

City of Minneapolis

ADA Evaluation

A review of policies, programs, services and activities for compliance with the Americans with Disabilities Act

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Final Report

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1 INTRODUCTION

1.1 BACKGROUND

Immediately following the passage of the Americans with Disabilities Act (ADA), the City of Minneapolis completed an ADA Self Evaluation and Transition Plan. It was submitted to the City Council and the first formal budget request for ADA improvements was made in February 1993. Over the last 25 years, the City has taken a proactive approach to ADA compliance. Policies, practices and procedures have been modified; auxiliary aids and services have been put into place; and facilities have undergone substantial accessibility improvements so that people with disabilities can engage, participate and benefit from the programs, services and activities offered by the City of Minneapolis.

Considering more than two decades had passed since the original ADA Self Evaluation and Transition Plan were developed, the City initiated a year-long process to reassess its current level of ADA compliance, both programmatically through the delivery of programs, services and activities, and physically in terms of access to supporting facilities. In the fall of 2014, an accessibility assessment of all City-owned buildings and leased spaces was coordinated by Finance and Property Services and conducted by JQP, Inc. Following in the spring of 2015, Neighborhood and Community Relations selected Skulski Consulting LLC to conduct an evaluation of city ordinances, policies, programs, services and activities. The purpose of this report is to present the findings from the evaluation of the enterprise and present recommendations for the City to maintain ADA compliance, expand its accessibility management program, and strive above and beyond the minimum standards toward model best practices of universal design to more fully include people with disabilities in all facets of community life.

1.2 METHODOLOGY

For the purposes of this ADA evaluation, data was collected through various methods that would paint a comprehensive landscape of the City's ADA compliance efforts including document reviews, interviews, web validation testing, perception surveys and community engagement.

- The Accessibility Liaison Network (ALN) was established at the launch of the evaluative process to ensure representation from all City departments. The ALN was formed to provide leadership and communication for ADA compliance. The ALN members provided guidance to the evaluation team, identifying critical documents to review and key personnel to contact.
- Interviews were conducted with City personnel across all departments, Council Members, the Mayor, and members of the Minneapolis Advisory Committee on People with Disabilities. The evaluation involved more than 56 City personnel and 100 hours of interviews.
- Essential governing documents were reviewed such as ordinances, policies and informational notices on procedures for residing or operating a business in the City.
- An accessibility assessment and validation testing were administered for the top layer pages of the City web site and 311 app since they serve as central portals of public information.

- City personnel were asked to participate in an optional online survey to assess the internal perceptions of compliance with the ADA; and
- People with disabilities who live, work and play in Minneapolis were invited to participate in a similar online survey as a means to compare public perceptions with internal perceptions, while also providing preliminary data for further community engagement activities.

City leaders view community engagement as a critical component to create One Minneapolis. As such, a multi-phased approach to community engagement was initiated to gather input from people with disabilities. Community engagement efforts utilized a variety of formats to enable people with disabilities and disability advocates several opportunities for input on their perceptions of the City's ADA compliance efforts and feedback for future ADA improvements through one-to-one interviews, public listening sessions, focus groups, social media events and an online survey.

The Department for Neighborhood and Community Relations (NCR) will seek further public comment following the release of this report along with the proposed ADA Action Plan as it is presented to the City Council in early 2016. Implementation of a forthcoming ADA Action Plan will promote and reinforce the City ADA Coordinator and the Department for Neighborhood and Community Relations as the central point of contact for people with disabilities to provide ongoing feedback regarding the City's ADA compliance and evolving expectations as new standards and best practices continue to emerge. This community engagement activity will be ongoing as part of the City's accessibility management program, serving as the communication bridge between residents with disabilities and policy makers.

1.3 DISABILITY, INCLUSION AND UNIVERSAL DESIGN

Consistently recognized as one of the best metropolitan cities to live, work and play, Minneapolis is home to more than 407,000 residents, 3.4 million neighbors from surrounding communities¹, and 29 million visitors each year.² According to the U.S. Census Bureau, more than 10 percent of residents in the Twin Cities metro area have identified as having at least one functional impairment that affects their daily life activity. Among individuals self-identified as having a disability, more than 30 percent are age 65 and older, followed by adults age 18 to 64 (7.5 percent) and youth age 5 to 17 (4.7 percent)³. It is important to note that the U.S. Census Bureau and statistical researchers in disability have long held that the definition of disability is both broadly and narrowly defined based on the context, whether it be as an expansive demographic category or a much more specific criteria for a federal benefit. Accounting for the vast population of people that may have a functional impairment along a spectrum and may not necessarily identify as having a disability per se, the Census Bureau estimates 18 to 20 percent of the population to have a disability in either the communicative, mental or physical domains. As the findings and recommendations of this evaluation are presented, planners should consider that disability can affect one in every five individuals; and two out of every seven families.⁴ When an individual with a disability encounters barriers to programs and the environment, it affects the group, the family and friends, who are also seeking to participate with the individual. Therefore, initiatives should be

¹ [U.S. Census Bureau](#). (2014)

² [Study: Twin Cities Visitors and Tourism Spending Up In 2013](#). Twin Cities Business. (May 20, 2014).

³ [American Community Survey](#). U.S. Census Bureau. (2009-2013).

⁴ [Disability and American Families: 2000](#). U.S. Census Bureau. (July 2005).

purposeful to meet the needs of individuals along a spectrum of functional limitations as well as facilitate a positive experience for the entire group, disabled and non-disabled alike. Throughout the enterprise evaluation, City leaders and point personnel reiterated the importance of a universal approach to ensure access for residents of all abilities.

1.4 HOW TO USE THIS REPORT

The following sections of this report present the findings from the ADA evaluation of policies, programs, services and activities offered by the City of Minneapolis. Proposed action items are presented as either REQUIRED or RECOMMENDED as defined:

REQUIRED: The action is essential and necessary to achieve minimum compliance with the Americans with Disabilities Act.

RECOMMENDED: The action is recognized as a best practice, above and beyond the minimum ADA standards and regulations, to create a community more inclusive of people with disabilities and achieve the [One Minneapolis](#) goal.

This report is designed to give the City's accessibility management team the information and tools necessary to develop an ADA Action Plan that can serve as a dynamic working document to guide future planning and gather ongoing feedback from people with disabilities who live, work and play in Minneapolis.

2 PERCEPTIONS: ADA, ACCESSIBILITY AND COMPLIANCE

Attitude toward disability, accessibility, inclusion and the ADA can often times pose the biggest barriers to successfully implementing an accessibility management program/ADA compliance program. For the purpose of this project, two different online surveys were administered to gauge perceptions of the ADA, accessibility and compliance among City personnel and residents with disabilities. Results from the two surveys showed there is a significant difference in perception of the City's ADA compliance internally among City personnel versus externally among residents with disabilities. 54 percent of respondents representing City personnel gave the City a "B" on its ADA compliance efforts. Alternatively, 44 percent of the respondents representing people with disabilities gave the City a "C" on its ADA compliance efforts. This misalignment of performance measure illustrates the need for improved communication and engagement with the disability community.

