

**Minneapolis Park and Recreation Board**

# **ADA Action Plan**

## **2018–2020**

**November 7, 2018**



**Minneapolis**  
**Park & Recreation Board**

# Minneapolis Park and Recreation Board ADA Action Plan

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# Minneapolis Park and Recreation Board ADA Action Plan

## SUMMARY

The Minneapolis Park and Recreation Board (MPRB) is updating their original 1992 Americans with Disabilities Act (ADA) Transition Plan to incorporate the updates to federal guidelines that address recreation facilities as well as emerging practices and technology. The 2018-2020 ADA Action Plan is a working document that will guide MPRB ADA Transition planning priorities along with policy and procedure revisions. A matrix of action-oriented tasks, lead assignments and timelines is embedded throughout the document. While this is a short-term plan, this component establishes timelines and accountability for each recommended task and establishes a framework for ADA compliance for the next 25 years.

This ADA Action Plan was developed through a multi-year process in conjunction with Recreation Accessibility Consultants LLC., and Skulski Consulting LLC., with input from key community stakeholders identified with the help of the Minneapolis Advisory Committee on People with Disabilities (MACOPD). Key community stakeholders were invited to learn more about MPRB's ADA Transition Plan, were asked about other groups and individuals to engage, provided input on the questions MPRB planned to ask during the engagement process and were invited to partner with the MPRB to cohost engagement events with the communities they serve.

MPRB intends that this will be a living document that will be utilized regularly by all departments for everything from capital planning to rehabilitation projects to recreation programming to communications. This document is a stand-alone report, and the material contained in it will be disseminated in various formats throughout the organization to ensure its recommendations are followed and accessibility work is coordinated across the organization.

## INTRODUCTION

The Minneapolis Park and Recreation Board (MPRB) exists to provide places and recreation opportunities for all people to gather, celebrate, contemplate, and engage in activities that promote health, well-being, community, and the environment. We are committed to ensuring that MPRB programs, policies, services and facilities are accessible to everyone who lives, works and plays in the city of Minneapolis. This commitment is further defined in the [Park Board's mission, vision, and values](#), along with the specific goals outlined in our [Comprehensive Plan 2007-2020](#).

Service to people with disabilities and compliance with the Americans with Disabilities Act (ADA) continues to be a top priority. The MPRB last completed an ADA Transition Plan in 1992 as required under Title II. This plan was a comprehensive inventory and analysis of MPRB facilities along with a schedule for barrier removal to provide better access for people with disabilities. Substantial accessibility improvements were made to facilities. In addition, an internal evaluation of policies,

practices and procedures was conducted shortly after the ADA was passed. Actions were taken to make reasonable modifications to policies to ensure participation by people with disabilities. This plan does not create different policies for different disabilities but rather addresses accessibility across the Minneapolis Park system.

## PURPOSE

In 2010, after the implementation of MPRB's original 1992 ADA Transition Plan, the federal guidelines were revised and updated to address access to recreation facilities as well as emerging practices and technology. The revised standards and new guidance on recreation facilities highlighted the need for MPRB to revisit its original ADA Transition Plan and make updates that are consistent with the 2010 ADA Standards.

The updated accessibility standards and 25<sup>th</sup> anniversary of the ADA in 2015 have also presented MPRB with an opportunity to revisit the agency ADA transition planning priorities along with policies and procedures. The purpose of MPRB's ADA Action Plan is to present a framework for ADA compliance for the next 25 years.

## CURRENT STATUS OF ADA COMPLIANCE AND TRANSITION PLANNING

As accessibility is everyone's responsibility, MPRB is taking an organization-wide approach to improve the accessibility of programs, policies, services and facilities. Several steps have been taken over the last five years to facilitate long-term planning that is consistent with the 2010 ADA Standards for Accessible Design specific to recreation facilities and the need to achieve "program access." In 2010, a consultant was contracted to provide accommodations within recreation services and to complete an inventory of the MPRB park system.

In 2014, an ADA Transition Plan Work Group was assigned the task of preparing a request for proposals to provide a complete and updated ADA inventory, assessment and transition plan. As a result, a comprehensive accessibility assessment of parks and facilities was conducted under contract over the course of the next year. In addition, the assessment included a review of policies, practices and procedures for compliance with the ADA. During this period, MPRB's Community Outreach Department began managing the organization's ADA Title II compliance responsibilities. The operational role of the ADA Title II Coordinator position was assigned to one of the department's Community Outreach and Access Coordinators. Within the year, the consultant provided findings and recommendations for barrier removal of more than 19,000 elements to be brought into compliance with the 2010 ADA Standards. The consultant also provided recommendations for policy modifications.

In 2015, MPRB partnered with the City of Minneapolis Civil Rights Department and Neighborhood and Community Relations to organize a celebration of the 25<sup>th</sup> Anniversary of the ADA. The anniversary provided an introspective opportunity for staff to process key findings and recommendations for improving physical access to parks and facilities, while also making reasonable modifications to policies, practices and procedures. In 2016, moving forward with one of the priority recommendations from the consultant, a Certified Therapeutic Recreation Specialist was hired to serve as the agency's inclusion coordinator. The inclusion coordinator works directly with program participants with disabilities and recreation staff to provide the most appropriate supports, modifications, auxiliary aids and services to ensure that participants with disabilities can fully participate in and benefit from the programs, services and activities offered by the MPRB.

