

EXECUTIVE SUMMARY



SELF-EVALUATION AND TRANSITION PLAN

Americans with Disabilities Act Section 504 of the Rehabilitation Act

City of El Centro

1275 W. Main Street
El Centro, CA 92243

2018-2020



Prepared by

Disability Access Consultants, LLC



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The City of El Centro’s ADA/504 Self-evaluation and Transition Plan was prepared by Disability Access Consultants, LLC with the collaboration and assistance of City of El Centro staff and input by other interested individuals and community members. Frank Soto served as the primary project contact and provided the overall project direction and oversight. Frank Soto is the designated City of El Centro ADA/504 Coordinator.

A copy of the Self-evaluation and Transition Plan is available from the ADA/504 Coordinator. Accessible alternate formats are available.

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City of El Centro ADA/504 Self-evaluation and Transition Plan Executive Summary

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

The ADA/504 Self-evaluation and Transition Plan of policies, procedures, activities, events, and facilities was conducted in 2019-2020 under the direction of Frank Soto, Assistant Community Development Director/Building Official. Frank Soto is the designated ADA/504 Coordinator for the City of El Centro.

Disability Access Consultants, LLC (DAC) was contracted to conduct a comprehensive survey of all City programs, services, activities, polices, buildings, parks, parking lots and public rights-of-way. The scope of work included 44 facilities and parks, 232 linear miles of sidewalk, 1,761 curb ramps, 46 signalized intersections and 71 bus stops/shelters.

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

The City of El Centro Executive Summary contains findings regarding the extent to which the City of El Centro's policies and practices provide access to the City's programs, services, and activities for persons with disabilities. Both programmatic and physical barriers are discussed in the City of El Centro Executive Summary. Recommendations may not necessarily indicate corrective action, but in many cases are recommendations that may enhance the current compliance activities.

Findings and recommendations for potential physical barriers are found in the online DACTrak secure accessibility management software program. DACTrak contains photographs of physical barriers, GIS information, findings, recommendations, estimated costs, and other information. Custom reports and transition plan information can be generated from DACTrak to monitor and track the implementation of the plan.

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

Policies and procedures that govern the administration of the programs, services, activities and events of the City are documented as findings and recommendations in this executive summary.

The results from the ADA/504 Self-evaluation demonstrate not only the commitment by the City to provide access to City programs, services, and activities, but documentation of the overall compliance by the City of El Centro and outlines a framework for enhancing compliance.

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

The purpose of the City of El Centro Americans with Disabilities Act (ADA) Title II and Section 504 (504) Self-evaluation is to document the results of the City of El Centro's review of access to programs, services, activities, events, facilities, parks, and public rights-of-way by individuals with disabilities in order to determine if any discriminatory or potentially discriminatory practices, policies or procedures exist that may deny access for individuals with disabilities. This report contains findings and recommendations based on the ADA/504 review of the City of El Centro and includes a review of potential programmatic and physical barriers that may deny access for persons with disabilities. As evidenced by this study and update, the City of El Centro (City) is committed to complying with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 (504), and other federal, state statutes and regulations to provide accessibility for persons with disabilities. The update further serves to demonstrate the ongoing compliance efforts by the City.

The City of El Centro contracted with Disability Access Consultants, LLC (DAC) to conduct a review of programs, services, and activities of the City in accordance of Title II of the ADA. City buildings, parks and public rights-of-way were assessed to update the City of El Centro ADA Self-evaluation and Transition Plan. The study included accessibility requirements for the Americans with Disabilities Act (ADA) Title II, the California Building Code, Caltrans requirements, California Manual on Uniform Traffic Control Devices (CAMUTCD) and the Public Right-of-Way Accessibility Guidelines (PROWAG). The 2010 ADA updates added accessibility requirements for areas such as recreational sites, golf facilities, play areas, recreational boating sites, fishing piers, swimming pools, wading pools, and judicial facilities. Accessibility requirements were also changed for items such as reach range, water closets, assembly areas and other areas. The City of El Centro current plan updates standards and provides safe harbor for those areas and items that were compliant under prior accessibility codes.

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

To further the City's commitment to provide programs, services and activities in a nondiscriminatory manner for individuals with disabilities, the City conducted an updated ADA/504 Self-evaluation of programs, services, activities to identify any potential programmatic barriers and a transition plan to identify any physical barriers.

The City of El Centro has demonstrated a commitment from the highest level of leadership with coordination of compliance activities and involvement of persons with disabilities and methodologies for compliance procedures. As evidenced in the current updated ADA/504 Report, the City of El Centro understands that the ADA/504 Compliance Plan is not a static document but requires ongoing implementation and periodic updates. The ADA/504 Self-evaluation provides a current benchmark for accessibility efforts by the City and provides an updated framework for implementation. The current study also incorporates recent code changes, updates in accessibility standards and regulations in addition to accessibility trends. The ADA Self-evaluation and Transition Plan activities work together to address the requirements of the ADA.

Requirements to Conduct an ADA Self-evaluation and Transition Plan

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

Several regulatory agencies require the development and implementation of an Americans with Disabilities (ADA) plan and a Section 504 Rehabilitation Act plan. The United States Department of Housing and Urban Development requires an ADA/504 Self-evaluation and Transition Plan that includes the oversight of the use of Community Development Block Grant (CDBG) funds in a nondiscriminatory manner. The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The CDBG program requires public agencies to develop, maintain and implement an Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act ADA/504 Self-evaluation and Transition Plan to ensure that programs, services, activities and facilities are accessible for persons with disabilities. The City became an Entitlement Community in 2009 and qualified to receive federal funding from the U.S. Department of Housing and Urban Development to specifically address the needs of low and moderate-income individuals.

Duties and Fundamental Alterations

ADA Part 35.164 does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. If the public entity believes that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity and must be accompanied by a written statement of the reasons for reaching that conclusion.

Methodology for the Self-evaluation and Transition Plan

A City of El Centro staff member was designated to provide oversight representation and direction regarding the study of City programs, services, activities, and events. Frank Soto, Assistant Community Development Director/ Building Official was designated as the ADA/504 Coordinator and project contact.

Several methods have been used to provide a comprehensive review regarding the public's accessibility to programs, services and activities offered by the City, including:

- A kick-off meeting call was held on May 4, 2018 with DAC and City staff. An ADA Planning Committee was formed and included the following participants:
 - Frank Soto, ADA Coordinator/Building Official
 - Mike Reed, Facilities and Buildings
 - Abraham Campos, City Engineer/Public Works Director
 - Angel Hernandez, Community Development Department/Associate Planner

- Liz Zarate, Management Assistant, City Manager's Office
 - Tim Mahoney, Disability Access Consultants (DAC)
 - Barbara Thorpe, Disability Access Consultants (DAC)
 - Mike Boga, Disability Access Consultants (DAC)
 - Jennie Grover, Disability Access Consultants (DAC)
- A project start date of May 2018 was confirmed for the surveys of facilities, parks, sidewalks and signalized intersections for the initial phase and later phases included the remainder of the public rights-of-way.
 - Two (2) accessibility website reviews were completed for compliance with WCAG 2.0 Level AA.
 - A survey of community members and organizations representing persons with disabilities was utilized to provide public input.
 - A survey for City staff and administrators was utilized to incorporate input from staff.
 - Survey information was placed in the Resident Headlines section of the City's website, a banner on the City's homepage, in the local Desert Sun newspaper-the Imperial Valley Press.
 - A review of the previous efforts by the City was conducted.
 - A review of policies, procedures, programs, services and activities was conducted for compliance with Title II of the ADA and Section 504.
 - An accessibility inspection of City sites, facilities, parks, public rights-of-way, and other public areas was completed by DAC.
 - Information was posted on the website, newspapers, and in other publications.
 - Public postings and notices requesting input were placed in high-use areas of the City

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

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

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

Some areas reviewed overlap in terms of findings and recommendations and the area they are reported in the executive summary. Some areas overlap as they are a part of the overall accessibility

of the City. For example, if accommodation statements or procedures for requesting a reasonable accommodation by a person with a disability is not available, access to programs, services and activities may not be available.

Another example of overlap is the request for a reasonable accommodation for persons with disabilities in housing that is reported in the category of "Statement of Accommodations", but is also discussed in "Access to Programs, Services and Activities".

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

Background

Title II of the Americans with Disabilities Act (ADA) Part 35 requires nondiscrimination on the basis of disability in state and local governments as amended by the final rule published on August 11, 2016. Part 35.101 outlines the purpose and broad coverage. The purpose of this part is to implement subtitle A of Title II of the Americans with Disabilities Act of 1990 (42 U.S. C. 12131–12134), as amended by the ADA Amendments Act of 2008 (ADA Amendments Act) which prohibits discrimination on the basis of disability by public entities.

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

The ADA has five separate titles:

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

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

Section 504 requires public entities that receive federal or state funding to ensure that they do not have any discriminatory practices. The requirements of Section 504 are very similar to those of the ADA that was passed by congress in 1990. Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112) prohibits discrimination based on disability in federally assisted programs and the flow through sub-recipients, including contractors. The Americans with Disabilities Act passed in 1990

(Public Law 101-336) is a broader civil rights statute that prohibits discrimination against people with disabilities. In addition to the Department of Justice (DOJ), the Federal Highway Administration's (FHWA) and the United States Department of Transportation (USDOT) have requirements for accessibility in accordance with the Americans with Disabilities Act (ADA) and Section 504. Pedestrians with disabilities should have an equal opportunity to use the pedestrian access routes in an accessible and safe manner.

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

As the California Department of Transportation (Caltrans) is a recipient of federal funds and cities, counties and other public entities are subrecipients of the flow through funding, public entities are required to demonstrate their compliance with the ADA and Section 504 of the Rehabilitation Act. A component of the DOT requests is the development of a comprehensive ADA/504 Self-evaluation and Transition Plan. Completion of a comprehensive ADA Self-evaluation and Transition Plan is an accepted practice to take the place of an updated Section 504 plan. The City's ADA/504 Self-evaluation and Transition Plan meets the requirements of not only the ADA plan, but the Section 504 plan as well. By completing this comprehensive plan, the City will not only meet its ADA and Section 504 compliance requirements but will have a sustainable plan that can be updated, monitored, managed, and will document progress for ongoing accessibility compliance.

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

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

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

California law provides similar protections to Title II and Section 504. Government Code Section 11135 prohibits discrimination by state and local governments. The Unruh Civil Rights Act (Civil Code Section 51) and the Disabled Persons Act (Civil Code Sections 54-55.32) prohibit disability-based discrimination by business establishments also applies to government entities in some circumstances.

State law or other federal laws such as Section 504 may provide a higher level of protection than Title II of the ADA. The higher standard should be applied, whether state or federal.

Classification of the City of El Centro

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

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

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

General Information About the City of El Centro

According to information on the City’s website:

El Centro is the center of one of Southern California's most promising new commercial and industrial regions. It covers 11.019 square miles and is the largest city in Imperial County. The city is located 616 miles southwest of San Francisco, 117 miles east of San Diego and 245 miles west of Phoenix, AZ. El Centro is accessible Via Interstate 8, State Highway 86 and State Highway 111.

In 1906 W.F. Holt and C.A. Barker purchased the land on which El Centro was eventually built for about forty dollars an acre and invested \$100,000 in improvements. The City of El Centro was incorporated on April 16, 1908. Early growth was rapid with the city's population reaching 1,610 by 1910 and more than tripling by 1920 to 5,646 people.

By the mid-forties, El Centro had become the second largest city in the Imperial Valley, with a population of 11,000 people. El Centro had also become the principal wholesale center of the area and the location of the Imperial Irrigation District (IID) Administrative Offices. The principal industries of El Centro in the forties revolved around agriculture - fruit and vegetable packing and shipping, ice plants, a flax fiber plant, box factories, and concrete pipe and brickyards.

By the early 1980s the two largest employment sectors in the El Centro labor market area were Government and Wholesale/Retail Trade, reflecting El Centro's emerging role as a regional administrative and commercial center.

City Government

The City of El Centro was incorporated on April 16, 1908. The City is operated by a Council/Manager form of government. The City is a charter city and owns the local hospital El Centro Regional Medical Center. The members of the City Council are also the Successor Agency to the Redevelopment Agency and Successor Housing Agency governing boards. The City Council is composed of five elected members who serve four year, staggered, terms. The City Council selects a Council member to serve as the Mayor for a one-year term. The City Clerk serves as the liaison between the public and the City Council.

- Mayor, Efrain Silva
- Mayor Pro Tem, Jason Jackson
- City Council
 - Council Member-Edgard Garcia
 - Council Member-Tomas Oliva
 - Council Member-Cheryl Viegas-Walker
- City Manager, Marcela Piedra
- City Clerk, Norma Wyles, CMC

City Boards/Commissions

- Building Board of Appeals
- Board of Trustees – ECRMC
- Library and Community Services Board
- Imperial Valley Housing Authority
- Personnel Appeals Board
- Planning Commission

City Departments

- City Clerk's Office
- City Council
- City Manager's Office
 - Legal Division
- Community Development Department
 - Code Enforcement
 - Building & Safety
 - Planning & Zoning
- Community Services Department
 - Economic Development Division
 - Library Division
 - Parks & Recreation Division
- Fire Department
 - Station 1
 - Station 2
 - Station 3
- Finance
 - Water Service-Bill
 - Accounts Payable

Efrain Silva - Mayor

Jason Jackson
Mayor Pro Tem

Edgard Garcia
Council Member

Tomás Oliva
Council Member

Cheryl Viegas-Walker
Council Member

- Business Licenses
- Human Resources
 - Information Technology
- Police Department
 - General Information
 - Records
 - Investigations
 - Chief's Office
 - Training/Recruitment
 - Animal Control
- Public Works
 - Engineering Division
 - Environmental Design
 - Facility Maintenance
 - Street & Utility Maintenance
 - Wastewater Division
 - Water Treatment Plan

Differences Between a Self-evaluation and Transition Plan

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

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

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

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

A comprehensive transition plan should contain the following:

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

Structural changes are not always required where there are other feasible solutions such as moving a recreational class to an accessible location. However, structural changes leading to increased integration should be considered where feasible.