2.1 PERCEPTIONS AMONG RESIDENTS WITH DISABILITIES

Input was sought from the Minneapolis Advisory Committee on People with Disabilities, presentations to the committee as a whole, discussions with the executive committee, and one-to-one interviews with the committee officers. Members of the Advisory Committee raised several issues that began to emerge as central themes and concerns when the wider community was surveyed, including:

- Program access to fully participate in all City activities and services, as necessary to either make reasonable modifications to policies and/or provide auxiliary aids and services.
- Captioning and sign language interpretation of live City programs and events.

- Ongoing accessibility improvements to facilities used to provide programs, services or activities.
- An active schedule to improve access of City sidewalks, curb cuts (also referred to as ped-ramps), public rights of way, and accessible pedestrian/traffic signals.
- An effective procedure for snow removal that enables people with disabilities to safely use public sidewalks and cross-walks.

An initial online survey was administered from September through the end of December 2015 to gather preliminary input with respect to the City's ADA compliance program. The purpose of this survey was to assess the perceptions of residents with disabilities and advocates regarding the City's compliance with the ADA and establish a benchmark. The survey has been designed to be administered again in the future, 1-3 years, to measure if the perceptions of the City's ADA compliance efforts have improved. People with disabilities and advocates for people with disabilities were asked to participate in the survey. Invitations to participate in the survey were disseminated through the membership of the Minneapolis Advisory Committee on People with Disabilities, state agencies and disability organizations within the region. Approximately 53 individuals participated in the survey. A summary of the results is included in this section while the full survey results are included in Appendix A. Data collected from the survey includes these findings:

- 64 percent of the respondents reported either having an advanced knowledge or moderate knowledge of the ADA.
- Overall, 60 percent of respondents reported that City programs, services and activities were somewhat accessible for people with disabilities. The same majority of respondents reported City facilities to be somewhat accessible to people with disabilities.
- 43 percent of respondents reported overall ADA compliance neutrally, as neither difficult or easy, while 40 percent reported ADA compliance as either easy or very easy.
- 44 percent of respondents gave the City a "C" on its ADA compliance efforts.
- Respondents reported the perceived lack of a knowledgeable ADA Coordinator as the top challenge for the City.

Recommended: Based on the information gleaned from the survey of people with disabilities and advocates, there are many opportunities to improve communication, knowledge and perception of ADA compliance that can fall specifically to the ADA Coordinator and the City's Accessibility Liaison Network. This will require the ADA Coordinator to take an active leadership role within the enterprise while also facilitating an ongoing community engagement process that extends to underrepresented individuals and groups of people with disabilities.

2.2 PERCEPTIONS AMONG CITY PERSONNEL

Prior to the launch of the project, an online survey was administered for optional participation by City personnel. The purpose of this survey was to assess the perceptions of city personnel regarding compliance with the ADA. The results are intended to serve as a benchmark as the City moves forward with its accessibility management program. Approximately 175 City employees responded to the survey. A summary of the results is included in this section while the full survey results are included in Appendix B.

- 15 percent of the City personnel participating in the survey reported having an impairment (physical, hearing, visual, cognitive or mental wellness).
- More than 50 percent of respondents reported having at least a basic knowledge of the ADA, while 26 percent reported a moderate knowledge and 5 percent reported an advanced knowledge.
- City personnel reported their top sources for ADA information as coming from the Internet, the ADA standards and regulations, and the City ADA Coordinator.
- While the City ADA Coordinator was identified as one of the top sources for ADA information, more than half of the total number of respondents reported they did not know if the City had an ADA Coordinator.
- Comparably, more than half of the total number of respondents also reported that they did not know if the City had an ADA Transition Plan, ADA Grievance Procedure or ADA Notice to the Public.
- While 50 percent of respondents viewed ADA compliance in neutral terms (neither easy nor difficult), 38 percent viewed ADA compliance as somewhat difficult.
- Finally, respondents were asked to give the City an overall grade on ADA compliance and the provision of programs, services and activities that are inclusive of people with disabilities. 53 percent of respondents gave the City a B. 36 percent gave a C. 5 percent gave an A.

Respondents were also asked what suggestions they may have for the City to improve access for people with disabilities. The most frequent response was to post additional information on the City's accessible programs, policies and procedures while also providing staff training on topics such as ADA compliance, program access, interacting with people with disabilities, and universal design. Other responses were related to transition planning, improving access at existing facilities, accessible pedestrian/traffic signals at public rights of way, and additional accessible on-street parking spaces. Respondents also cited a need for continuous community engagement among different disability groups. Furthermore, respondents indicated that City leadership must be clear on its commitment to the inclusion of people with disabilities in order for ADA compliance to be effective.

Recommended: Based on the information gleaned from the survey of City personnel, there are many opportunities to improve communication, knowledge and perception of ADA compliance that can fall specifically to the ADA Coordinator and the City's Accessibility Liaison Network. This will require the ADA Coordinator to take an active leadership role within the enterprise while also facilitating an ongoing community engagement process that extends to underrepresented individuals and groups of people with disabilities.

Recommended: As the forthcoming ADA action plan is implemented, the survey can be administered again to measure any increased awareness/knowledge and other positive outcomes compared to the original benchmarks.

3 TITLE II ADMINISTRATIVE REQUIREMENTS

The ADA Title II regulations require units of state and local government, depending on size, take certain administrative measures to implement the regulations and make the information available to constituents with disabilities. This section serves to provide an update of the administrative

requirements completed by the City of Minneapolis while also outlining follow-up tasks to create greater access for people with disabilities, above and beyond the minimum regulations set forth in the ADA (*28 CFR Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services*).

3.1 SELF-EVALUATION

Title II, 35.105 Self-Evaluation, requires a public entity to evaluate its current services, policies, and practices to the extent modification of any such services, policies, and practices are necessary to enable participation by people with disabilities. The City of Minneapolis completed its ADA Self-Evaluation and made the document available to the public in 1993. As policy has evolved and personnel has changed over the last 25 years, the evaluation conducted herein is intended to update the original findings from 1993.

Recommended: A successful public entity is attentive, flexible and responsive to the ever-changing needs of the community it serves. As such, City policies, programs and services will continue to evolve. Recognizing the fluidity of the enterprise, it is recommended that the expertise of the City ADA Coordinator be utilized to continually self-evaluate programs, services, policies and procedures; and work with departments to make reasonable modifications to ensure people with disabilities have the equal opportunity to participate and enjoy the benefit of City programs, services and activities.

3.2 NOTICE

Title II, § 35.106 Notice, requires public entities to make available a public notice to applicants, participants, beneficiaries and other interested parties the applicability of the ADA provisions and to apprise them of the protections afforded to them under the federal law. The manner by which the information is made available is left to the discretion of the head of the agency. The City of Minneapolis has an ADA Notice posted on its web site and made available to the public in alternate formats upon request. Different versions of the ADA Notice are included in job postings, public meeting announcements and some program brochures.

The U.S. Department of Justice interprets the ADA Notice requirement as an ongoing responsibility of the public entity and recommends ADA Notice placement in job applications; periodically in local newspapers; public service announcements on local radio and television stations; published on the government entity's website; posted at all facilities, included in program handbooks and activity schedules; announcements for meetings of programs, services, and activities; published as a legal notice in local newspapers; and posted in bus shelters or other public transit stops. The ADA Notice and obligation of the City's responsibilities to comply with Title II should not be confused with program and service information directing an individual on the process to request a reasonable modification, alternate format, auxiliary aid or service for participation.

