



City of Iowa City ADA Self-Evaluation & Transition Plan

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1. INTRODUCTION

The American with Disabilities Act (ADA) is a civil rights law which provides protections for individuals with disabilities. The law was enacted on July 26, 1990 and was amended in 2008. The ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous Provisions

Title II pertains to the programs, activities, and services provided by state and local government entities and is the focus of this document. Title II extends the prohibition on discrimination established by section 504 of the Rehabilitation Act of 1973 to all activities of State and local governments regardless of whether these entities receive Federal financial assistance.

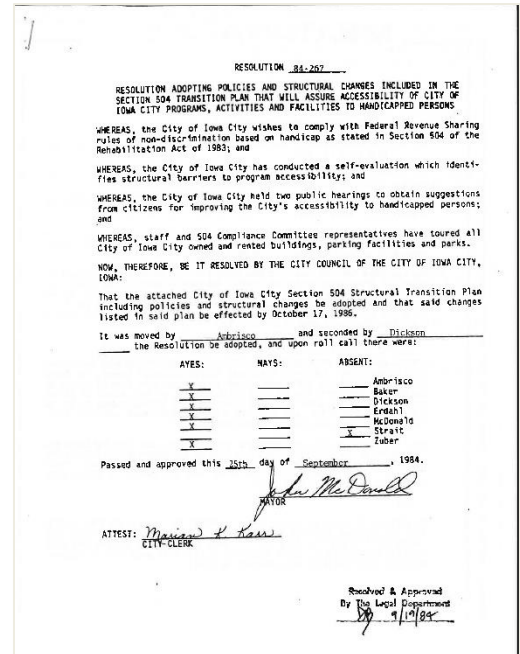
As a public entity, the City of Iowa City is subject to the ADA's Title II requirements. A fundamental tenant of Title II of the ADA is "the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services."¹ This principle is referred to as program accessibility.

A public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as "program accessibility," applies to all existing facilities of a public entity. Public entities, however, are not necessarily required to make each of their existing facilities accessible.²

As a public entity, the City is required to ensure accessibility for the programs, activities, and services it provides to the public; and modify policies, practices, or procedures accordingly to avoid discrimination against people with disabilities. This process will be accomplished with two strategies:

- (1) **Self-Evaluation:** Policy and procedure modifications to remove programmatic barriers.
- (2) **Transition Plan:** Maintenance and construction projects to remove architectural barriers.

This report will assist the City of Iowa City in identifying policy, programmatic, and physical barriers to accessibility and developing barrier removal solutions.



Above: 1984 City Council resolution approving the first Sec. 504 Transition Plan. The City has routinely conducted various accessibility reviews and action plans over the years.

¹ The Americans with Disabilities Act, Title II Technical Assistance Manual II-3.3000.

² The Americans with Disabilities Act, Title II Technical Assistance Manual II-5.1000.

ADMINISTRATIVE REQUIREMENTS

Title II of the ADA requires a state or local government agency that employs 50 or more people to designate at least one employee (“the ADA coordinator”) to coordinate the City’s transition plan, give notice of the ADA’s requirements, and establish a grievance procedure.³

2.1 DESIGNATED ADA COORDINATOR

The ADA Coordinator is responsible for organizing and communicating the City’s efforts to comply with and fulfill its responsibilities under Title II of the ADA and is instrumental in moving compliance plans forward. Having a designated ADA Coordinator also makes it easier for both staff and the public to know who to contact for help with accessibility questions and concerns. Iowa City has appointed an ADA coordinator to address compliance issues.

Iowa City’s ADA Coordinator is:

Kirk Lehmann
Assistant City Manager
410 E. Washington St.
Iowa City, Iowa 52240
Phone: (319) 356-5014
Email: klehmann@iowa-city.org

2.2 NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

The City must inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. Publishing and publicizing the ADA notice is not a one-time requirement and should be provided on an ongoing basis with the most up-to-date information.

- The City of Iowa City’s ADA Notice is available on the City website at: www.icgov.org/ADA.
- The ADA Notice is posted in an easily viewable location in all municipal buildings which are accessed by the public (e.g. front lobby bulletin board).
- Staff are asked to include a brief ADA accommodation statement on all meeting agendas, event flyers, program brochures, and other materials marketed to the public for which an individual may need to request an accommodation.
- Employment and recruitment materials, postings, applications, and forms include accommodation request information and non-discrimination notices.

2.3 GRIEVANCE PROCEDURE

Establishing and implementing a grievance procedure is an important component of ensuring compliance with ADA requirements. The City of Iowa City’s Grievance Procedure and ADA complaint forms are available at www.icgov.org/ADA.

Additionally, the Grievance Procedure is posted in all municipal buildings accessed by the public in an easily viewable location (e.g. front lobby bulletin board).

³ DOJ, Title II Regulations Subpart A § 35.107 Designation of responsible employee and adoption of grievance procedures

ADA SELF-EVALUATION AND TRANSITION PLAN REQUIREMENTS

The ADA Self-Evaluation and Transition Plan is intended to provide a framework for the continuous improvement of City programs and facilities for people with disabilities. **The Plan is intended to be a living document that is regularly updated as programs and services change, as barriers are removed, and new facilities are constructed or acquired by the City.**

SELF-EVALUATION

The ADA Self-Evaluation identifies and makes recommendations to correct policies and practices in the City's programs and services that are inconsistent with Title II regulations and result in access barriers for people with disabilities. Accessibility applies to all aspects of programs or services provided by the City, such as contracting, customer service, printed information, eligibility requirements, special events, televised communications, tours and field trips, and the City website.

TRANSITION PLAN

The Transition Plan is a document that outlines a strategy for the City to progress toward architectural compliance with the ADA. The Transition Plan identifies physical barriers for persons with disabilities and a schedule to remove those barriers over time including documentation of barriers, identified feasible solutions to remedy barriers, and a timeline for removing barriers.