## DEVELOPMENT OF AN ADA ACTION PLAN

This ADA Action Plan was drafted based on findings from the policy review and in an effort to further outline purposeful strategies to achieve ADA compliance. The MPRB's ADA Action Plan outlines steps to meet the current ADA Title II regulations set by the U.S. Department of Justice. The plan identifies current standards as well as best practices above and beyond compliance regulations to support the full inclusion of people with disabilities and to ensure that Minneapolis's award-winning park system is inclusive of and accessible to people with disabilities. A matrix of action-oriented tasks, lead assignments and timelines is embedded throughout the document. The matrix will be periodically updated by the ADA Coordinator. The public, especially people with disabilities and disability advocates, are welcome and encouraged to provide comment on the ADA Action Plan at any time. Comments can be submitted to Elise Niedermeier, ADA Coordinator, Minneapolis Park and Recreation Board, 2117 West River Road, Minneapolis, MN 55411, [ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org).

## ADA TITLE II ADMINISTRATIVE REQUIREMENTS

This section outlines the MPRB processes that have been put into place to meet the Title II administrative requirements and ensure full inclusion of people with disabilities in MPRB programs, services and activities. These requirements include making notice to the public; completing a review of policies, practices and procedures in the form of a self-evaluation; outlining a grievance procedure for ADA-related complaints; designating a responsible employee for agency compliance; and developing a transition plan for the removal of physical and communication barriers to programs, services and activities in existing facilities.

### 1. Notice

Title II of the ADA requires that "a public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part."<sup>1</sup> MPRB personnel will take the appropriate actions to ensure the agency's intent to comply with the requirements of the ADA is communicated and published for interested persons, including people with disabilities and disability advocacy groups. The MPRB ADA Notice will be included on the agency web site; posted at facilities; published with guidebooks, job announcements and meeting notices; broadcast as a public service announcement and periodically printed in the local newspaper. The appendix includes the content of the public notice or variation thereof.

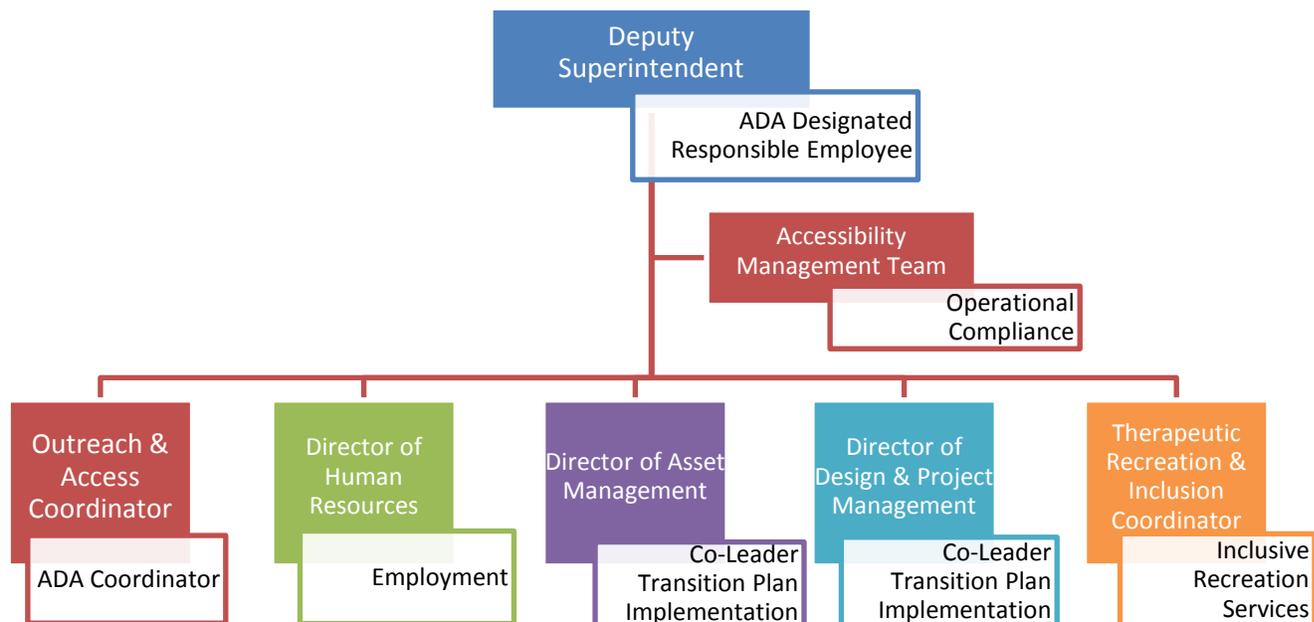
### 2. Designation of Responsible Employee

Title II requires a public entity to appoint an employee to coordinate and carry out the MPRB's compliance efforts, including investigation of complaints.<sup>2</sup> To maximize efficiency and ensure ADA compliance in all facets of the agency, a multi-level approach has been developed with compliance responsibilities lying with the Deputy Superintendent; coordinating efforts with the ADA Coordinator; and operational tasks delegated to the Accessibility Management Team.

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<sup>1</sup> 28 CFR §35.106 Notice

<sup>2</sup> 28 CFR § 35.107(a) Designation of Responsible Employee



*Chart 1: Organizational chart of delegated ADA compliance responsibilities.*

The Deputy Superintendent is the designated responsible employee overseeing the MPRB ADA compliance efforts. The Deputy Superintendent serves as the official of record and makes all final decisions on requests for reasonable modifications to policies, practices and procedures; ADA transition planning priorities; and final responses to ADA-related complaints.