Recommended: Position the ADA Notice in a prominent link from the homepage of the City web site. At a minimum, maintain the information to include the [template recommended by the U.S. Department of Justice](#) to Title II entities through Project Civic Access. A longer, more explicatory version may be more suitable for the web site, posting in public buildings and in a brochure to be developed specifically on the City's ADA activities. A shorter version could be adopted for other marketing and communication materials.

Recommended: Develop a schedule to broaden the outreach of the City's ADA Notice such as through major City publications, public service announcements and as a legal notice in the local newspaper.

Recommended: Design a poster that can be used as a public notice on display at all City facilities and locations of City programs, services and activities.

3.3 DESIGNATED OFFICIAL

Title II, § 35.107(a) Designation of Responsible Employee, requires a public entity to appoint an employee to coordinate and carry out the City's compliance efforts, including investigation of complaints. Further the contact information for the designated official is required to be made available through the public notice.

3.3.1 ADA Coordinator

The assignment as the City of Minneapolis ADA Coordinator has changed over time since the 1993 ADA Self Evaluation due to reorganization. As the emphasis of ADA compliance shifted from facilities to community engagement, the designation was moved to the Department of Neighborhood and Community Relations to the specific position of Access and Outreach Manager. Since this Access and Outreach Manager position was vacant at the time of this evaluation, the interim ADA Coordinator for the City of Minneapolis is David Rubedor, Director of Neighborhood and Community Relations. The placement of the ADA Coordinator within the Department of Neighborhood and Community Relations serves as an important link between the greater enterprise and direct contact with residents. It is critical for the ADA Coordinator to be in a position of authority and influence in order to implement, monitor and ensure ADA compliance for the City.

Required: Contact information for the City ADA Coordinator should be updated and included in all ADA Notices to the public.

Recommended: Continuing education is critical to support the role of the ADA Coordinator and a public entity's ADA compliance program. It is recommended that the City ADA Coordinator complete the [ADA Coordinator Training Certification Program](#) offered through the Great Plains ADA Center and supported through the educational offerings of the National Network of ADA Centers and the [National ADA Symposium](#).

3.3.2 Accessibility Management Team

An effective accessibility management/compliance program utilizes a team approach that includes representation of key decision-makers. The City has established an Accessibility Liaison Network (ALN) of representatives across departments.

Recommended: The further development of the Accessibility Liaison Network (accessibility management/compliance team) is recommended to facilitate the flow of ADA compliance information, direct policy, and prioritize corrective actions while maintaining a consistent level of expectation among residents with disabilities. The Accessibility Liaison Network (accessibility management/compliance team) should provide a structure for determining the appropriateness of reasonable modifications of policies, practices and procedures, or other instances that may pose a direct threat, fundamental alternation to the nature of the program, or undue burden to the entity. At a minimum, the Accessibility Liaison Network (accessibility management/compliance team) should include

representation of the ADA Coordinator, Human Resources, Property Services, Marketing and Communications, the City Clerk, Public Works and the City Attorney.

3.4 GRIEVANCE PROCEDURE

Title II, § 35.107(b) Complaint Procedure, requires a public entity to adopt and publish grievance procedures providing for prompt and equitable resolution of ADA-related complaints. The purpose of the ADA grievance procedure is to provide people with disabilities an informal process to contact an entity regarding an access issue so that the individual and the public entity may work together toward a mutual and timely resolution. The City's [Americans with Disabilities Act Complaint Intake Form](#) has been developed to serve as a point of entry for the grievance procedure. However, older versions of the form and the grievance procedure appear on the web site with outdated contact information.

Minneapolis 311, through its call center, online service and mobile application, acts as a conduit for connecting residents to City services. It is most likely that ADA, accessibility, and disability-related inquiries or complaints will first come through one of these portals either as a phone call or e-mail.

Required: Update the grievance procedure as an individual document and create a link from the ADA Notice to clearly outline the process for individuals with disabilities to promptly and equitably seek resolution to ADA-related complaints. The public information should include contact information and a reasonable timeline for follow up as outlined through the [U.S. Department of Justice Project Civic Access template for ADA Grievance Procedure](#). The public information and any related forms for completion should be made available in alternate formats and indicate the availability of such in the primary communication document(s).

Recommended: Conduct periodic training for all Minneapolis 311 staff on the ADA Grievance Procedure and the specific workflow to handle ADA, accessibility/disability-related inquiries and ADA complaints that may be received first through 311. Modify the intake form to enable 311 staff to take information over the phone as a reasonable modification for individuals with disabilities. Enable the form to be tracked as "ADA-related" and routed to the ADA Coordinator for follow up.

Recommended: Establish a system for the ADA Coordinator to intake, update, monitor, track and report all ADA-related inquiries and complaints. This will enable staff to pinpoint specific facility access issues that may need reconsideration for prioritizing in the ADA Transition Plan, policy issues that may need further modification, and document corrective actions should the complaint proceed as a formal complaint to DOJ or private right of action in federal court.

3.5 TRANSITION PLAN

Title II, § 35.150(d) Transition Plan, requires a public entity to develop a transition plan if structural changes to facilities are necessary in order to achieve program accessibility.

3.5.1 Policy and Physical Access to City Facilities

The City of Minneapolis encompasses a vast enterprise of several moving parts. Key personnel oversee the day-to-day operation while other key personnel are responsible for long-term planning. Therefore, it is critical that operational and planning decisions to improve access be in alignment with the needs and expectations of residents with disabilities.

Recommended: Energy should be focused on re-establishing a collaborative approach to access policy development that includes City Planners, Public Works, Neighborhood and Community Relations and the Minneapolis Advisory Committee on People with Disabilities. Together, this team should make policy recommendations such as adoption of universal designs for curb cuts (ped ramps), replacement of accessible audible pedestrian signals, and snow removal.

3.5.2 Scheduling Accessibility Improvements

The City of Minneapolis developed a transition plan in 1993 that served as guidance for accessibility improvements to City-owned and leased spaces. ADA improvements under the 1993 transition plan and other capital projects included renovations to City Hall, such as the installation of automatic doors and accessible service counters at the reception desks for the City Council, Mayor, City Clerk, Human Resources, Minneapolis Development Review and several police stations; renovations to restrooms at City Hall and the Minneapolis Public Service Center; along with the addition of accessible parking spaces at surface lots, parking ramps and on-street parking locations. An updated accessibility assessment of City-owned and leased spaces was conducted between fall 2014 and summer 2015.