PUBLIC PARTICIPATION

People with disabilities, service and advocacy organizations, and the general public are also required to be provided an opportunity to weigh in on the Self-Evaluation and Transition Plan processes.

Website: www.icgov.org/ADA serves as the online informational portal for the ADA Self-Evaluation and Transition Plan process. The public is welcome and encouraged to submit feedback on the City's Self-Evaluation & Transition Plan online.

Public Input: The public was invited to provide input on accessibility of City facilities, programs, and services at a hybrid Listening Post held in April 2023 and by submitting comments directly to the ADA Coordinator via phone or e-mail.

Iowa City Area Disability Services Coordinating Committee: This informal committee consisting of people with disabilities, representatives of non-profits and organizations, and community advocates meets bi-monthly were informed throughout the development of the Plan and invited to participate in a number of ways, such as accompanying a facility assessment to provide heightened perspective beyond the technical checklist provided by the Department of Justice. The Committee will continue to meet and provide ongoing feedback as ADA-related projects take place in Iowa City.

3. TRANSITION PLAN

Title II of the ADA requires that public entities having responsibility for or authority over facilities, roads, sidewalks, and other areas meant for public use develop a Transition Plan to ensure their facilities meet the standards for program accessibility. **A Transition Plan documents known ADA compliance issues and outlines how inaccessible facilities will be remedied to be accessible and useable by individuals with disabilities.**

3.1 REVIEW PROCESS

In 2021, the City conducted an accessibility assessment of all City facilities, except those that were previously assessed through a professional third-party (i.e. Parks & Recreation facilities had an ADA assessment completed during master planning processes).

The facility assessments performed by City staff included public interior and exterior elements of each site and were conducted using measuring devices, facility records, and the [ADA Checklist for Existing Facilities](#) provided by the ADA National Network and based upon the 2010 ADA Standards for Accessible Design. The staff team conducting the assessments consisted of members of the City Manager's Office, Government Buildings, and representatives from each City department. When a barrier was identified, the issue was documented along with a remedy for barrier removal. The following sections include an overview of the barrier removal prioritization process and a timeline and action plan for barrier removal. Changing circumstances or new opportunities could alter the timelines and plans listed in this document.

It is important to note that facility assessments provide a snapshot in time. Accessibility is a moving target and the Transition Plan should be viewed as a living document that will be updated and change over time. For example, due to winter freeze-thaw cycles, poured concrete compliant at the time of installation can shift over time and result in slope, grade, and surface changes. Additionally, in some cases, remediation is not required when the barrier can be remedied through alternative means such as moving or modifying the public service, program, or activity. Similarly, building standards and best practices occasionally change, but the completed facility assessments should serve as a baseline for future barrier removal.

Note: The Transition Plan addresses physical/architectural accessibility barriers only. Please see Chapter 4: Self-Evaluation for an overview of structural/architectural barriers and remedy plan.

3.2 BARRIER REMOVAL PRIORITIZATION

Chapter 2 of the Self Evaluation & Transition Plan includes a discussion of the barrier removal considerations which informed the City facility assessments. In order to develop a responsive, efficient, and cost-effective barrier removal plan within limited financial and staff resources, priority ratings were assigned to each compliance issue and remedy. Prioritization and target completion dates were based upon analysis of the following criteria:

- **ADA Category:** Priorities for accessibility established in the Department of Justice ADA Title III Regulations (Priority 1 – Approach & Entrance, Priority 2 – Access to Services, Priority 3 – Restrooms, Priority 4 – Other Amenities).
- **Level of Use:** Frequency of access and analysis of access by the general public versus specific subsets of the community with a defined use.
- **Cost and Complexity:** Low cost-barrier simple remedies with readily/easily available resources versus projects requiring advance or considerable staff time, funding, and project planning.

- **Critical Nature & Unique Service:** Essential services, critical healthy and safety functions, and unique programming/service locations versus facilities with substantially similar offerings.
- **Capital Improvements:** Capital improvement projects, facility renovations, or facility replacement projects which are already identified in long-term capital improvement plans.

3.3 BARRIER REMOVAL TRANSITION PLAN

The ADA Transition Plan is considered a living document. Remedial actions were developed and prioritized based upon the best information available. However, barrier removal that is difficult at the time of authoring this Plan may become readily achievable due to changing resources or planned projects. As such, it is anticipated that this Plan will evolve and change over time.

PROJECT COMPLETED BY END OF FISCAL YEAR 2024

| Facility | Summary of Barrier Removal Improvements | Cost |
|---------------------|--|-----------------|
| Airport | ADA parking space, lobby and restroom improvements | \$1,170 |
| Animal Center | ADA parking space, restroom improvements | \$1,355 |
| City Hall | ADA parking space, elevator signage, entrance improvements, meeting room improvements, restroom improvements | \$13,375 |
| Fire Station #1 | Doors | \$4,250 |
| Fire Station #2 | ADA parking space, Restroom improvements | \$560 |
| Fire Station #4 | Entrance, ADA parking space, signage, restroom improvements | \$1,750 |
| Library | Restroom, door, signage, materials, and after-hours drop-off improvements | \$3,550 |
| Parking Office | ADA parking space | \$280 |
| Police Station | Front desk, restroom improvements | \$2,850 |
| Recycling Drop-Offs | Signage | \$2,000 |
| Wastewater Plant | ADA parking space, restroom improvements | \$1,566 |
| Water Plant | Entrance, conference room, restroom improvements | \$5,420 |
| FY24 Total: | | \$38,126 |