The Community Outreach and Access Coordinator serves as the ADA Coordinator systematizing the MPRB ADA compliance program through policy, communications, and community engagement. The ADA Coordinator facilitates policy development and modifications; leads the collective efforts for ADA compliance across multiple departments; convenes the Accessibility Management Team; tracks ADA compliance progress; manages the ADA-related complaint process and records; and continuously seeks input from disability communities.

An Accessibility Management Team has been organized to include representation across all MPRB departments. The MPRB Accessibility Management Team works to ensure ADA compliance is effectively and consistently implemented across the agency, communicating accessibility concerns from community members and following through on ADA implementation strategies. The Accessibility Management Team meets at least semi-annually, and more frequently as ADA compliance issues arise.

The Director of Human Resources oversees implementation of the ADA regulations specific to the application process for employees, interviews, new hires, orientation, workplace reasonable accommodations, reassignments and benefits. The Director of Human Resources ensures interested individuals can apply either in-person or online for full time employment positions. Further, the Director of Human Resources administers the process by which employees can request reasonable accommodations, including intake, assessment, implementation, evaluation and record-keeping.

The Director of Asset Management and the Director of Design and Project Management jointly coordinate the implementation of corrective actions and barrier-removal to improve access for visitors with disabilities at MPRB parks and facilities. Together, they will communicate with the ADA Coordinator and Accessibility Management Team to prioritize, budget, schedule and track accessibility improvements in both existing facilities and new capital projects.

The Therapeutic Recreation and Inclusion Coordinator works with staff in all MPRB programs on how best to support people with disabilities in programs. The Therapeutic Recreation and Inclusion Coordinator enables MPRB to initiate immediate contact and assessment as people with disabilities register for MPRB programs. The Therapeutic Recreation and Inclusion Coordinator also coordinates staff training on inclusion and leads the MPRB in the development of adaptive and therapeutic recreation programs.

### 3. Complaint Procedure

Title II requires a public entity to adopt and publish complaint procedures providing for prompt and equitable resolution of ADA-related complaints.<sup>3</sup> The purpose of the ADA complaint procedure is to provide people with disabilities an informal process to contact an entity regarding an access issue so that the individual and the public entity may work together toward a mutual and timely resolution.

The MPRB ADA Complaint Procedure is established to meet the requirements of the ADA. It may be used by anyone who wishes to file a non-employment related complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the MPRB. The MPRB's Personnel Policy governs employment-related complaints of disability discrimination.

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

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

Elise Niedermeier, ADA Coordinator  
Minneapolis Park and Recreation Board  
2117 West River Road  
Minneapolis, MN 55411  
[ADACoordinator@minneapolisparks.org](mailto:ADACoordinator@minneapolisparks.org)

Within 10 business days after receipt of the complaint, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 10 business days of the meeting, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, electronic file or audio. The response will explain the position of MPRB, offer options for substantive resolution of the complaint and articulate next steps of the review of the complaint.

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<sup>3</sup> 28 CFR § 35.107(b) Complaint Procedure

If the response does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 10 business days after receipt of the response to the Deputy Superintendent or their designee. Within 10 business days after receipt of the appeal, the Deputy Superintendent or their designee will meet with the complainant to discuss the complaint and possible resolutions.

Within 10 business days after the meeting, the Deputy Superintendent or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. All written complaints received by the ADA Coordinator, appeals and responses will be retained by the Minneapolis Park and Recreation Board for at least three years.

#### 4. Self-Evaluation: Policies, Practices and Procedures

Title II requires a public entity to evaluate its current services, policies, and practices to the extent modification of any such services, policies, and practices are necessary to enable participation by people with disabilities.<sup>4</sup>

Between December 2014 – December 2015, a comprehensive review of agency policies and procedures was conducted under contract by a consultant and in conjunction with the accessibility assessment of parks and facilities. The consultant reviewed approximately 42 agency policies and procedures. In addition, the consultant conducted more than 32 hours of interviews with key personnel across all MPRB departments. Recommendations were received on 14 policies to modify the language or clarify the process to better serve people with disabilities in MPRB programs, services and activities. Upon receipt of the recommendations, staff worked to synthesize a framework for action items that most immediately impact people with disabilities participating in MPRB programs.

The ADA Action Plan matrix outlines specific agency policies requiring modifications to clarify language and ensure people with disabilities are fully able to participate and benefit from MPRB programs, services and activities. Specific policy and procedure changes have been delegated to lead departments and lead staff with a targeted timeline. Some actionable policies and procedures can easily be modified within the responsible unit or department. Other actionable policies, such as ordinances, require proposed modifications be brought to the Park Board of Commissioners for adoption. Therefore, some modifications may have an extended target timeline.

The ADA Coordinator will manage, monitor, track and publish an annual update to the ADA Action Plan matrix and make it available to the public upon request.