Recommended: Responsibilities to maintain accessible spaces and plan future accessibility improvements fall across multiple departments and units. While many of the corrective actions cited in the original 1993 ADA Transition Plan have been completed, it has become necessary for the City to re-prioritize for future planning. It is recommended that the City develop an updated ADA Transition Plan for ongoing barrier removal at owned and leased properties, parking facilities, and public rights of way. An updated transition plan should serve as a dynamic, working document with the flexibility to meet the needs and expectations of residents with disabilities. Further, it is recommended that each responsible unit publish and update its section of the plan for public comment and on a cycle that is consistent with budget requests for funding. As a result of discussions with the responsible units, the following sections are proposed to be updated and published in a working transition plan:

| Transition Planning | Responsible Unit | Publication Cycle for Public Comment |
|---|----------------------------------|---|
| City Hall | Property Services | Based on 3-5 year budget cycle |
| Other Owned Facilities (offices, police stations, fire stations and water treatment facilities) | Property Services | Based on 3-5 year budget cycle |
| Convention Center and Target Center | Property Services | Based on 3-5 year budget cycle |
| Leased Spaces | Property Services | Based on 3-5 year budget cycle |
| Parking Services | Public Works & Property Services | Based on 3-5 year budget cycle |
| Sidewalks and Curb Cuts/ Ped Ramps | Public Works | Upcoming FY projects published every November |
| Traffic Signals and Other Pedestrian Rights of Way | Public Works | Upcoming FY projects published every November |

Recommended: The responsibility units for transition planning should convene semi-annually to report progress on accessibility improvements along with updates on upcoming projects.

3.5.3 Planning and Design

Input from residents with disabilities versed in the accessibility standards indicates a preference and expectation that the City take more action to utilize innovative design approaches and technologies to make City buildings and support facilities accessible to people with disabilities. Input from residents suggests concerns with safety of certain curb cut designs, public rights of way, access aisles for on-street parking spaces, power-assisted doors, and audible pedestrian signals. Residents with disabilities, service providers and advocates have expressed an expectation that the City shift its focus from designing to the minimum accessibility standards to a practice of universal design that benefits all ages and abilities.

Recommended: Provide training to City planners on the Principles of Universal Design.

Recommended: Support staff for continuing education on the emerging trends and best practices of universal design applications in urban environments.

Recommended: Utilize the ADA Coordinator on specific projects and planning teams to research the latest technology advancements and design innovations to ensure the needs of people with disabilities from the onset of the project planning process.

3.5.4 Maintenance of Accessible Features

Title II, 35.133 Maintenance of Accessible Features requires a public entity to maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities. Residents with disabilities have voiced concerns regarding the City's snow removal policy on public sidewalks, parking areas, and crosswalks.

Recommended: Staff should work collaboratively with the Minneapolis Advisory Committee on People with Disabilities to develop a policy recommendation for snow removal that addresses priorities and enforcement, especially on public sidewalks where property owners are responsible for clearing snow under the current policy.

3.6 PARTICIPATION BY PEOPLE WITH DISABILITIES

Title II, § 35.105(b) Self-Evaluation and § 35.150(d) Transition Plan of the ADA requires a public entity provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and the development of the transition plan by submitting comments. The City of Minneapolis utilizes a community engagement approach to develop and apply a collective vision for the growth of a healthy, vibrant community.

3.6.1 Public Input

The City of Minneapolis invites public input throughout the planning and policy-making processes. For the purpose of this ADA review, public input was initially gathered through interviews with active residents with disabilities, discussions with members of the Minneapolis Advisory Committee on People with Disabilities and an online survey open to people with disabilities and advocates who live, work or play in Minneapolis. Further community engagement will commence with the release of this report and

the development of a new ADA action plan. Public comment will be invited to gather input and feedback on the development of ADA new priorities going forward. Public input will be sought from people with disabilities in a variety of formats including additional one-to-one interviews, public listening sessions, focus groups, and social media events.

Recommendation: Gathering public input is a responsibility of the Department of Neighborhood and Community Relations. As such, NCR should continually seek public input specific to accessibility issues through its service relationship and facilitation of the Minneapolis Advisory Committee on People with Disabilities.

3.6.2 Boards and Commissions

The City of Minneapolis has 18 appointed advisory boards and commissions with more than 300 members serving as volunteers. Special emphasis is placed on making sure the composition is representative of the many interests of the City's residents. The [2014 Boards and Commissions Diversity Survey Report](#) indicates at least 9 percent of individuals participating on advisory boards and commissions has identified as living with a disability. Compared to 11 percent of residents reported living with a disability, the report indicates the "diversity measure" or composition to be at 82 percent representation of the City population.

Recommended: Residents and visitors with disabilities are affected by all aspects of City programs, services and activities. As work groups and planning teams meet on specific topics, it is important to ensure that accessibility and disability-related issues are addressed in the earliest stages of planning. Representation of people with disabilities should be balanced, first, because the person has an interest in the overall project, and, second, because the person also has expertise with the ADA regulations and standards. If the individual does not have a working knowledge of the ADA, membership should be cultivated to ensure that knowledge is represented in the planning process and as part of the whole of the group.

3.6.3 Advisory Committee on Disability

The [Minneapolis Advisory Committee on People with Disabilities](#) (MACOPD) was established to serve as a resource to civic leaders on issues affecting people with disabilities and the ways by which the City of Minneapolis can be more accessible to everyone. The committee consist of 15 volunteer members appointed by the Mayor and approved by the City Council. Each member serves a two year term. However, at the time of the review, more than half of the membership had been awaiting approval of appointments for several months. Interviews with personnel quickly revealed a strained relationship between staff and committee members. Many staff have a perception that either current or former committee members are abrasive and heavy-handed when staff approach for guidance on specific projects. Some residents also made a special point during this review process to share their perception that some committee members and their approaches are not representative of these residents with disabilities. As a result of the negative perceptions and vacancies of membership, the committee has not been able to maximize its potential in recent years.

Recommended: During the evaluation process, all but two of the vacant positions on the committee were filled. The Council should move toward appointment and approval to fill the two remaining seats in the membership of the committee as soon as possible.

Recommended: Work with the committee to renew its relationship with City leaders, department heads and personnel to develop a collaborative and congenial partnership that is beneficial to residents with disabilities.

4 MODIFICATION OF POLICIES, PRACTICES AND PROCEDURES

Title II, § 35.130(b)(7), requires a public entity to make reasonable modifications to policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. The following findings and recommendations are based on a broad review of the enterprise and those policies, practices and procedures that most immediately impact participation by people with disabilities.

4.1 ADVANCE REQUESTS FOR AUXILIARY AIDS, SERVICES AND ALTERNATE FORMATS

Title II, § 35.160(b)(1), requires a public entity to furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity. The City of Minneapolis provides a vast array of programs and services to residents, visitors and businesses. These services range from health and family services, building permits, business licenses, animal care and control, public safety, voter services, housing inspections, traffic control, snow emergency response, waste collection, recycling, and much, much more. The City publishes an “accessibility block” in all information bulletins for programs, services and public meetings. Modifications, auxiliary aids and services are decentralized and provided through the coordinating department or unit. The Department for Neighborhood and Community Relations has an established contract in place for the use of professional sign language interpreters. Under the terms of this contract, any department can schedule sign language interpretive services for programs, events or meetings with residents. NCR also provides support to departments to create accessible PDF’s, format documents to large print and translate information to Braille.

Recommended: Continue to communicate through the Accessibility Liaison Network the ADA requirement and necessity to ensure the “accessibility block” is published in all information bulletins, guides, programs, and service brochures disseminated to the public. A longer, more descriptive version of the “accessibility block” can be published to web pages for City programs and services to give people with disabilities a better understanding of the availability of auxiliary aids, services and alternate formats such as sign language interpreters, readers, real-time captioning, Braille and large print. A shorter version can be developed for print materials that may have restrictions on space.

