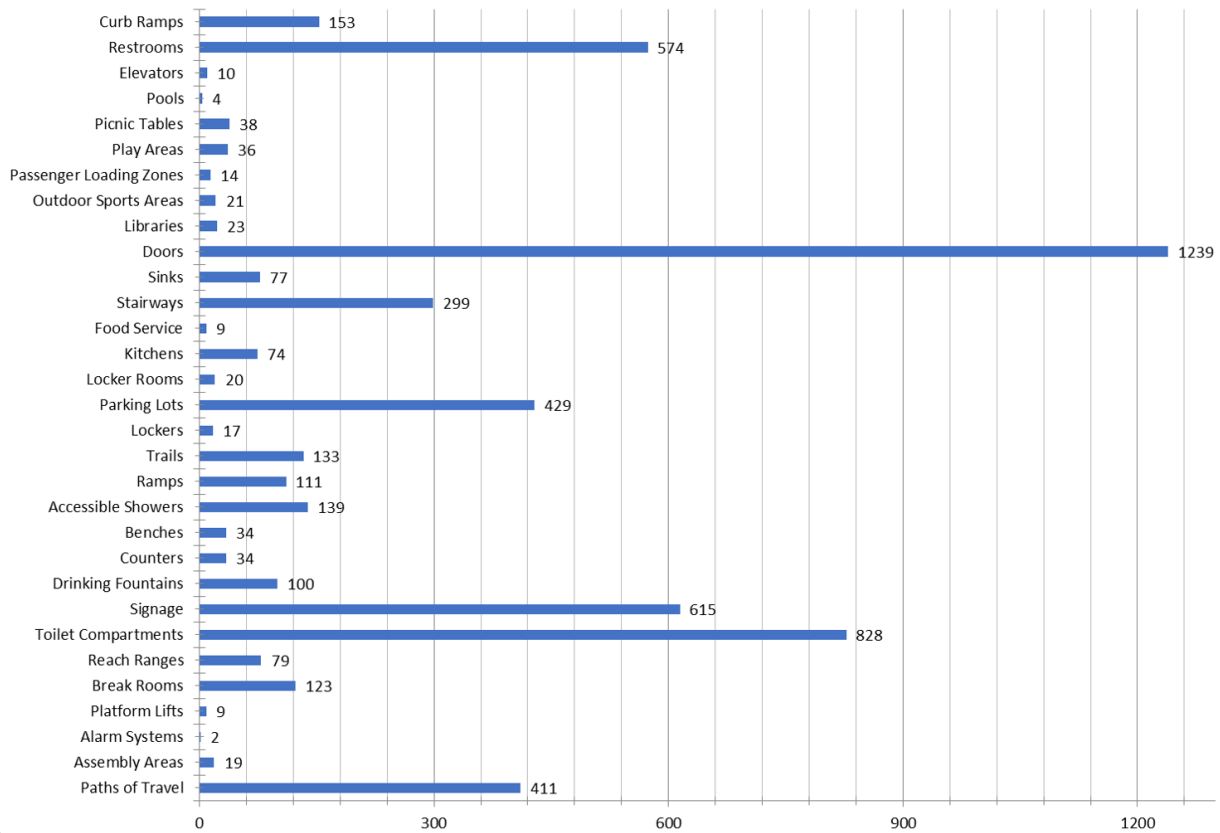
- ✓ The Town demonstrates some efforts to maintain and improve ADA accessibility to provide access to programs, services, activities, and facilities.
- ✓ The Town has engaged in activities such as the establishment of Mayor's Council for Individuals with Disabilities, the Mayor's Diversity & Inclusion Taskforce and the 2012 project with UNC Charlotte entitled "Establishing A Model City for Individuals with Disabilities" with the commitment to provide access to programs, services, and activities of the Town for persons with disabilities.
- ✓ To enhance compliance for persons with disabilities in an expeditious and cost-effective manner, the Town received input from the community and staff. The Town has several methods available for ongoing input to continue to develop, maintain and implement the ADA/504 Self-evaluation and Transition Plan.

- ✓ The Town has received training using an online program called DACTrak that is licensed to the Town to manage, enter estimated dates for barrier removal, implement and document the removal of barriers on an ongoing basis. Following the training in July 2020, designated Town staff were planning to add projected dates for barrier removal in the DACTrak accessibility management program. Some of the factors for assigning additional priorities or a change in priorities include, but are not limited to:
  - Input and access by persons with disabilities
  - Prevalence of use by persons with disabilities
  - Location of programs Townwide
  - Accommodations for persons with disabilities
  - Funding
  - Scheduled and planned facility and construction projects
  - Remodeling and renovations
  - Complaints regarding accessibility
  - Staff and public input
  - Risk management issues
  - Safety issues related to accessibility
  - Changes in budgets
  
- ✓ Multiple reporting formats can be generated using the DACTrak accessibility management software system. Depending upon the type of report selected, photographs, maps, findings, recommendations, estimated costs and other formats are available.
  
- ✓ Bar graphs of noncompliant findings for facilities (by site and by category) and public rights-of-way follow below.

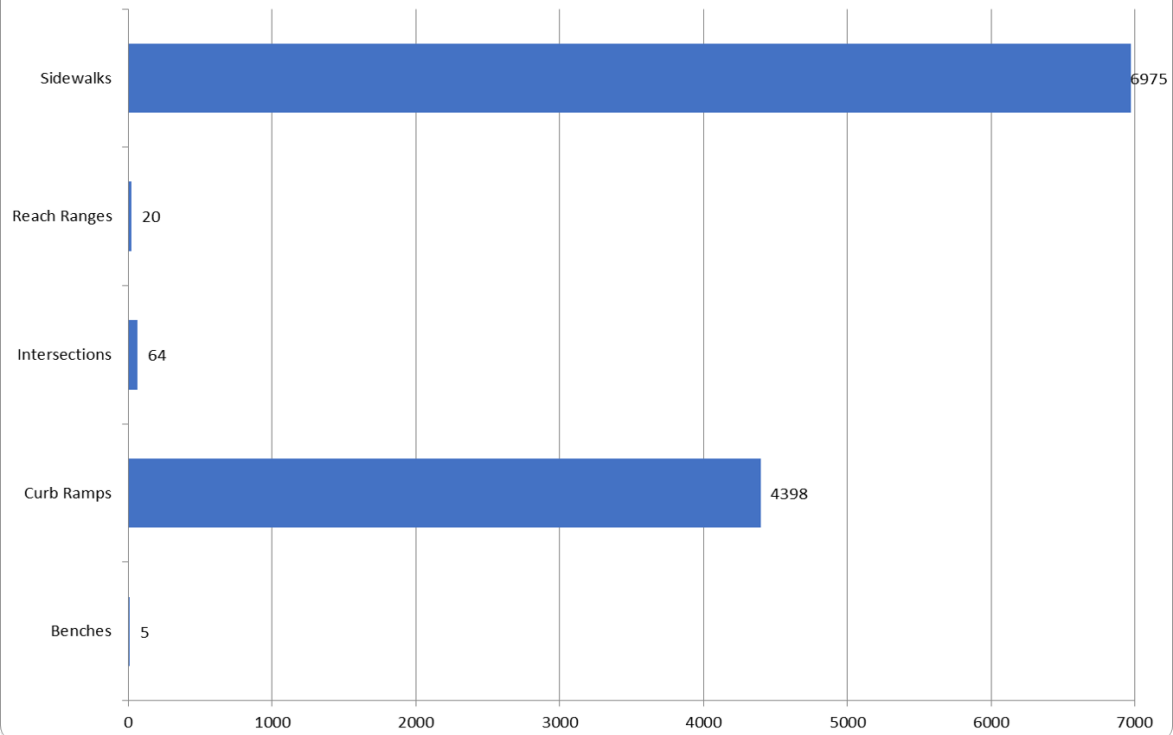




Number of Noncompliant Findings per Category



Public Rights of Way - Noncompliant Findings by Category



## RECOMMENDATIONS

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- It is recommended that the Town formulate an approach and prioritization to be confirmed regarding the overall approach to implementing the accessibility plan. As the plan is a working document and will need regular updates, it is expected that the estimated dates of barrier removal may change.
- The Town should continue to maintain an ongoing barrier removal implementation plan and document the Town's progress, initiatives and funds expended.
- In appropriate cases, it is recommended that the Town contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA) and the North Carolina Building Code. It is important and required that the accessibility barrier removal efforts meet federal (ADA) and North Carolina building accessibility codes and scopes to the code that provides the higher level of accessibility.
- The ADA/504 Coordinator, or designated staff, should be empowered with the authority to make recommendations and monitor the current Town's ADA/504 Self-evaluation and Transition Plan.
- In addition to the removal of structural barriers, departments should consider budgeting for accessibility items, especially in the area of communication and alternate formats.
- Implementation of the recommendations will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

## Conclusion and Summary of Findings and Recommendations

Although the Town of Mooresville has demonstrated a commitment to provide equal access to its programs, services, and activities to maintain and enhance compliance with the requirements of the Americans with Disabilities Act, additional and revised ADA activities are recommended to improve compliance. The Town has attempted to embrace a concept of equal access for all the people it serves.

The findings from the Town's 2019-2020 ADA Self-evaluation and Transition Plan memorializes the Town's previous and current compliance efforts and provides recommendations to improve accessibility. The ADA/504 Self-evaluation and Transition Plan is one component of an overall accessibility road map to improve compliance.

As further evidence of its efforts for compliance with the Americans with Disabilities Act and related accessibility legislation, the Town of Mooresville is currently prioritizing the barriers identified in the Town's ADA/504 Self-evaluation and Transition Plan and is applying the projected (estimated dates) for the removal of barriers that may deny access for persons with disabilities to access programs, services and activities of the Town. The Town is currently evaluating funding sources and developing funding projections for implementation of the ADA self-evaluation and transition plan.