Where structural modifications are required to achieve program accessibility, a public entity with 50 or more employees must complete a transition plan that provides for the removal of these barriers. Any structural modifications must be completed as expeditiously as possible and are required to be in the City's transition plan.

Prior ADA Self-evaluation and Transition Plan

The comprehensive 2018-2020 ADA/504 Self-evaluation and Transition Plan completed by Disability Access Consultants, LLC (DAC) included a review of programmatic and potential physical barriers. City parks, facilities, and the public right-of-way (PROW) were reviewed. The current plan updates the previous ADA Self-evaluation and Transition Plan conducted by the City in 2000.

Regular Self-evaluation and Transition Plan Updates

The ADA/504 plan is a living, dynamic document and requires regular updates to keep it current. As barriers are removed it is important to update the plan to reflect the current barrier removal progress. If new facilities are built or acquired or no longer used by the City, the City will need to update the ADA Plan. Many city and county governments have a practice of updating their plan on an ongoing basis but prepare a progress update. In accordance with 35.150 of the ADA, the City's designated ADA Coordinator, Frank Soto, is empowered with oversight responsibility for implementation of the requirements of the ADA, 504 and related accessibility standards and regulation.

In its continuing efforts to maintain compliance, the City has several mechanisms in place to provide for an ongoing update of the self-evaluation and transition plan and to provide a realistic and manageable plan to remove barriers. The City has the use of a secure online accessibility management software called DACTrak, to update, document and track the findings and the implementation of the plan, including progress reports. The City understands that the ADA/504 plan is a living, ongoing document and requires regular updates to keep it current.

Accessibility standards and regulations may change and will be incorporated into the plan as appropriate. Updates may also be necessitated by changes in the ADA, the California Building Code, PROWAG, Caltrans Standards and MUTCD. An example requiring updates that was facilitated by litigation is on-street parking. Another example is the FHWA and DOT memorandum clarifying what is maintenance and what is an alteration and when alterations trigger curb ramp installations. Due to the intake methodology for the site inspections that captured actual and detailed field measurements, DACTrak can be updated as codes change, which allows the ADA plan to stay current without the need to do any re-inspections.

As public input is important to develop and prioritize the plan, the City solicited input from the public and staff as described in the public input portion of this document. It is recognized that input from stakeholders is a valuable component of an updated, usable, and realistic plan. It is anticipated that additional comments and input may be received and incorporated into the plan as appropriate.

Location of Self-evaluation and Transition Plan

Requests for copies or information about the City of El Centro ADA/504 Self-evaluation and Transition Plan can be obtained from the Frank Soto, ADA Coordinator, City of El Centro, 1275 W. Main St., El Centro, CA 92243 by email: fsoto@cityofelcentro.org or by phone at (760)-337-4508.

In addition, the City offers alternate methods and accommodations (e.g., enlarged print, Braille) to provide access to review or provide input into the City's plan.

Designated ADA and 504 Coordinator

The regulations implementing the ADA and 504 require any public entity with fifty (50) or more employees to designate at least one employee to coordinate ADA/504 compliance (28 CFR § 35.107(a)). In addition, federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA Coordinator. Furthermore, in providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160.

Although the law does not refer to this person as an "ADA Coordinator," this term is commonly used in state and local governments across the country and will be used in this chapter. Part 35.107 states that "a responsible person should be designated" should serve to oversee and implement the plan. The ADA Coordinator is responsible for coordinating the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated in accordance with Title II. A government entity may elect to have more than one ADA Coordinator; however, this may be confusing for the public. Another option is to designate "ADA Liaisons" for departments or key areas of government in addition to the City's ADA Coordinator.

The requirement for designation of a particular employee and dissemination of information about how to locate that employee, helps to ensure that members of the public, organizations and staff can easily access the ADA Coordinator who is familiar with the requirements of the ADA.

The information below in the indented paragraph is extracted from the Department of Justice (DOJ) publication entitled "ADA Best Practices Tool Kit for State and Local Governments" regarding the requirements to designate a responsible person to oversee the ADA Plan and initiatives, known as the ADA Coordinator.

"If a public entity has 50 or more employees, it is required to designate at least one responsible employee to coordinate ADA compliance in accordance with 28 C.F.R. part 35.107. A government entity may elect to have more than one ADA Coordinator. Although the law does not refer to this person as an "ADA Coordinator," this term is commonly used in state and local governments across the country and will be used in this chapter. The ADA Coordinator is responsible for coordinating the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated Title II. The name, office address, and telephone number of the ADA Coordinator must be provided to interested persons."

According to the DOJ Publication, an effective ADA Coordinator has, but is not limited to, the following skills:

- Familiarity with the state or local government's structure, activities, services
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act 29 U.S.C. § 794
- Experience and understanding of a broad range of disabilities and acceptable terminology regarding disabilities
- Knowledge of effective communication for persons with disabilities, accessible alternative formats, technologies that enable people with disabilities to communicate, participate, and perform tasks
- Ability to work cooperatively with the local government and people with disabilities

- Familiarity with any local disability advocacy groups or other disability groups
- Skills and training in negotiation and mediation
- Organizational and analytical skills

FINDINGS

Compliant

- ✓ The City of El Centro has designated Frank Soto as the City's ADA Coordinator.
- ✓ Frank Soto's name and contact information are listed on the PDF and Word versions of the City's grievance procedures and forms and on the PDF and Word versions of the City's Nondiscrimination and Public Notice.
- ✓ The ADA Coordinator's name and direct contact information is listed:

Frank Soto
ADA Coordinator
City of El Centro
1275 W. Main St.
El Centro, CA 92243
Email: fsoto@cityofelcentro.org
Phone: (760)-337-4508
TTY: by state relay at 7-1-1

RECOMMENDATIONS

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

- The ADA Coordinator's name and contact information should also be listed directly on the Accessibility web page of the website. This will help to locate the ADA Coordinator's name and contact information via the Search Box of the City's website, thus making this contact information more accessible.
- The City should consider the appointment of a designated Section 504 Coordinator to meet current requirements. The ADA and 504 posting can be included as ADA/504 Coordinator and can be included on the website and applicable documents.
- Additional methods should be implemented by the City to increase the knowledge of the identity of the ADA and 504 Coordinator.
- Information regarding the identity of the City's ADA Coordinator should continue to be provided to staff, posted at all City locations, incorporated into new employee orientation and volunteer packets, and placed in frequently used publications, on the website and in staff and public directories.

- The City should consider adding an enhanced ADA information page to the website to provide easy access to not only the identity of the ADA Coordinator, but the resources that are available to include reasonable accommodations and grievance procedures and forms.
- The identity of the ADA Coordinator should be updated to if the identity of the ADA Coordinator changes to identify the current identity of the ADA Coordinator. If there is more than one ADA Coordinator identified, the roles and responsibilities should be clearly defined. It is recommended that one ADA Coordinator be designated for the City.
- It is recommended that the City continue to publish the name, address, email address and phone numbers of the City ADA Coordinator in appropriate public notices, brochures, pamphlets, press releases, the website and other documents frequently distributed to the general public. Publications should also include a TDD/TYY and/or the California relay phone number.
- The City should consider adding a “How do I” section to the website to assist with finding items such as the identity of the ADA Coordinator, how to request a reasonable accommodation and other items such as providing accessibility input regarding a concern or compliment.
- If additional City staff are assigned ADA duties specific to each department, the City could designate “ADA Liaisons” for certain areas in addition to the overall ADA Coordinator. This method will avoid confusion by the public regarding who to contact and may increase the communication between departments. The designation of one ADA Coordinator will assist with the requirement to track complaints and their resolution (ADA and 504 requirement).
- City staff should receive ongoing information or training regarding the requirements and role of the ADA Coordinator and the 504 Coordinator.

Grievance/Uniform Compliant Procedures

A public entity that employs fifty (50) or more people must adopt and publish grievance procedures which provide for the prompt and equitable resolution of complaints alleging any action that would be prohibited by the ADA (28 CFR § 35.107(b)). The term “grievance procedure” is used by the Department of Justice. City governments may use the term “complaint” or “uniform complaint procedures” which may be identical or very similar. The current City grievance procedures and forms are included in Appendix B.

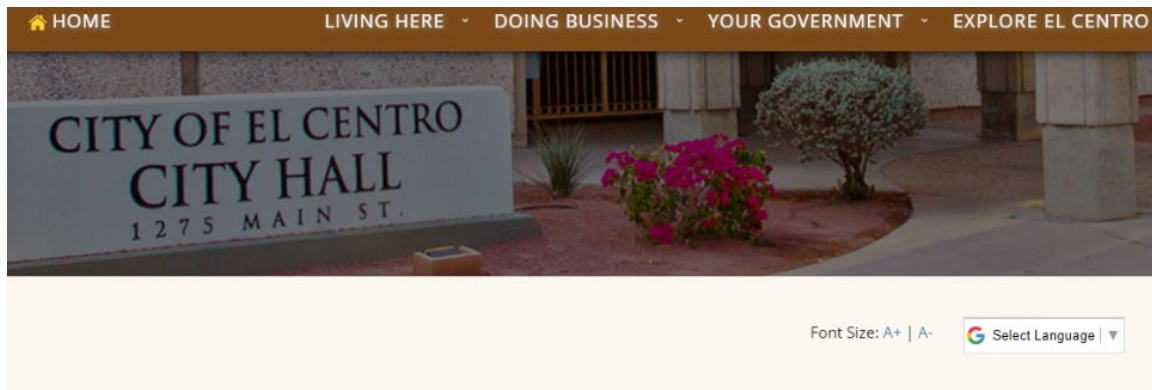
A public entity that employs 50 or more people shall designate at least one employee to coordinate its efforts to comply with and fulfill its responsibilities under Title II of the ADA, including the investigation of complaints. A public entity shall make available the name, office address, and telephone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

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

FINDINGS

Compliant

- ✓ The City's grievance procedures and grievance form are readily available on the website.
- ✓ Grievance procedures were available in English and Spanish. Other languages were available by selecting the "select language" drop down available on the website.



A screenshot of the City of El Centro website content area. On the left is a grey sidebar with the heading 'HOME' and a list of navigation links: Home, About El Centro, Community Newsletters, Community Sponsorship, Legal Division, Measure P, Press Releases, and Proclamation Requests. The main content area has the heading 'Americans with Disabilities Act' and a paragraph stating: 'In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of El Centro will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.' Below this paragraph is a list of links for various documents, each with 'PDF' and 'Word' options: Public Notice and Posting (English), Public Notice and Posting (Spanish), Survey for the City of El Centro Program and Facility Users (English), Survey for the City of El Centro Program and Facility Users (Spanish), Nondiscrimination Notice (English), Nondiscrimination Notice (Spanish), ADA Grievance Procedure (English), ADA Grievance Procedure (Spanish), ADA Grievance Form (English), and ADA Grievance Form (Spanish).

- ✓ The grievance policy, procedures and grievance form contain compliant wording in accordance with the Americans with Disabilities Act of 1990 and ADA Amendments Act of 2008.
- ✓ The City's grievance procedures and complaint form are easily accessible on the website. A copy can be found in the Appendix B of this report. The grievance form is provided in accessible formats in both a Word and PDF version formats. The grievance procedures state that if accommodations for persons with disabilities are needed to please contact the ADA Coordinator.
- ✓ Citizens of El Centro and City staff may utilize the grievance process by completing the form and submitting it to the ADA Coordinator or another City staff member.

- ✓ City staff survey respondents stated they were not aware of any specific concerns, complaints or problems regarding access for persons with disabilities.

Not Compliant

- Tracking procedures to document grievances and follow-up action taken were not found.

RECOMMENDATIONS

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

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

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

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

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

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

FINDINGS

Compliant

- ✓ A notice of the rights afforded to individuals with disabilities is posted on the Accessibility page of the website.
- ✓ The City's ADA nondiscrimination notice is compliant. A copy of the notice is included in Appendix A.
- ✓ The City's nondiscrimination notice includes a TDD/TTY number or the California Relay number.
- ✓ The nondiscrimination notice states "In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973, the City of El Centro will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities."
- ✓ A notice of the rights afforded to persons with disabilities and nondiscrimination statement, along with the methods to request an accommodation and/or to file a complaint are available and are posted on the City's website, in addition to high access locations throughout the City.

RECOMMENDATIONS

Additional recommendations listed will maintain and enhance the requirements and do not reflect corrective action.

- The City should provide ongoing notice of the identity of the ADA/504 Coordinator on its website and in frequently used publications or documents accessed by the public and by recipients of programs, services, and activities.

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

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

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

FINDINGS

Compliant

- ✓ Public input was solicited from June 2019 to October 2019.
- ✓ Public notices regarding the City of El Centro ADA/504 Self-evaluation and Transition Plan were developed and disseminated for public and staff input soliciting input into the development of the City's ADA/504 Self-evaluation and Transition Plan.
- ✓ The City solicited public input and comments by offering surveys of programs, services and activities to City staff, community organizations and members of the public by various means, such as the City's website, online surveys, notices posted in high foot traffic areas such as City Hall and the Library. The City provided public notice on the City's website, in the El Centro newsletter and placed in high traffic locations throughout the City. A copy of the actual notice is provided in Appendix A of this report.

The screenshot shows a website interface. On the left is a vertical navigation menu with the heading 'HOME' and several items: Home, About El Centro, Community Newsletters, Community Sponsorship, Legal Division, Measure P, Press Releases, Proclamation Requests, and Resources. The main content area is titled 'Americans with Disabilities Act' and contains a paragraph stating that the City of El Centro will not discriminate against qualified individuals with disabilities. Below this paragraph is a list of links for various documents, each with 'PDF' and 'Word' options: Public Notice and Posting (English), Public Notice and Posting (Spanish), Survey for the City of El Centro Program and Facility Users (English), Survey for the City of El Centro Program and Facility Users (Spanish), Nondiscrimination Notice (English), Nondiscrimination Notice (Spanish), ADA Grievance Procedure (English), ADA Grievance Procedure (Spanish), ADA Grievance Form (English), and ADA Grievance Form (Spanish).