PROJECT COMPLETED BY END OF FISCAL YEAR 2025

| Facility | Summary of Barrier Removal Improvements | Est. Cost |
|--------------------|---|----------------|
| Airport | Restroom improvements | \$1,600 |
| Cemetery | Entrance, office, and sign improvements | \$1,300 |
| City Hall | Restroom improvements | \$200 |
| Fire Station #1 | Entrance and fire alarm system improvements | \$850 |
| Fire Station #2 | Entrance ramp improvements | \$3,000 |
| Fire Station #4 | Entrance improvements | \$1,500 |
| Library | Signage improvements | \$90 |
| Parking Office | Entrance | \$400 |
| FY25 Total: | | \$8,940 |

PRIORITY 1: COMPLETE BY END OF FISCAL YEAR 2026

Priority 1 projects can be addressed quickly with readily available resources; and improve public use areas in facilities which are high use, of a critical nature, or the only location a service is provided.

| Facility | Summary of Barrier Removal Improvements | Est. Cost |
|-------------------------------|---|-----------------|
| Airport | Lounge improvements | \$1,200 |
| Cemetery | Ramp, restroom improvements | \$5,700 |
| Fire Station #1 | Route improvements | \$320 |
| Fire Station #2 | Entrance ramp and restroom improvements | \$2,900 |
| Fire Station #4 | Restroom improvements | \$400 |
| Library | Furniture, signage, restroom, and patron space improvements | \$2,650 |
| Police Station | Restroom improvements, alarm improvements | \$450 |
| Recycling Drop-Offs | ADA parking space | \$280 |
| Water Plant | Interior doors | \$575 |
| Priority 1/FY26 Total: | | \$14,475 |

PRIORITY 2: COMPLETE FY2027 OR LATER

Priority 2 projects may require securing resources and/or advance planning or design.

| Facility | Summary of Barrier Removal Improvements | Est. Cost |
|--------------------------|---|-----------------|
| Cemetery | Restroom improvements | \$25,000 |
| Fire Station #4 | ADA curb ramps | |
| Library | ADA curb ramps | \$3,000 |
| Parking Office | ADA curb ramps | \$3,000 |
| Police | Entrance improvements | \$1,100 |
| Water Plant | ADA parking spaces and curb ramps | \$11,500 |
| Priority 2 Total: | | \$43,600 |

PRIORITY 3: NOT SCHEDULED

Priority 3 projects are more complex, higher cost, and require extensive construction or renovation. These projects will be addressed through upcoming facility improvement projects which are known or planned. In some cases, a space needs study is already underway or planned and will inform how best to address accessibility barrier removal as part of a larger facility project. Where the City is able to improve accessibility to the extent possible in the interim, those improvements are included in the Priority 1 and 2 action plans.

Known barriers to be addressed through future facility alterations:

- Airport – new airport terminal building or lobby and restroom remodel
- Cemetery – parking/driveway
- City Hall – parking spaces and entrances
- Fire Station #1 – restrooms
- Library – parking space and Literature Walk repair
- Police – entrances and accessible route

OTHER & ONGOING

ADA assessments and action plans completed separately with ongoing improvements:

- [Sidewalk & Curb Ramp Transition Plan](#): The City maintains a database of curb ramp locations and conditions in Iowa City. The City installs or repairs ADA curb ramps through annual capital improvement programs, new subdivisions, and other unscheduled City projects and reports on progress and future priorities annually.
- [Senior Center Facilities Plan](#): Phase I of the Senior Center Facilities Plan development process kicked off in February 2020 and a completed Senior Center Assessment and Master Plan (Phase II) was completed in April 2022. Implementation of facility improvements are underway and ADA compliance issues will be recommended and addressed as design plans are developed. Plans for interior design improvements will begin in 2025.
- [Parks & Recreation Facilities Master Plans](#): A Parks System Master Plan was completed in 2017 and included a comprehensive ADA assessment and recommendations for all active park areas. A Recreation Master Plan was completed in 2022 and included an ADA assessment and recommendations for all recreation facilities and fields. Parks & Recreation is managing implementation of ADA improvements in parks and recreation facilities through annual capital improvement programs and renovation projects.
- [Iowa City Area Transit Study \(ICATS\)](#): A comprehensive Iowa City Area Transit Study was completed in June 2021. The study identified high-level ADA enhancements to infrastructure such as signage and pedestrian/bus stop amenities (see ICATS Chapter 10) and a detailed study of route and fare policies. As a result, route changes and fare policy changes -- including free fare for disabled riders -- were implemented in 2021. Transportation Services staff also conducted a review of ADA compliance issues at all bus stops and is developing an action plan to address these issues.

In addition, the City will continue to evaluate facility and space needs, including implementation of studies which will provide direction on future building improvements, renovations, and/or replacement and will better enable the City to address known accessibility barriers in these facilities in tandem with more comprehensive facility projects.

4. SELF-EVALUATION

The City must take steps to ensure all aspects of programs, services, and activities are accessible. The City of Iowa City reviews inclusivity of policies, practices, and procedures on an ongoing basis and strategies for correcting barriers that limit access for people with disabilities are identified and implemented as outlined in this section. This is called the “Self-Evaluation.”

The individuals involved in the Self-Evaluation process included the department or division head, a designee from the department or division, and the ADA Coordinator. As part of the self-evaluation process, each department was asked to complete a questionnaire and conduct a review of their operations for situations where a policy, program, or procedure created a barrier to accessibility. When a barrier was identified, the issue was documented along with a suggested action step to achieve barrier removal.

The categories below encompass the contents of this section and served as the basis for review and recommendation across the organization:

- [4.1 Program & Service Accommodation](#)
- [4.2 Communications & Signage](#)
- [4.3 Website](#)
- [4.4 Staff Training](#)
- [4.5 Public Meetings](#)
- [4.6 Contracts](#)
- [4.7 Service Animals](#)
- [4.8 Public Services](#)

Within each of these categories:

1. **Compliance Strategies** = Actions being taken by the City to ensure ADA Compliance. These are ongoing and recurring strategies.
2. **Action Items** = Action steps that need to be taken to address an identified accessibility barrier. The target implementation date is listed for each action item.