Implementation of the recommendations in the Town of Mooresville ADA/504 Self-evaluation and Transition Plan will continue to require planning, resources, funding, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

A summary of the primary recommendations includes, but are not limited to:

1. **ADA POLICY/POSITION STATEMENT:** It is recommended that the Town develop and adopt an ADA Policy/Position Statement that includes the primary components and requirements for ADA compliance. The ADA Policy/Position Statement should be disseminated throughout all Town departments and training provided to staff regarding the requirements of the ADA and Section 504 of the Rehabilitation Act.
2. **ADA NOTICE OF RIGHTS AFFORDED TO PERSONS WITH DISABILITIES/NONDISCRIMINATION STATEMENT:** The Town should update its notice of rights afforded to persons with disabilities, with a nondiscrimination statement and the identity and contact information of the ADA/504 Coordinator.
3. **POLICY DEVELOPMENT AND UPDATES:** Although the Town is not required to develop a policy for each and every area of access to the Town's programs, services and activities, it is general practice for public entities to develop policies and procedures to ensure compliance with the accessibility requirements and standards.
4. **ADA/504 COORDINATOR:** The identity and the role of the ADA and 504 Coordinator should be published using multiple methodologies to inform staff and members of the public. In addition, training should be provided to Town staff. Due to the required role of the ADA/504 Coordinator, it is important that interdepartmental coordination is enhanced to include project planning, funding and documentation of the barriers removed.
5. **PRIORITIZATION AND ESTIMATED DATES FOR BARRIER REMOVAL:** A process should be developed by departments to update the DACTrak accessibility management software program. Following communication between departments and an analysis of not only currently available funding, but funding that will be needed in the future, the Town should enter the projected dates of barrier removal into the DACTrak software in order to have "estimated dates" of barrier removal. The ADA/504 Self-evaluation and Transition Plan is a fluid, planning document that is prioritized and phased to develop and maintain a plan for the removal of barriers to access programs, services and activities of the Town. Projected and estimated dates may change due to accessibility needs, planned projects, projected projects, funding, complaints, claims, litigation and initiatives of the Town. The Town should determine which existing deviations from the code are "De Minimis" and would have a lower priority and later timelines for barrier removal. For example, the Town should establish what noncompliant findings are considered minimal and "De Minimis", such as changes in elevation in sidewalks. The courts have litigated and provided rulings that have allowed some deviations in a few areas of accessibility.
6. **MAINTENANCE OF ACCESSIBLE FEATURES:** The Town should develop policies and procedures regarding the requirement to maintain accessible features. The policy should include the enforcement of the Town's requirement to maintain accessible features as required by Title II of the ADA in Section 35.133 and should be disseminated to all departments.
7. **GRIEVANCE PROCEDURES AND FORMS:** Grievance or Uniform Compliant Procedures should be made available to members of the public. Staff should be trained regarding the requirements and methods for members of the public to access grievance procedures and forms. In addition, grievances should be tracked to document the date of the grievance, the action taken by the Town (if any) and the resolution of the grievance.

8. **REASONABLE ACCOMMODATIONS:** Statements of accommodation should be provided on public facing documents such as agendas, meeting announcements, public hearings, information about events and activities and on the website. It is recommended that the Town develop a statement of accommodation that is consistent, specifies timeframes for notice and procedures. Town staff should receive training regarding the requirement for making reasonable accommodations or modifications and the benefits of improved accessibility by persons with disabilities regarding programs, services and activities of the Town or sponsored by the Town.
9. **CONSTRUCTION OVERSIGHT:** The Town should consider a more formalized construction oversight process to include accessibility planning, construction, and plan reviews for all construction and remodeling projects. Accessibility requirements should be included, reviewed and approved in all phases of construction including proposal development, construction reviews, post construction reviews and acceptance by the Town.
10. **STAKEHOLDER INPUT AND OUTREACH:** The Town should consider forming, supporting and integrating input from a disability advisory committee. The disability advisory committee would serve as a liaison between stakeholders and the Town to provide input and suggestions regarding access by persons with disabilities. The Town should have representation on the committee and interaction with Town on a regular basis. Additional outreach activities may include pictures of persons with disabilities in publications, information regarding accessibility provisions for Town events and programs, accommodations to increase participation and increased participation of persons with disabilities on committees and advisory boards.
11. **PLANNING AND BUDGETING:** The Town should continue to plan and budget for barrier removal of items that may deny access for persons with disabilities. Interdepartmental communication regarding planned or current construction or remodeling projects should be incorporated into the schedule for barrier removal.

## Appendix A – Grievance Procedures and Forms

Information regarding filing a grievance was found on town website as shown below.

**Americans with Disabilities Act (ADA) Grievance Form** [Sign in to Save Progress](#)

**First Name**  **Last Name**

**Address1**

**City**  **State**  **Zip**

**Phone Number**  **Email Address**

**Reason for filling grievance: Explain below the difficulty encountered (barrier) or other issue(s) preventing participation in program/service/activity**

Receive an email copy of this form.

**Email address**

This field is not part of the form submission.

[Submit](#)

## RISK MANAGEMENT & SAFETY

The Risk & Safety Management Department provides comprehensive Risk and Safety programs that contribute to the safety and well-being of all Town of Mooresville employees, as well as protect the Town's physical and financial resources.

The department provides important services to both Town employees and citizens through the administration of Commercial Liability Insurance, Workers' Compensation Claims and Processing, Citizen Claims, Contract Reviews, Safety Management Systems, Loss Control, Hazard Mitigation, Industrial Hygiene, Internal Risk and Safety Auditing, and the American's with Disabilities Act (ADA) services for the public. Risk Management exists primarily to ensure that the Town of Mooresville can continue to provide excellent services to our citizens by ensuring adequate insurance coverages, compliance with regulatory agencies, and that our employees are trained, empowered, and equipped to conduct their work safely and professionally every day.

If you have been involved in an accident involving Town property, Town employees, or if you have incurred losses for which you feel the Town is responsible, please complete the [Citizen Claim Form](#). You can do so by clicking the link, or by contacting the Risk & Safety Department at 704-799-4183.

If you wish to fill out a grievance for an ADA claim please complete the [ADA Grievance Form](#). If you have additional questions please contact the ADA Coordinator at 704-662-3524.

## Appendix B – Survey Results

### Public Input Surveys

Twenty-eight (28) online surveys were received from the public. The timeframe for public response was from November 11, 2019 to March 13, 2020.

Note: Names and personally identifying information have been redacted.

#### **What role most adequately describes your association with the Town of Mooresville and the representation you are providing?**

#	Answer	Percentage
1	Member of the public with a disability	31.3%
2	Member of the public without a disability	37.5%
3	Relative or caregiver of a person with a disability	25.0%
4	Community organization - Please list the name of the organization:	0.0%
5	Town Volunteer	6.3%
	Total	16

#### **Do you participate in programs, services, or activities offered by the Town of Mooresville?**

#	Answer	Percentage
1	No	56.3%
2	Yes - Please list:	37.5%
3	Not applicable	6.3%
	Total	16

Yes - Please list:

Recreation

CERT, Talbert Recreation Center

Senior Center. Library. Town Meeting

Library activities

Bible Study at Winnie Hooper; downtown parades; activities at War Memorial & public library

Race City, Movies on Main, Town Board Meeting, Food Truck Fest., parades

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

#	Answer	Percentage
1	No - I do not know who to contact	80.0%
2	Yes - Please list who you would contact:	13.3%
3	Not applicable	6.7%
	Total	15

Yes - Please list who you would contact:

Normally I'd reach out to contacts at each site. Otherwise I would call the town's general phone number

Town Hall

**Have you ever requested an accommodation for a disability from the Town?**

#	Answer	Percentage
1	No	100.0%
2	Yes - Please describe the request:	0.0%
3	Not applicable	0.0%
	Total	13

**Was your accommodation provided?**

#	Answer	Percentage
1	No	100.0%
2	Yes	0.0%
3	Yes, but I was unsatisfied with how the accommodation was provided - Please elaborate:	0.0%
	Total	6

**Is the attitude of Town of Mooresville staff towards persons with disabilities generally helpful, supportive, positive, and proactive in solving accessibility issues?**

#	Answer	Percentage
1	No	0.0%
2	Yes	50.0%
3	Somewhat	16.7%
4	Don't know	33.3%
	Total	12

**Are you aware of any specific concerns, complaints, or problems regarding access for persons with disabilities to any of the programs, services, or activities provided by the Town of Mooresville?**

#	Answer	Percentage
1	No	66.7%
2	Yes - Please describe:	33.3%
	Total	12

Yes - Please describe:

The ramp at the rear parking is too steep, lacks handrails and has no resting pad along its length. Also the steps at the side of town hall require handrails. Too many risers per code. The ramps between us the pedestrian bump outs on Main St accumulate water during rains that can be inches deep making them impassable for persons who cannot jump across the water. They also accumulate mud and detritus.



I am aware of several people who have visited the Mooresville Public Library with a visual impairment but they are unable to access the computer because they are not equipped with an appropriate visual aid or screen reading software.

Not many sidewalks

No way to get from my house on North main to the park and baseball fields on North main Street. No public pathway no sidewalks ect.

**Do you know who the designated ADA Coordinator is for the Town of Mooresville?**

#	Answer	Percentage
1	No	58.3%
2	No, I have not had a need or reason to seek out this person.	33.3%
3	Yes - Please provide the name:	8.3%
	Total	12

**What do you feel should be the Town of Mooresville's highest priority to improve accessibility for persons with disabilities?**

Sidewalks and entrances to downtown buildings

I think this question is too broad sweeping and will be unique for each disabled person.

No comment

I would say making sure that we have adequate sidewalks for safe travel, appropriate street crossings with noise-activated signals, and appropriate assistive technology for residents of all disabilities at all town applicable facilities.

General accessibility for those in wheelchairs. Ramps, elevators, etc.

Enforce unlawful parking in handicap spaces. Provide more handicap spaces

Place to walk with my service dog to the park on North main other than in the road or up on someone's property. Have been blocked from email by both town and state about sidewalks. Neither want to accept responsibility for the road/easement. Have cc both of their responses. Or how about improving the roads because it hurts to drive across town hitting so many potholes and bumps..... disabled vet with physical combat injuries.

Sidewalks!!!!!!

Pool access

Continuing to improve sidewalk accessibility and maintenance to make it easier for those with disabilities to get out and about.

**Thank you for completing this survey. The information collected will assist the Town in improving the accessibility of programs offered to the people it serves. If you have any questions regarding the Town of Mooresville's ADA Self-evaluation and Transition Plan or are aware of any specific physical or programmatic barriers, please let us know of any suggestions or comments.**

Thanks to the Talbert Rec staff for assisting my recovery from cancer treatment.