Summary of Results of Opportunities for Input

Two (2) types of surveys were used to solicit input from the **public and organizations** and from **City staff and administrators**. Respondents were given the opportunity to provide comments using either an online survey option or by completing and returning a hard copy survey to the City.

The City of El Centro's public input timeframe was June 2019 through October 2019.

The complete survey responses are in Appendix C and are "actual comments" and have not been redacted or changes made in spelling or grammar. Survey responses listed below are highlights of some of the comments provided.

Survey Responses from the Public and Organizations

- ✓ According to the Community Organization ADA Survey, Imperial County Behavioral Health has provided training to local law enforcement regarding the identification and strategies to intervene with individuals experiencing psychiatric emergency. Additionally, printed materials were available to El Centro police department staff to become familiar with the Mental Health Triage Unit and how to access services. Numerous meetings have been held to assist the El

Centro Police Department regarding roles and responsibilities in the management of individuals on involuntary holds. The activities of the Imperial County Behavioral Health exemplify the collaboration between community organizations and the City.

- ✓ Accessible sidewalks and pedestrian ramps were identified as a high priority.

Survey Responses from City Staff and Administrators

- ✓ The height of counters was identified as a priority to service individuals with disabilities that use wheelchairs.
- ✓ A City staff member stated that they have provided accommodations for persons with disabilities by providing a wireless microphone, wheelchair designated areas, ramps and an accessible podium in City Council Chambers.
- ✓ Although not required, a city staff member recommended electronic push button doors for the City Council Chamber and the back door into City Hall Building B.

Statement of Accommodations on Public Notices, Agendas and Documents

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

A public entity must administer services, programs, and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities, *i.e.*, in a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible, and that persons with disabilities must be provided the option of declining to accept a particular accommodation (§ 35.130(d)(e)).

FINDINGS

Partial Compliance

- ✓ Statements of accommodations were found on some public-facing documents.
- ✓ Accommodation statements were not consistent in content. Some statements did not provide a method to request an accommodation other than a phone number. Others provided an email address. Some mentioned special equipment for the hearing impaired but not for other areas for accommodations. An example from a Planning Commission Agenda is below:

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, you should contact the Community Development Department-Planning & Zoning Division at (760) 337-4545. Notification of at least 72 hours prior to the meeting will enable the City to make reasonable arrangements to assure accessibility to this meeting.

RECOMMENDATIONS

- It is recommended that a “statement of accommodation” be included on all postings (hard copy and on the website) of agendas, meetings, events, programs, and activities for public-facing documents.
- Accommodation statements and procedures should be added for public records requests.
- The City should consider a consistent or standardized accommodation statement with language that includes a minimum timeframe to request an accommodation prior to the City and includes the contact person, address or location, phone number and email address.
- Statements of accommodation should include a contact person, phone number and email address. For example, the accommodations statement on the Planning Commission Agenda and others is included on the last page and only provides a phone number for the Planning and Zoning Division.
- It is recommended that the accommodations statement be placed at the beginning of the agenda in the “Notice to the Public” area instead of at the end after the adjournment section of the agenda.
- Information and training should be developed and disseminated to all City departments with information as to the purpose of the accommodations statement.
- An alternate format for filling out applications should be made so that applications can be filled out online or by hard copy.
- Statements of accommodations should include appropriate terminology and not use the term “handicapped”.
- Alternate means for requesting an accommodation should be added to all statements of accommodation and should include phone, postal mail, email, or dropping off the request for accommodation at City sites.
- Contact information including a TDD/TTY or California Relay number for requesting an accommodation should be included on all statements of accommodations.

Access to Programs, Services, Activities and Events

A public entity may not adopt official policies that are discriminatory or engage in practices that are discriminatory. This prohibition applies to policies that are explicitly exclusionary and to those which appear to be neutral but have a discriminatory effect (28 CFR §35.130(b)(3)). Title II of the ADA requires public entities to ensure that all public meetings and events sponsored are readily accessible to persons with disabilities and provide opportunities for participation. Policies and procedures need to ensure that persons with disabilities are provided equal opportunity to access programs, services, and activities of the City. Part 35.149 specifically requires nondiscriminatory practices to have program accessibility. The ADA/504 does not specifically state how a public entity provides for accessibility to programs, services, and activities.

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

disabilities. These laws include the Americans with Disabilities Act, the federal Section 504 of the Rehabilitation Act of 1973, and state constitutional provisions.

Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by persons with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

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

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

FINDINGS

Compliant

- ✓ No intentional discriminatory practices were found regarding access to programs, services, and activities.
- ✓ The City's nondiscrimination notice is compliant and provides notice to request an accommodation or modification to access City programs, services or events to better ensure that individuals with disabilities have equal opportunities to participate.
- ✓ Drop-down menus allow users to choose language preferences which enhances access to programs, services and activities of the City.



- ✓ In response to the Americans with Disabilities Act (ADA), IVT ACCESS was created in 1994 and offers this service for individuals who have physical or cognitive disabilities that cannot use the Imperial Valley Transit regular, fixed-route, bus system.

- ✓ Individuals can request special assistance to participate in City meetings or events by contacting the office of the City Clerk at (760) 337-4515 at least 48 hours in advance of the meeting or event and the City will make reasonable arrangements to assure accessibility.

Partial Compliance

- ✓ The City's 2019 Summer Guide references the following statement: "Persons with special disabilities are encouraged to participate in City recreation programs. To do so, a one-week advance notice is required to complete an assessment of the participant to ensure the appropriate program is available and to determine if an aide is required." The timeframe of a one-week advance notice is longer than the timeframe used by the City for other accommodations statements.

Not Compliant

- Some programs, services, activities, and publications do not contain an accommodation statement or how to request modifications for persons with disabilities to participate in City programs, services, and activities. For example, the Community Services Department Adult Center Services Guide does not contain a statement of accommodation or any information as to how to request an accommodation or a modification.
- The website does not include accessibility information to access programs, services and activities of the City that would inform users of the accessible features to provide access for persons with disabilities.

RECOMMENDATIONS

- The City should continue to disseminate information in a variety of locations and methodologies with accessible formats to enhance the access to programs, services, and activities.
- The ADA/504 Coordinator should continue to monitor and receive information regarding concerns or issues about access to programs, services and activities and take the appropriate action regarding any potential discriminatory practices for persons with disabilities.
- Social media platforms should be reviewed to make sure that they are accessible for persons with disabilities.
- The ADA/504 Coordinator should continue to monitor programmatic access.
- Additional and ongoing training should be provided regarding the requirements of the Americans with Disabilities Act and accommodations that provide equal access to programs, services, and activities.
- Meetings and events open to the public should be held in buildings that meet accessibility requirements, or in the accessible portion of the building with accessible elements that serve the area where the meeting or event is held. For example, parking, restrooms and drinking fountains that serve the area where the meeting and event is held should also be accessible.
- Information regarding the facility should include information regarding accessible features and elements of the site. For example, accessible parking, accessible restrooms and other items and elements should be indicated on documents and on the website. Indicating accessible paths of travel and accessible entrances also provides valuable information for

individuals with disabilities. A contact number and email address should be provided for additional assistance.

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

Outreach Materials and Activities

The ADA/504 does not specifically state how a public entity provides for outreach and accessibility to the City's programs, services, and activities that would include persons with disabilities. One method is to disseminate information in a variety of locations, a variety of methods and formats to enhance the access to programs, services, and activities of the City.

FINDINGS

Partial Compliance

- ✓ Outreach activities for persons with disabilities were limited.

RECOMMENDATIONS

- The City should consider including additional pictures and references to individuals with disabilities on the website, in publications, brochures, and materials.
- Organizations representing individuals with disabilities and areas with an increased population of individuals with disabilities could be targeted for input regarding additional methods to disseminate information regarding programs, services, and activities of the City.
- In City publications, areas or services that are accessible should be indicated with descriptive text and the International Symbol of Accessibility (ISA). For example, accessible restrooms and routes can be designated on the website, on maps and in publications.

Service Animals

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

The Department of Justice (DOJ) published revised final regulations implementing the Americans with Disabilities Act (ADA) for Title II (State and local government services) and Title III (public

accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated, requirements, including the 2010 Standards for Accessible Design (2010 Standards). Beginning on March 15, 2011, only dogs and miniature horses are recognized as service animals under Titles II and III of the ADA. A service animal is a dog (in some cases a miniature horse) that is individually trained to do work or perform tasks for a person with a disability. Public entities, such as the City, must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

FINDINGS

Not Compliant

- Information, policies and procedures were not found regarding service animals.

RECOMMENDATIONS

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

Other Power-Driven Mobility Devices

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

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

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

In determining whether a particular other power-driven mobility device can be allowed in a specific facility as a reasonable modification, a public entity may consider:

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

FINDINGS

Not Compliant

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

RECOMMENDATIONS

- It is recommended that the City continue to develop a policy for OPDMDs and disseminate the information.

Ticketing and Seating

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

Providing equal opportunity to people with disabilities is the fundamental principle of the Americans with Disabilities Act (ADA). This publication provides guidance on the Department's new nondiscrimination requirements that apply to selling tickets for assigned seats at events such as concerts, plays, and sporting events. The requirements, which are identical for Title II and Title III entities, apply to tickets sold for single events and those sold for a series of events (*e.g.*, subscriptions or season tickets). A public entity that sells tickets for a single event or series of events shall modify its policies, practices, or procedures to ensure that individuals with disabilities have an equal opportunity to purchase tickets for accessible seating (28 CFR § 35.138).

FINDINGS

Partial Compliance

- ✓ Although a specific policy regarding ticketing and seating was not provided, the City states it 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.

Not Compliant

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

RECOMMENDATIONS

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

Eligibility Criteria

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

FINDINGS

Compliant

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

RECOMMENDATIONS

- Program eligibility criteria should be reviewed as they are drafted or modified to ensure that eligibility criteria do not put additional burdens or requirements on individuals with disabilities.
- The City should continue to ensure that all eligibility criteria allow for accommodations for individuals with disabilities.

Fees and Surcharges

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

FINDINGS

Compliant

- ✓ There was no evidence of additional surcharges or fees charged to individuals with disabilities that were not charged to individuals without disabilities to access programs, services, and activities.
- ✓ The ADA nondiscrimination statement states that "The City 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."

RECOMMENDATIONS

- The City's ADA Coordinator should continually review fee policies and practices for consistency and to ensure that fees and surcharges are not charged to persons with disabilities that are not charged to persons without disabilities.

Emergency Evacuation Procedures

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

FINDINGS

Emergency operations are managed by the El Centro Fire Department in collaboration with the Police Department. The City of El Centro has assembled a Community Emergency Response Team (CERT) of organized and trained volunteers that operate and can assist during a disaster at the neighborhood level. The City of El Centro partners with the Imperial County Regional Communications System (RCS) to provide public safety voice and data communications to the City.

Not Compliant

- No specific emergency evacuation procedures were found regarding policies or procedures for evacuating persons with disabilities.

RECOMMENDATIONS

- Policies and procedures should be developed for emergency evacuation of individuals with disabilities, requirements at shelters and accessibility of shelters.
- The City should provide additional training and information regarding emergency evacuation procedures, particularly regarding the evacuation of persons with disabilities.
- The City should continue to post evacuation routes and procedures continue to be posted at all City sites and on the website.
- The City should develop procedures and a mechanism to monitor the posting of emergency evacuation routes and procedures.
- The City should consider the development of a voluntary registry for individuals that may need additional assistance that may not have access to technology.
- Shelters should be surveyed to determine that they are accessible for individuals with disabilities prior to be designated as an evacuation shelter. A provision should be noted to allow service animals and training should be provided to shelter staff to understand the difference between pets and service animals.
- Designated evacuation shelter sites should also be inspected on a regular basis to determine that the shelter continues to be accessible for persons with disabilities. Noncompliant findings for designated shelters that are owned by the City can be found in the City's Transition Plan.

Policies for the Use of City Facilities

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

FINDINGS

Compliant

- ✓ The Mardi Gras 2020 Vendor Rules and Procedures require the vendor to “comply with all Federal, State and local laws, ordinances, codes and regulations” and would therefore incorporate the Federal ADA and Section 504 accessibility standards and regulations and the State of California ADA and accessibility requirements.

Not Compliant

- ✓ The City’s facility rental applications and application for use of facilities do not address accessibility and do not provide assurances that use of the facility will not be used in a discriminatory manner with one exception.

RECOMMENDATIONS

- The City should consider the inclusion of a nondiscrimination clause in their facility rental policy. The inclusion of nondiscrimination language in policy and on forms would help ensure that outside groups and organizations would agree to abide by all applicable local, state, and federal laws and City policy regarding nondiscriminatory practices during the utilization of City facilities.
- It would be beneficial to persons with disabilities if information on accessible routes, maps, accessible parking locations, restrooms and wayfinding was available for all facilities on the City’s website.
- The City should make provide the application form and facility use agreement available in multiple formats, ensuring at least one is accessible, and offer multiple methods to submit the application. A policy that would prohibit pets in a facility or park should include a notice allowing service dogs, when appropriate.

Lease and Joint Use Agreements

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

FINDINGS

Partial Compliance

- ✓ A sample of lease agreements were reviewed for language regarding requirements to lease facilities that are accessible, and it was noted that ADA accessibility provisions were not evident in terms of maintenance, repairs, and improvements. Agreements, however, state that the Lessee can construct or make improvements with the City’s prior written approval. If the City has an approval process to ensure that ADA improvements or remodeling are compliant, there is a higher probability that the improvements will be compliant.

RECOMMENDATIONS

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

Special Events and Activities

Special events sponsored by the City are considered a program, service or activity of the City and are required to be accessible in accordance with ADA requirements.

FINDINGS

Compliant

- ✓ City Policy Administrative Statement regarding community sponsorship that was adopted June 3, 2009 states that "special event requirements and other requirements must be followed according to City policies, codes and ordinances." As stated, the requirements would include federal and state accessibility requirements. This statement is of particular importance due to the City's sponsorship and funds that are provided for the sponsorship program. As the City funds the program, the City is responsible for its accessibility.