Please note that a listed action step does not necessarily mean that the instigating barrier was present organization-wide, but rather is demonstrative of the overall approach the City is taking towards program, service, and activity accessibility.

The City’s ADA Coordinator is responsible for coordinating with City departments and divisions to ensure progress on the implementation of the action steps. As actions are carried out, they will be moved to the “compliance strategies” sections as this plan is updated annually and reported upon to the public.

The public was also invited to provide feedback on accessibility of City services, programs, and activities at a Listening Post held in April 2023 and ongoing feedback may be submitted to the ADA Coordinator. Public input continually informs updates and implementation to the Self-Evaluation Action Plans.

Note: The Self-Evaluation addresses programmatic accessibility barriers only. Please see Chapter 3: Transition Plan for an overview of structural/architectural barriers and remedy plan.

4.1 PROGRAM & SERVICE ACCOMMODATIONS

The provision of public services and programs account for some of the most fundamental functions of the various City departments. Thus, staff administering programs, services, and activities and interacting with

the public must be aware of appropriate procedures for avoiding discrimination and accommodating people with disabilities.¹

PROGRAM & SERVICE ACCOMMODATIONS: COMPLIANCE STRATEGIES

Recognizing that each situation and individual has unique circumstances and needs, requests for reasonable accommodation are addressed on a case-by-case basis. This process can be a joint effort between the individual or advocate making the request, the appropriate department or division head, the City's ADA Coordinator, and even other service agencies. The request of the individual with disabilities is the first solution considered and implemented unless it results in a fundamental alteration to the nature of the program or an undue burden. Title II regulations and standards and the DOJ's [Best Practices Toolkit for State and Local Governments](#) inform reasonable accommodation request resolutions.

The City has also implemented the following strategies for compliant program and service accessibility:

- Programs and activities offered by the City welcome participation by people with disabilities and people with disabilities are never required to participate in permissible separate programs or activities that are offered.
- The City seeks to increase participation by persons with disabilities by incorporating inclusive images and conducting outreach to members of the disability community and to organizations serving people with disabilities.
- The City's ADA Notice is posted online and in all public facilities and contains information about requesting modification to programs, policies, or procedures.
- A shortened Accommodation Statement is included on all public meeting agendas and print materials for City services, programs, and activities.
- The City provides a digital grievance form on its dedicated website at www.icgov.org/ADA as an additional outlet for submitting an accommodation request.
- The City provides regular ADA-related trainings to staff.

These strategies are periodically monitored to ensure continued compliance and to address any inconsistencies in the application of these strategies.

PROGRAM & SERVICE ACCOMMODATIONS: ACTION STEPS

Target Implementation Date: Complete Fiscal Year 2026

1. Finalize the document laying out a consistent process for City staff to use in determining reasonable modifications as they are requested which addresses the following:
 - a. How a request can be made (including allowing a request to be made from someone on behalf of the individual with a disability and not requiring requests to be in writing).
 - b. To which designated staff member(s) a person making a request should be directed.
 - c. Procedures for documenting requests, accommodations, and the effectiveness of the resolution.
2. Develop an optional survey tool to evaluate the effectiveness of an accommodation by the requesting individual following the implementation of the accommodation.

¹ DOJ, Title II Regulations Subpart B

3. Provide specific training to customer service and public-interfacing staff on non-discrimination and accommodations for people with disabilities in services, programs, and activities.

4.2 COMMUNICATIONS, INFORMATION & SIGNAGE

Title II of the ADA includes the following requirements regarding Communications²:

- A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public are as effective as communications with others.
- A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability and equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.
- In determining what type of an auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities.
- A public entity shall ensure that interested persons, including persons with impaired vision or hearing can obtain information as to the existence and location of accessible services, activities, and facilities.
- A public entity shall provide signage at all inaccessible entrances to each of its facilities, directing 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.

COMMUNICATIONS, INFORMATION, AND SIGNAGE: COMPLIANCE STRATEGIES

Generally, the requirement to provide an auxiliary aid or alternate communications format is triggered when a person with a disability requests it.³ Recognizing that each situation and individual has unique circumstances and needs, requests for reasonable accommodation are addressed on a case-by-case basis. The request of the individual with disabilities is the first solution considered and implemented unless it results in a fundamental alteration to the nature of the program or results in undue burden. Some requests, such as providing a large print version of a meeting agenda, are very simple to accommodate while other requests may require more coordination and resources to address. Costs are not to be assigned to the individual requesting the alternative format.

The City has implemented the following for improved communications, information, and signage:

- The City's ADA Notice about the availability of reasonable accommodations, alternative formats of materials, and auxiliary aids is posted online and in City facilities.
- The Communications Division maintains knowledge of digital accessibility standards and tools, monitors accessibility of public-facing digital documents, and delivers training as needed to City staff on developing accessible and screen reader-friendly Microsoft Word files, PDFs, etc.
- The Communications Division maintains knowledge in accessible design and advises on font, spacing, contrast, and other design specifications for City materials.
- The Communications Division ensures the inclusion of alt text for graphics in digital documents.

² 28 CFR Sec. 35.160 - 28 CFR Sec. 35.163

³ ADA Best Practices Toolkit for State and Local Governments, Chapter 3(A)(1)

- Video captions are provided for all videos produced by City Channel 4, except for Board and Commission meetings, which will require additional funding. Captions are also available via online video played back through the website, YouTube channel, or Facebook.
- Regular updates to the Self-Evaluation & Transition Plan will report upon all strategies taken by the City to improve accessibility and carry out ADA compliance requirements.
- Staff ensures people in City materials and productions are reflective of Iowa City's diverse population, including people with disabilities.