Recommended: Continue to ensure that letters sent to residents regarding fees, fines or administrative hearings also include the “accessibility block” with a specific contact name, phone, email and TTY/relay phone number should they need to request a reasonable modification, auxiliary aid, service or alternate format in advance of a deadline or date for a hearing.

4.2 COMMUNICATIONS

Title II, § 35.160(a)(1), requires a public entity take appropriate steps to ensure that communications with people with disabilities are as effective as communications with others. Further, the Title II

regulation states the type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. In determining what types of auxiliary aids and services are necessary, a public entity shall give primary consideration to the requests of individuals with disabilities. In order to be effective, auxiliary aids and services must 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 (§ 35.160(b (2))). The City of Minneapolis employs multiple communication vehicles to disseminate information to residents, visitors and businesses.

The [City of Minneapolis web site](#) and [311 mobile app](#) are two primary modes of communication. An evaluation of the top level pages of the web site and mobile app was conducted for compliance with the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#). Findings from the evaluation are included in the appendix of this report. In addition, a classroom training session and 90-minute webinar were presented for City personnel with IT, development, content management and/or contractor oversight responsibilities. The sessions presented an overview of the electronic and information technology barriers encountered by people with disabilities, findings from the evaluation, and recommendations for future development of web sites, mobile apps, streaming programs, electronic kiosks and other technologies.

In addition to the City's main web site and 311 mobile app, many specialty web sites and new apps have either been developed or are in the planning process. The City uses an e-newsletter/e-mail subscription service to send news items of interests to people who have opted into the service. The City also produces videos, brochures, guides and posters to communicate public service announcements, services, general information and events. While many of the PSA videos for topics such as recycling, recreational fires and bike lines are available in Spanish, Somali and Hmong, they lack open captions for people who are deaf or hard of hearing.

It should be noted that during the evaluation process, a new and highly visible website for a City department was launched. An initial scan of the website detected multiple instances that lacked accessibility programming to ensure the information was effectively communicated and accessible to people with disabilities. The accessibility of the new web site was compromised for the "bells and whistles" of a sleek new design.

Required: Ensure all new web sites, mobile apps and other technologies are accessible to people with disabilities (*§35.149 Program accessibility; §35.160 Communications*) and adopt a City standard for accessible technology (WCAG 2.0 or Section 508).

Required: Ensure all new PSA videos are produced with open captions (*§35.149 Program accessibility; §35.160 Communications*).

Required: Ensure all new print publications include a statement "This publication available in alternate format (large print, braille, electronic, etc) upon request" (*§35.149 Program accessibility; §35.160 Communications*).

Recommended: Appoint a lead IT staff as the accessibility compliance coordinator to ensure all new projects are designed to be accessible to people with disabilities using various adaptive technologies

from the conceptualization and onset of development. This lead staff should drive usability testing of new City technologies specifically with a designated group of people with disabilities who use different types of adaptive technologies including screen readers, screen magnifiers, braille keyboards, alternative touch or mouse control devices, and other emerging adaptive technologies. This lead staff should also be trained to provide support to personnel and departments using contractors for IT development to ensure all new contracted IT projects are accessible and, at a minimum, compliant with the Web Content Accessibility Guidelines (WCAG) 2.0.

Recommended: Identify and support continuing education on accessible information technology and development for IT and departmental content management staff.

4.3 ELECTIONS AND VOTER SERVICES

The Office of the City Clerk coordinates election and voter services. Public information is disseminated through the vote.minneapolismn.gov web site. The staff have taken extraordinary efforts to make sure voters have information on accessible polling places, voting equipment and the types of assistance that can be requested. For example, the Voter Assistance and Resources page reads:

All polling places meet state and federal accessibility standards, including:

Curb cuts where needed

Accessible parking spaces

Signage indicating an accessible entrance and route in building

Accessible voting booth with chair

Seating available for voters waiting to vote

Notepads available to communicate in writing

Magnifier for election material and the ballot

Sufficient space for voters in wheelchairs

MATERIALS IN ALTERNATE FORMATS

Voter registration and absentee ballot instructions are available in audio cassette, large type or Braille formats at Hennepin County Elections, (612) 348-5151, TTY (612) 348-3461.

Many materials are also available in alternate languages. Throughout this site, materials are linked in multiple languages as available, and all such materials are also available on the Language Support page.

If you need materials provided by the City of Minneapolis in an alternative format please contact the Neighborhood and Community Relations Department at 612-673-3737 or email

NCR@minneapolismn.gov. Deaf and hard-of-hearing persons may call 311 or 612-673-3000. TTY users may call 612-673-2157 or 612-673-2626.

The detail of the information can serve as a model to other departments for communicating accessibility information to residents with disabilities.

At least 3-6 months prior to each election, staff make site visits to each polling location. A very basic ADA checklist for polling places has been used to confirm parking, accessible routes and entrances. Staff has indicated they would like to either receive training on the application of the accessibility standards

to polling places or utilize the expertise of a contractor to conduct independent accessibility assessments of each polling place.

Recommended: Conduct a minimum 90-minute training on the application of the accessibility standards to polling places. Then conduct a pilot accessibility assessment with a team consisting of elections staff and JQP Inc to determine the more feasible approach for completing an accessibility assessment of all City polling locations.

4.4 EMERGENCY PREPAREDNESS AND PUBLIC SAFETY

The City Office of Emergency Management was recently reorganized to implement the national standards for emergency preparedness as set by the Federal Emergency Management Agency, the U.S. Department of Homeland Security and the Red Cross. At the highest level, Emergency Management personnel take the lead to work with other City departments and the community to establish the new normal and tap into the resources for effective recovery. Should an incident become too large for the initial command, they are the next call for help. Public safety is a constant priority through the provision of police and fire services. All public safety personnel receive ongoing training which includes modules on communicating and interacting with people with disabilities. The City 911 system is TTY compatible and also able to receive text messaging. The City has a voluntary program where residents can make known their address and any medical conditions or needs for special assistance in the event of a fire or other emergency. The information is maintained confidentially within the emergency response system. However, it is the responsibility of the individual to keep the information updated, especially in the event of moving to a new address. Emergency Management and public safety staff frequently give presentations to neighborhood and community organizations.

Recommended: Explore the opportunity to collaborate with the Minneapolis Advisory Committee on People with Disabilities to develop a public presentation specific to increasing awareness of emergency preparedness for residents with disabilities.