Just wish the town would spend money on sidewalks or improving roads instead of quarter of a million dollars for 7 flowerbeds next to crosswalks that half of pedestrians don't use.... SMH

## **Town of Mooresville ADA Staff Input Survey**

Sixty-seven (67) online surveys were received from Town staff. The timeframe for Town staff responses was from July 2, 2020 to September 3, 2020.

Note: Names and personally identifying information have been redacted.

### **What description most adequately describes your role with the Town of Mooresville?**

#	Answer	%	Count
1	I am responsible for administering a program, service or activity	35.09%	20
2	My role is to provide support to a Town program, service, or activity	21.05%	12
3	I am a Department Head, Manager, or the Town Manager	43.86%	25
	Total	100%	57

**Which department do you primarily work for?** (Department and number of responses by department are indicated.)

Engineering
Facilities
Finance (4 respondents)
Fire Department (8 respondents)
Fleet
Human Resources
Library (2 respondents)
Parks and Recreation (11 respondents)
Planning and Community Development (3 respondents)
Police (9 respondents)
Public Information
Public Services (2 respondents)
Public Utilities
Public Works
Risk Management (2 respondents)
Sanitation
Stormwater
Technology & Innovation (2 respondents)
Town Board
Water Treatment / Utilities / Sewer Maintenance (5 respondents)

### **At which sites(s) are the programs and services that your department provides located?**

#	Answer	%	Count
4	All locations	51.85%	28
5	Only at the following locations: (please list the locations)	48.15%	26
	Total	100%	54

Only at the following locations: (please list the locations)

Public Services Operations Center, Fleet Building, Water Treatment Plants, Wastewater Treatment Plant

750 W. Iredell Avenue

Rocky River Wastewater treatment plant

Town Hall

Fire Stations 1, 2, 3, 4, 5 and Fire Training Center

54 pump stations and provide water and sewer for 15,000 accounts throughout town

Town Hall

fleet

Fire Stations 1, 2, 3, 4, 5 and FTC.

Selma Burke Center Talbert Recreation Center War Memorial Center Winnie Hooper Center

Town parks Bellingham, CRP, North Main, Magla, Mazeppa, Edgemoor Recreation Centers-Talbert, War Memorial, Selma MGSD Gyms- EMIS, MIS, RRE

War Memorial

Town Hall

Water Treatment Facilities

304 South Main Street

Police Department and Annex Office locations

750 W. Iredell Ave

Town Hall

Town Hall Warehouse at Operations Center

Selma Burke, Winnie Hooper, War Memorial

Town Hall

water treatment plants (2), wastewater treatment plant, operations center

WE SUPPORT ALL DEPARTMENTS

Mooresville Golf Club

**Does your role require regular interaction with the public?**

#	Answer	%	Count
1	Yes	80.00%	44
2	No	20.00%	11
	Total	100%	55

**Do you know who the designated ADA Coordinator is for the Town of Mooresville?**

#	Answer	%	Count
1	Yes - Please provide the name:	51.85%	28
2	No	48.15%	26
	Total	100%	54

Yes - Please provide the name:

Chris Russell (26 responses)

Caitlyn McKenzie

Risk Management

**Have you received training or information regarding the requirements of the Americans with Disabilities Act?**

#	Answer	%	Count
1	Yes, I have received training only	1.85%	1
2	Yes, I have received information only	37.04%	20
3	Yes, I have received both training and information	27.78%	15
4	No	33.33%	18
	Total	100%	54

**Have you received training on providing services or activities for persons with disabilities?**

#	Answer	%	Count
1	Yes	31.48%	17
2	No	68.52%	37
	Total	100%	54

**Would ADA related training or technical assistance services in these areas be helpful for you or other department staff? (check all that apply):**

#	Answer	%	Count
1	Developing policies and procedures	14.72%	24
2	Assisting persons with disabilities	19.02%	31
3	Legal requirements	24.54%	40
4	Responding to requests for accommodations (i.e. American Sign Language interpreters, assisted listening devices, etc.)	18.40%	30
5	Providing materials in alternate formats (i.e. Braille, audio recordings, etc.)	11.66%	19
6	American Sign Language (ASL) training	6.75%	11
7	Other - Please list:	1.23%	2
8	None	3.68%	6
	Total	100%	163

Other - Please list:

As a public library we are usually on top of ADA compliance but a refresher would be excellent.  
development standards for APA (ramp slope, parking, other built features)

**Have you received, or are you aware of any specific concerns, complaints or problems regarding access for persons with disabilities to any of the programs, services, activities or facilities provided by the Town of Mooresville?**

#	Answer	%	Count
1	Yes - Please describe:	25.49%	13
2	No	74.51%	38
	Total	100%	51

Yes - Please describe:

Golf Course

[name redacted for privacy] - Has required several accommodations during her employment and all have been dealt with by coordinating with Chris, Tiffany, or other appropriate staff.

We have had citizens in wheel chairs report the need for accessible ramp at locations around Town location and distance of handicapped parking at the golf course.

I know some folks have wanted access upstairs at Talbert but we only have stairs, no elevator.

no restroom on site that is ADA compatible, no ADA entrance to the pool

Many of our playgrounds are non-compliant. Talbert Recreation center has no access to the upstairs (gym) area

Although Parks and Recreation no longer manages Moor Park, complaints have been made about ADA parking. Beyond that, just general issues related to wheelchair accessibility and some facilities, lack of elevator at Talbert, reasonable modifications for program participants and ADA access to the swimming pool.

Some accessible ramp issues that were resolved when received

Golf Course Clubhouse Accessible Parking location

We have installed automated door closers/openers as a result of them being needed and omitted from locations

We get a lot of complaints that the way from the parking lots is too long. Also the steps at the Clubhouse are too steep.

**In your opinion, what do you feel should be the highest priority of the Town of Mooresville to improve accessibility for persons with disabilities?**

I think we really need to focus on training our managers and employees regarding the ADA and then we also need to address some of the more immediate ADA concerns with regard to our facilities.

Provide an alarm system in your accessible toilets. Staff can be notified and help somebody in an emergency.

Access to our indoor and outdoor recreational facilities if not already provided and the possibility of someone inclusionary type playground equipment at more sites.

To have our streets and sidewalks up to the current ADA standards

Ramps to enter the building. Making sure spaces inside the building are accessible, such as aisles.

Have properly trained town employees that can accommodate individuals with disabilities. Enforce violations of handicap parking to its fullest extent.

Use the recommendations from the hired consultant

Just to be aware.

Training

Training for employees who regularly interact with persons with disabilities.

Continue to follow ADA requirements and assist citizens within our community.

i believe our sidewalks and crossing could use some work

training the employees on what or what not to do. putting policy in place.

public facing accommodations

Training

are there provisions for "reasonable accommodation" at all town facilities?

Entry ways

More crosswalks

Make sure each park/facility is accessible for everyone

pool to be ADA compatible

Ensuring town facilities are accessible for all.

Realizing the daily challenges that someone with disabilities face when going out into public.

Complete the inventory, assessment and prioritized action plan, and share it with staff.

An audit of all Town properties

Accommodations for those with hearing and visual impairments

Unknown

I don't see any issues at this time

Removal of any physical barriers, especially for children at the library and parks

Unsure

Awareness for facilities manager

Identify and supply reasonable accommodations for employees to perform their job. Also, proper access to Town Facilities.

Complete Transition Plan. Training. Police response. Sticking to growth and improvement per plan as feasible.

Educating employees on what we can do with what we already have. A close second is ensuring access to facilities is ADA compliant. This is a huge undertaking so educating employees on how to effectively manage what we have is the most urgent and allows us time to start addressing ADA site issues.

Facility use.

Modification of points of entry on public buildings

Sidewalks

Facilities - restrooms, entrances, make sure all amenities are accessible for all.

I don't know. The vast majority of the facilities I run are not open to the public.

Continue to ensure all activities and programs offer an ADA option so no citizen or employee is left out.

Making sure access to public facilities is compliant

More handicap parking or closer parking lot

Make sure that all town buildings and properties are ADA accessible

**Is there a policy in place for responding to requests from the general public for accommodations to the program allowing persons with disabilities to participate?**

#	Answer	%	Count
1	Yes	15.38%	8
2	No	1.92%	1
3	Don't know	73.08%	38
4	Not applicable	9.62%	5
	Total	100%	52

**How much notice is required to provide an accommodation request?**

#	Answer	%	Count
1	24 hours or less (not including weekends/holidays)	3.85%	2
2	1-4 workdays	0.00%	0
3	More than 1 week	1.92%	1
4	Don't know - have not completed such a request	76.92%	40
5	Not applicable	11.54%	6
6	1-3 workdays	5.77%	3
	Total	100%	52

**Does the program charge an additional fee for modifying the program for a person with disabilities that is not charged for a person without a disability?**

#	Answer	%	Count
1	Yes - Please describe:	0.00%	0
2	No	27.45%	14
3	Don't know	50.98%	26
4	Not applicable	21.57%	11
	Total	100%	51

**What types of accommodations have been requested?**

Automatic doors, Working from home, alternative phone system, restroom access modifications
Don't know
The police department receives frequent requests to enforce violations of handicapped parking.
don't know
None in our department
NA
I do not know.
Unknown
n/a
seating and transportation for adults with physical limitations
I dont know
no specific requests that i am aware of
No idea

restrooms, pool entrances, behavioral issues in children

None to my knowledge

None that I am aware of

Unknown

?

None that I am aware of

One-on-one settings instead of group settings, settings where kids are not in the dark (movies, etc.), medication administered during a program, allowing a kid to play in a lower age division in sports leagues due to mental and physical delays

Not sure

Allowing a child to participate in a program designed for a younger age- based on the child cognitive development.

Wheelchair access, Closer and more parking, signage

None. our facilities are treatment, pumping and water storage facilities and not open to the general public.

Door closers/openers, restroom stalls

Handicap Golf Carts

None

**Does the department track accommodation requests?**

#	Answer	%	Count
1	Yes	9.80%	5
2	No	19.61%	10
3	Don't know	56.86%	29
4	Not applicable	13.73%	7
	Total	100%	51

**Does the department offer any programs, services, activities, or events specifically for persons with disabilities?**

#	Answer	%	Count
1	Yes - Please describe:	36.00%	18
2	No	24.00%	12
3	Don't know	26.00%	13
4	Not applicable	14.00%	7
	Total	100%	50

Yes - Please describe:

Backyard sanitation and recycling pickup

Create & Learn- programs for adults with disabilities. Sensory storytimes for children.