TITLE II ADMINISTRATIVE REQUIREMENTS			
Year	Supporting Tasks	Accountability	Timeline
2016	Conduct an ADA self-evaluation of policies, practices and procedures and make identified modifications.	ADA Coordinator; Accessibility Management Team	Assessment completed 2016; Modifications ongoing
2017	Coordinate implementation of MPRB ADA Transition Plan for ongoing barrier removal and	Director, Asset Management; Director, Design & Project Management	Ongoing; 2018 transition plan published Q2 2018

<sup>4</sup> 28 CFR § 35.105 Self-Evaluation

	maintenance of existing accessible amenities.		
<b>2017</b>	Designate an employee to coordinate ADA Compliance, including investigation of complaints. Make available to all interested individuals the name, office address, and telephone number of the employee or employees.	Deputy Superintendent	Completed Q4, 2016
<b>2017</b>	Create and launch accessibility landing page for minneapolisparcs.org.	ADA Coordinator	Page launched Q3 2017
<b>2017</b>	Outline and publish the procedure for individuals with disabilities to promptly and equitably seek resolution to ADA-related complaints.	ADA Coordinator	Completed Q3 2017
<b>2018</b>	Update MPRB ADA Notice to the Public. Develop communication schedule to broadly communicate through agency publications and as a legal notice in the local newspaper. Design a poster that can be used as a public notice on display at MPRB facilities, programs, services and activities.	ADA Coordinator	Notice updates Q2 2018 Communication schedule Q2 2018 Poster design & deployment Q4 2018

### 5. Transition Plan: Existing Facilities

Title II requires a public entity to develop a transition plan if structural changes to facilities are necessary in order to achieve program accessibility.<sup>5</sup>

MPRB began developing its transition plan in late 2014, when a consultant began conducting access audits at 207 sites throughout the park system’s 6,804 acres. Each site comprises a unique array of elements that were assessed for their accessibility.

207 sites audited	Sample range of elements assessed
<ul style="list-style-type: none"> <li>• Parks</li> <li>• Recreation and community centers</li> <li>• Ice arenas</li> <li>• Golf clubs</li> </ul>	parking lots, playgrounds, swimming pools/wading pools, docks, picnic shelters, benches, drinking fountains, signage, building entryways and interior doorways, gymnasiums, multi-purpose rooms, kitchens, restrooms and locker rooms

<sup>5</sup> 28 CFR § 35.150(d) Transition Plan

The consultant findings comprise more than 100 electronic files, 19 binders and thousands of images. Individuals interested in the findings from a specific park or recreation facility can contact Elise Niedermeier, ADA Coordinator, Minneapolis Park and Recreation Board, 2117 West River Road, Minneapolis, MN 55411, [ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org).

The consultant identified three types of corrective actions and accessibility improvements applied to elements (or aspects of elements) that are required to bring the site into compliance with Minnesota and federal accessibility guidelines.

Type* of corrective action	General requirements for each type of action	Estimated cost**
1	Corrective actions that can be made as part of routine maintenance (relocating garbage cans or insulating pipes under accessible lavatories); and more complex corrective actions that require planning and design work	\$6,546,914
2	Accessibility improvements to playgrounds, golf facilities, sports courts and fields, boating and fishing areas and other recreation elements covered in the 2010 ADA Standards for Accessible Design	\$5,745,633
3	Corrective actions or capital improvements that require long-range planning for trails, picnic areas and other outdoor developed areas that are not yet part of the ADA's final and enforceable design standards	\$11,318,950
<b>Total cost of corrective actions:</b>		<b>\$23,611,497</b>

*\*Note: the consultant referred to each type of corrective actions as a "phase," but did not recommend actual phasing with specific timing, ordering or prioritizing of the actions.*

*\*\*Estimated cost to implement each type were determined using RS Means Cost Indexing, and include 10% for staff time, 10% for fixtures and materials, 6% for design and engineering services, and adding a 5% design and construction contingency.*

**Funding for accessibility actions and improvements.** A key source of funding for these corrective actions and accessibility improvements comes through the MPRB's 20-Year Neighborhood Park Plan (NPP20) Ordinance, approved in 2016. NPP20 includes approximately \$800,000 annually, through 2036, targeted to specific accessibility improvements that are identified in the Access Audit and are not a part of a larger capital project.

**Prioritizing and selecting improvements.** Priorities for accessibility improvements will be determined to achieve the Title II standard for "program access" such that "when viewed in its entirety," each program, service or activity is readily accessible to and usable by people with disabilities.

Accessibility priorities will be coordinated with capital and rehabilitation projects identified in the MPRB’s six-year Capital Improvement Program (CIP), which is updated annually and includes funding allocations through NPP20. Therefore, ADA corrective actions and accessibility improvements may be implemented either through NPP20’s \$800,000 dedicated funding, or by way of capital and other rehabilitation projects that the ADA would consider to be “alterations” or “new construction”: That status triggers compliance with the 2010 ADA Standards for Accessible Design along with the 2015 Minnesota Accessibility Code.

Factors considered in prioritizing accessibility improvements for a program, service or activity
<ul style="list-style-type: none"> <li>• visitor/participant use</li> <li>• program/facility goals</li> <li>• location</li> <li>• asset condition and lifespan</li> <li>• duplication of the element(s) to be modified</li> <li>• degree by which the barrier prohibits participation by people with disabilities</li> </ul>

**Implementing the ADA Transition Plan.** For successful implementation, the MPRB’s ADA Transition Plan must be sustained as a dynamic, flexible, working document, with joint coordination by the Director of Asset Management and the Director of Design and Project Management with input from the ADA Coordinator and Accessibility Management Team. The MPRB ADA Transition Plan will be published on April 18, 2018 with a one-year schedule of accessibility improvements. Annual updates will report completed and upcoming accessibility improvements and corrective actions and the status of longer term projects, as well as adjustments that may have been made based on public input or unforeseen circumstances such as storm damage or vandalism.