4.5 EMPLOYMENT & PROFESSIONAL DEVELOPMENT

The City of Minneapolis employs more than 4,000 individuals to meet the daily needs of residents, visitors and businesses. As an employment support to the enterprise, the Human Resources Department coordinates recruitment, training and development, employee benefits, collective bargaining and labor contracts, compensation, job classifications, policy development and implementation, technology solutions, and respect in the work investigations. For the purposes of this evaluation, a broad scan was conducted through interviews with staff and the Director of Human Resources. The City has put many processes into place, consistent with similar size companies, to comply with the employment provisions of the ADA. The City web site is used as a repository of personnel policies and procedures. The information is available in alternate format upon request. The City subscribes to the www.neogov.com web service to post position announcements, accept job applications and screen perspective candidates. Information is included for applicants as to how they may request a reasonable accommodation for the interview process or any pre-employment tests that may be administered. Each City department is assigned a Human Resources Generalist (HRG) to support its employment functions including filling positions and providing ADA accommodations. Employees can request ADA accommodations either directly from the supervisor or through the HRG. Medical

documentation supporting the need for a disability-related accommodation is required. There is a form that employees can have completed either by their personal physician or they can meet with the City's physician under contract. While many of these employment practices are consistent with current industry standards, the priority area in most need of attention concerns the formats for job descriptions. The City uses a "job specification" or "job specs" approach to job descriptions that are written in very broad or general terms. These are developed out of the classification and compensation process. The job specs do not include the specific functions of each job responsibility, nor are tasks broken down by essential and marginal functions as described in the ADA.

Required: Develop individual job descriptions formatted with the essential functions, marginal functions and physical requirements for each employment position. Job descriptions formatted in this manner should serve as guidance to clearly define which essential functions must be performed either with or without a reasonable accommodation, which marginal functions may be reassigned, and how the essential functions are related to physical tasks (*§35.140 Employment*).

Recommended: Update the procedure for employees to request ADA accommodations and post with other HR policies on the web site. Ensure the procedure includes information on timelines the employee should expect are followed, documents to be completed, medical documentation required, and the appeals process should a request be denied.

Recommended: Develop a system to track the receipt, documentation, review process, accommodation provided/denied, and outcome of the appeals for ADA accommodations in the new HR system.

Recommended: Review the City's recruitment/hiring practices to ensure that sources for recruitment include organizations that train and place people with disabilities and that job announcements, job fairs, etc. are accessible to persons with disabilities.

Recommended: Conduct annual disability awareness training for ALL City personnel to build a culture whereby disability is understood to be a part of the diversity of the City's workforce.

Recommended: Develop training modules for supervisors and managers on ADA accommodations; and the interplay between the ADA, reassignment and collective bargaining agreements.

4.6 ORDINANCES

City ordinances related to disability and accessibility are purposefully crafted to mirror the Americans with Disabilities Act and the state anti-discrimination law. Since updated ADA regulations were published in 2010, at least two ordinances have been identified to undergo discussion and/or revision.

The "Animal Care and Control Ordinance" has been enacted to protect the public health and safety of citizens, while promoting the general welfare of the animals residing within the City by preventing cruelty, abuse and neglect. Department staff has identified the need to update the definition of "service animal" within the ordinance to be consistent with the revised ADA regulations such that "a service animal means a dog or miniature horse that is individually trained to do work or perform task for people with disabilities." In addition, staff are in the process of proposing revisions to the section "Service animals permitted in public places" so that, it too, is consistent with the revised ADA regulations.

Staff has also identified Minneapolis Code of Ordinances § 64.50(d) the exception for leashing animals in need of revision. The exception from the requirement of a leash is allowed for “a certified service dog accompanying a disabled person.” Since the ADA does not mandate “certification” of service animals, the exception of the City ordinance could be inconsistent with the federal regulation.

Required: Make reasonable modifications to the sections of City ordinance and present for City Council approval as expeditiously as possible (*§35.130(b)(7) Reasonable modifications*).

Recommended: As the Minneapolis Codes is complex, length and ever-evolving, it is recommended that the ADA Coordinator be consulted in the drafting stage. The ADA Coordinator can assist with additions or revisions proposed for adoption to ensure the language is consistent with the federal ADA regulations.

4.7 PUBLIC MEETINGS

Meetings held by the City Council, Boards and Commissions are open to the public. A schedule of meetings, agendas and minutes are posted to the City web site. Notices of public meetings are posted to the web site and distributed to media and other outlets. City Council meetings are held at City Hall in the council chambers. An overflow room for the public is located across the hall where the proceedings are the televised. City Council meetings are broadcast locally on cable access and the video programs are archived for residents to view on demand from the City web site. Meeting notices include a statement “For reasonable accommodations or alternative formats please contact the Minneapolis City Clerk’s Office, 612-673-2216, councilcommitteecoordinators@minneapolismn.gov.” An assistive listening system is available in the council chambers. However, at the time of the review the functionality of the receiver units was uncertain. Captions to the video archives for City Council meetings are generated through YouTube and uploaded within an hour of the meeting. The YouTube caption generator, however, has less than an 80 percent accuracy rate

Required: Post signage at the entrance to the council chambers indicating the availability of the assistive listening system (*2010 ADA Standards 216.10*). Perform routine testing on the equipment in conjunction with the audio system to ensure it is operational. Ensure the receiver units are out and available for use prior to the start of each meeting (*§35.160 Communications and §35.133 Maintenance of accessible features*).

Required: Acquire a portable assistive listening system that can be used for meetings and training programs in various locations. (*§35.160 Communications and 2010 ADA Standards 216.10*).

Required: Develop a procedure for providing real-time captioning of meetings upon request for attendees (*§35.149 Program accessibility; §35.160 Communications*).

Required: If the YouTube caption generator is to be used for captioning archives, it will be necessary to develop a procedure to clean up the auto-generated captions in the new video archives of meetings that are available to the public on demand (I.e. streaming internet video) and meet the ADA standard for “effective communication.” The procedure should also address the means by which an individual can request captions or a transcript of previously recorded meeting archives which existed before the YouTube captioning process was put into place (*§35.149 Program accessibility; §35.160 Communications*).

Recommended: Because governing meetings of the City Council, boards and commissions are some of the major activities conducted by the City, it is recommended the “accessibility block” for public meetings be more descriptive. It is important for residents with disabilities to fully understand the availability of auxiliary aids and services along with the timeline to make such request in order to fully participate in the public forums. A more descriptive “accessibility block” could include the statement:

People with disabilities are invited and encouraged to public meetings. Requests for a sign language interpreter, real-time captioning, reader, assistive listening device, large print, braille or electronic format should be made at least 48 hours in advance by calling the Minneapolis City Clerk’s Office at (612) 673-2216 or by sending an e-mail to: councilcommitteecoordinators@minneapolismn.gov

4.8 PURCHASING

The Procurement Division provides support to City Departments buying equipment, products and services to maintain the operation of the enterprise. Bid and contract documents include the statement “All successful bidder(s) will be required to comply fully with the Americans with Disabilities Act of 1990 (ADA).” This statement provides an overall expectation to the seller of the requirements the City has for the equipment, product or service to be compliant with the ADA. However, in many cases the statement may be too broad to ensure certain equipment, products, or services meet the standards and regulations of the ADA. Furthermore, in instances where there are general requirements but no specific technical provisions in the ADA, the seller is likely to use a false/uninformed defense like “The ADA does not apply.” For example, a bid or contract for the development of a web-based application with this broad statement does not ensure the final product is accessible simply because the ADA does not have specific standards for the web, apps and information technology. Instead, and in the absence of finalized standards for electronic and information technology under the ADA, the City should adopt specific criteria to ensure procured equipment, products and services are accessible to the public and City employees. As such in this example, the bid and contract for the web/app development should include specific language that the final product must meet all requirements of the Web Content Accessibility Guidelines (WCAG) 2.0 and the Section 508.