Smoke detectors for hearing impaired

The fire department holds the yearly 'Camp Blaze' and has an Explorer Post that allows citizens to participate in. We also participate in MDA 'fill the Boot'

Smoke Detector installations for the hearing impaired.

Backyard garbage pickup



Cooking classes for individuals with disabilities

I know Parks and Recreation offers Special Olympics, not under Athletics though. Our youth and adult leagues are open to anyone that registers

Special Olympics opportunities

Special Olympics; general recreation programming

We offer resources for the hearing impaired and will hire a ASL interpreter if it is ever requested.

Law Enforcement services

All programs that we offer are open to everyone.

Language Line for translation

Even though it is the long-term goal to include all participants into all programs, we currently have two part-time staff members who specialize in therapeutic recreation. These staff integrate with Special Olympics and provide unique programming for those with mental and physical challenges. In addition, we partner with a local soccer agency to provide a soccer program to this same population.

Therapeutic recreation activities & special Olympics

Programming through special olympics and Therapeutic adaptability for all programs

Software for employees (Library)

**Is a "Notice under the Americans with Disabilities Act" or a nondiscrimination statement available and posted for program participants who may be persons with disabilities?**

#	Answer	%	Count
1	Yes - Please describe the locations where it is available:	20.00%	10
2	No	16.00%	8
3	Don't know	48.00%	24
4	Not applicable	16.00%	8
	Total	100%	50

Yes - Please describe the locations where it is available:

In each fire station

Next to the mailboxes in Station 3.

near time clock

HR & public meeting notices

Bulletin board

Hallway

Meeting agendas and advertisements

Hallway leading to the truck bay

All Town Offices/Facilities

**Does the nondiscrimination statement include information about the Town 's ADA coordinator and how to contact them or file a grievance?**

#	Answer	%	Count
1	Yes	4.00%	2
2	No	6.00%	3
3	Don't know	72.00%	36
4	Not applicable	18.00%	9
	Total	100%	50

**Are you familiar with the Town 's grievance or complaint procedures for persons with disabilities?**

#	Answer	%	Count
1	Yes	18.00%	9
2	No	60.00%	30
3	Don't know	18.00%	9
4	Not applicable	4.00%	2
	Total	100%	50

**Are grievances or complaint procedures available?**

#	Answer	%	Count
1	Yes, for employees only	6.12%	3
2	Yes, for the public only	0.00%	0
3	Yes, for employees and the public	38.78%	19
4	No	0.00%	0
5	Don't know	55.10%	27
	Total	100%	49

**If participants are required to fill out a form to participate in department programs, how is it made available?**

#	Answer	%	Count
1	Both online and by hard copy	39.13%	18
2	Online only	10.87%	5
3	Hard copy only	10.87%	5
4	Not applicable	39.13%	18
	Total	100%	46

**What types of accessible alternate formats does the department make available for persons with disabilities when requested? (check all that apply):**

#	Answer	%	Count
1	Audio recording (cassette or digital)	6.06%	4
2	Braille	4.55%	3
3	Large print	4.55%	3
4	Electronic copy (for use with a screen reader)	6.06%	4
5	American Sign Language Interpreters	9.09%	6
6	Other media type - Please list:	4.55%	3
7	The department does not provide any alternative formats	12.12%	8
8	Don't know	42.42%	28
9	Assistive listening devices	3.03%	2
10	Electronic/computer-based document readers	3.03%	2
11	Enlarged keyboards	1.52%	1
12	Communication access real-time translation (CART)	1.52%	1
13	Video Remote Interpreting (VRI)	1.52%	1
	Total	100%	66

Other media type - Please list:

meetings are streamed

Forms printed in Spanish

I am not aware that any of these have been specifically requested but each one of them could be. Access to as many of these as possible will be beneficial going forward.

**Does the department periodically include images of persons with disabilities in their printed materials and publications?**

#	Answer	%	Count
1	Yes, images of persons with disabilities are included	19.57%	9
2	No, images of persons with disabilities are not included	23.91%	11
3	Not applicable	56.52%	26
	Total	100%	46

**Does the department require that public meetings and conferences be held in accessible locations?**

#	Answer	%	Count
1	Yes	50.00%	23
2	No	6.52%	3
3	Don't know	43.48%	20
	Total	100%	46

**Are assistive listening devices or systems available for public meetings?**

#	Answer	%	Count
1	Yes - Please include how many are available and the capacity of seating in the combined rooms utilized for public meetings:	2.17%	1
2	No	15.22%	7
3	Don't know	82.61%	38
	Total	100%	46

Yes - Please include how many are available and the capacity of seating in the combined rooms utilized for public meetings:

Provided by PIO

**Does the department have a policy for service animals?**

#	Answer	%	Count
1	Yes	18.75%	9
2	No	20.83%	10
3	Don't know	60.42%	29
	Total	100%	48

**Are you aware of any persons with disabilities currently serving on any of the department advisory boards or committees?**

#	Answer	%	Count
1	Yes	4.17%	2
2	No	22.92%	11
3	Not applicable	16.67%	8
4	Don't know	56.25%	27
	Total	100%	48

**What tools does the department use to communicate by phone with people who have speech or hearing difficulties?**

#	Answer	%	Count
1	Text-telephone (TTY or TDD)	8.33%	4
2	Third-party relay system where a trained operator facilitates a conversation between staff and the caller	4.17%	2
3	Other - Please list:	6.25%	3
4	None	25.00%	12
5	Don't know	56.25%	27
	Total	100%	48

Other - Please list:

Email

System was being researched and implemented by Finance for town wide use

Most of the interaction we have with folks in Athletics (either volunteer coaches/parents) we communicate via email or phone

**Does the department publish the Town 's text telephone relay service in all materials where a phone number is listed?**

#	Answer	%	Count
1	Yes	4.17%	2
2	No	18.75%	9
3	Don't know	77.08%	37
	Total	100%	48

**If a third-party relay system is used, does department staff receive training on how to place a relay call as well as receive one?**

#	Answer	%	Count
1	Yes - Please describe the training:	2.08%	1
2	No	20.83%	10
3	Don't know	77.08%	37
	Total	100%	48

Yes - Please describe the training:

TTY/TDD Training

**On the Town website, is there information about the accessibility of its programs, services, and activities (Parking, bathrooms, assistive listening devices, Sign Language interpreters, Braille, etc.)?**

#	Answer	%	Count
1	Yes - Please briefly describe:	0.00%	0
2	No	100.00%	5
	Total	100%	5

**Does the website home page include easily located information, including a telephone number and email address, for use in reporting website accessibility problems and requesting accessible services and information?**

#	Answer	%	Count
1	Yes	38.30%	18
2	No	4.26%	2
3	Don't know	57.45%	27
	Total	100%	47

**Does the department provide transportation to volunteers, visitors, or students?**

#	Answer	%	Count
1	Yes - Please describe:	12.77%	6
2	No	31.91%	15
3	Don't know	29.79%	14
4	Not applicable	25.53%	12
	Total	100%	47

Yes - Please describe:

After school and summer camp programs; future day trips

We accommodate when possible.

We pick kids up from school to bring them to our After-School Program. We also provide transportation for field trips during summer camps.

For program participants enrolled in after school or summer programs

Children

We can offer to pick them up so they do not have to walk

**Does the department have procedures to make transportation accessible to persons who have visual, hearing, mobility and learning disabilities?**

#	Answer	%	Count
1	Yes - Please describe the procedures:	8.70%	4
2	No	17.39%	8
3	Don't know	39.13%	18
4	Not applicable	34.78%	16
	Total	100%	46

Yes - Please describe the procedures:

Vans can provide for some accessibility issues, but possibly not all.

We provide transportation when needed and possible.

We own a bus that has a lift to accommodate folks in a wheel chair. The Mooresville Main bus route also provides transportation for those who can't drive whether it be special needs or lack of car.

Solo Rider Golf Cart for our golfers with disabilities

**Does the department provide facility tours or organize trips for members of the public?**

#	Answer	%	Count
1	Yes - Please list the tours and trips offered:	45.65%	21
2	No	28.26%	13
3	Don't know	17.39%	8
4	Not applicable	8.70%	4
	Total	100%	46

Yes - Please list the tours and trips offered:

All Public Services locations provide tours to the public such as Citizens Academies, Schools, Boy Scouts, and etc.

We will give a tour of the facility during the citizen academy program.

School classes

Citizens Academy

Fire Education Tours

citizens academy and touch a truck events

Fire station tours

Fire Education and Citizens Academy

Citizens Academy

In the past we've offered tours of the water treatment facilities

Schools Civic Groups Individuals

Building tours and ride along's

Department tours

We provide tours of our facility under non-pandemic circumstances.

Citizens Academy

Departmental Tours offered to the public

Trips for active adults are in the planning stages now. These trips may include shopping trips, Kannapolis Intimidators games, leaf viewing in the mountains, Billy Graham Library and others.

Children

Water and Wastewater plants may be toured (limited accessability due to general safety, equipment, etc) upon request from school groups. Also annual citizen's academy set up by the Town.

**Is the evacuation route or instructions posted in a visible and accessible area of each floor in all facilities used by the department?**

#	Answer	%	Count
1	Yes	82.61%	38
2	No	2.17%	1
3	Don't know	15.22%	7
	Total	100%	46

**Do the emergency procedures include instructions for persons with disabilities?**

#	Answer	%	Count
1	Yes	19.57%	9
2	No	32.61%	15
3	Don't know	47.83%	22
	Total	100%	46

**Does the department host any public special events on public property?**

#	Answer	%	Count
1	Yes - Please describe:	52.17%	24
2	No	21.74%	10
3	Don't know	19.57%	9
4	Not applicable	6.52%	3
	Total	100%	46

Yes - Please describe:

Citizens academy

Programs

Camp Blaze, Explorer Post Events, Cooking on parade day, Fire Station tours, Citizens Academy.

citizens academy and touch a truck events

citizens academy and Camp Blaze

Sports and camps located at the various parks

I know our parks have hosted big Town events such as Easter and Christmas. Not sure if that is what you are asking

voting, blood donations,

The Community Clean Up event where we provide dumpsters and pick up unwanted items from the streets

Festivals Programs

Numerous community events

training classes

We host safety fairs at numerous public locations throughout the year.

public meetings, various input sessions

Citizens Academy and Camp Blaze

Community events and occasional classes

Easter Eggstravaganza, outdoor concerts, farmers market, sports tournaments and more

Public meetings for projects

Special Events in Parks

Have hosted Christmas Classic, Pumpkin Run, Lobster Fest, etc.