These strategies are periodically monitored to ensure continued compliance and to address any inconsistencies in the application of these strategies.

COMMUNICATIONS, INFORMATION, AND SIGNAGE: ACTION STEPS

Complete in Fiscal Year 2026

1. Finalize a toolkit of adaptive aids and resources for staff who interact with the public, including Text-to-Telephone (TTY), Telecommunications Device for the Deaf (TDD), Telecommunications Relay Service (TRS), Video Remote Interpreting (VRI), live interpreters, and other alternative communication technologies.
2. Continue ensuring City publications and directories with phone numbers include information on how people who are deaf or have hearing loss or speech disorders can communicate with staff by phone.
3. Continue remediating non-compliant facility signage issues as identified in the Transition Plan.
4. Continue to explore options for expansion of closed captioning, including additional funding or technology to support captioned Board and Commission meetings and analog TV playback.

4.3 WEBSITE

The internet is widely considered a primary source of information for many and the City's website is used to communicate information and collect forms related to City services, programs, activities, and facilities. As such, ensuring the City website is accessible for people with disabilities is an effective means of meeting ADA requirements⁴.

Section 508 of the Rehabilitation Act Amendments of 1998 set accessibility standards for federal agencies and now incorporate the Web Content Accessibility Guidelines (WCAG), including WCAG 2.0 A and AA. These standards are considered best practices for local government websites.

WEBSITE: COMPLIANCE STRATEGIES

The City of Iowa City incorporates the following accessible components into www.icgov.org:

⁴ <https://www.ada.gov/pcatoolkit/chap5toolkit.htm>

- In conjunction with the 2023 website redesign, all new and modified web content pages are accessible including:
 - When navigation links are used, a 'skip navigation' link provides a bypass to the content. Page titles are descriptive to help individuals using screen-readers easily navigate.
 - All images, maps, and other graphics include alt tags or long descriptions so screen readers can access map links and information
 - Text links avoid verbiage that would be confusing to a screen reader (such as "click here"). The text clearly indicates what the link does and does not require any additional descriptions.
 - When tables with headers and row identifiers are used, the header and row identifier information is associated with each data cell by using HTML to work with a screen reader.
 - Linked and embedded documents and videos incorporate accessible features, such as screen-reader friendly technology or video captioning.
 - Blinking, flashing, or rotating features are minimized and, when included, may be paused.
 - Digital forms include descriptive HTML tags and work with screen-reader technology.
 - Color, font, and contrast of elements are moderated by trained Communications staff to ensure compliance with modern accessibility standards.
- With the 2023 website redesign, the City's site host includes an "Accessibility Checker" tool so staff making website updates can check their content for accessibility in real-time. Additional monitoring by trained Communications staff is ongoing.
- At least one Communications Division employee participates in an in-depth WCAG or other digital accessibility training per year to increase division knowledge of modern practices.
- Communications staff delivers accessibility training to assigned website managers in each department / division in order for them to receive administrative privileges. All web edits require approval from staff with digital accessibility training prior to posting.

4.4 TRAINING

An essential component of ensuring equal access to City programs, services, and activities and non-discrimination of people with disabilities is ongoing staff training. Staff trainings will focus on equipping staff who interface with the public with the awareness, knowledge, cultural competence, and resources to effectively serve people with disabilities.

TRAINING: COMPLIANCE STRATEGIES

Current training efforts include:

- The Office of Human Rights delivers various trainings throughout the year for both the public and staff. Trainings range from cultural competency to disability awareness and sensitivity trainings.
- The City's online training platform includes several ADA and disability sensitivity and customer service trainings for both frontline and supervisory staff. The City requires at least one annual mandatory training on topics such as disability sensitivity, effective customer service, reasonable accommodations, service animals, and related requirements. Supervisors have the ability to assign additional trainings.
- Facility and maintenance staff are receiving regular training in accessibility compliance and the fundamentals of building codes to ensure facilities are maintained in an accessible condition.
- The New Supervisor Orientation schedule includes an introduction to the ADA Coordinator which provides an opportunity to discuss relevant information related to the ADA for new hires.

- The City's designated ADA Coordinator completed the ADA Coordinator Training Certification Program certificate through the University of Missouri and Great Lakes ADA Center. This certificate required 41 credit hours of training plus passing a comprehensive exam and will require ongoing continuing education credits.

4.5 PUBLIC MEETINGS

Public meetings are a regularly occurring activity provided by the City and, in many cases, are legally required to be held. As public meetings are held for the purpose of conveying important information about public issues and projects and soliciting input from community members, it is critical meetings are accessible to all and ADA compliant.

PUBLIC MEETING: COMPLIANCE STRATEGIES

Current strategies to ensure public meetings are accessible to people with disabilities include:

- Statements of accommodation are included in public meeting notices, agendas, and news releases to notify the public they may request accommodation to participate.
- Individual requests for accommodation are addressed on a case-by-case basis with primary consideration given to the individual's requested form of accommodation.
- The City has assistive listening devices and continues to ensure they are available at public meetings where the sound is amplified.
- The Communications Division maintains a Translation and Interpretation Guidelines document, which includes contact information for agencies that provide interpretation and sign language services.

PUBLIC MEETING: ACTION STEPS

Complete in Fiscal Year 2026

1. Deliver staff training and resources on holding accessible meetings, including hybrid or virtual meetings.
2. Finish compiling a list of accessible meeting locations.

4.6 CONTRACTS

When the City contracts with consultants, contractors, or other entities to deliver public services, the entities are considered an extension of the municipal government and are required to adhere to ADA regulations:

- Bid documents for commodities, services, and consulting that the City issues contain provisions that any subcontracts made under the award shall not discriminate against any individual based on disability nor discharge or refuse to hire an individual because of a disability.
- Contracts and agreements that the City enters into for commodities, services, and consulting contain provisions that the contracted party shall not discriminate against any individual based on disability nor discharge or refuse to hire an individual because of a disability.