Recommended: Utilize the expertise of the ADA Coordinator to develop bid criteria and technical specifications to ensure the procurement of accessible equipment, products and services on a case by case basis. Inspect all final projects and products for ADA compliance prior to issuing final payment to the vendor.

4.9 REGULATORY SERVICES

The City’s Regulatory Services Department oversees housing, health and fire inspections, parking violations, rental licenses and animal control. In addition, the Community Planning and Economic Development Department manages business licensing. Staff are very cognizant of accessibility and disability-related issues that may arise with commercial businesses and individual property owners. All regulatory staff receive ongoing training on making reasonable modifications to policies and procedures. The Regulatory Services Division had done exemplary work with the local ordinances and its jurisdiction to improve accessibility among businesses and properties. For example, the Business Licenses unit works through the permitting/licensing and inspection processes to ensure dining establishments with

sidewalk cafes are accessible to patrons and at the same time the accessible route of the sidewalk is maintained for public use. At many accessible on-street parking locations, the regulated two-hour parking restriction extends to four hours for qualified individuals with disabled parking placards and the parking fee is waived.

Most Regulatory Services activities are performed off-site at the location of the property owners. All information brochures and forms are posted to the City web site. Customer information and service counter is provided on the third floor of the Public Services Building. Administrative hearings are held at City Hall. Most often staff will extend the administrative deadlines for individuals, regardless of whether they have specifically made the request based on a disability-related need. Initial correspondence to individuals and property owners includes the “accessibility block.” Staff are currently in the process of reviewing all types of correspondence, such as letters for administrative hearings, to verify the “accessibility block” or a longer description to request auxiliary aids and services is included.

Through the evaluation process, staff made note that ongoing ADA training would be of great benefit for professional development and suggested topics including disability awareness; the interplay of disability laws; reasonable modifications; and the inspection process related to ADA/state/local enforcement.

Required: Review every electronic form, whether a PDF or web-based form, to ensure it is fully accessible to people with disabilities who may use adaptive technologies to read, complete and/or submit the information. Include a notation on each form “Alternate formats of this publication are available upon request by calling [Contact and phone number].”

Recommended: Considering the volume of public correspondence, conduct an annual review of all documents to ensure the most current “accessibility block” or longer description to request auxiliary aids and services is included.

4.10 SPECIAL EVENTS, FESTIVALS, AND CONVENTIONS

The City is host to hundreds of special events and festivals from professional sports and concerts at Target Center to international expos at the Convention Center. People with disabilities have an expectation that because an event takes place at a City venue, on a City street or with the support of City services, the event will be accessible. In many instances, the City has simply provided space and a special event permit to an external organization or group that will actually coordinate and host the event itself. However, the role of issuing a permit, providing use of facilities, or extending supporting services puts the City in a unique position to influence the accessibility of special events with the coordinating entities. An event review committee meets weekly to review and approve permits and licenses that have been requested for events. The committee includes representatives from Public Works, Community Planning and Economic Development, Police, Fire, Environmental Health, Metro Transit, the State Department of Revenue, Warning Lights of Minnesota, Traffic Control, Park Board, MNDOT and the Coast Guard. The event holder is required to provide a general layout of the event and demonstrate where all the accessible amenities will be located. The event committee is known to ask specific questions on physical access to the event. If an amenity at one location is not accessible, the same offering needs to be made accessible at another location.

The event review committee is heavily weighted on looking at the physical access of the event and not necessarily the program access side. The City does not mandate any of the other auxiliary aids and

services like sign language interpreters, assistive listening systems, sighted guides, large print, etc. Staff have noted that the Twin Cities Pride event is one of the most accessible and inclusive events held during the year. It could serve as a model to other event holders regarding the provision of program access, auxiliary aids and services. Ideally there would be a pre-event inspection of the layout and amenities to make sure everything was accessible before the event was opened to the public. However, there are 8 new events that come online every day and the City does not have a specified special events coordinator. At this point in time it is physically and logistically impossible to conduct a pre-event inspection specific to accessibility for every event permitted through the City.

Required: Continue to use language in permits and contracts stating the permit holder and/or contracting entity will be responsible for complying with the ADA and ensuring the event is accessible to people with disabilities.

Recommended: Include the ADA Coordinator to this event review committee to more fully address the ADA programmatic requirements for auxiliary aids and services.

Recommended: Refer event holders to the resource publication "[A Planning Guide for Making Temporary Events Accessible to People With Disabilities](#)" so they have a better understanding of the expectations and means to coordinate a successful AND accessible event. Consider holding an annual or semi-annual training for event coordinators on ADA compliance.

5 CONCLUSION

Successful inclusion of people with disabilities starts with a commitment from the top, quality customer service on the frontline and a thorough understanding of the standards, regulations and emerging best practices. An effective accessibility management/compliance program utilizes a team approach that includes representation of key decision-makers. Simply, ADA compliance is not just one person's, the ADA Coordinator's, job, it must be everyone's responsibility. There are many departments, units and individuals that have taken ownership for ADA compliance within their area of responsibility well before this evaluative process was initiated. Finance and Property Services has led the City's efforts for long term planning with the commissioning of an accessibility assessment of facilities to update the original ADA Transition Plan from 25 years earlier. Business Licensing, Regulatory Services, and Minneapolis Development Review have put procedures into place to ensure businesses permitted or licensed through the City are accessible to residents with disabilities. The City Clerk's office publishes the process to request auxiliary aids and services in meeting notices along with comprehensive information on access to polling places for residents with disabilities. The Department for Neighborhood and Community Relations bridges the knowledge and expertise of the Minneapolis Advisory Committee on People with Disabilities to provide valuable disability perspective to City departments during project conceptualization, planning and policy making. These are exemplar initiatives that can serve as models within the enterprise as well as to other cities.

Attitude toward disability, accessibility, inclusion and the ADA can often times pose the biggest barriers to successfully implementing an accessibility management program/ADA compliance program. Overall, the organizational culture within the City enterprise reflects a positive attitude toward a comprehensive approach to ADA compliance that can benefit people with disabilities. Throughout the ADA Evaluation process, elected officials, department directors and personnel with ADA compliance responsibilities

demonstrated a confident commitment to inclusion of people with disabilities and eagerness to learn the best practices for ADA implementation. During the interviews with key personnel, staff were incredibly responsive to institute procedural changes to improve access for people with disabilities as they use City programs, services, activities and facilities. Many recommendations outlined in this report are already in the process of implementation. The intake process through 311 has been updated to allow the ADA Coordinator to track and follow-up on ADA-related inquiries and complaints. A lead IT staff has been designated to drive usability testing and ensure all new web projects and apps are fully accessible to people with disabilities.