Not Compliant

- Policies and procedures for the provision of accessible events were not found for special events or meetings.
- The City's Special Event Information packet is comprehensive and addresses the majority of the areas related to special events, but it does not contain information and requirements for accessibility for persons with disabilities.
- No accessibility information pertaining to special events is indicated on the website or in the recreation information for persons with disabilities.

RECOMMENDATIONS

- The City's special events policies, procedures, applications and event safety plan should be updated to include ADA accessibility information and provisions that the event comply with federal, state and local accessibility requirements for persons with disabilities. It is recommended that accessible features for persons with disabilities be indicated on the site plan requirements.

- Planning for accessible provisions should include a checklist and training for City staff regarding the ADA requirements for special events.
- ADA accessibility requirements should be included in the City's Public Safety Plan for Special Events, which provides event organizers a guide to identify and address potential hazards or safety issues. For example, information regarding accessible parking, accessible restrooms and accessible emergency communications should be included in the City's Special Event Application and the Public Safety Plan for each event.
- ADA accessibility information should be added to the Special Events section of the City's website.
- Accessible features and elements for special events and activities should be indicated in publications, brochures and on the website. For example, accessible features may include accessible parking, accessible routes and restrooms.
- A statement of accommodation should be included on the website and on flyers and publications regarding the special event or activity.

Contracted Services

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

FINDINGS

Compliant

- ✓ No discriminatory or exclusionary practices were identified regarding the selection process of contractors and contracted services for the City.
- ✓ A sampling of contracts for services with the City were reviewed and no discriminatory or exclusionary practices were found.
- ✓ The City Manager's Office, in coordination with the Community Development Department, the Planning Commission and Building and Safety Division provide oversight of the contracted services and contractor selection process.
- ✓ The City of El Centro runs their bids and RFP process through an impartial online bid portal called PlanetBids.

RECOMMENDATIONS

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

Building and Construction

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

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

FINDINGS

Compliant

- ✓ The City has accessibility standards and regulations for accessibility that include, but are not limited to, the California Building Code (CBC), the ADA Standards, California Manual on Uniform Traffic Control Devices, Proposed Right-of-way Accessibility Guidelines (PROWAG) and Caltrans standards.
- ✓ Plan reviews are part of the application process for submittal of any development proposal to the City.

Partial Compliance

- ✓ Evidence of monitoring of construction for ADA compliance or general review of remodeling for ADA compliance was limited.
- ✓ Construction oversight policies were limited.
- ✓ The City has a detailed Business Guide for developers that includes a site plan review, permitting, zone changes and other information for business license. Although the intent is to incorporate accessibility, the information in the guide does not contain requirements for accessibility. An example of incorporation of accessibility would be the requirements for accessibility in the site plan review.

RECOMMENDATIONS

- Due to the number of noncompliant findings of new construction and remodeling, the City should enhance their oversight of projects to ensure that remodeling and new construction meet applicable accessibility standards.
- In selected cases, it is recommended that the City contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA), the California Building Code and other applicable building standards and regulations to provide additional oversight. It is important

and required that the accessibility barrier removal efforts for new and remodeled buildings, parks and public rights-of-way meet federal and state accessibility codes.

- The City should review policies, practices, and procedures to review remodeling and construction activities to ensure that they meet the applicable accessibility standards.
- Internal policies and procedures focusing on the review of design and construction activities specific to ADA compliance and Accessibility compliance should be added.
- The City should ensure that accessibility inspections are conducted as work progresses and is completed.
- Language in contracts with outside vendors should state that work will be performed with all applicable state and federal accessibility standards and regulations.
- The City should ensure that contractors are informed when performing construction activities adjacent to or within the public rights-of-way that accessible and safe pedestrian routes must be maintained throughout the project. Information on alternate accessible pedestrian routes and detours should be posted on the City's website, as well as at the site during construction.
- Procedures should be established to ensure alteration projects which affect usability of facilities containing a primary function; that the path of travel to the altered area including restrooms, telephones, and drinking fountains serving the altered area be brought into compliance with ADA Standards to the extent of 20% of the cost of the alteration.

Maintenance of Accessible Features

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

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

FINDINGS

Compliant

- ✓ The City has designated departments with responsibility to maintain the accessible features of the City. The Public Works Department and Community Development Department are responsible for the administration and implementation of maintenance and service programs within the City of El Centro, which include ongoing maintenance and repairs of streets, sidewalks, curb ramps, traffic signals, streetlights, medians, sewers and storm drains, etc. The Public Works department also is responsible for all maintenance of parks and landscape areas.

- ✓ Through the City’s website, via the Online Action Center portal, residents can submit and monitor service requests to the City; the online portal helps manage service requests ranging from construction conducted without a permit, insect infestation, unsanitary conditions to dead or overgrown vegetation.
- ✓ City job descriptions include preventative maintenance and job responsibilities to maintain the accessible features, such as trimming trees that hang down lower than 80 inches or clearing vegetation that encroaches on an accessible path of travel.

Partial Compliance

- ✓ Although a specific policy is not evident for the maintenance of accessible features, the City has staff assigned to this duty and demonstrates compliance.
- ✓ The City has other designated staff with job responsibilities to maintain accessible features, such as public works, engineering and maintenance staff.

RECOMMENDATIONS

- The City should continue to monitor accessible items and elements that are required to be accessible and therefore need to be maintained in an accessible manner.
- The City should consider developing internal procedures or policies to maintain and track accessible features which require general maintenance. A few examples include re-stripping of parking, trimming vegetation or items that interfere with sidewalks and paths of travel, and adjusting the push/pull force and closing speeds of door closers.
- The City should continue to interface with other local jurisdictions to coordinate ADA efforts and staff training.

Equally Effective Communication

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

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

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

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

When a public entity uses an automated-attendant system, including, but not limited to, voice mail and messaging, or an interactive voice response system, for receiving and directing incoming telephone calls, that system must provide effective real-time communication with persons using auxiliary aids and services, including TTYs and all forms of FCC-approved telecommunications relay system, including Internet-based relay systems.

A public entity shall respond to telephone calls from a telecommunications relay service established under Title IV of the ADA in the same manner that it responds to other telephone calls.

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

Telephone emergency services (35.162), including 911 services, shall provide direct access to persons who use TDD's and computer modems and should be accessible to persons with disabilities. Many public entities provide telephone emergency services by which persons can seek immediate assistance from police, fire, ambulance, and other emergency services. These telephone emergency services, including 911 services are clearly an important public service whose reliability can be a matter of life or death.

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

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

FINDINGS

Compliant

- ✓ The City's ADA nondiscrimination notices state "The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City 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."
- ✓ Live streaming, video and audio versions of City Council meetings are available upon request and advance notice.

- ✓ City information, meeting information, surveys and public notices can be provided in alternate formats by contacting the ADA Coordinator.
- ✓ The City publicly lists the California Relay Service (dial 711) and offers accessibility assistance by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.
- ✓ The website specifies that the City of El Centro website was designed with accessibility guidelines in mind to comply with Section 508 as well as 2.0 A and AA referring to website accessibility standards.

RECOMMENDATIONS

- The City should consider training for staff regarding assistive technology.
- The City should provide staff with information regarding assistive technology that is available.

Auxiliary Aids, Services and Alternative Formats

The ADA uses the term “auxiliary aids and services” (“aids and services”) to refer to the ways to communicate with people who have communication disabilities.

There are many ways that the City can provide equal access to communications for people with disabilities. These different ways are provided through “auxiliary aids and services”. “Auxiliary aids and services” are devices or services that enable effective communication for people with disabilities.

Title II of the ADA requires government entities to provide appropriate auxiliary aids and services to ensure effective communication. Information about the location of accessible services, activities, and facilities available in a format that is accessible to people who are deaf or hard of hearing and those who are blind or have low vision.

Generally, the requirement to provide an auxiliary aid or service is triggered when a person with a disability request it.

Auxiliary aids and services include, for example:

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

FINDINGS

Compliant

- ✓ The City notifies the public of the option to request auxiliary aids and services to participate in programs, services, meetings and events through its nondiscrimination policy and accommodations statements that is available on the website and in selected publications and agendas.
- ✓ The nondiscrimination notice states "Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City should contact the office of the program, service or activity coordinator as soon as possible but no later than 48 hours before the scheduled event."
- ✓ The website also states "The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City 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."
- ✓ City information, meeting information, surveys and public notices can be provided in alternate formats by contacting the ADA Coordinator.
- ✓ The City publicly lists the California Relay Service: dial 711 and offers accessibility assistance by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.

RECOMMENDATIONS

- Persons with disabilities may not participate in or participate as frequently in City sponsored programs, services, or activities if they do not understand what is being communicated. Information on the availability of auxiliary aids and services should be included in departmental, e.g. Library, policies, procedures and guidelines.
- When equipment is used, as part of a public entity's program, activity, or service, an assessment should be completed to safeguard that the equipment is usable by persons with disabilities, particularly persons with hearing, visual, and manual impairments. In addition, a public entity should have policies in place to ensure that its equipment is well maintained and in operable working order.
- Training should be provided so that staff are aware of and understand how to arrange for auxiliary aids and services, such as sign language interpreters, material in Braille and assistive listening systems; to support effective communication with persons with disabilities.

Qualified Interpreter Services

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

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

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

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

FINDINGS

Compliant

- ✓ The City of El Centro utilizes sign language interpreting, telecommunication devices (TTYs), and other aids and services provided by the County of Imperial. These services are provided free of charge to all persons conducting business with the County.
- ✓ The El Centro Regional Medical Center (ECRMC) also provides spoken language interpretation services and American Sign Language (ASL) services to accommodate those who have limited proficiency in English or are deaf or hard-of-hearing.
- ✓ The City posts information regarding requesting an accommodation, such as sign-language interpreters, on the website and in selected publications.

RECOMMENDATIONS

- Notices for public input should include information on the availability of interpreter services and other services.
- Sign language interpreters should be provided as determined through the request for accommodation process for qualified persons with disabilities or in circumstances where a sign language interpreter is known to be required.
- Interpreters should be provided as determined through a request for accommodation process or in circumstances where an interpreter is known to be required.
- The City must ensure that those persons utilizing a language other than English and are deaf, are also provided interpreter services that specialize in signing for that language.
- The City may consider the use of a video relay interpreter system to augment contracts and arrangements for interpreters.

Telecommunications Devices for the Deaf and Hard of Hearing

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

FINDINGS

Compliant

- ✓ The City provides notice of the California State Relay at 7-1-1.
- ✓ The City utilizes telecommunication devices (TTYs), and other aids and services provided by the County of Imperial.
- ✓ Individuals can contact the ADA Coordinator, Frank Soto, 48 hours in advance of programs, events or meetings to request such service.
- ✓ TTY/TDD numbers are included in some areas of the website, in selected documents and selected brochures.

RECOMMENDATIONS

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

Assistive Listening Systems

Assistive listening systems should be available for public meetings to ensure effective communication.

FINDINGS

Partial Compliance

- ✓ The City utilizes assistive listening systems and other aids and services provided by the County of Imperial.
- ✓ The City contracts for assistive listening systems, when needed.
- ✓ Citizens may contact the ADA Coordinator, Frank Soto, 48 hours in advance of programs, events or meetings to request such service.

- ✓ Accommodations statements are posted on some public facing documents.
- ✓ Assistive listening systems were found in only limited cases, but it was noticed that the ADA Coordinator could be contacted to request an accommodation which may include an assistive listening system.

RECOMMENDATIONS

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

Alternate Formats

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

FINDINGS

Partial Compliance

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

RECOMMENDATIONS

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

Accessible Fonts and Documents

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

FINDINGS

Partial Compliance

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

RECOMMENDATIONS

- The City should continue to provide information on its website and publications regarding the City's branding policy, if available.
- The possibility of a central City-wide department or method to provide Braille and other accessible documents should be assessed to assist with providing accessible alternate formats.
- The City should have an existing contract with one or more firms or organizations to provide accessible documents, such as Braille in a timely manner.
- The City should provide information or training regarding accessible fonts.

Acceptable Terminology

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

FINDINGS

Partial Compliance

- ✓ Some documents reviewed contained the word "handicapped" instead of the term "disabled".

RECOMMENDATIONS

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

Website Accessibility

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

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

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

1. Level A is the minimum level of conformance with the fewest requirements. A couple examples of Level A requirements are that all non-text components such as images include an alternative text component and that captions are provided for all prerecorded audio content.
2. Level AA compliance must satisfy all the Level A requirements and additional criteria such as providing captions for all live broadcasted audio content.
3. Level AAA satisfies all Level A and Level AA criteria as well as additional requirements such as providing sign language interpretation for all prerecorded audio content.

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

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

FINDINGS

The website for the City was reviewed using two different website accessibility software programs to determine accessibility compliance with WCAG 2.0 Level AA standards. Website reviews were conducted in October 2018 using AIM and in May 2020 using SortSite website accessibility testing software. The detailed website accessibility reviews results are contained in separate documents.

Compliant

- ✓ The City's website hosts a website accessibility page which specifies accessibility design guidelines, browser accessibility information, browser accessibility and supported assistive technology. The website accessibility guidelines statement follows:

Website Accessibility Guidelines

The City of El Centro is committed to providing a website that is accessible to the widest possible audience. We actively work to ensure that our website is accessible and usable by people of all abilities.

Our aim is to ensure that all pages of this website conform to Level AA of the Web Content Accessibility Guidelines 2.0 (WCAG 2.0). These guidelines are the internationally recognized benchmark for building accessible websites. Conformance with these guidelines makes web content more user friendly for everyone.

Partial Compliance

A comprehensive analysis of the City of El Centro's website was completed in October 2018 by DAC and the results are being provided to the City as a separate report. Links to external sites and web pages were not evaluated. The reports indicated the following:

- The most prominent errors identified by the evaluation tool include empty link errors and missing alternative text errors. An empty link error signifies that the link contains no text and if the link contains no text, the purpose of the link will not be presented to the user. This can introduce confusion for keyboard and screen reader users. A missing alternative text error indicates that image alternative text is not present. This is important because each image must have an alt attribute. Without alternative text, the content of an image will not be available to screen reader users or when the image is unavailable.
- Other frequent errors identified are contrast errors. Contrast errors mean there is very low contrast between foreground and background colors. Larger text does not require as much contrast as smaller text. Adequate contrast is necessary for all users, especially users with
- Some broken links were found. Documents or files may have been removed from the site, or possibly renamed, which prevents the link from taking the user to the correct target. A website user would receive an error message when clicking the link.
- The accessibility check also returned several findings for images that do not contain alternative text descriptions or where the alternative text is a file name and not actually a description of the image. This would result in meaningless or confusing image descriptions when read aloud by a screen reader.