4.7 SERVICE ANIMALS

The Department of Justice published implementing regulations for Title II of the Americans with Disabilities Act, which include provisions regarding service animals⁵, and an FAQ resource about service animals and the ADA.⁶ Additionally, while federal law does not cover service-animals-in-training, Iowa law provides additional protections for service-animals-in-training, the individual with disabilities the animal serves, and the animal's handler, if different than the individual being served.⁷

As part of an ongoing compliance effort, City staff will be provided resources and training related to service animals including how to recognize service animals covered under the ADA, conditions service animals' handlers must follow while in City facilities, how to provide effective customer service to people with disabilities using a service animal and how to resolve conflicts related to service animal use in a City facility, and understanding the limited scenarios in which service animals may not be allowed or may be asked to leave

4.8 PUBLIC SERVICES

The City of Iowa City is comprised of over 25 different departments and divisions which provide a broad range of services, programs, and activities to the public. As part of the self-evaluation process, each City department and division self-evaluated their programs, services, and activities for barriers to access and full participation. This evaluation was conducted with the aid of a questionnaire as well as an accessibility barrier review tool. In addition to the specific action steps identified below, all City departments and divisions provide reasonable accommodations to facilitate equal access to program, services, and activities (see section **4.1 Program & Service Accommodations**).

Note: The Self-Evaluation addresses programmatic accessibility barriers only. Please see Chapter 3: Transition Plan for an overview of structural/architectural barriers and remedy plan.

PUBLIC SERVICES: COMPLIANCE STRATEGIES

All City departments identified ongoing non-discrimination and disability access compliance strategies they are undertaking. Below are some examples performed in essential public service areas:

PARKS & RECREATION

- Inclusive and adaptive recreation programs are offered, providing high-quality recreation and leisure opportunities for all (people with disabilities are welcome to participate in any programs).
- Iowa City Parks & Rec offers the "Rec & Ride" program, which provides free bus passes to individuals who are attending any recreation facility or special event in the park.

PUBLIC SAFETY

⁵ https://www.ada.gov/service_animals_2010.htm

⁶ <https://beta.ada.gov/resources/service-animals-faqs/>

⁷ https://educateiowa.gov/sites/files/ed/documents/2022-03-17_RevisedServiceAnimalRegulations.pdf

- Loved Ones Safe Together (LOST)⁸ is a program that ICPD administers in collaboration with several agencies that support people with disabilities, especially those disabilities that may cause individuals to become suddenly confused or disoriented. ICPD also implements Project Lifesaver⁹, an internationally recognized program that supports public agencies in quickly locating individuals who are at risk of wandering.
- All Iowa City police officers are trained in Crisis Intervention Training, which equips officers with the tools to recognize, respond to, and de-escalate crisis and mental health situations.

PUBLIC TRANSIT

- Paratransit service is provided through Johnson County SEATs, which is obligated to meet federal accessibility standards. People with disabilities are never required to use the SEATs paratransit service; eligible individuals may choose to use SEATs or fixed-route transit.
- In 2020, a joint partnership between the Iowa City, Coralville, and University of Iowa transit agencies implemented fare policy changes which eliminated fares for disabled persons.
- All buses are equipped with mobility lifts for assistive mobility devices and are tested regularly for compliant functionality.
- All buses are equipped with destination and stop announcement technology and utilize boarding and deboarding circulation paths that mitigate barriers for people with disabilities.

PUBLIC SERVICES: ACTION STEPS

As part of the self-evaluation process, each City department and division completed a general accessibility questionnaire about their service, program, and activity offerings and utilized a programmatic access assessment tool to evaluate potential non-structural access barriers of specific public programs and services. Additionally, members of the public and disability community were invited to submit input related to accessibility barriers in April 2023 through a listening post and via e-mail. Based on these responses, the following action steps were identified to address non-structural gaps or barriers in ADA compliance for City programs, services, and activities.

As action items are completed, this report will be updated annually to reflect recently completed ADA improvements. Additionally, many action items listed will be ongoing strategies after an initial implementation, rather than a one-time action step. Please note many Programmatic Action Steps contained in the various sub-sections of Chapter 3 of the Iowa City Self-Evaluation and Transition Plan apply organizational-wide and will also be pursued, though not reflected here.

ONGOING EFFORTS

| Dept. | Action | Steps Taken |
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| CMO – Climate Action | Enable automated captions in Zoom for virtual presentations. | Currently an ongoing practice. |
| CMO – Climate Action | Include general accommodations statement in newsletter. | Events in regular newsletters link to webpage which includes accommodation statement. |
| CMO – Climate Action | Implement accessibility review checklist for events and make an effort to balance event offerings (i.e. Bird Walks, ClimateFest, etc.) in accessible locations. | Currently ongoing. Next steps include providing accommodation request information in ClimateFest mailer beyond just pointing to webpage for details. |