**Does the department have staff notify vendors and third-party entities of obligations to facilitate participation of persons with disabilities in special events or private events held on public property?**

#	Answer	%	Count
1	Yes - Please describe how this is done:	4.44%	2
2	No	28.89%	13
3	Don't know	66.67%	30
	Total	100%	45

Yes - Please describe how this is done:

We have a third party vendor form, but I am not sure of the exact language if it addresses this or not.

There is no formal process other than communicating to vendors and service providers that the activity should be accessible to all parties. In the case of contracted programs, we may suggest to the service provider not to use the upstairs mezzanine at Talbert but host the program on the gym floor instead for example.

**Are there policies and procedures for selling tickets and assigning seating for persons with disabilities?**

#	Answer	%	Count
1	Yes - Please describe:	2.22%	1
2	No	8.89%	4
3	Don't know	44.44%	20
4	Not applicable	44.44%	20
	Total	100%	45

Yes - Please describe: - Text

Yes we make accommodations for wheel chairs, service dogs etc..

**Are department staff informed of the department's obligations and policies that enables persons with disabilities to participate in the program?**

#	Answer	%	Count
1	Yes - Describe how department staff are informed:	13.33%	6
2	No	11.11%	5
3	Don't know	40.00%	18
4	Not applicable	35.56%	16
	Total	100%	45

Yes - Describe how department staff are informed:

Town's Orientation?

In programs preparation training

NC Justice Academy Annual Training



There have been many discussion among staff and supervisors to plan every program with then intent to serve all citizens. We all know it's expected of each program but there is no formal policy in place.

Informed at staff meetings & Stated in staffing resource information

**Are you aware of any areas or elements of the facilities that the department utilizes which are not accessible to persons with disabilities?**

#	Answer	%	Count
1	Yes - Please describe:	22.22%	10
2	No	62.22%	28
3	Not applicable	15.56%	7
	Total	100%	45

Yes - Please describe:

mezzanine in Ops Center and Fleet Building

some of the library shelving may be limited

upstairs area

Upstairs fitness room and dance room at Talbert (no elevator access)

restrooms, pool entrance/exit

There are many stairs at a water treatment facility

Pool

Talbert recreation gym, Playgrounds

Upstairs mezzanine at Talbert (no elevator or lift chair), Winnie Hooper Center is too narrow in many cases to accommodate wheelchairs, Moor Park (owned by the Town but not used) has inadequate ADA parking

Concessions at Talbert,

**Are there any procedures in place for monitoring and/or maintaining accessible features (i.e. adjusting door pressure, repainting accessible parking spaces, repairing uneven curb cuts and sidewalks, trimming trees and hedges encroaching into a path of travel, etc.)?**

#	Answer	%	Count
1	Yes - Please describe:	15.56%	7
2	No	20.00%	9
3	Don't know	64.44%	29
	Total	100%	45

Yes - Please describe:

When reported these issues will be addressed.

We monitor our facility to make sure signs/parking spots are visible. Landscaping is kept tidy.

We trim tree limbs hanging over walking trails and parking areas.

Yes we have expanded handicapped parking and adjusted doors to allow easier opening.

Facilities Maintenance

If we see issues that need to be repaired or added, we contact the Town's building and grounds department.

**Does the Town have a facility use or lease agreement?**

#	Answer	%	Count
1	Yes	26.67%	12
2	No	0.00%	0
3	Not applicable	73.33%	33
	Total	100%	45

**Does the department rent or lease facilities or space to individuals, groups or organizations?**

#	Answer	%	Count
1	Yes - Please list:	31.11%	14
2	No	31.11%	14
3	Not applicable	37.78%	17
	Total	100%	45

Yes - Please list:

non-profit groups

Facility rentals for classes, camps, and programs

We rent both indoor spaces (gyms, rooms, dance studios) and outdoor spaces such as baseball fields or soccer fields

room rental, gym rental, pool rental

Multiple spaces and groups

picnic shelters, rec center space

picnic shelters, turf fields

Charles Mack Citizens Center, Any/all of the Town Parks can be rented for parties/events.

Several locations and departments. War Memorial, Selma Burke Center, Talbert, CMCC, Winnie Hooper, parks

All athletic fields, picnic shelters, gymnasiums and meeting rooms may be rented by the public.

Recreation centers are rented for private use

The banquet room is rented out throughout the year.

**Do you have input or involvement with design and construction activities for new or altered space?**

#	Answer	%	Count
1	Yes - Please elaborate:	26.67%	12
2	No	48.89%	22
3	Not applicable	24.44%	11
	Total	100%	45

Yes - Please elaborate:

Members of Public Services staff take part in the design and construction process.

We will meet with the Facilities Director during design of a new space

fleet building expansion

site plan review

I am usually involved in discussion for new construction projects and am allowed to submit input. Examples: Selma Burke renovation, War Memorial visioning project, Liberty Park Phase II, Cornelius Road Park Phase II

Engineering Director so I am involved in all construction

New police station

**Are there procedures or standards in place which ensure accessibility compliance and best practices are incorporated into design and construction activities?**

#	Answer	%	Count
1	Yes - please elaborate:	28.89%	13
2	No	6.67%	3
3	Don't know	53.33%	24
4	Not applicable	11.11%	5
	Total	100%	45

Yes - please elaborate:

ordinance guidance

We check against current ADA compliance issues

Facilities and Risk Management

Our department has accessibility ramps in front of the building.

Risk Management and Facility Maintenance Personnel

Working to establish but incomplete

All local building codes are honored and all new construction (or renovations) pay close attention to ADA requirements and build those into construction plans.

Land Development Standards and Zoning Ordinance

ADA compliance is written into all design services contracts

ADA is a component of the building code and review of approved building plans

**Is there a budget for improving accessibility for facilities?**

#	Answer	%	Count
1	Yes - Please describe:	15.56%	7
2	No	6.67%	3
3	Don't know	66.67%	30
4	Not applicable	11.11%	5
	Total	100%	45

Yes - Please describe:

There are different ways of improving the facilities located in the budgets.

Facilities and Construction

\$150,000 in FY 2021 for ADA Transition Plan

FY2021 has \$150K for Town wide improvement

Some specific items are included in the budget for the pool (pool house flooring, new pool house drain system, ADA lift chair for pool). There is not a specific line item for improving accessibility but dollars can be budgeted each year to address pressing issues.

\$150,000 per year starting this year. That number may increase next year.

**Is there a policy in place for other power-driven mobility devices (OPDMD)?**

#	Answer	%	Count
1	Yes - Please explain:	2.22%	1
2	No	8.89%	4
3	Don't know	71.11%	32
4	Not applicable	17.78%	8
	Total	100%	45

Yes - Please explain:

Have a handicap ramp for all mobility devices to enter the second level at the Clubhouse.

**Do you have responsibility for creating web page content?**

#	Answer	%	Count
1	Yes	13.33%	6
2	No	86.67%	39
	Total	100%	45

**Do you have responsibility for website accessibility?**

#	Answer	%	Count
1	Yes	8.89%	4
2	No. If no, do you know who is responsible for website accessibility? Please explain:	91.11%	41
	Total	100%	45

No. If no, do you know who is responsible for website accessibility? Please explain:

Public Information Office (11 responses)

Nikki Sloop – marketing coordinator (3 responses)

Kim Sellers and Staff (2 responses)

Administrative Assistant to the Chief of Police

Chris Russell

I am not the webmaster. PIO office is in charge. My content is limited to regulatory information regarding our utility system.

I don't know.

not sure

Our department's Marketing division handles website accessibility with assistance from PIO.

Our Marketing Coordinator handles our website information. Athletics only helps with the volunteer information or program information

The Admin Specialist uploads documents to the website

TI is responsible for web accessibility

TI, PIO and our Admin for social media

## Appendix C - Inspected by DAC

### Facilities and Parks

Moor Park  
600 S. Broad Street  
 Mooresville, NC 28115

Liberty Park  
225 East Iredell Ave  
 Mooresville, NC 28115

Selma Burke Center  
781 Agape Drive  
 Mooresville, NC 28115

Fire Station #4  
2014 Charlotte Highway  
 Mooresville, NC 28115

Fire Station #1  
457 North Main Street  
 Mooresville, NC 28115

Fire Station #2  
186 Knob Hill Road  
 Mooresville, NC 28115

Fire Station #3  
1023 Shearers Road  
 Mooresville, NC 28115

Fire Station #5  
125 Balmy Lane  
 Mooresville, NC 28115

Hope Park  
106 Montibello Drive  
 Mooresville, NC 28115

Water Treatment Plant  
2300 S. Highway #21  
 Mooresville, NC 28115

New Water Treatment Plant  
2528 Charlotte Hwy  
 Mooresville, NC 28115

Public Operations Center  
2523 Charlotte Hwy.  
 Mooresville, NC 28115

Wastewater Office  
369 Johnson Dairy  
 Mooresville, NC 28115

Museum  
142 E. Center Ave.  
 Mooresville, NC 28115

Talbert Recreation Center  
210 Talbert Pointe Road  
 Mooresville, NC 28115

Recreation Maintenance  
418B Carpenter Ave  
 Mooresville, NC 28115

Recreation Administrative Offices  
418 Carpenter Ave  
 Mooresville, NC 28115

Library  
304 S. Main Street  
 Mooresville, NC 28115

Winnie Hooper Center  
221 S. Sherill  
 Mooresville, NC 28115

Reed Creek Park  
116 Romany Lane  
 Mooresville, NC 28115

Stevenson Street Park  
312 Stevenson Street  
 Mooresville, NC 28115

Willow Valley Park  
216 East Mclelland  
 Mooresville, NC 28115

Police Station  
750 West Iredell Ave  
 Mooresville, NC 28115

Mooreville Skate Park  
763 West Iredell Ave  
Mooreville, NC 28115

Offices of building/grounds (Combined with Golf Course Clubhouse)  
161 Golf Course Dr  
Mooreville, NC 28115