RECOMMENDATIONS

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

Social Media

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

FINDINGS

Compliant

- ✓ The City uses social media as a form of communication. The accessibility of social media is dependent upon the third-party vendor that provides the service.

RECOMMENDATIONS

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

Staff Training

Ongoing compliance with the ADA/504 can only be achieved if City staff and officials receive ongoing and updated training about the rights of persons with disabilities and the obligations of public employees under the ADA/504. Although training is not required by the ADA/504, training regarding the requirements of the ADA/504 is recommended. Staff that understand the requirements of the ADA and how to assist persons with disabilities are empowered to provide services to all stakeholders in a nondiscriminatory manner.

Ongoing compliance with the ADA is a process that occurs over time using an understanding of the ADA, responsibilities of City employees, appropriate terminology, and specific methods to assist persons with disabilities. A simple and easy to achieve compliance method is understanding and using appropriate terminology that provides information in a positive and nondiscriminatory manner. For example, the use of the term "handicapped" is not acceptable and the term "persons with disabilities" should be used instead. Another example of appropriate terminology is using the description of "person using a wheelchair" and not using the term "wheelchair bound".

FINDINGS

Compliant

- ✓ Select City staff has received ADA training provided by the California Joint Powers Insurance Authority.

- ✓ According to the Community Organization ADA Survey, Imperial County Behavioral Health has provided training to local law enforcement regarding the identification and strategies to intervene with individuals experiencing psychiatric emergency. Additionally, printed materials were available to El Centro police department staff to become familiar with the Mental Health Triage Unit and how to access services. Numerous meetings have been held to assist the El Centro Police Department regarding roles and responsibilities in the management of individuals on involuntary holds. The activities of the Imperial County Behavioral Health exemplify the collaboration between community organizations and the City.

RECOMMENDATIONS

- A recommendation in the Community ADA Survey from the Imperial County Behavior Health stated that it is a major priority for the City to improve accessibility for individual with mental disabilities is to inform and train City employees to recognize, address and serve the underserved population of mental health and persons with disabilities.
- Staff respondents stated they would benefit from training and would like training regarding developing policies and procedures, how to assist persons with disabilities, legal requirements, how to provide accommodations, how to provide materials in alternate formats and more information about American Sign Language. The City should continue to provide ongoing accessibility related training regarding persons with disabilities. Suggested training topics should include, but are not limited to:
 - Requirements of the ADA/504 for the City of El Centro
 - Individuals with Disabilities
 - Acceptable Terminology and Expressions
 - Noncompliance Consequences
 - Accessible vs. Compliant
 - Barriers – Programmatic or Physical
 - Providing Services for Individuals with Disabilities
 - Service animals
 - Other
 - Leased Sites
 - Special Events
 - Accessible Locations for Meetings
 - Events & Voting
 - Auxiliary Aids and Services
 - Construction & Remodeling
 - Maintenance of Accessible Features
 - Community Donations and Construction Projects
 - City of El Centro Responsibilities
 - Notice of the ADA/504 Coordinator
 - Notice and Rights Posted for individuals with disabilities
 - TDD/TTY
 - Assistive Listening
 - Grievance Complaint Procedures
 - Individuals with Disabilities Participation
 - Use of City Facilities by Organizations and Individuals
 - Reasonable Accommodations
 - Statement of Accommodations

- Effective Communication
- Alternate and Accessible Formats
- Accessible Websites
- Volunteers
- Accessibility standards and regulations (ADA, CBC, PROWAG, MUTCD, Caltrans)
- The City should provide staff training in additional formats other than a classroom session, if needed. Training methodologies could include videos (captioned) that could be viewed at the training or checked out by departments and agencies.
- Handouts and training materials should be prepared, if needed, in alternate accessible formats.
- The ADA/504 Coordinator should continue to provide or coordinate additional ADA/504 training to all management and staff who have regular contact with the public.

New Employee and Volunteer Orientation

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

FINDINGS

Compliant

- ✓ No discriminatory practices regarding employment and screening process with the City of El Centro were identified.
- ✓ The City Human Resources and Job Opportunities web pages does not include information regarding the process to request an accommodation.
- ✓ Specific open job postings include the following statement: "If you have a disability that requires assistance at any point in the recruitment process (for example, filling out applications, testing, interviewing), please notify the Human Resources Department."

Not Compliant

- The volunteer information packet and application does not include a nondiscrimination statement, statement about accommodations or modifications for persons with disabilities.
- There was no evidence of ADA training provided to new employees and volunteers.
- The application for appointment to a Citizen's Board or Commission does not contain a statement of accommodations and it does not contain any statements regarding nondiscriminatory practices.

RECOMMENDATIONS

- The City should consider adding assurances to applications for volunteers, City Boards and Commissions that would include assurances that the applicant will adhere to abide by all applicable state, federal and City policies and procedures. Compliance assurance information could be added to the "certificate of applicant" for signature.
- The City should add information as to the identity, title, address, phone number and email address of the ADA/504 Coordinator to new employee orientation and volunteer information.
- New employees and volunteers should be provided materials and/or training regarding nondiscriminatory practice and the requirements for access to programs, services, and activities of the City.
- The City should develop training materials and videos for new employees and volunteers regarding information and requirements of Title I and Title II of the ADA and Section 504. Materials could also be offered on providing accommodations for individuals with disabilities.

Distribution and Location of Publications

Publications, documents, and brochures are required to be accessible for individuals with disabilities. Accessibility includes physical access to the publications, brochures, documents, posted agendas and other information. Displays and locations should allow for retrieval of the information on an accessible route with clear floor space and within a compliant reach range.

FINDINGS

Partial Compliance

- ✓ Most publications, brochures and documents are displayed in departments and areas that were accessible for individuals with disabilities.

RECOMMENDATIONS

- The ADA/504 Coordinator should continue to provide information to departments regarding the placement of brochures, pamphlets, and information in accessible locations and in accessible containers or displays for individuals with disabilities. Including requirements for reach ranges and clear floor space to access publications would also be helpful.
- Counters and areas that are lowered for access by individuals with disabilities should be maintained and kept clear of display and work items.

Planning, Budgeting, Implementation and Strategies for Ongoing Compliance

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

In accordance with the ADA, the City is required to provide a projected schedule with estimated dates for barrier removal in the ADA Self-evaluation and Transition Plan. The projected schedule is an estimate or planned date for barrier removal. Projected dates, however, may change due to a variety of factors. Developing an ADA plan and a schedule for implementation and removal of barriers

provides clear documentation of the City's ongoing efforts to remove barriers and to provide access to City programs, services and activities.

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

FINDINGS

Compliant

- ✓ The City of El Centro's FY2020 Adopted Operating Budget and Capital Improvement Plan allocate funds annually towards maintenance and repairs/improvements to facilities, streets, sidewalks, traffic signal repairs and upgrades and parks and playground maintenance and repairs and upgrades.
- ✓ Although no specific funds were designated exclusively for ADA compliance in the FY2020 Budget and Capital Improvement Plan, it is understood that ADA activities are incorporated when remodeling, new construction projects, renovations, street/sidewalk repairs and traffic signal upgrades are conducted.
- ✓ It is assumed that potential barriers identified in the City's ADA Self-evaluation and Transition Plan will be incorporated into existing and future capital improvement projects for the City.
- ✓ There is evidence that the City is incorporating the removal of barriers to accessibility on an ongoing basis and plans to remove additional barriers to City programs, services and activities.

RECOMMENDATIONS

- The City should continue to maintain an ongoing barrier removal implementation plan and document the City's progress, initiatives and funds expended.
- In appropriate cases, it is recommended that the City contract for an independent review of plans, remodeling efforts and new construction for accessibility requirements for the Americans with Disabilities Act Standards (ADA) and Title 24 of the California Building Code. It is important and required that the accessibility barrier removal efforts meet federal and state accessibility codes.
- The ADA/504 Coordinator, or designated staff, should be empowered with the authority to make recommendations and monitor the current City of El Centro ADA/504 Self-evaluation and Transition Plan.
- In addition to the removal of structural barriers, departments should consider budgeting for accessibility items, especially in the area of communication, such as TTY/TDD's and alternate formats.
- Implementation of the recommendations in the Self-evaluation will continue to require planning, resources, staff training, interdepartmental coordination and collaboration throughout the organizational structure and the public.

Conclusion

The City of El Centro has demonstrated an ongoing commitment to provide equal access to its programs, services, and activities to maintain and enhance compliance with the requirements of the Americans with Disabilities Act. Although there are items identified in the recommendations to improve accessibility, the City continues to embrace a concept of full and equal access for all the people it serves. The findings from the updated ADA Self-evaluation and Transition Plan memorializes the City's compliance efforts.

As evidenced by this study and update, the City of El Centro is committed to complying with the tenets of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 (504), and other federal, state statutes and regulations to provide accessible for individuals with disabilities. The City of El Centro 2018-2020 ADA/504 Self-evaluation and Transition Plan further serves to demonstrate the ongoing compliance efforts by the City.

The City of El Centro has demonstrated a commitment from the highest level of leadership with coordination of compliance activities and involvement of individuals with disabilities and methodologies for compliance procedures. As evidenced in the ADA/504 Report, the City of El Centro understands that the ADA/504 Compliance Plan is not a static document and requires ongoing implementation and periodic updates. City Operating and Capital Improvement Budgets support an ongoing commitment to provide for funding for ADA improvements and accessibility. A research of historical planning and budgets for prior years provided clear evidence of a commitment of resources and funds to improve ADA compliance.

As further evidence of its efforts for compliance with the Americans with Disabilities Act and related accessibility legislation, the City is prioritizing the removal of barriers identified and developing funding projections for the implementation of the barrier removal/transition plan. Public and staff input conducted during the project has provided additional information to develop an accessibility plan to serve the members of the community and visitors.

To enhance compliance for persons with disabilities in an expeditious and cost-effective manner, the City received input from the community and staff. The City has several methods available for ongoing input to continue to develop, maintain and implement the ADA/504 Self-evaluation and Transition Plan.

Appendix A- Public Notices and Postings

City of El Centro Americans with Disability Act Transition Plan Public comment and input invitation



The City of El Centro, in keeping with its ongoing efforts to serve all members of the community, is updating its Americans with Disabilities Act (ADA) self-evaluation and transition plan. The accessibility plan provides a comprehensive plan for access for individuals with disabilities to the City of El Centro facilities, parks, programs, services, activities, and events.

The City of El Centro is seeking input from agencies, organizations, and individuals with disabilities. As an agency, organization, or individual, the value of stakeholder guidance will help to address and prioritize current and future needs. Individuals who would like to provide input are invited to complete a survey, call or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested individuals who wish to participate in the evaluation.

Your comments and opinions are important to us and will provide valuable information regarding how the City of El Centro can better serve individuals with disabilities. Surveys are available from the City of El Centro's ADA Coordinator.

Frank Soto, ADA Coordinator
City of El Centro
1275 W. Main St.
El Centro, CA 92243
Phone: 760-337-4508
TTY: by state relay at 7-1-1
fsoto@cityofelcentro.org

Please contact Frank Soto, ADA Coordinator, if you have questions or comments or would like to request a survey in an alternate format.

Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator.

The City of El Centro complies with the Americans with Disabilities Act of 1990, Public Law 101-336, which prohibits discrimination on the basis of disability.



City of EL Centro Americans with Disability Act Non-discrimination Notice

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

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

Effective Communication: The City of El Centro will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of El Centro's programs, services, and activities.

Modifications to Policies and Procedures: The City of El Centro 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 the City of El Centro offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of El Centro, should contact the office of the program, service or activity coordinator as soon as possible but no later than 48 hours before the scheduled event.

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

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

Frank Soto, ADA/504 Coordinator
City of El Centro
El Centro, CA 92243
fsoto@cityofelcentro.org
Phone: (760) 337-4508
TTY: state relay at 7-1-1

The City of El Centro 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.

This notice is available in alternate formats from the ADA Coordinator.

090 Legal Ads|

City of El Centro Americans with Disability Act Transition Plan Public comment and input invitation

The City of El Centro, in keeping with its ongoing efforts to serve all members of the community, is updating its Americans with Disabilities Act (ADA) self-evaluation and transition plan. The accessibility plan provides a comprehensive plan for access for individuals with disabilities to the City of El Centro facilities, parks, programs, services, activities, and events. The City of El Centro is seeking input from agencies, organizations, and individuals with disabilities. As an agency, organization, or individual, the value of stakeholder guidance will help to address and prioritize current and future needs. Individuals who would like to provide input are invited to complete a survey, call or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested

individuals who wish to participate in the evaluation. Your comments and opinions are important to us and will provide valuable information regarding how the City of El Centro can better serve individuals with disabilities. Surveys are available from the City of El Centro's ADA Coordinator. Frank Soto, ADA Coordinator City of El Centro 1275 W. Main St. El Centro, CA 92243 Phone: 760-337-4508 TTY: by state relay at 7-1-1 fsoto@cityofelcentro.org Please contact Frank Soto, ADA Coordinator, if you have questions or comments or would like to request a survey in an alternate format. Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator. The City of El Centro complies with the Americans with Disabilities Act of 1990, Public Law 101-336, which prohibits discrimination on the basis of disability.

Ciudad de El Centro Plan de transicin de la ley Ley de Estadounidenses con
Dicapacidades invitacin para comentario del pblico.



City of El Centro
Americans with Disability Act Transition Plan
Public comment and input invitation

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The City of El Centro is seeking input from agencies, organizations, and individuals with disabilities. As an agency, organization, or individual, the value of stakeholder guidance will help to address and prioritize current and future needs. Individuals who would like to provide input are invited to complete a survey, [call](#) or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested individuals who wish to participate in the evaluation.