⁸ <https://www.icgov.org/LOSTprogram>

⁹ <https://projectlifesaver.org/>

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| CMO – Climate Action | When holding events off-site, bring signage to post identifying nearest accessible entrances if such signage does not exist. | Signage created and kept in event tote; aiming for more consistent usage and clarity on outdoor event protocols |
| CMO – Communications | Provide support to neighborhood associations for including and accommodating individuals with disabilities in neighborhood efforts. | Added language to neighborhood association grant forms to prioritize ADA accommodations for meetings and events. |
| CMO - Economic Development | Ensure agreements with artists, entrepreneurs, and small businesses include a provision about non-discrimination on the basis of disability. | New language was added into artist and small business grant agreements and will be including in any new agreements. |
| CMO – Equity & Human Rights | Enable automated captions in Zoom for live virtual presentations. | Currently an ongoing practice for all programs and meetings. |
| CMO – Equity & Human Rights | Ensure agreements include a provision about not discriminating on the basis of disability. | City-issued agreements have an unlawful discrimination disclaimer that includes disability. |
| CMO – Equity & Human Rights | Explore closed captioning for videos and recordings. | Currently all videos and recordings offer the option to view with CC. |
| CMO – Equity & Human Rights | Use an accessibility review checklist for events and make an effort to locate event offerings in accessible locations. | Currently an ongoing practice for all events. |
| CMO – Equity & Human Rights | Perform targeted outreach with local organizations that serve people with disabilities about discrimination complaint policy. | Sent out mailers with handouts and brochures introducing these specific organizations to City services. |
| Finance | Continue reviewing and making updates to Budget Book and Budget-a-Glance document for ADA compliance. | Every year staff watches for this and tries to update any issues. |
| Finance | Water shut-offs can be disproportionately harmful for people with disabilities if they reply upon water for health-related needs. Conduct outreach with local disability advocacy organizations to promote low-income program and registering multiple contact methods. | Periodically conducts outreach on low-income program such as through the Disability Services Coordinating Committee and strives to have multiple contact methods on all accounts. |
| Fire | Conduct outreach to local disability advocacy and service organizations to promote the Fire Detector Battery Program. | Annually this is a focus at National Night Out with partnership with South of 6. |
| NDS – MPO | Ensure letters and other digital and print materials include a disability accommodation statement. | Statement provided by Communications, and staff have been instructed and put it into use. |
| NDS | Consider rehabbing some units in Homeownership Program to be fully accessible and/or fitted for aging in place. Increase outreach and promotion of program with local disability advocacy and service organizations. | Staff follows accessibility standards for new homes with City financial assistance but homeowner determines scope of rehab. Accessibility improvements are often included for disabled or elderly homeowners. Marketing is ongoing, such as to the Senior Center's morning coffee group. |
| Parks & Rec – Parks | Partner with disability advocacy and service agencies such as Systems Unlimited and Mayor's Youth | Ashton House, the new adaptive programming hub, offers no cost drop-in programming three times during the week and offers outdoor spaces to |

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| | Empowerment to offer rental opportunities at no fee during the week. | groups and the gazebo at no cost. Staff frequently communicates with these organizations to identify space and program needs and provides assistance. Examples: Sound Reach utilizes the Recreation Center Social Hall for music programs throughout the year at no cost, the Inclusion Club has access to softball fields for Special Olympics practices, the Iowa City Autism Group accesses free gymnasium space, and Reach For Your Potential received a garden bed at no cost in 2025. |
| Parks & Rec – Parks | Update Community Garden registration process to be more inclusive (currently requires in-person registration). | Six raised garden beds are reserved for those with access needs, and requests are reviewed to ensure applicants are qualified. The six raised beds are not publicly available during registration but are instead distributed as needed and phone registration is allowed. One raised bed remains available. Additionally, accommodations can be requested to identify alternative solutions that do not require in-person registration. |
| Park & Rec – Recreation | Consider relocating summer camp to a more accessible facility. | Summer Camp has been relocated temporarily to Mercer Park Aquatic Center for 2025 and will likely transition to the new City Park Pool meeting room for 2026. |
| Parks & Rec – Recreation | Partner and share with other organizations offering programming; assign an AIR staff member to service on the Iowa City Disability Services Coordinating Committee. | Staff continue to work alongside, partner with and share efforts amongst various local organizations to continue improvements in adaptive and inclusion services. Staff has also joined the City's Disability Services Coordinating Committee. |
| Parks & Rec – Recreation | Ensure adequate number of staff are certified and trained to assist and meet assistance requests for youth programming. | Adequate & Inclusive Recreation staff are primarily hired from the University of Iowa's Therapeutic Recreation program. Many are passionate about assisting the community and staff are thoroughly trained so they are prepared to provide assistive services. |
| Parks & Rec – Recreation | Deliver inclusion training to recreation staff focused specifically on assistive and accommodation practices for recreation programming. | Adequate & Inclusive Recreation staff are thoroughly trained so they are prepared to provide assistive services, including an overview on accommodation requests in order to properly prepare staff to provide the best experience possible for the requesting participant . |
| Police – Animal Center | Conduct social media promotion and outreach with local disability service and advocacy organizations to promote adoption opportunities, community pantry, volunteer programs, and public education or tour programming. | Animal Services is currently engaged in this outreach and will continue their efforts. |

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| Public Works - Refuse | Add disability accommodation statement to environmental education event notices and communication materials. | New notices and materials will continue to be reviewed. |
| Public Works – General | Ensure accommodation statements are listed on relevant Public Works webpages or public communication materials. | Existing and new webpages and materials continue to be reviewed. |
| Senior Center | Consider partnerships or sponsorships for free or reduced memberships for people with disabilities. | Currently provide free programming to specific populations, such as the Parkinson's music group and exercise. |