Open ended building for parking equip (Combined with Golf Course Clubhouse)  
161 Golf Course Dr  
Mooreville, NC 28115

Golf Course Clubhouse  
205 Golf Course Drive  
Mooreville, NC 28115

N. Main Park  
1474 North Main Street  
Mooreville, NC 28115

Town Hall  
413 N. Main Street  
Mooreville, NC 28115

Nesbit Park  
302 Nesbit Street  
Mooreville, NC 28115

War Memorial Building  
230 N. Maple Street  
Mooreville, NC 28115

Pool (Combined with War Memorial Building)  
220 North Maple Street  
Mooreville, NC 28115

Magla Park  
93 Spencer Street  
Mooreville, NC 28115

Mazeppa Park  
645 Mazeppa Road  
Mooreville, NC 28115

Lee Street Park  
331 Lee Street  
Mooreville, NC 28115

Edgemoor Park  
630 Ridgecrest Drive  
Mooresville, NC 28115

Cornelius Park  
247 Cornelius Rd.  
Mooresville, NC 28115

Citizen Center (Charles Mack Center)  
215 N. Main Street  
Mooresville, NC 28115

Academy Street Park  
601 South Academy Street  
Mooresville, NC 28115

Bellingham Park  
160 Bellingham Drive  
Mooresville, NC 28115

### **Sidewalks and Curb Ramps**

Crimson Orchard Drive - Forest Walk Way to 121 Crimson Orchard Drive - West Side  
Cayuga Drive - Cul-De-Sac to 283 Cayuga Drive - North Side  
Cedar Point Drive - Cayuga Drive to 160 Cedar Point Drive - East Side  
Fallon Lane - Sansome Road to Northbridge Drive - East Side  
Northbridge Drive - Sansome Road to Wiggins Road  
Sansome Road - Fellspoint Road to Cul-De-Sac  
Glenholden Lane - Sansome Road to Snow Fountain Lane  
E Warfield Drive - Chertsey Drive to End  
Chertsey Drive - E Warfield Drive to Glastonbury Drive  
Gleniris Trail - Northbridge Drive to Delaney Lane  
Snow Fountain Lane - Northbridge Drive to Pink Orchard Drive  
Winterbell Drive - Forest Walk Way to Cardinal Berry Court - West Side  
Forest Walk Way - Laurel Glen Drive to Cul-De-Sac - North Side  
Weeping Spring Drive - Laurel Glen Drive - West to Forest Walk Way - East Side  
Laurel Glen Drive - Weeping Spring Drive - East to Weeping Spring Drive - West - South Side  
Rougemont Lane - Oak Ridge Farm Highway to End  
Laurel Glen Drive - Weeping Spring Drive - East to Weeping Spring Drive - West - South Side  
Glastonbury Drive - W Warfield Drive to Chertsey Drive  
E Warfield Drive - Chertsey Drive to E Wellesley Lane  
Colborne Drive - Rougemont Lane to E Warfield Drive  
S. Audubon Avenue - Autry Avenue to Plantation Ridge Drive  
S Wendover Trace Avenue - Autry Avenue to Plantation Ridge Drive - West Side  
Moorcroft Lane - Riding Trail to Autry Avenue - East Side  
Charing Place - Riding Trail to Autry Avenue - East Side  
N Audubon Avenue - Plantation Ridge Drive to Montibello Drive - West Side  
Cloister Lane - Montibello Drive - N Audubon Avenue - East Side  
Middleton Place - Montibello Drive - East to Montibello Drive - West - East Side



Autry Avenue - S Wendover Trace Avenue to Plantation Ridge Drive - West Side  
Autry Avenue - Plantation Ridge Drive to Trotter Ridge Drive - East Side  
Trotter Ridge Drive - Autry Avenue to Cul-De-Sac - East Side  
Trotter Ridge Drive - Plantation Ridge Drive to Cul-De-Sac - West Side  
Riding Trail - Trotter Ridge Drive to S Wendover Trace Avenue - North Side  
N Wendover Trace Avenue - Plantation Ridge Drive to Montibello Dr- West Side  
Plantation Ridge Drive - Montibello Drive to Morrison Plantation Parkway  
Morrison Plantation Prkwy - Plantation Ridge Dr to Brawley School Rd - East Side  
Morrison Plantation Prkwy- Brawley School Rd to Plantation Ridge Dr- West Side  
Montibello Drive - Plantation Ridge Drive to Acdeley Lane - West Side  
Runningdeer Drive - Steeplechase Avenue to Montibello Drive - West Side  
Glencoe Lane - Carriage Club Drive to W Maranta Road - West Side  
Sandeed Drive - W Maranta Road to Glencoe Drive - East Side  
Morrison Plantation Parkway - Plantation Ridge Drive to River Highway  
Montibello Drive - Morrison Plantation Prkwy to Plantation Ridge Dr- North Side  
Montibello Dr- Middleton Place-West to Morrison Plantation Parkway- South Side  
Steeplechase Ave- N Wendover Trace Ave to Montibello Drive - South Side  
Joe Knox Avenue - Williamson Road to Capital Avenue  
Welton Way - Plantation Ridge Drive to Capitol Avenue  
Quarter Lane - Corporate Park Drive to Capitol Avenue  
Lowrie Loop - South - Joe Knox Avenue to Lowrie Loop - East  
Lowrie Loop - North - Joe Knox Avenue to Lowrie Loop - East - South Side  
Corporate Park Drive - Singleton Road to Joe Knox Avenue  
Singleton Road - Town Center Drive to Plantation Ridge Drive  
Sapling Street - Lowrie Loop - East to Joe Knox Avenue  
Chawton Lane - Quarter Lane to Exchange Lane  
Marketplace Avenue - Quarter Lane to Singleton Road  
Singleton Road - Corporate Park Drive to Capital Avenue  
Welton Way - Plantation Ridge Drive to Joe Knox Avenue  
Plantation Ridge Drive - Morrison Plantation Parkway to Singleton Road  
Leaning Oaks Drive - Williamson Road to Welton Way - South Side  
Leaning Oaks Drive - Joe Knox Avenue to Williamson Road - North Side  
Savannah Drive - Welton Way to Williamson Road  
W Maranta Road - Spartina Court to End - North Side  
W Maranta Road - Sandreed Drive to Glencoe Lane - South Side  
W Maranta Road - Spartina Court to West Cul-De-Sac - North Side  
Carriage Club Drive - Bluefield Road to 130 Carriage Club Drive - West Side  
Harbor Cove Lane - Williamson Road to Cul-De-Sac  
Pamlico Lane - Samdusky Drive to Williamson Road - East Side  
Pamlico Lane - Samdusky Lane to Harbor Cove Lane - East Side  
Samdusky Lane - Chandeleur Drive to Pamlico Lane - South Side  
Winborne Drive - Rinehardt Road to Grayland Road - West Side  
Bosburg Drive - Grayland Road to Rinehardt Road - East Side  
Shephard Hill Drive - Gabriel Drive to End - East Side  
Northland Avenue - Shephard Hill Drive to Gabriel Drive - North Side  
Gabriel Drive - Banterling Court to Shinnville Road - West Side  
Gabriel Drive - Banterling Court to Cul-De-Sac - West Side  
Banterling Court - Gabriel Drive to Cul-De-Sac - North Side  
Chandeleur Drive - Harbor Cove Lane to Currituck Court - West Side

Chandeleur Drive - Harbor Cove Lane to Cul-De-Sac - West Side  
W Statesville Avenue - Oak Street to Cascade Street  
Grayland Road - Cinebar Road to Statesville Highway - North Side  
Grayland Road - Cinebar Road to Ostrander Lane - North Side  
Cinebar Road - Grayland Road to End - West Side  
Markham Drive - Cul-De-Sac to Cinebar Road - North Side  
Ostrander Lane - Markham Drive to Grayland Road - East Side  
Nahcotta Drive - Rinehardt Road to Grayland Road - West Side  
N Academy Avenue - W Iredell Avenue to W Center Avenue  
S Academy Avenue - W Center Avenue to W Wilson Avenue  
W Center Avenue - N Academy Avenue to Sherrill Street  
W Mcllelland Avenue - Sherrill Street to N Academy Avenue  
N Academy Street - Oak Street to Tunnel Road - East Side  
N Academy Street - W Iredell Avenue to Oak Street - West Side  
W Mcneely Avenue - Oak Street to N Main Street - East Side  
W Mcneely Avenue - N Main Street to Oak Street - West Side  
E Mcneely Avenue - E Iredell Avenue to N Main Street - West Side  
E Statesville Avenue - N Main Street to E Iredell Avenue - East Side  
W Statesville Avenue - Oak Street to N Main Street  
S Ranney Way - Flanders Drive to End - West Side  
Zolder Lane - N Ranney Way to Flanders Drive - North Side  
N Ranney Way - Flanders Drive to End - West Side  
Clacton Court - Flanders Drive to Cul-De-Sac - East Side  
Flanders Drive - Thorsen Drive to Cul-De-Sac - North Side  
Carlson Drive - Flanders Drive to End - East Side  
Ellington Drive - Carlson Drive to Flanders Drive - North Side  
Fleishhacker Place - Ellington Drive to Cul-De-Sac - South Side  
Brewster Court - Grayland Road to Markham Road - East Side  
Red Tip Lane - Easy Street to Meadow Pond Lane - North Side  
Westbury Drive - Camforth Drive to Cul-De-Sac - North Side  
Henfield Way - Brantley Place Drive to Cul-De-Sac - West Side  
Daventry Place - Camforth Drive to Brantley Place Drive - West Side  
Brantley Place Drive - US Highway 21 to Cul-De-Sac - North Side  
Daventry Place - Camforth Drive to End - West Side  
Camforth Drive - Oates Road to Brantley Place - West Side  
Flanders Drive - Carlson Drive to US Highway 21 - South Side  
W Mcllelland Avenue - Sherrill Street to E Plaza Drive  
Portestowne Way - 120 Portestowne Way to End  
Forester Street - Corporate Center Drive to Portestowne Way  
Corporate Center Drive - Oates Road to Forester Street  
W Wilson Avenue - S Academy Street to S Broad Street  
Brunswick Street - W Mcneely Avenue to Creekridge Circle - North Side  
W Mcneely Avenue - Brunswick Street to Oak Street - East Side  
Oak Street - N Broad Street to N Academy Street - South Side  
Oak Street - N Broad Street to Beatty Avenue - North Side  
Beatty Avenue - Mebane Street to N Main Street - East Side  
Gateway Boulevard - Professional Park Drive to US Highway 21  
Professional Park Drive - US Highway 21 to Cul-De-Sac  
Sunridge Drive - Forest Ridge Road to 118 Sunridge Drive - East Side