The MPRB ADA Transition Plan, including annual updates, will be posted to the “accessibility” page of the MPRB web site and announced by the ADA Coordinator to interested parties. The plan and annual updates will also be made available in alternate formats upon request. As accessibility improvements are proposed, residents with disabilities and disability advocates will be invited to provide input. Public input is vital to the planning process and will be welcomed at any time during the year. Questions and comments should be directed to Elise Niedermeier, ADA Coordinator, at (612) 230-6400 or [ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org).

TRANSITION PLAN IMPLEMENTATION			
Year	Supporting Tasks	Accountability	Timeline
2019	Develop omnibus agreement with Metropolitan Council to improve bus access to parkways.	Director, Strategic Planning	2019
2019	Increase collaboration with City of Minneapolis to improve accessible connections between park and city property.	Director, Design and Project Management	2019
2019	Review garden design, installation and maintenance practices to consider garden access	Director, Asset Management	2019

TRANSITION PLAN IMPLEMENTATION			
Year	Supporting Tasks	Accountability	Timeline
	across experiences (physical access, sight, smell, touch etc.)		
2019	Modify contract language to ensure vendors offer options for accessible watercraft	Director, Customer Service	Begun 2018, ongoing as new contracts are negotiated.
2020	Review and develop accessible routes to waterfront areas including beaches, and fishing areas.	Director, Strategic Planning; Director, Asset Management	2020
2020	Design/procure, install and maintain accessible boating amenities including boat slips, courtesy/boarding docks, and canoe/kayak launches.	Director, Strategic Planning; Director, Asset Management	2020

## MODIFICATION OF POLICIES, PRACTICES & PROCEDURES

Title II requires a public entity to make reasonable modifications to policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.<sup>6</sup> As previously noted, a comprehensive review of agency policies and procedures was conducted under contract by a consultant and recommendations were received on 14 policies to modify the language or clarify the process to better serve people with disabilities in MPRB programs, services and activities.

Staff have since worked to develop this ADA Action Plan, outlining the agency approach to ADA compliance, policy modifications and implementation of an ADA Transition Plan. Additionally, an ADA Action Plan matrix has been developed to further identify departmental tasks that will contribute to the successful administration of an ADA compliance program. The Accessibility Management Team has been organized to guide development and modifications of policies, practices and procedures along with the specific tasks framed in the ADA Action Plan matrix. The ADA Coordinator will manage, monitor, track and publish an annual update to the ADA Action Plan matrix and make it available to the public upon request.

In addition to the modification of existing policies, the Accessibility Management Team lead by the ADA Coordinator will be charged with proposing new policies such as specific guidance on the use of service animals and other power-driven mobility devices in parks and recreation facilities. More tasks will

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<sup>6</sup> 28 CFR § 35.130(b)(7)

address the provision of effective communication, auxiliary aids and services, technology, inclusive recreation services and ongoing professional development related to the ADA regulations and the accessibility standards.

The Minneapolis Park and Recreation Board provides a wide variety of programs, services and activities to residents and visitors. People with disabilities can request alternate formats, auxiliary aides and services directly from the MPRB department producing the program, service or activity. Individuals interested in learning more about inclusion and how to access MPRB programs are encouraged to contact Sarah Thorsen, Therapeutic Recreation and Inclusion Coordinator at 612-230-6400 or sthorsen@minneapolisparcs.org.

New issues continue to emerge regarding ADA compliance in the field of parks and recreation. The Accessibility Management Team, as facilitated by the ADA Coordinator, will meet at least semi-annually, and more frequently as ADA compliance issues arise.

## ORGANICATIONAL AND DEPARTMENTAL POLICY MODIFICATIONS

<b>ORGANIZATIONAL AND DEPARTMENTAL POLICY MODIFICATIONS</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
<b>2016</b>	Amend Process and Guidelines for Permitting to ensure events are accessible and applicant agrees reasonable modifications shall be provided at applicant expense.	Director, Customer Service	Completed Q4 2016
<b>2017</b>	Develop bid criteria and technical specifications to ensure the procurement of accessible equipment, products and services on a case by case basis.	Director, Asset Management; Director, Design & Project Management	In progress, building standards to be completed Q2 2018; exterior site standard development ongoing
<b>2018</b>	Modify Board System Master Planning Policies.	ADA Coordinator; Director, Strategic Planning; Director, Community Outreach	2018
<b>2018</b>	Update Sailboat Buoy Assignment Procedures and Registration to include a section on Access for Boat Owners with Disabilities.	Director, Customer Service	2018
<b>2018</b>	Update Canoe Rack Procedures to include a section on Access for Boat Owners with Disabilities.	Director, Customer Service	2018
<b>2018</b>	Modify (Interim) Athletic Field Policy such that applicant	Director, Athletics and Aquatics	Q4, 2018