COMPLETED ACTIONS

| Dept. | Action | Steps Taken |
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| City Clerk | Ensure residents in mobility devices can utilize the microphone for participating in public comment during Council meetings. | Public comment podium is adjustable height and provides sufficient knee clearance for wheelchair. |
| City Clerk | Add information about notary services to webpage | Info about notary services was added to the City Clerk's webpage to ensure information about this service is accessible. |
| CMO – Communications | Modify online customer service portal to include accommodation alternative or alternative form accessible to screen readers. | Added contact information to customer service portals to help those experiencing issues with access. |
| CMO - Economic Development | Include disability accommodation statement on webpages, news releases, agendas, and grant application forms. | Disability accommodation statement added to Council EDC and Public Art Advisory Committee agendas and news releases, Sculptor's Showcase and Public Art Matching Grant application forms, and on the Public Art webpage. |
| Finance | Ensuring purchasing bids and contracts include a provision about non-discrimination on the basis of disability. | Added to the General Terms and Conditions of all outgoing RFBs, RFPs, RFQLs, RFQs. |
| Fire | Include disability accommodation statements on news releases, webpages, and other informational materials advertising programs and events. | All items posted on City website are ADA compliant. |
| NDS | Add a disability accommodation statement to Energov and other online forms, applications, and program brochures. | Statements added to relevant documents. |
| NDS | Ensure funding agreements with agencies include a provision about non-discrimination on the basis of disability. | Statements included in all federal agreements. |
| NDS | Update Homeowner Exams to remove accessibility barriers and include a testing accommodation statement for people with disabilities. | Addressed in June 2024. |
| NDS | Reduce unnecessary HCDC paperwork and ensure reading materials are in large, clear print on presentations. | Reduced several requirements during HCDC allocation process. Summary documents now provided for commissioners. |
| Parks & Rec – Parks | Feature accessible picnic tables on social media to increase awareness and highlight some highly accessible parks. | Social media post in 2024 featured accessible tables. |

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| Parks & Rec – Recreation | Update Vendor Handbook to meet ADA compliance and screen-reader compatibility. | The Handbook has been updated to meet ADA compliance and screen-reader capability. |
| Parks & Rec - Recreation | Update Recreation Programming Guide to encourage inclusion of people with disabilities in standard rec programs (separate from AIR), such as updating language, denoting accessible activities with the universal accessibility symbol, incorporating more inclusive images, etc. | Sections in the seasonal activity guides note what the department can provide for Inclusion Services, how to request, the primary staff contact, and that it is offered at no additional cost. In addition, images of individuals with visible physical disabilities and images of the universal accessibility symbol are used throughout. |
| Parks & Rec – Recreation | Resolve disconnect between participant enrollment and requesting assistance with delivering assistance in the program by establishing a clear operating procedure for handling accommodation requests. | Developed procedure for handling accommodation requests, including the staff responsible for discussing specific needs with the registrant and/or guardian. Particularly for youth, a supplemental registration form helps gather information to tailor the accommodation to specific needs. |
| Police | Update Urban Bow Hunt page to include link to DNR's hunting accommodation policy. | Link to DNR's accommodations policy to deer management webpage. |
| Senior Center | Work with the Communications Division to ensure weekly e-mail platform meets ADA digital communications standards and best practices. | Addressed in the summer of 2023. |
| Senior Center | Procure additional assistive listening devices to place in additional classrooms. | Assistive listening devices now present in Assembly Room, Room 302, and Room 308. Also applied for grant funding to procure mobile assistive listening devices for programming in the community. |
| Senior Center | Recently completed items of note. | Increased online/hybrid programming that includes captions, incorporated seating that accommodates all body types, purchased new piano that connects to the sound system and including assistive devices, moved front desk to ground level with accessible entrance, and updated braille classroom number signs. |

ACTION PLAN - COMPLETE IN FISCAL YEAR 2026

| Dept. | Action | Steps Taken |
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| CMO – Climate Action | Use an online accessibility checker tool to review accessibility of linked websites and PDFs for Climate Ambassador Program. | Using Adobe Pro accessibility tool to evaluate PDFs on Climate Action web pages. Anticipate completion in May 2026. |
| CMO – Communications | Continue phased conversion of non-compliant printable forms and web documents to accessible formats or provide an accessible link to request a compliant document. | Staff continues to update forms and documents and to provide staff training. Staff is implementing a purchasing mechanism to require consultants to use ADA compliant tools for engagement. |

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| CMO – Communications | Consider options for expanding video closed captioning, including CC for board and commission meetings and analog tv playback on City Channel 4. | Budget dependent. Digital transmission alternatives are being investigated for potential CC options on TV. |
| NDS | Use an online accessibility checker tool to review accessibility of online brochures and other informational PDFs about programs. | Staff received training but turnover means new staff will need to receive training. Goal is to address next FY. |
| NDS – MPO | Use an online accessibility checker tool to review accessibility of MPO website. | Staff trained on website accessibility by Communications staff. |
| Parks & Rec – Cemetery | Update public-facing documents and forms to be ADA compliant and available online. | Most forms are available online and are ADA compliant, but work is ongoing. Currently updating the deed transaction form to a fillable PDF and converting the “Rules and Regulations” into a screen-reader-friendly format. |
| Parks & Rec – Parks | Develop informational video about various parks accessibility features to better communicate how various playground designs are sensitive and meet needs of all abilities. | Staff is considering the best way to feature accessible features of our playgrounds in video form. |
| Parks & Rec - Recreation | Train staff in using TTY relay and other alternative communication methods for program registrations and reservations. | Staff attended a presentation by Relay Iowa and discussed options for the purchase and installation of Captioned Telephone devices at the recreation center front desks. Devices have not been purchased yet. |
| Park & Rec – Recreation | Consider requesting temporary staff funding or volunteer partnerships for 1:1 aides or companions for participants with additional needs. | Accessible and Inclusive Recreation requested additional staff in FY26 but funding was not available. |
| Police | Add disability accommodation statement to program brochures and applications, such as the Community Police Academy. | Literature will be checked, and necessary language will be added |
| Senior Center | Carry out interior improvements, including ADA improvements, as identified in the Senior Center Master Plan. | Interior design for the Senior Center is scheduled to begin in 2026. |

ACTION PLAN - COMPLETE IN FISCAL YEAR 2027 OR BEYOND

| Dept. | Action | Target Completion Date |
|------------------------|---|-------------------------------|
| Parks & Rec – Cemetery | Explore option of implementing interactive / 360-degree viewing map for lot sales. | 2026-2027 |
| Parks & Rec – Parks | Request budget funds to install paved trail between gardens and water source or implement alternative means of easier water access for those with reduced mobility. | 2026-2027 |