Forest Ridge Road - Bintree Lane to 142 Forest Ridge Road - South Side  
 Forest Ridge Road - 142 Forest Ridge Road to 118 Sunridge Drive - North Side  
 Meadow Pond Lane - Talbert Lane to Red Tip Lane - North Side  
 Red Tip Lane - Easy Street to Meadow Pond Lane - North Side  
 Red Tip Lane - Easy Street to Meadow Pond Lane - South Side  
 Easy Street - Romany Lane to Cul-De-Sac - East Side  
 Romany Lane - End to Easy Street - South Side  
 Commerce Pointe Boulevard - Fairview Road to 199 Commerce Pointe Boulevard  
 Leyton Loop - Waterlynn Ridge Road - South to Waterlynn Ridge Road - North  
 Foxfield Park Drive - Mecklenburg Highway to Alexandria Drive - North Side  
 Alexandria Drive - Foxfield Park Drive to Burlwood Drive - East Side  
 Glade Valley Lane - Waterlynn Ridge Road to Waterlynn Club Drive  
 Waterlynn Ridge Road - E Waterlynn Road to Charlotte Highway  
 Silverspring Place - Walnut Cove Drive to Cul-De-Sac  
 Walnut Cove Drive - Silverspring Place to E Waterlynn Road  
 Colville Road - Silverspring Place to End  
 Sand Spur Drive - Colville Road to Four Seasons Way  
 Tulip Drive - Colville Road to End  
 Morning Mist Lane - Silverspring Place to Pleasant Valley Way  
 Ameena Chase Trail - Golden Valley Avenue to Silverspring Place  
 Artisan Court - Golden Valley Avenue to Cul-De-Sac  
 High Bluff Circle - Ridge Bluff Road to Cul-De-Sac  
 Lookout Point Place - Ridge Bluff Road to Cul-De-Sac  
 Ridge Bluff Road - W Mclelland Avenue to Kelly Avenue  
 Byers Village Avenue - River Highway to Argus Lane  
 Springwood Lane - Kingston Drive to Village Commerce Drive - South Side  
 Village Commerce Drive - Springwood Lane to Brawley School Road  
 Kingston Drive - Brawley School Road to Springwood Lane - West Side  
 Montrose Drive - Cul-De-Sac to Muirfield Drive - North Side  
 Swift Creek Lane - Cul-De-Sac to Muirfield Drive - North Side  
 Harris Farm Road - End to Elizabeth Hearth Road - West Side  
 Dairy Farm Road - Harris Farm Road to Coddle Creek Highway - West Side  
 Hedgewood Drive - Coddle Creek Highway to Cul-De-Sac  
 N Arcadian Way - Cypress Landing Drive to Beverly Chase Lane  
 S Arcadian Way - Cypress Landing Drive to Beverly Chase Lane  
 Cypress Landing Drive - Beverly Chase Lane to Charlotte Highway  
 Beverly Chase Lane - S Arcadian Way to End  
 Doyle Farm Lane - S Cromwell Drive to Dairy Farm Road - East Side  
 Lamplighter Lane - Dairy Farm Road to Elizabeth Hearth Road - South Side  
 Garden Gate Lane - Elizabeth Hearth Road to Forest Glen Road - North Side  
 Elmhurst Lane - Elizabeth Hearth Road to Forest Glen Road - North Side  
 Elizabeth Hearth Road - Dairy Farm Road to Elmhurst Lane - East Side  
 Forest Glen Road - Harris Farm Road to Burtons Barn Road - East Side  
 Burtons Barn Road - Forest Glen Road to Harris Farm Road - North Side  
 Sagewood Drive - Hedgewood Drive to End  
 Richland Lane - Pickens Lane to N Cromwell Drive  
 Pickens Lane - Collenton Lane to N Cromwell Drive  
 Collenton Lane - N Cromwell Drive - West to N Cromwell Drive - East  
 N Cromwell Drive - Sheridan Court to Harris Crossing Boulevard

S Cromwell Drive - Harris Crossing Boulevard to End  
 Sheridan Court - N Cromwell Drive to Cul-De-Sac - South Side  
 Heywatchis Drive - Golden Valley Drive to Pleasant Grove Lane  
 "Edgington Street - Golden Valley Drive to Washburn Range Drive       "  
 Stanwood Place - Morning Sun Drive to Cul-De-Sac  
 Denton Road - Golden Valley Lane to End  
 Plainview Court - Golden Valley Lane to Cul-De-Sac  
 Hawleyville Lane - Golden Valley Lane to Pleasant Grove Lane  
 Bushnell Place - Golden Valley Lane to Cul-De-Sac  
 Gladbrook Place - Fontanelle Drive to Cul-De-Sac  
 Whitefield Trace - Heywatchis Drive to Cul-De-Sac  
 Farnham Way - Pleasant Grove Lane to Cul-De-Sac  
 West Iredell Avenue - North Academy Street to West Moore Avenue - West Side  
 Marakery Road - West Plaza Drive to Limerick Road  
 Limerick Road - East Plaza Drive to Marakery Road  
 Fontanelle Drive - Golden Valley Drive to Heywatchis Drive  
 Pleasant Grove Lane - Fontanelle Drive to Cul-De-Sac  
 Golden Valley Drive - Maple Falls Way to End  
 Morning Sun Drive - Fontanelle Drive to Cul-De-Sac  
 Piedmont Point Drive - North Broad Street to Agape Drive  
 Walnut Street - North Broad Street to West Statesville Avenue - North Side  
 Patterson Avenue - West Statesville Avenue to North Broad Street  
 Middle Grove Drive - Golden Valley Drive to Linwood Avenue  
 Washburn Range Drive - Middle Grove Drive to End  
 Maple Falls Way - Washburn Range Drive to Edgington Street  
 Humbold Place - Maple Falls Way to Cul-De-Sac  
 Lacona Trace - Wayman Road to Morning Sun Drive  
 Bellelaine Drive - Sweetmartha Drive to Selma Drive  
 Agape Drive - 781 Agape Drive to Piedmont Point Drive  
 Dixie Drive - Logan Street to Brookwood Street  
 Selma Drive - Williams Street to Brookwood Street  
 Williams Street - Selma Drive to Cascade Street  
 Burke Circle - Selma Drive to Cul-De-Sac - North side  
 Burke Circle - Selma Drive to Cul-De-Sac - South side  
 Cascade Street - Brookwood Street to West Statesville Ave-East side  
 Almora Loop -East - Madelia Place - East to Cul-De-Sac  
 Glennallen Road - Almora Loop - East to Gage Drive  
 Glennallen Road - Gage Drive to Rocky River Road  
 Centerpoint Drive - Linwood Avenue to Fontanelle Drive  
 Wayman Road - Golden Valley Drive to Morning Sun Drive  
 Saye Place - Almora Loop - East to Glennallen Road  
 Millen Drive - Almora Loop - East to Glennallen Road  
 Gilden Way - Almora Loop - East to Glennallen Road  
 Almora Loop - West - Madelia Place to Gilden Way  
 Royalton Road - Bluffton Road to Rocky River Road - West Side  
 Logan Street - Brookwood Street to West Park Avenue - North Side  
 Brookwood Street - West Park Avenue to Cascade Street  
 Pebble Court - Wren Hill Drive to Cul-De-Sac  
 Broadleaf Loop - Ivy Creek Lane - West to Ivy Creek Lane

Elgin Lane - Stallings Mill Road to Sawhorse Drive - South Side  
 Sawhorse Drive - Kistler Farm Road to End - North Side  
 Rusty Nail Drive - Sawhorse Drive to Rocky River Road - East Side  
 Stallings Mill Drive - Kistler Farm Road to End - North Side  
 Dovetail Drive - Stallings Mill Drive to Rusty Nail Drive - South Side  
 Ashton Drive - Quinn Lane to Gilden Way  
 Ivy Creek Lane - Wren Hill Drive to Cul-De-Sac  
 Nevis Lane - Bluffton Road to Royalton Road - West Side  
 Scanlon Road - Bluffton Road to Elrosa Road - West Side  
 Elrosa Road - Bluffton Road to Royalton Road - West Side  
 Elrosa Road - Royalton Road to Glennallen Road - North Side  
 Elrosa Road - Glennallen Road to Scanlon Road - South Side  
 Elrosa Road - Glennallen Road to Almora Loop- East  
 Gage Drive - Glennallen Road to Almora Loop- East  
 Bluffton Road - Elba Drive to Rocky River Road - South Side  
 Milroy Lane - Elrosa Road to Rocky River Road - West Side  
 Quinn Lane - Glennallen Road to Cul-De-Sac  
 Wren Hill Drive - West Park Avenue to Ivy Creek Lane  
 Laporte Lane - Royalton Road to End - North Side  
 Elba Drive - Bluffton Road to Alborn Drive - North Side  
 Almora Loop - Madelia Place - West to Madelia Place - East - West Side  
 Madelia Place - Bluffton Road to Almora Loop - East - North Side  
 Dunnell Road - Bluffton Road to Madelia Place - West Side  
 Karlstad Lane - Elba Drive to Almora Loop - East Side  
 Renville Place - Elba Drive to Almora Loop - East Side  
 Alborn Drive - Madelia Place to Almora Loop - East Side  
 Denham Place - Elba Drive to Madelia Place - West Side  
 Longboat Road - Castles Gate Drive to Oak Tree Road - West Side  
 Fernbrook Drive - Oak Tree Road to Cul-De-Sac - West Side  
 Castles Gate Drive - Morrison Cove Road to Cul-De-Sac - South Side  
 Morrison Cove Road - Castles Gate Drive to Oak Tree Road - West Side  
 Queensbury Lane - Spring Grove Drive to Cul-De-Sac - North Side  
 Spring Grove Drive - Kilborne Road to Queensbury Lane - West Side  
 Kilborne Road - Autumn Breeze Road to Oak Tree Road - North Side  
 West Morehouse Avenue - Murphey Place to Water Oak Drive - South Side  
 West Morehouse Avenue - Murphey Place to Water Oak Drive - North Side  
 West Deactur Avenue - Murphey Place to Gresham Lane - North Side  
 West Deactur Avenue - Murphey Place to Gresham Lane - South Side  
 Water Oak Drive - Gresham Lane to River Highway - West Side  
 Water Oak Drive - Gresham Lane to River Highway - East Side  
 Gresham Lane - Border Field Way to Water Oak Drive - East Side  
 Gresham Lane - Border Field Way to Water Oak Drive - West Side  
 East Fenway Avenue - Gresham Lane to Murphey Place  
 Hembree Place - West Fenway Avenue to West Morehouse Avenue  
 Kensington St - West Fenway Avenue to West Morehouse Avenue - East Side  
 Kensington St - West Fenway Avenue to West Morehouse Avenue - West Side  
 Murphey Place - West Fenway Ave to East Morehouse Avenue  
 N Church Street - E Iredell Avenue to Institute Avenue  
 Charlotte Street - W Mcllland Avenue to End