Your comments and opinions are important to us and will provide valuable information regarding how the City of El Centro can better serve individuals with disabilities. Surveys are available from the City of El Centro's ADA Coordinator.

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Please contact Frank Soto, ADA Coordinator, if you have questions or comments or would like to request a survey in an alternate format.

Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator.

The City of El Centro complies with the Americans with Disabilities Act of 1990, Public Law 101-336, which prohibits discrimination on the basis of disability.

**AFFIDAVIT OF PUBLICATION
(2015.5 C.C.P.)**

STATE OF CALIFORNIA

County of Imperial

I am a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk* of the printer of the

REC'D CITY CLERK'S
AUG 16 2019 09:11:26

Imperial Valley Press

a newspaper of general circulation, printed and published daily in the City of El Centro, County of Imperial and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Imperial, State of California, under the date of October 9, 1951, Case Number 26775; that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

08/11.

all in the year 2019


I certify (or declare) under penalty of perjury that the foregoing is true and correct.



SIGNATURE

Name of Account: CITY OF EL CENTRO
Order Number: 11314832
Ad Number: 31562598

* Printer, Foreman of the Printer, or Principal Clerk of the Printer
Date: 12 th day of August, 2019.
at El Centro, California.



**City of El Centro
Americans with Disability Act Transition Plan
Public comment and input invitation**

The City of El Centro, in keeping with its ongoing efforts to serve all members of the community, is updating its Americans with Disabilities Act (ADA) self-evaluation and transition plan. This plan provides a comprehensive plan for access for individuals with disabilities to the City's facilities, parks, programs, services, activities, and events.

The City of El Centro is seeking input from agencies, organizations, and individuals with disabilities. The value of stakeholder guidance will help to address current and future needs. Individuals who would like to provide input are invited to call, visit, or email the ADA Coordinator. Surveys are available for organizations that represent individuals with disabilities, patrons, community members, employees, and other interested parties who wish to participate in the evaluation.


Your comments and opinions are important to us and will provide valuable information that the City of El Centro can better serve individuals with disabilities. Surveys are available from the City of El Centro's ADA Coordinator.

Frank Soto, ADA Coordinator
City of El Centro
1275 W. Main St.
El Centro, CA 92243
Phone: 760-337-4508
TTY: by state relay at 7-1-1
fsoto@cityofelcentro.org

Please contact Frank Soto, ADA Coordinator, if you have questions or request a survey in an alternate format.

Information regarding the Americans with Disabilities Act can be obtained from the ADA Coordinator.

The City of El Centro complies with the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability.



**Ciudad de El Centro
Plan de transición de la Ley de Estadounidenses
con Discapacidades invitación para comentario del público.**

La Ciudad de El Centro, en consonancia con sus esfuerzos continuos para servir a todos los miembros de la comunidad, está actualizando su plan de autoevaluación y transición de la Ley de Estadounidenses con Discapacidades (ADA). El plan de accesibilidad proporciona un plan de acceso para personas con discapacidades a las instalaciones, parques, programas, servicios, actividades y eventos de la Ciudad de El Centro.

La Ciudad de El Centro está buscando aportes de agencias, organizaciones y personas con discapacidades. Como agencia, organización o individuo, el valor de la orientación de las personas que ayudarán a abordar y priorizar las necesidades actuales y futuras. Las personas que deseen participar están invitadas a completar una encuesta, llamar o enviar un correo electrónico al Coordinador de ADA. Las encuestas están disponibles para organizaciones que representan a personas con discapacidades, patrocinadores, miembros de la comunidad, empleados y otras personas que deseen participar en la evaluación.

Sus comentarios y opiniones son importantes para nosotros y brindarán información que la Ciudad de El Centro puede atender mejor a las personas con discapacidades. Encuestas están disponibles con el Coordinador de ADA de la Ciudad de El Centro.

Frank Soto, Coordinador de ADA
Ciudad de El Centro
1275 W. Main St.
El Centro, CA 92243
Teléfono: 760-337-4508
TTY: por relé de estado al 7-1-1
fsoto@cityofelcentro.org

Comuníquese con Frank Soto, Coordinador de ADA, si tiene preguntas o comentario sobre una encuesta en un formato alternativo.
La información sobre la Ley de Estadounidenses con Discapacidades se puede obtener del Coordinador de ADA.
La Ciudad de El Centro cumple con la Ley de Estadounidenses con Discapacidades Públicas 101-336, que prohíbe la discriminación por motivos de discapacidad.
L086 Au11

Appendix B- Grievance Policy and Form



City of El Centro Americans with Disabilities Act Grievance Procedure

Complaint and Grievance Procedure under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act

The Complaint and Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973. It may be used by anyone who wishes to file a complaint or grievance alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of El Centro. The City of El Centro's Personnel Policy governs employment-related complaints of disability discrimination.

The City of El Centro wants to hear concerns and complaints from citizens in order to provide accessible programs, services, and activities. A citizen can call with a comment, concern, or complaint without filing a formal grievance. A formal grievance can be filed by completing the grievance and complaint form by contacting the ADA Coordinator, Frank Soto.

If the citizen wants to file a formal grievance, grievance procedures and forms are provided. It is preferred that the grievance is in writing and contain information about the alleged discrimination such as name, address, and contact information of the grievant. A description of the problem that includes location and date is requested.

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. If additional accommodations are needed, please contact the ADA Coordinator.

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:

Frank Soto
ADA Coordinator
City of El Centro
1275 W. Main St.
El Centro, CA 92243
Email: fsoto@cityofelcentro.org
Phone: (760)-337-4508
TTY: State relay at 7-1-1



**City of El Centro
Americans with Disabilities Act
Section 504 of the Rehabilitation Act of 1973
Grievance Form**

Instructions: Please fill out this form completely. A printed or typed response is recommended. Sign and return to the address on the last page by email, fax, mail, or in person. If you need an accommodation to complete or submit this form, please contact the ADA Coordinator as indicated on this form.

1. Complainant: _____
Address: _____
City, State and Zip Code: _____
Telephone: Home: _____ Business: _____

2. Person Discriminated Against: (if other than the complainant): _____
Address: _____
City, State, and Zip Code: _____
Telephone: Home: _____ Business: _____

3. Department or person which you believe has discriminated (if known):
Name: _____
Address: _____
City, State and Zip Code: _____
Telephone Number: _____
When did the discrimination occur? Date: _____

4. Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated:

5. Have efforts been made to resolve this complaint? Yes _____ No _____
If yes: what efforts have been taken and what is the status of the grievance?

6. Has the complaint been filed with another bureau, such as the Department of Justice or any other Federal, State, or local civil rights agency or court? Yes _____ No _____

If yes:
Agency or Court: _____
Contact Person: _____
Address: _____
City, State, and Zip Code: _____
Telephone Number: _____ Date Filed: _____

7. Do you intend to file with another agency or court? Yes _____ No _____
Agency or Court: _____
Street Address: _____
City, State and Zip Code: _____
Telephone Number: _____

8. Additional comments or information:

Signature: _____ Date: _____

Return to:

**Frank Soto, ADA Coordinator
City of El Centro
1275 W. Main St.
El Centro, CA 92243
fsoto@cityofelcentro.org
Phone: (760) 337-4508
TTY: State relay at 7-1-1**

Appendix C- Survey Results

City of El Centro - Organizations Representing Individuals with Disabilities Survey Responses

Name of Organization:

- Imperial County Behavioral Health
- Wisdom Physical Therapy, Inc.
- Arc Imperial Valley

Name the ADA Coordinator(s) for your organization:

- Douglas Wisdorn
- Rodolfo Aguayo, HR Director

What direct communications have you had with the City of El Centro to facilitate services and accommodations for individuals with disabilities?

- None
- Imperial County Behavioral Health staff has engaged in numerous meetings and phone conversations with the administrative staff of El Centro Police Department regarding their lack of response or at times refusal to respond to calls for assistance in placing individuals on a W&I 5150 involuntary hold who are experiencing a mental health crisis consisting of being a danger to self, others or gravely disabled. This action is taken when these individuals require a higher level of care than what ICBHS can provide and need emergency assessment and treatment. Presently, ECPD has taken the position that they will only respond when there are safety issues or when clients have become violent. They will not respond to calls involving clients who are suicidal or gravely disabled. ECPD insists that ICBHS staff are equipped to place clients on involuntary holds, however ICBHS staff are not equipped to ensure the safe transport of these individuals to the local Emergency Department or to the ICBHS Mental Health Triage Unit for assessment and treatment.
- Since the loss of the El Centro Dial-A-Ride, the Arc has not had direct communication with the City of El Centro.

Are there any specific complaints or problems regarding access for individuals with disabilities to any of the program, services, or activities provided by the City of El Centro?

- Not aware of any
- Due to the City of El Centro, ECPD policy decision not to respond to non-violent mental health emergencies, danger to self or grave disability, clients with these mental illness impairments are not able to be taken to local emergency services for assessment and treatment. Calls made through 911 to ECPD dispatch are rebuffed or callers told that our department should handle it without dispatching patrol officers.
- Not that I'm aware of.

What information or other resources can you supply to help educate or inform the City of El Centro about your organization and your services for individuals with disabilities?

- Business comes by physician referral. More information could be directed this office to physicians regarding ability to improve certain disability conditions.
- ICBHS has provided training to local law enforcement regarding the identification and strategies to intervene with individuals experiencing psychiatric emergencies. Additionally, print materials have been made available to ECPD staff to become familiar

with the Mental Health Triage Unit and how to access services. Numerous meetings have been held to assist ECPD become aware of our role and responsibilities in the management of individuals on involuntary holds. Our staff continues to be available to inform, educate and collaborate with ECPD on the management of the mentally ill who are experiencing an emergency.

- Please see brochure.

What general guidance, advice, or assistance could your organization provide to the City of El Centro to protect against potential discrimination of individuals with disabilities in its programs, services, and activities?

- Not aware of any deficiency
- ICBHS is available to provide information and training on mental health awareness, identification of signs, symptoms and behaviors and step by step instructions on how to assist individuals to access services. Improve awareness and understanding of the disabled population which includes the mentally ill.
- Adhere to the ADA law

What do you feel is the highest priority for the City of El Centro to improve accessibility for individuals with disabilities?

- I have not encountered any physical obstacles for disabled persons that the city of El Centro is not already addressing.
- It is a major priority for the City of El Centro to improve accessibility for individuals with mental disabilities by informing and educating City Employees. The City can then recognize and address this underserved population in their policies and procedures.
- Accessible sidewalks/pedestrian ramps.

City of El Centro – Survey Responses from Program and Site Administrators

Please list the programs, services, activities, and special events for which you are responsible:

- City Council Agenda
- City Claims
- Applications for Boards/Commissions
- Records Requests

Are the events, programs, or activities for which you are responsible, provided at one location or at multiple locations in the City of El Centro? For example, swimming lessons at several pools:

- Council Chambers
- City Hall

List the location where your office is located:

- City Hall Building B 1275 W Main St. El Centro

How do recipients access or request information about your programs, services or events (come to your office, call, email, other, etc.)?

- Office counter, phone, email and mail

Hours of operation by program (if applicable):

- Monday through Friday 8am - 5pm

What organizations or groups utilize all or part of your site? (Describe use and location):

- LAFCO
- IID
- STATE WATER BOARD
- U.S. MARSHALS
- TRAININGS - EXTERNAL AND INTERNAL
- ICTC

Are there any recent or current complaints from employees, members of the public or other stakeholders regarding accessibility for individuals with disabilities at your site? (If so, please describe):

- None

Are you aware of any barriers to program accessibility? Please describe:

- No

What would you consider to be the highest priority to make programs, services, activities, or events offered by the City of El Centro more accessible for individuals with disabilities?

- Counter height accessibility for people in wheelchairs (City Clerk's Office)

Do you know who the designated ADA Coordinator is for the City of El Centro?

- Yes – Frank Soto

Have you posted and noticed the name and address of the ADA Coordinator?

- No

Have you posted and noticed the rights afforded individuals with disabilities?

- No

Do you have access to current City of El Centro policies, procedures or practices?

- Yes

Are grievance procedures or uniform complaint procedures noticed and posted at your site?

- No

Are accessibility grievance procedures available for employees and members of the public?

- Don't know

Do you have emergency evacuation plans posted at your site that includes procedures for individuals with disabilities?

- Don't know

Are assistive listening devices available for individuals with hearing impairments at your site?

- Yes – City Council Chambers

Do you have a Telecommunications Device for the Deaf (TDD/TTY) at your site?

- No

Is your staff trained regarding the use of a TDD/TTY?

- No

Have you reviewed your website for accessibility for persons with vision impairments?

- Yes, Periodically

Do you have a statement of accommodations in your literature or on public notices?

- On City Council agenda

Are individuals with disabilities included in, or have an opportunity to participate in, all programs, activities, and services provided by your site?

- Yes

Are individuals with disabilities served or located in segregated areas of your facility?

- No

Do you require persons with disabilities to receive or participate in services at an alternate location?

- No

Do you provide public transportation for your programs, services or activities?

- No

Do you offer programs at your site that are not offered at other sites in the City of El Centro?

- No

Do you follow a specific procedure or policy for the use of the facility by organizations or members of the public?

- Yes

Are you aware of any community members or recipients of services with disabilities who utilize your site?

- Yes

Have you made accommodations for individuals with disabilities (employees, patrons, members of the public, etc.)?

- Yes -Wireless microphone available
- Wheelchair designated areas in Council Chamber
- Ramps in Chambers
- ADA podium in Chambers

Do you have any employees, volunteer or interns with disabilities at your site (if known)?

- No

Have you provided training or information to your staff regarding the requirements of the Americans with Disabilities Act?

- No

Do you have any volunteers or interns?

- No

If you have volunteers or interns, have they received training on providing services or activities for individuals with disabilities?

- No

Would you like additional training regarding the Americans with Disabilities Act?

- Yes

Does your site offer any exemplary programs or services for individuals with disabilities?

- No

Have you received any awards or special recognitions regarding programs or services for individuals with disabilities?