<b>ORGANIZATIONAL AND DEPARTMENTAL POLICY MODIFICATIONS</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
	agrees that reasonable modifications shall be provided at applicant expense.		
<b>2018</b>	Consider modification of Healthy Food Policy to address the needs of people with food allergies.	Director, Recreation Centers and Programs	Q2 2018
<b>2018</b>	Modify MPRB Golf Policies so golfers with mobility impairments using single rider golf carts as assistive mobility devices will be allowed to approach greens, fairways and tees.	Director, Golf	Q4 2018
<b>2018</b>	Modify MPRB Data Practices Policy to include “Requests for records by a person with a disability may be received in alternative formats such as Braille, digitally, or by voice. The MPRB will, in fulfilling the request, provide it in the format in which it was made, or in another format preferred by the requester.”	Deputy Superintendent	2018
<b>2018</b>	Modify MPRB Policy Statements to address ADA Compliance, accessibility, inclusion and universal design.	Deputy Superintendent	Additional review and modification will take place in 2018 as part of agency accreditation through CAPRA, the Commission for Accreditation of Park and Recreation Agencies.
<b>2018</b>	Modify Rec Center Use Policy & Procedures such that applicant agrees that reasonable modifications shall be provided at applicant expense.	Director, Recreation Centers and Programs	Q4 2018
<b>2018</b>	Include language in special events permits and contracts stating that the permit holder/contracting entity will	Director, Customer Service	Completed 2017 for 2018 permit season.

**ORGANIZATIONAL AND DEPARTMENTAL POLICY MODIFICATIONS**

Year	Supporting Tasks	Accountability	Timeline
	be responsible for complying with the ADA and ensuring the event is accessible to people with disabilities.		
<b>2018</b>	Modify Section 5(c)(4) of Policies and Guidelines Governing the Use of the Park System, the book of MPRB Policy Statements and Code of Ordinances to allow for the use of wheelchairs and OPMDs on the same paths and in the same spaces as pedestrians.	Deputy Superintendent; ADA Coordinator; Director, Community Outreach	2018
<b>2018</b>	Modify Policies and Guidelines Governing Use of Park System Section 5(c )(11) and the Code of Ordinances by adopting a section specific to service animals used by people with disabilities.	Deputy Superintendent; ADA Coordinator; Director, Community Outreach	2018
<b>2019</b>	Adopt a policy for Other Power Driven Mobility Devices (OPDMDs).	ADA Coordinator; Deputy Superintendent; Director, Community Outreach	2019
<b>2019</b>	Adopt/revise service animal policy.	ADA Coordinator; Deputy Superintendent; Director, Community Outreach	2019
<b>2020</b>	Review current snow removal practices and evaluate opportunities for coordination with City of Minneapolis and Hennepin County	Director, Asset Management	2020

## COMMUNICATIONS AND ADVANCE REQUESTS FOR AUXILIARY AIDES, SERVICES AND ALTERNATE FORMATS

COMMUNICATIONS AND ADVANCE REQUESTS FOR AUXILIARY AIDES, SERVICES AND ALTERNATE FORMATS			
Year	Supporting Tasks	Accountability	Timeline
2017	Acquire assistive listening system for use at public meetings and other events.	ADA Coordinator	Completed Q4 2017
2017	Inventory existing websites, mobile apps and other technologies and ensure all websites, mobile apps and other technologies are accessible to people with disabilities.	Director, Communications & Marketing; Director, Information Technology	Ongoing, minneapolisparcs.org audit completed Q4 2016, minneapolisparcs.org and intranet compliant by Q4 2018, Inventory completed Q4 2017, 3 <sup>rd</sup> party software inventory completed Q2 2017, technology accessibility considerations ongoing as contracts are updated/renewed
2018	Outline procedure for people with disabilities to request a sign language interpreter or real-time captioning for public meetings and other events.	ADA Coordinator	Q2 2018
2018	Inventory existing MPRB videos and develop schedule for captioning or the availability of transcripts.	Director, Communications & Marketing; Deputy Superintendent	Anticipated inventory and captioning schedule completed Q4 2018
2018	Ensure all new videos are produced with open captions.	Director, Communications & Marketing; Board Secretary	Starting Q1 2018, ongoing to align with revised media policy
2018	Ensure all new print publications include a statement "This publication available in alternate format (large print, braille, electronic etc.) upon request."	Executive Team	Started Q1 2017; incorporation into organization style guide Q4 2018; Revised MPRB Media Policy 2018

## INCLUSIVE RECREATION SERVICES

In 2016 MPRB initiated the appointment of a Therapeutic Recreation and Inclusion Coordinator. The new position requires qualifications as a Certified Therapeutic Recreation Specialist (CTRS), a nationally accredited certification with education and practical experience serving the wide array of disabilities. It should be noted that Therapeutic Recreation is programming specifically structured for people with disabilities. Inclusion means having programs that are welcoming and accessible to people of all ability levels – all are welcome, all participate, and all belong. The addition of the Therapeutic Recreation and Inclusion Coordinator enables MPRB to initiate immediate contact and assessment as individuals with disabilities register for recreation programs. The Therapeutic Recreation and Inclusion Coordinator is able to conduct a professional TR assessment of the individual’s needs and put supports, albeit modifications, equipment or staff, into place to ensure they are fully able to participate on day one of the program.