Stevenson Street - W Mcllelland Avenue to End  
 S Sherrill Street - W Mcllelland Avenue to Bolivia Lane - North Side  
 Neel Avenue - S Sherrill Street to Charlotte Street  
 N Sherrill Street - W Center Avenue to W Mcllelland Avenue  
 S Main Street - E Wilson Avenue to Dingler Avenue - South Side  
 S Church Street - E Center Avenue to E Iredell Avenue  
 S Church Street - Pond Street to E Wilson Avenue - North Side  
 S Church Street - E Wilson Avenue to E Mcllelland Avenue  
 S Church Street - E Mcllelland Avenue to E Center Avenue - South Side  
 Institute Avenue - N Church Street to N Main Street  
 E Gray Avenue - Smith Street to S Main Street - West Side  
 E Pressley Avenue - Smith Street to S Main Street - West Side  
 Parker Avenue - Kennette Street to Spruce Street - East Side  
 Summer Street - Brawley Avenue to Bruce Avenue - South Side  
 Spruce Street - Brawley Avenue to Parker Avenue - South Side  
 E Wilson Avenue - Cabarrus Avenue to S Church Street - East Side  
 E Wilson Avenue - S Church Street to S Broad Street  
 E Mcllelland Avenue - S Church Street to S Main Street  
 Brawley Avenue - E Mills Avenue to S Main Street - East Side  
 E Lowrance Avenue - Summer Street to Spruce Street - West Side  
 East Morehouse Avenue - Water Oak Drive to Pavilion Lane - Southside  
 Pavilion Lane - East Morehouse Avenue to Cul De Sac - Eastside  
 Pavilion Lane - Cul De Sac to East Morehouse Avenue - Westside  
 East Morehouse Avenue - Pavilion Lane to Water Oak Drive - Northside  
 Water Oak Drive - Gresham Lane to Gresham Lane - Southside  
 Water Oak Drive - Gresham Lane to Gresham Lane - Northside  
 Magnolia Street - Woodberry Drive to Cabarrus Avenue - East Side  
 Freeman Drive - College Street to E Wilson Avenue - North Side  
 E Catawba Avenue - S Church Street to S Main Street - West Side  
 Cabarrus Avenue - Mcllelland Avenue to Cedar Street - North Side  
 College Street - S Church Street to E Mills Avenue - East Side  
 E Mills Avenue - College Street to Oakwood Road - East Side  
 Short Avenue - Summer Street to End - West Side  
 Bruce Avenue - Summer Street to End - East Side  
 Harris Avenue - E Wilson Avenue to College Street-North Side  
 Mcllelland Avenue - Cabarrus Avenue to End-North Side  
 Cedar Street - Cabarrus Avenue to Center Avenue  
 Thayer Court - Cabarrus Avenue to Cul-De-Sac-East Side  
 Mcllelland Avenue - Cabarrus Avenue to End-East Side  
 Mcllelland Avenue - Cabarrus Avenue to Cemetery Entrance-East Side  
 Sharpe Street - Sycamore Street to End-North Side  
 Sharpe Street - White Street to Sycamore Street-South Side  
 Sharpe Street - Mcllelland Avenue to White Street  
 Leonard Street - Mcllelland Avenue to Cul-De-Sac  
 Hager Lake Road - Shearers Road to Cul-De-Sac  
 Heatherly Road - Magnolia Street to Fieldstone Road  
 Magnolia Street - Heatherly Road to Woodberry Drive  
 Fieldstone Road - White Oaks Road to Edgemoor Drive-West Side  
 Fieldstone Road - White Oaks Road to Cul-De-Sac

N Maple Street - Carpenter Avenue to E Iredell Avenue - West Side  
 N Maple Street - E Iredell Avenue to Carpenter Avenue - East Side  
 E Statesville Avenue - E Center Avenue to E Iredell Avenue - West Side  
 E Statesville Avenue - E Iredell Avenue to E Center Avenue - East Side  
 "Cabarrus Avenue - S Magnolia Street to White Street - South Side     "  
 S Magnolia Street - Cabarrus Avenue to E Center Avenue - West Side  
 S Magnolia Street - E Center Avenue to Cabarrus Avenue - East Side  
 E Center Avenue - Manor Circle to E Iredell Avenue - North Side  
 E Center Avenue - Coddle Creek Highway to Manor Circle - South Side  
 E Center Avenue - Manor Circle to S Magnolia Street - South Side  
 "E Center Avenue - N Magnolia Street to Manor Circle - North Side     "  
 N Magnolia Street - E Center Avenue to E Iredell Avenue - West Side  
 "E Center Avenue - N Maple Street to S Church Street - South Side     "  
 "E Center Avenue - N Church Street to N Maple Street - North Side     "  
 E Center Avenue - N Maple Street to E Statesville Avenue - North Side  
 E Center Avenue - E Statesville Avenue to N Maple Street - South Side  
 E Center Avenue - E Statesville Avenue to N Magnolia Street - North Side  
 E Center Avenue - S Magnolia Street to E Statesville Avenue - South Side  
 Evergreen Street - E Center Avenue to Carpenter Avenue - West Side  
 Evergreen Street - Carpenter Avenue to E Center Avenue - East Side  
 E Iredell Avenue - E Statesville Avenue to Church Street - South Side  
 E Iredell Avenue - E Statesville Avenue to E Mcneely Avenue  
 E Iredell Avenue - Carpenter Avenue to E Mcneely Avenue - South Side  
 N Main Street - Park Avenue to Statesville Avenue  
 N Main Street - Park Avenue to Duffy Drive  
 Center Avenue - Church Street to Academy Street  
 N Main Street - Iredell Avenue to Institute Avenue  
 E Iredell Avenue - N Church Street to N Main Street  
 W Iredell Avenue - N Main Street to N Academy Street  
 N Main Street - Statesville Avenue to Institute Avenue  
 S Main Street - Mcllelland Avenue to Wilson Avenue-East Side  
 Doster Avenue - S Main Street to Kennette Street-South Side  
 Dinger Avenue - S Main Street to Young Street-South Side  
 N Main Street - Iredell Avenue to Mcllelland Avenue  
 Muirfield Drive - Norman Drive to Lockerbie Lane-West Side  
 Muirfield Drive - Swift Creek Lane to Lockerbie Lane-West Side  
 Huntly Lane - Lockerbie Lane to Cul-De-Sac-West Side  
 Lockerbie Lane - Huntly Lane to Muirfield Drive-South Side  
 S Academy Street - Caldwell Avenue to Southside Avenue-East Side  
 S Academy Street - Southside Avenue to W Lowrance Avenue-West Side  
 W Lowrance Avenue - S Academy Street to S Broad Street-North Side  
 S Broad Street - W Lowrance Avenue to Caldwell Avenue-West Side  
 Norman Drive - Par Place to Main Street-East Side  
 Kelly Avenue - Alexander Street to S Academy Street-South Side  
 Kelly Avenue - Alexander Street to Ridge Bluff Road-South Side  
 Ogburn Street - W Wilson Avenue to End-West Side  
 S Academy Street - W Wilson Avenue to Caldwell Avenue-East Side  
 W Mills Avenue - S Academy Street to S Main Street-South Side

**Signalized Intersections**

Morrison Plantation Parkway & Plantation Ridge  
W Statesville Avenue & Oak Street  
W Mclelland Avenue & S Academy Street  
N Church Street & E Statesville Avenue  
N Church Street & Institute Street  
Morrison Plantation Parkway & Swift Arrow Drive  
S Church Street & E Mclelland Avenue  
S Church Street & E Wilson Street  
S Magnolia Avenue & Cabarrus Avenue  
E Center Avenue & E Statesville Avenue  
E Center Avenue & Magnolia Street  
E Center Avenue & N Church Street

**On Street Parking**

S Church Street - E Center Avenue to E Moore Avenue - North Side  
S Church Street - E Moore Avenue to E Iredell Avenue - North Side  
S Church Street - E Iredell Avenue to E Moore Avenue - South Side  
E Statesville Avenue - E Center Avenue to Carpenter Avenue  
E Statesville Avenue - Carpenter Avenue to E Iredell Avenue  
N Main Street - E Iredell Avenue to Institute Avenue  
N Main Street - E Iredell Avenue to Moore Avenue  
N Main Street - E Moore Avenue to E Central Avenue - East Side  
E Center Avenue - Main Street to Church Street  
S Main Street - Center Avenue to Mclelland Avenue  
N Broad Street - W Center Avenue to W Moore Avenue  
N Broad Street - W Moore Avenue to W Iredell Avenue  
E Center Avenue - Magnolia Street to Rankin Street  
E Center Avenue - E Statesville Avenue to Evergreen Street  
E Center Avenue - Evergreen Street to Rankin Street  
Evergreen Street - E Center Avenue to Carpenter Avenue  
N Main Street - Center Avenue to Moore Avenue - West Side