- No

Do you have any construction or remodeling projects currently underway or planned for the next 5 years?

- No

Do you already have an Accessibility Survey or report for your site or the sites for which you are responsible?

- No

Other Comments:

- Council Chamber doors should have handicap accessible doors with push button
- Back door into City Hall building B should also have handicap accessible doors with push button.

Appendix D- Areas Inspected by DAC

Facilities and Parks

Adams Park
4th & 7th Street
El Centro, CA 92243

Bucklin Park
1450 South 8th Street
El Centro, CA 92243

Carlos Aguilar Park
1575 West Pico Avenue
El Centro, CA 92243

Center Point Property
1130 North Imperial
El Centro, CA 92243

City Hall & Council Chambers
1275 Main Street
El Centro, CA 92243

Countryside Park
162 Jackrabbit Drive
El Centro, CA 92243

Debbie Pittman Park
1997 Orange Avenue
El Centro, CA 92243

Economic Development
1249 Main Street
El Centro, CA 92243

El Centro Bus Transfer Station
7th Street & State Street
El Centro, CA 92243

El Centro Public Library
1140 North Imperial
El Centro, CA 92243

El Centro Youth Center and Martin
Luther King Pavilion
750 Park Avenue
El Centro, CA 92243

Farmers Park
18th Street & Whitney Way
El Centro, CA 92243

Fire Station 1
775 West State Street
El Centro, CA 92243

Fire Station 2
900 South Dogwood Road
El Centro, CA 92243

Fire Station 3
1910 North Waterman Avenue
El Centro, CA 92243

Frazier Field
1150 North 6th Street
El Centro, CA 92243

Gomez Park
901 South Hope Street
El Centro, CA 92243

Humane Society
1575 Pico Avenue
El Centro, CA 92243

Incubator Facility
703 Industry Way
El Centro, CA 92243

Leeper Park
250 Lotus Avenue
El Centro, CA 92243

Legacy Park
3900 Arthur Hennesey Court
El Centro, CA 92243

Maintenance
1248 West State Street
El Centro, CA 92243

Mcgee Park & Community Center
375 South 1st Street
El Centro, CA 92243

Old Post Office
230 South 5th Street
El Centro, CA 92243

Parking Lot 1
Olive Street & 5th Street (Southeast Corner)
El Centro, CA 92243

Parking Lot 2
State Street Between 5th Street & 6th Street
El Centro, CA 92243

Parking Lot 3
State Street & 6th Street (Northeast Corner)
El Centro, CA 92243

Parking Lot 4
Broadway Street & 5th Street (SE Corner)
El Centro, CA 92243

Parking Lot 5
Broadway Street Between 5th Street & 6th Street
El Centro, CA 92243

Parking Lot 6
Broadway Street & 7th Street
El Centro, CA 92243

Parking Lot 7
Main Street Between
7th Street & 8th Street
El Centro, CA 92243

Parking Lot 8
State Street & 6th Street (Northwest Corner)
El Centro, CA 92243

Plank Park
Desert Village West-Subdivision
El Centro, CA 92243

Police Department
150 North 11th Street
El Centro, CA 92243

Public Works Department
307 Brighton/300 Block Orange
El Centro, CA 92243

Sidewinder Skate Park
650 Park
El Centro, CA 92243

Stark Field
831 South 4th Street
El Centro, CA 92243

Sunflower Park
350 North Lotus Avenue
El Centro, CA 92243

Swarthout Park
350 Euclide Avenue
El Centro, CA 92243

Townsquare
679 West Main Street
El Centro, CA 92243

Wastewater Treatment Plant
2255 North La Brucherie Road
El Centro, CA 92243

Water Plant
1555 South Clark Avenue
El Centro, CA 92243

Water Tower Open Space
8th Street & Vine Street
El Centro, CA 92243

Wildflower Park
Vine Street & Lotus Avenue
El Centro, CA 92243

Public Rights-of-Way

Cypress Drive - Manuel A Ortiz Avenue to End
14th Street - Manuel A Ortiz Avenue to Valleyview Avenue
Palmview Avenue - Cypress Drive to 8th Street
Desertview Avenue - Cypress Drive to Cul-De-Sac
Mountainview Avenue - Cypress Drive to Cul-De-Sac
Skyview Avenue - Cypress Drive to Cul-De-Sac
Imperial Ave- Valleyview Avenue to End-East side only
10th Street - Fieldview Avenue to Palmview Avenue
Manuel Ortiz Avenue - 8th Street to Imperial Avenue
Valleyview Avenue - Imperial Drive to 8th Street
Fieldview Court- Cul-De-Sac to Cul-De-Sac
Riverview Avenue - Cul-De-Sac to Cul-De-Sac
Fairview Avenue - 8th Street to Cul-De-Sac
Meadowview Avenue - Cul-De-Sac to Cul-De-Sac
Cypress Drive - Danenberg Drive to Manzanita Drive
Dananberg Drive - 8th Street to End
Jacaranda Drive - 8th Street to End
Manzanita Drive - 8th Street to End
Farmer Drive - 9th Street to Cypress Drive
Whitney Way - 10th Street to Cypress Drive
Chaparral Drive - Cypress Drive to 9th Street
8th Street - City Limit to Wake Avenue
9th Street - Wake Avenue to Farmer Drive
Cypress Drive - Whitney Way to Chaparral Drive
Wake Avenue - 8th Street to End

11th Street - Chaparral Drive to Cul-De-Sac
10th Street - Chaparral Drive to Cul-De-Sac
9th Street - Chaparral Drive to Wake Avenue
Cottonwood Drive - Wake Avenue to Whitney Way
18th Street - Wake Avenue to Farmer Drive
18th Street - Barbara Way to Whitney Way
8th Street - Wake Avenue to City Limit
8th Street - City Limit to Wake Avenue
Wake Avenue - La Brucherie Road to End
Smoketree Drive - 4th Street to 2nd Street
Driftwood Drive - 4th Street to 3rd Street
Cruickshank Drive - North La Brusherie Road to State Route 86
Wensley Avenue - Lotus Avenue to La Brucherie Road
Vine Street - Lotus Avenue to 24th Street
24th Street - Vine Street to Wensley Avenue
21st Street - Wensley Avenue to Northern Cul-De-Sac
22nd Street - Wensley Avenue to Northern Cul-De-Sac
Desert Gardens Drive - 24th Street to 22nd Street
Heil Avenue - Dogwood Road to Hope Street
Hamilton Avenue - Dogwood Road to Hope Street
State Street - 4th Street to End
Olive Avenue - 4th Street to End
Brighton Avenue - 4th Street to End
Aurora Drive - 4th Street to 2nd Street
3rd Street - Ross Avenue to Yucca Drive
Cruickshank Drive - North La Brusherie Road to State Route 86
23rd Street - Desert Gardens Drive to Orange Avenue
Holt Avenue - Lotus Avenue to La Brucherie Road
Hamilton Avenue - 1st Street to Hope Street
Heil Avenue - 1st Street to Hope Street
Holt Avenue - 1st Street to Hope Street
S Fairfield Drive - Orange Avenue to S Fairfield Drive
3rd Street - Yucca Drive to Westwind Drive
Cruickshank Drive - State Route 86 to North 8th Street
North 10th Street - Cruickshank Drive to Bradshaw Avenue
Heil Avenue - Lotus Avenue to La Brucherie Road
Elm Avenue - Lotus Avenue to La Brucherie Road
Elm Avenue - Lotus Avenue to Western Cul-De-Sac
24th Street - Ocotillo Drive to Desert Gardens Drive
4th Street - Orange Avenue to Ross Avenue
4th Street - Ross Avenue to Aurora Drive
4th Street - Aurora Drive to Driftwood Drive
North La Brucherie Road - Bradshaw Avenue to Treshill Road
North Waterman Avenue - Bradshaw Avenue to Ford Drive
Lotus Avenue - Ross Avenue to Orange Avenue
23rd Street - Ocotillo Drive to Pepper Drive
Pepper Drive - 23rd Street to Pepper Court
Pepper Court - Pepper Drive to 22nd Street
Maple Avenue - 3rd Street to End
Hamilton Avenue - 3rd Street to End
Holt Avenue - 4th Street to End
Heil Avenue - 4th Street to End

Hamilton Avenue - 4th Street to 3rd Street
Holt Avenue - 2nd Street to 1st Street
Heil Street - 2nd Street to 1st Street
4th Street - Driftwood Drive to Interstate 8 Entrance
3rd Street - Smoketree Drive to Westwind Drive
Aurora Drive - 5th Street to 4th Street
Hamilton Avenue - Western Cul-De-Sac to La Brucherie Road
Haskell Road - Hamilton Avenue to Orange Avenue
Elm Circle - Western Cul-De-Sac to Eastern Cul-De-Sac
Heil Circle - Western Cul-De-Sac to Eastern Cul-De-Sac
Holt Circle - Haskell Drive to Western Cul-De-Sac
Heil Court - 2nd Street to 1st Street
Main Street - 4th Street to 6th Street
Park Avenue - 6th Street to 4th Street - South Side Only
Commercial Avenue - 6th Street to 4th Street
6th Street - Commercial Avenue to Adams Avenue
Lotus Avenue - Ross Avenue to Southern Cul-De-Sac
Glenwood Drive - Ross Avenue to Northern End
Vine Court - Glenwood Drive to Eastern Cul-De-Sac
Wensley Avenue - Glenwood Drive to Plank Road Drive
Lenrey Court - Glenwood Drive to Eastern Cul-De-Sac
Sandalwood Court - Glenwood Drive to Eastern Cul-De-Sac
Plank Road Drive - Ross Road to Northern End
Broadway Street - 6th Street to End
2nd Street - Southwind Drive to Tangerine Drive
Combs Way - Smoketree Drive to Barrett Drive
Barrett Drive - 3rd Street to Combs Way
Orange Avenue - Western End to Imperial Avenue
State Street - 6th Street to 4th Street
6th Street - Commercial Avenue to State Street
5th Street - State Street to Park Avenue
Haskell Drive - Ross Avenue to Wensley Avenue
Wensley Avenue - Western End to Eastern Cul-De-Sac
Kay Davis Court - Wensley Avenue to Northern Cul-De-Sac
Lenrey Avenue - Western End to Eastern Cul-De-Sac
Sandalwood Drive - Western End to Eastern Cul-De-Sac
22nd Street - Ocotillo Drive to Desert Gardens Drive
Aurora Court - 22nd Street to Western Cul-De-Sac
Orange Avenue - 4th Street to 8th Street
6th Street - State Street to Orange Avenue
7th Street - State Street to Orange Avenue
Adams Avenue - 8th Street to Main Street
8th Street - Orange Avenue to State Street
Ross Avenue - Lotus Avenue to La Brucherie Road
Cottonwood Drive - Aurora Avenue to Ross Avenue
Pepper Drive - Waterman Avenue to Imperial Avenue
Aurora Drive - Waterman Avenue to Eastern Cul-De-Sac
Elm Avenue - Waterman Avenue to Imperial Avenue
8th Street - State Street to Adams Avenue
State Street - 8th Street to 6th Street
Lotus Avenue - Orange Avenue to Main Street
Brighton Avenue - Western Cul-De-Sac to 23rd Street

Moiola Avenue - Western Cul-De-Sac to 23rd Street
Olive Avenue - Lotus Avenue to 23rd Street
7th Street - Adams Avenue to Main Street
Main Street - 6th Street to 8th Street
Broadway Street - 6th Street to 8th Street
Park Avenue - 6th Street to 8th Street
23rd Street - Orange Avenue to Main Street
State Street - Lotus Avenue to 23rd Street
Heil Avenue - Waterman Avenue to Imperial Avenue
Brighton Avenue - Western Cul-De-Sac to Imperial Avenue
State Street - 8th Street to Imperial Avenue
Wilson Street - Adams Avenue to Commercial Avenue
Bradshaw Avenue - North Imperial Avenue to North Waterman Avenue
23rd Street - Main Street to Barbara Worth Drive
22nd Street - Main Street to Barbara Worth Avenue
21st Street - Main Street to Barbara Worth Avenue
Solano Road - Orange Avenue to Olive Avenue
Olive Avenue - Solano Road to Main Street
Solano Road - Olive Avenue to Main Street
21st Street - Olive Avenue to Northern End
Olive Avenue - Western End to Waterman Avenue
Holt Avenue - Waterman Avenue to Imperial Avenue
5th Street - State Street to Orange Avenue
7th Street - State Street to Orange Avenue
Park Avenue - 8th Street to Wilson Street
14th Street - Commercial Avenue to Broadway Street
Commercial Avenue - Imperial Avenue to Wilson Avenue
S 9th Street - State Street to Main Street
Bradshaw Avenue - North Imperial Avenue to North 8th Street
North 8th Street - Bradshaw Avenue to City Limits
North 8th Street - Bradshaw Avenue to West Lincoln Avenue
Waterman Avenue - Hamilton Avenue to Main Street
Vine Street - 18th Street to Imperial Avenue
N 9th Street - Broadway Street to Main Street
10th Street - Broadway Street to Adams Avenue
11th Street - Broadway Street to State Street
Adams Avenue - 5th Street to End - North Side Only
12th Street - Adams Avenue to Brighton Avenue
Cottonwood Drive - Bradshaw Avenue to Ford Drive
Main Street - 8th Street to Imperial Avenue
Broadway Street - 8th Street to 12th Street
14th Street - Main Street to State Street
Ford Drive - Cottonwood Drive to North Waterman Drive
North 8th Street - Woodward Avenue to Lincoln Avenue
Broadway Street - 12th Street to Imperial Avenue
14th Street - State Street to Brighton Avenue
8th Street - Orange Avenue to Vine Street
Pico Road - Imperial Avenue to 6th Street
12th Street - Bradshaw Avenue to Pico Avenue
Lincoln Avenue - 8th Street to 6th Street - South Side Only
Barbara Worth Drive - Western End to Imperial Avenue
Haskell Drive - Southern End to Main Street