INCLUSIVE RECREATION SERVICES			
Year	Supporting Tasks	Accountability	Timeline
2016	Include statement on website and in all program guides with contact information for making disability-related requests.	Therapeutic Recreation and Inclusion Coordinator	Completed Q3 2016
2016	Set up contractual services with sign language provider.	ADA Coordinator	Completed Q1 2016
2017	Update registration process to include section for participants to make initial disability-related requests.	Therapeutic Recreation and Inclusion Coordinator	Completed Q4 2017
2017	Outline assessment process for inclusion in staff manual.	Therapeutic Recreation and Inclusion Coordinator	Completed Q3 2017
2017	Inventory and develop plan to access/acquire adaptive equipment.	Therapeutic Recreation and Inclusion Coordinator	Ongoing
2017	Outline process for evaluating new requests for personal and medical supports.	Therapeutic Recreation and Inclusion Coordinator	Completed Q3 2017
2017	Update Recreation Standards and Measurements Manual to include inclusion practices.	Therapeutic Recreation and Inclusion Coordinator	Completed Q2 2017

<b>INCLUSIVE RECREATION SERVICES</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
<b>2018</b>	Define supports available through inclusion process and publish agency inclusion manual for staff training and guidance.	Therapeutic Recreation and Inclusion Coordinator	Q4 2018
<b>2018</b>	Develop technical assistance manual for staff, volunteers, vendors and partners that includes information on ADA regulations and universal design principles.	ADA Coordinator	Q4 2018
<b>2019</b>	Compile accessible restroom inventory to include on website, trail maps.	Director, Asset Management; Director, Strategic Planning	2019
<b>2020</b>	Audit and compile trail elevation to include on website, trail maps.	Director, Asset Management; Director, Strategic Planning	2020

## **EMPLOYMENT & PROFESSIONAL DEVELOPMENT**

The MPRB is committed to the fair and equal employment of people with disabilities. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment without the accommodation process. The MPRB will make every effort to provide reasonable accommodations to qualified individuals with disabilities unless the accommodation would impose an undue burden on the organization.

In accordance with the Minnesota Human Rights Act and the Americans with Disabilities Act, accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment. The Director of Human Resources oversees implementation of the ADA regulations specific to employment.

The policy and procedure for employees to request ADA accommodations was last updated in 2017 and will continue to be monitored for updating as new regulations and best practices are published. The ADA Action Plan matrix has identified additional employment priorities to include the development of a system to track ADA accommodations, and an expanded process to recruit and hire people with disabilities.

<b>RECRUITMENT AND EMPLOYMENT OF PEOPLE WITH DISABILITIES</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
<b>2016</b>	Format job descriptions with essential functions, marginal functions and physical requirements for each position.	Director, Human Resources	Started Q4 2016, Ongoing as positions become vacant
<b>2017</b>	Review hiring practices to ensure recruitment sources include organizations that train and place people with disabilities and that job announcements, job fairs etc. are accessible to people with disabilities.	Director, Human Resources	Recruitment sources review completed Q4 2016, job fair accessibility considerations ongoing on an event by event basis
<b>2017</b>	Update procedure for employees to request ADA accommodations.	Director, Human Resources	Completed Q4 2017
<b>2017</b>	Develop system to track ADA accommodations process.	Director, Human Resources	Completed Q1 2017

Through the ADA Action Plan matrix, staff have proposed a multi-faceted approach to support professional development and build agency knowledge for ADA compliance. The consultant’s review of policies and procedures found MPRB staff to have many diverse credentials and certifications representing the fields of park management, recreation services, sport, human resources, finance, planning, and safety. However, most evident was the lack of on-staff expertise specific to ADA compliance and therapeutic recreation. Recommendations were made specific to the assignment of two specific roles, the ADA Coordinator and a Therapeutic Recreation Professional. Title II requires a designated compliance official and is often referenced as an ADA Coordinator. In early 2016, the ADA Coordinator was able to enroll in and complete the ADA Coordinator Training Certification Program offered through the Great Plains ADA Center. This certification program is recognized among peers as the most in-depth program to support the responsibilities of ADA coordinators in public entities.

In 2017, a series of ADA-compliance training sessions were offered for all staff to establish a foundational understanding of the key principles of Title II, in addition to sessions focusing on accessibility standards, maintenance, universal design, program access and customer service. The information from these sessions will be incorporated into new staff training to ensure a broad base of agency knowledge.

<b>PROFESSIONAL DEVELOPMENT</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
<b>2016</b>	ADA Coordinator to complete ADA Coordinator Training Certification Program (ACTCP).	ADA Coordinator	Completed Q3 2016
<b>2017</b>	Training for planners, facilities and maintenance personnel on federal and state accessibility standards.	ADA Coordinator	Ongoing beginning Q1 2017
<b>2017</b>	Support continuing education for staff on emerging trends and best practices of universal design applications in park and recreation settings.	ADA Coordinator	Ongoing beginning Q1 2017
<b>2018</b>	Develop ADA accommodations training modules for supervisors and managers.	Director, Human Resources	Q4 2018

## COMMUNITY ENGAGEMENT & INPUT FROM PEOPLE WITH DISABILITIES

Title II requires a public entity to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments.<sup>7</sup>

Community engagement was conducted from January 2014 through August 2015 to inform communities about the development of the ADA Transition Plan and Self Evaluation and gather input. In addition, specific questions were asked on recreational experiences, amenity use and community preferences for dispersal or concentration of accessible amenities.

A key stakeholder meeting was held January 2014 prior to widespread community engagement as a way to connect with key community leaders and plan future engagement sessions. With the help of the Minneapolis Advisory Committee on People with Disabilities (MACOPD), MPRB identified and invited key community stakeholders to learn more about its ADA Action Plan. Attendees were asked about other groups and individuals to engage, provided input on the questions MPRB planned to ask during the engagement process and were invited to partner with the MPRB to co-host engagement events with the communities they serve.