Lotus Avenue - Adams Avenue to Main Street
Commercial Avenue - 8th Street to 6th Street
Commercial Avenue - 8th Street to 12th Street
Adams Avenue - 8th Street to Imperial Avenue
Pico Road - Imperial Avenue to End
El Dorado Avenue - 8th Street to Imperial Avenue
12th Street - Cruickshank Drive to Cul-De-Sac
Main Street - Sunset Drive to Imperial Avenue
Olive Avenue - 4th Street to 8th Street
Olive Avenue - 8th Street to Imperial Avenue
Waterman Avenue - Villa Way to Bradshaw Avenue
Villa Way - Waterman Avenue to End
Imperial Avenue - Adams Avenue to Scott Avenue
Ocotillo Drive - Western End to Imperial Avenue
Orange Avenue - 8th Street to 10th Street
10th Street - State Street to Hamilton Avenue
Holt Avenue - Imperial Avenue to 10th Street
Lincoln Avenue - La Brucherie Avenue to Imperial Avenue
Ross Avenue - Lotus Avenue to Imperial Avenue
Hamilton Avenue - Imperial Avenue to Wilson Street
Wilson Street - Hamilton Avenue to Holt Avenue
Brighton Avenue - 10th Street to Imperial Avenue
Vine Street - 8th Street to 10th Street
Villa Avenue - La Brucherie Avenue to Imperial Avenue
17th Street - Villa Avenue to Lincoln Avenue
Frontage Road - Lincoln Avenue to End - West Side Only
5th Street - Aurora Drive to Southwind Drive
Aurora Drive - 5th Street to 8th Street
Yucca Drive - 5th Street to 8th Street
6th Street - Aurora Drive to Southwind Drive
6th Street - Aurora Drive to Ross Avenue
Driftwood Drive - Willow Drive to 5th Street
Willow Drive - Centinella Avenue to Driftwood Drive
Adams Avenue - La Brucherie Road to Imperial Avenue
La Brucherie Road - Ocotillo Drive to Hamilton Avenue
18th Street - Lincoln Avenue to Villa Way
18th Street - Scott Avenue to Villa Avenue
Stacey Court - 19th Street to 17th Street
19th Street - Villa Avenue to Stacey Court
17th Street - Villa Avenue to Stacey Court
7th Street - Driftwood Drive to Southwind Drive
Smoketree Drive - 7th Street to 4th Street
Southwind Drive - 7th Street to 4th Street
Willow Drive - Southwind Drive to Driftwood Drive
Southwind Drive - Willow Drive to Woodside Drive
La Brucherie Road - Hamilton Avenue to Adams Avenue
21st Street - Ocotillo Drive to Northern Cul-De-Sac
Westwind Drive - 5th Street to 6th Street
Ocotillo Drive - 5th Street to 6th Street
Driftwood Drive - 5th Street to 4th Street
Tangerine Drive - 5th Street to 6th Street
Woodside Drive - Centinella Avenue to Southwind Drive

Centinela Avenue - 8th Street to Willow Drive
8th Street - Aurora Drive to Centinela Avenue
Imperial Avenue - Hamilton Avenue to Adams Avenue
Desert Gardens Drive - 5th Street to 4th Street
5th Street - Desert Gardens Drive to Aurora Drive
5th Street - Sandalwood Drive to Desert Gardens Drive
Ross Avenue - 6th Street to 4th Street
Sandalwood Drive - 5th Street to 4th Street
Sandalwood Drive - 5th Street to 8th Street
Woodward Avenue - Imperial Avenue to 5th Street
10th Street - Adams Avenue to Northern End
Sandalwood Drive - 5th Street to 8th Street
11th Street - Westwind Drive to Aurora Drive
Westwind Drive - 11th Street to 8th Street
9th Street - Westwind Drive to Cul-De-Sac
Euclid Avenue - Imperial Avenue to 5th Street
Aurora Drive - Imperial Avenue to 8th Street
11th Street - Ocotillo Drive to Cul-De-Sac
Driftwood Drive - 11th Street to 9th Street
12th Street - Adams Avenue to Northern End
8th Street - Adams Avenue to Woodward Avenue
7th Street - Adams Avenue to Northern End
14th Street - Ocotillo Drive to Cul-De-Sac
Driftwood Drive - 14th Street to Cypress Drive
Smoketree Circle - Smoketree Drive to Cul-De-Sac
Smoketree Court - Smoketree Drive to Cul-De-Sac
Smoketree Drive - Cypress Drive to 14th Street
Smoketree Drive - Cypress Drive to 9th Street
10th Street - Smoketree Drive to Cul-De-Sac
El Centro Avenue - Imperial Avenue to 5th Street
7th Street - Southern End to Lincoln Avenue
Cypress Drive - Aurora Drive to Cul-De-Sac
Ocotillo Drive - Cypress Drive to 9th Street
Ocotillo Drive - Cypress Drive to Imperial Avenue
6th Street - Lincoln Avenue to Adams Avenue
Oleander Drive - 12th Street to 8th Street
Rose Avenue - 12th Street to 8th Street
Pepper Drive - Cypress Drive to Imperial Avenue
Westwind Drive - 14th Street to Cypress Drive
12th Street - Poplar Drive to Cypress Drive
Poplar Drive - 12th Street to Cul-De-Sac
12th Street - Poplar Drive to Cypress Drive - West Side Only
Cypress Drive - Ross Avenue to Aurora Drive
Scott Avenue - 14th Street to 8th Street
Stacey Avenue - 14th Street to Eastern Cul-De-Sac
Scott Avenue - 14th Street to Imperial Avenue
Buena Vista Avenue - 8th Street to 6th Street
Cypress Drive - Ross Avenue to Aurora Drive
Ross Avenue - Cypress Drive to Imperial Avenue
Sandalwood Drive - 10th Street to 14th Street
Ross Avenue - 12th Street to 8th Street
12th Street - Ross Avenue to Vine Street

Lenrey Avenue - 10th Street to 14th Street
14th Street - Ross Avenue to Vine Street
Lenrey Avenue - 14th Street to Imperial Avenue
Wensley Avenue - 10th Street to 12th Street
12th Street - Vine Street to Holt Avenue
Wensley Avenue - 12th Street to 14th Street
Heil Avenue - Wilson Street to 8th Street
Hamilton Avenue - Wilson Street to 12th Street
Hamilton Avenue - 12th Street to 8th Street
Hamilton Avenue - 12th Street to 8th Street
Vine Street - 10th Street to Imperial Avenue
10th Street - Ross Avenue to Hamilton Avenue
Wensley Avenue - 10th Street to 9th Street
9th Street - Wensley Avenue to Wensley Avenue
Wensley Avenue - 6th Street to 8th Street
Wensley Avenue - 8th Street to 9th Street
7th Street - Ross Avenue to Hamilton Avenue
Brighton Avenue - 4th Street to 7th Street
Brighton Avenue - 7th Street to 10th Street
7th Street - Orange Avenue to Hamilton Avenue
Vine Street - 7th Street to 4th Street
Wensley Avenue - 6th Street to 4th Street
6th Street - Ross Avenue to Hamilton Avenue
8th Street - Ross Avenue to Vine Street
Lenrey Avenue - 8th Street to 6th Street
Lenrey Avenue - 6th Street to 4th Street
5th Street - Sandalwood Drive to Wensley Avenue
5th Street - Wensley Avenue to Orange Avenue
Holt Avenue - 10th Street to 7th Street
Holt Avenue - 7th Street to 5th Street
Hamilton Avenue - 6th Street to 4th Street
Hamilton Avenue - 6th Street to 8th Street
Heil Avenue - 6th Street to 8th Street
6th Street - Hamilton Avenue to Orange Avenue
Heil Avenue - 6th Street to 4th Street
Holt Avenue - 5th Street to 4th Street
8th Street - Centinela Avenue to Wake Avenue
Tangerine Drive - Blaxton Drive to Eshelman Drive
Blaxton Drive - Tangerine Drive to Yucca Drive
Yucca Drive - Blaxton Drive to Eshelman Drive
Eshelman Drive - Yucca Drive to Tangerine Drive
Westwind Drive - 2nd Street to 3rd Street
Ocotillo Drive - Eshelman Drive to 2nd Street
Eshelman Drive - Ocotillo Drive to Driftwood Drive
Driftwood Drive - Combs Way to 3rd Street
Combs Way - Driftwood Drive to Ocotillo Drive
Ocotillo Drive - Combs Way to 3rd Street
Southwind Drive - 2nd Street to Cul-De-Sac
Smoketree Drive - 2nd Street to Eshelman Drive
Eshelman Drive - Smoketree Drive to Driftwood Drive - West Side Only
Eshelman Drive - Smoketree Drive to Southwind Drive
Driftwood Drive - Eshelman Drive to 2nd Street

4th Street - Wake Avenue to Interstate 8 Highway
Ross Avenue- Austin Road to Lotus Avenue - North Side Only
Lotus Avenue - Ross Avenue to City Limit - East Side Only
Sandalwood Court - Plank Road Drive to Cul-De-Sac
Lenrey Court - Plank Road Drive to Cul-De-Sac
Adams Avenue - La Brucherie Road to City Limit - South Side Only
La Brucherie Road - Adams Avenue to City Limit - East Side Only
Euclid Avenue - La Brucherie Road to Imperial Avenue
Euclid Avenue - La Brucherie Road to Imperial Avenue
Scott Avenue - Imperial Avenue to 17th Street
Waterman Court - Scott Avenue to Cul-De-Sac
Scott Avenue - 17th Street to 19th Street
Sandy Avenue - 7th Street to 6th Street

Signalized Intersections

8th Street & Wake Avenue
4th Street & Danenberg Drive
Dogwood Avenue & South Mall Entrance
Dogwood Avenue & North Mall Entrance
Dananberg Drive & Plaza Drive
Dananberg Drive & IV Commons Drive
Dogwood Avenue & Plaza Drive
4th Street & Wake Avenue
Dogwood Avenue & Danenberg Drive
Dogwood Road & Ross Avenue
Dogwood Road & East Main Street
Orange Avenue & 4th Street
4th Street & Aurora Drive
La Brucherie Avenue & Cruickshank Drive
Cruickshank Drive & State Route 86
4th Street & Ross Avenue
Cruickshank Drive & North 8th Street
North La Brucherie Road & Bradshaw Avenue
Bradshaw Avenue & North Waterman Avenue
4th Street & Interstate 8 Entrance
6th Street & Adams Avenue
8th Street & State Street
8th Street & Main Street
8th Street & Broadway Street
State Street & Imperial Avenue
8th Street & Adams Avenue
North Imperial Avenue & Bradshaw Avenue
Imperial Avenue & Scott Avenue
Imperial Avenue & Pico Road
Main Street & Imperial Avenue
Imperial Avenue & Adams Avenue
Imperial Avenue & Euclid Avenue
Imperial Avenue & Hamilton Avenue
La Brucherie Road & Ocotillo Drive
Adams Avenue & La Brucherie Avenue

Ross Avenue & La Brucherie Road
Imperial Avenue & Ross Avenue
8th Street & Ross Avenue
Imperial Avenue & Ocotillo Drive
4th Street & Interstate 8 Exit

Bus Stops

12th Street & El Dorado Avenue - Eastbound
14th Street & State Street - Eastbound
14th Street & State Street – Northbound
14th Street & State Street - Westbound
18th Street & Villa Avenue - Eastbound
3rd Street & Orange Avenue
4th Street & Aurora Drive - Eastbound
4th Street & Aurora Drive - Westbound
4th Street & Brighton Avenue - North Bound
4th Street & Brighton Avenue - South Bound
4th Street & Danenburg - Northbound
4th Street & Driftwood Drive
4th Street & Wake Avenue - Northbound
4th Street & Wake Avenue - Southbound
4th Street & Wensley Avenue - Northbound
4th Street & Wensley Avenue - Southbound
5th Street & Park Avenue
5th Street & State Street - Eastbound
5th Street & State Street - Westbound
7th Street & Park Avenue
8th Street & Hamilton Avenue
8th Street & Pico Avenue - Southbound
8th Street & State Street - Eastbound
8th Street & State Street - Westbound
8th Street & Wake Avenue - Southbound
Adams Avenue & La Brucherie Road - Eastbound
Adams Avenue & La Brucherie Road - Westbound
Aurora Drive & Cypress Drive
Bradshaw Avenue & La Brucherie Road
Bradshaw Avenue & North Waterman Avenue - Eastbound
Clark Road & South Loop Road
Cruickshank Drive & North 10th Street
Cruickshank Drive & North La Brucherie Avenue
Cruickshank Drive & North Waterman Avenue
Dogwood Road & Main Street
El Centro Regional Medical Center - Northbound
El Centro Regional Medical Center - Southbound
Euclid Avenue & Imperial Avenue (Vons)
El Centro, CA 92243
Evan Hewes Highway & Dogwood Road - Eastbound
Food 4 Less
Frontage Road & Scott Avenue - Southbound
Imperial Avenue & Adams Avenue
Imperial Avenue & Bradshaw Avenue - Westbound

Imperial Avenue & Commercial Avenue - Northbound
Imperial Avenue & Commercial Avenue - Southbound
Imperial Avenue & Euclid Avenue - Northbound
Imperial Avenue & Euclid Avenue - Southbound
Imperial Avenue & Holt Avenue - Northbound
Imperial Valley Mall
Joshua Tree Street & Bougainvillea Trail
La Brucherie Road & Ocotillo Drive
La Brucherie Road & Orange Avenue
Main Street & La Brucherie Road - Westbound
Main Street & Waterman Avenue
Myrtle Road & Aten Road
Orange Avenue & Dogwood Road
Ross Avenue & 10th Street - Eastbound
Ross Avenue & 10th Street - Westbound
Social Security Office Cruickshank Drive & State Route 86
State Street & 7th Street - Blue Line
State Street & 7th Street - Fast Line Route
State Street & 7th Street - Green Line
State Street & 7th Street - Route 1
State Street & 7th Street - Route 2
State Street & 7th Street - Route 3
State Street & 7th Street - Route 4
Theatre
Villa Avenue & La Brucherie Road
Villa Avenue & Oak Road - Eastbound
Villa Avenue & Oak Road - Westbound
Wake Avenue & 2nd Street