Groups MPRB reached out to include but are not limited to the ARC Greater Twin Cities, the Epilepsy Foundation of MN, the MACOPD, Minneapolis Public Schools Early Childhood, the Metropolitan Area Agency on Aging, Autism MN, the Commission of Deaf, DeafBlind and Hard of Hearing Minnesotans, the

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<sup>7</sup> 28 CFR § 35.105(b) Self-Evaluation and § 35.150(d)(1) Transition Plan

City of Minneapolis Neighborhood and Community Relations Department, the Direct Support Professional Association of Minnesota (DSPAM), and CanDo Canines.

Community meetings were then held on April 28 and April 30, 2015 at Lake Nokomis Community Center. These meetings provided community members with an opportunity to learn about the status of MPRB’s ADA Action Plan and to provide input on their use of the parks and current accessibility concerns. One was a general community meeting and one focused on parents of children with disabilities.

While there was significant interest among the key stakeholder group in co-hosting engagement meetings, ultimately organizations did not have the capacity to support this level of engagement. However, they were instrumental in sharing opportunities for community members to provide feedback through surveys and MPRB open houses.

Between April 28, 2015 and August 31, 2015 more than 60 community members completed a survey regarding preferences and priorities related to the ADA Action Plan. The survey was available online and paper copies were made available in all rec centers and at a series of engagement meetings for the Closing the Gap initiative. The survey was promoted through email via the key stakeholder group and was linked to the project page on the MPRB website.

Staff from the ADA workgroup were in attendance at the City of Minneapolis’ 25th Anniversary ADA Celebration to provide information about the status of the project and get feedback to inform the plan. Additionally, contact was initiated with the following community groups: Advocating Change Together (ACT), Governor’s Council on Disability, U of M Institute on Community Integration, PACER Center, Metropolitan Center for Independent Living, Courage Center, Dowling School, Adapt Minnesota, and Southside Services.

Input from individuals with disabilities and disability advocacy groups is essential to the successful implementation of the MPRB ADA Action Plan and forthcoming ADA Transition Plan. The ADA Coordinator and the Therapeutic Recreation and Inclusion Coordinator provide regular updates to the MACOPD, which in turn provides valuable input on the preferences and best practices to serve people with disabilities. MPRB will continue to consult with the MACOPD for program and policy development as well as transition plan implementation. Through the community engagement process, the ADA Coordinator has also been able to develop new relationships with disability-service organizations that should be able to provide constructive feedback for future growth.

Most important, and reflective of the MPRB’s commitment to inclusion, people with disabilities and disability advocates are encouraged to provide public comment during the formal period related to the release of this draft ADA Action Plan and at any point in the future. Our staff welcome feedback and the opportunity to transform accessibility challenges into new opportunities to build a more inclusive community.

<b>COMMUNITY ENGAGEMENT AND INPUT FROM PEOPLE WITH DISABILITIES</b>			
<b>Year</b>	<b>Supporting Tasks</b>	<b>Accountability</b>	<b>Timeline</b>
<b>2016</b>	Continue to seek input from residents and visitors with disabilities.	ADA Coordinator, all staff	Ongoing

COMMUNITY ENGAGEMENT AND INPUT FROM PEOPLE WITH DISABILITIES			
Year	Supporting Tasks	Accountability	Timeline
2016	Continue to seek input from MACOPD on direction of transition plan, policy development.	ADA Coordinator	Ongoing
2017	Ensure people with disabilities are represented on advisory boards and committees.	Director, Community Outreach	Ongoing
2018	Convene MPRB advisory committee of people with disabilities to provide input on inclusive programming.	Therapeutic Recreation and Inclusion Coordinator; ADA Coordinator	Q4 2018

## RESOURCES

Any Minneapolis residents or MPRB program participants with questions about the implementation of the MPRB ADA Action Plan are encouraged to call or e-mail the ADA Coordinator:

Elise Niedermeier, ADA Coordinator  
 Minneapolis Park and Recreation Board  
 2117 West River Road  
 Minneapolis, MN 55411  
 (612) 230-6400  
[ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org)

For general questions about the Americans with Disabilities Act, contact:

U.S. Department of Justice  
 (800) 514-0301  
[www.ada.gov](http://www.ada.gov)

U.S. Access Board  
 (800) 872-2253  
[www.access-board.gov](http://www.access-board.gov)

Great Lakes ADA Center  
 (800) 949-4232  
[www.adagreatlakes.org](http://www.adagreatlakes.org)

# Appendix A

## MPRB ADA Public Notice

### MPRB Notice Under the Americans with Disabilities Act

**Recreation is for everyone!** The Minneapolis Park and Recreation Board (MPRB) is committed to the spirit and intent of the Americans with Disabilities Act. In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the MPRB will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** People with disabilities are encouraged to apply for seasonal employment, full-time and volunteer opportunities. The MPRB does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

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

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

Anyone who requires an auxiliary aid or service for effective communication, or a reasonable modification of policies or procedures to participate in a program, service, or activity of the MPRB, should contact Elise Niedermeier, ADA Coordinator, at (612) 230-6400 or [ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org) as soon as possible but no later than 72 hours before the scheduled event.

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

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

**Complaints:** Comments, concerns and/or complaints that a program, service, or activity of the MPRB is not accessible to persons with disabilities should be directed to Elise Niedermeier, ADA Coordinator, at (612) 230-6400 or [ADACoordinator@minneapolisparcs.org](mailto:ADACoordinator@minneapolisparcs.org).