However, while great strides have been made to improve access over the last 25 years and even accelerated with enthusiasm during this evaluative process, there are still pockets of resistance. When an organization experiences resistance to ADA compliance, it is often masked by either a lack of understanding of the ADA regulations and the practical solutions that can be put into place OR by fear....most likely tied to budgetary constraints. When resistance exists within an organization, it is CRITICAL that executive leadership clearly, concisely and directly communicate that ADA compliance is rooted in its organizational goals for inclusion and its shared values for equality. The attitudinal barrier of resistance is not easily expunged until such time as individuals develop a personal connection to disability. There will also be many difficult decisions to be made as the implementation of the forthcoming ADA Action Plan evolves. Therefore, it is very important for elected officials and top level administrators to communicate, reinforce and support staff as they work individually and collectively to achieve and maintain ADA compliance. There is no doubt, with the commitment and support of leadership at the top, that the forthcoming ADA Action Plan can be successfully implemented and the City's accessibility management program will serve as an extraordinary model of best practices for other cities to follow.

6 RESOURCES

U.S. Department of Justice
(800) 514-0301
www.ada.gov

U.S. Access Board
(800) 872-2253
www.access-board.gov

Great Lakes ADA Center
(800) 949-4232
www.adagreatlakes.org

Job Accommodation Network (JAN)
(800) 526-7234
www.askjan.org

Summary Report

ADA Perceptions Survey of People with Disabilities Accessing City of Minneapolis Programs, Services, Activities and Facilities

December 2015

Prepared by Skulski Consulting LLC

1 INTRODUCTION

In June 2015, the City of Minneapolis initiated a process to review its programs, services and activities serving people with disabilities and fulfilling the requirements of the Americans with Disabilities Act (ADA). Included in this process was a multi-phased approach to community engagement to gather input from people with disabilities. Community engagement efforts utilized a variety of formats to enable people with disabilities and disability advocates several opportunities for input on their perceptions of the City's ADA compliance efforts. Feedback was sought for future ADA improvements through one-to-one interviews, public listening sessions, focus groups, social media events and an online survey. An initial online survey was administered from September through the end of December 2015 to gather preliminary input with respect to the City's ADA compliance program. The purpose of this survey was to assess the perceptions of residents with disabilities and advocates regarding the City's compliance with the ADA and establish a benchmark. The survey has been designed to be administered again in the future, 1-3 years, to measure if the perceptions of the City's ADA compliance efforts have improved. People with disabilities and advocates for people with disabilities were asked to participate in the survey. Invitations to participate in the survey were disseminated through the membership of the Minneapolis Advisory Committee on People with Disabilities, state agencies and disability organizations within the region.

2 KEY FINDINGS

Approximately 53 individuals participated in the survey. Participants were asked about their relationship to the City of Minneapolis.

| Do you Live, Work, or Play in Minneapolis (check all that apply)? | Responses | N |
|---|-----------|----|
| I LIVE in Minneapolis. | 53% | 26 |
| I WORK in Minneapolis. | 55% | 27 |
| I PLAY in Minneapolis. | 81% | 40 |

Participants were also asked optional questions about disability. The disability categories used for this question were very specific to how the ADA regulations and standards are developed. In addition,

participants were only able to select one disability category, the most prominent of which they most closely identify. The broad categorization of disability and identity is most frequently used and accepted in behavioral research related to ADA policies and practices. The broad categories for disability were used for consistency and comparison to other related ADA research as opposed to using a long list of diagnoses more often associated with medical or rehabilitation research.

| Do you consider yourself to be a person with a disability or an advocate for people with disabilities? | Responses | N |
|--|-----------|----|
| Yes, I have a physical impairment | 43% | 23 |
| Yes, I am an advocate for people with disabilities | 34% | 18 |
| Yes, I have a visual impairment | 9% | 5 |
| Yes, I have a cognitive impairment | 8% | 4 |
| Yes, I have a mental wellness impairment | 4% | 2 |
| Yes, I have a hearing impairment | 2% | 1 |
| No | 0% | 0 |

Participants were asked if they used an assistive device. The majority of respondents did not use an assistive device (45%). Of those that used an assistive device, a wheelchair was the most frequently reported assistive device (36%), followed by service animal (9%), hearing aid (9%), cane (7%), prosthetic (5%), and crutches (2%).

Participants were then asked to rate their knowledge of the Americans with Disabilities Act. 64 percent of the respondents reported either having an advanced knowledge or moderate knowledge of the ADA. 29 percent reported having a basic knowledge of the ADA, while 8 percent reported having a limited knowledge of the ADA.

Participants were asked about their use of the City of Minneapolis programs, services, activities and buildings.

| When using a City of Minneapolis program, service, activity or building, have you used any of the following? (Check all that apply.) | Responses | N |
|--|-----------|----|
| Accessible facilities | 75% | 27 |
| Accessibility information from the City web site | 33% | 12 |
| Information in electronic format | 28% | 10 |
| Contact the City ADA Coordinator | 17% | 6 |
| Information in audio format | 8% | 3 |
| Sign language interpreter | 8% | 3 |
| Captions | 8% | 3 |
| Braille | 8% | 3 |
| Review the City ADA self-evaluation or ADA transition plan from 1993 | 8% | 3 |
| Large print | 6% | 2 |
| Reader | 6% | 2 |
| Use the City ADA grievance procedure | 6% | 2 |

Participants were asked to rate the accessibility of City programs, services and activities, along with the accessibility of City facilities. Overall, 60 percent of respondents reported that City programs, services

and activities were somewhat accessible for people with disabilities. The same majority of respondents reported City facilities to be somewhat accessible to people with disabilities.

| How would you rate the accessibility of City programs, services and activities for people with disabilities? (Select one.) | Responses | N |
|--|-----------|----|
| Very accessible to people with disabilities | 2% | 1 |
| Accessible to people with disabilities | 19% | 8 |
| Somewhat accessible for people with disabilities | 60% | 26 |
| Limited accessibility for people with disabilities | 19% | 8 |
| Not accessible to people with disabilities | 0% | 0 |

| How would you rate the accessibility of City facilities for people with disabilities? (Select one.) | Responses | N |
|---|-----------|----|
| Very accessible to people with disabilities | 5% | 2 |
| Accessible to people with disabilities | 14% | 6 |
| Somewhat accessible for people with disabilities | 55% | 23 |
| Limited accessibility for people with disabilities | 26% | 11 |
| Not accessible to people with disabilities | 0% | 0 |

Participants were asked to give their perception on the ease or difficulty of overall ADA compliance and inclusion of people with disabilities. 43 percent of respondents reported overall ADA compliance neutrally, as neither difficult or easy, while 40 percent reported ADA compliance as either easy or very easy. This is an important indicator of public perception as it relates to their expectations for access. Essentially, when the public perceives ADA compliance as neutral or easy, their expectations are raised that easy solutions should be implemented to ensure programs, services and activities are, in fact, accessible.

Finally, participants were asked to give a performance grade on the City compliance with the ADA. 44 percent of respondents gave the City a “C” on its ADA compliance efforts. This response should serve as a benchmark as the City ADA Coordinator, Accessibility Liaison Network and the Minneapolis Advisory Committee on People with Disabilities move forward with an ADA Action Plan.

| Overall, what grade would you give the City regarding compliance with the ADA and the provision of programs, services and activities that are inclusive of people with disabilities? | Responses | N |
|--|-----------|----|
| A | 5% | 2 |
| B | 26% | 10 |
| C | 44% | 17 |
| D | 23% | 9 |
| F | 3% | 1 |

3 CHALLENGES AND OPPORTUNITIES

Participants were asked a series of open-ended questions to gather more qualitative data on their perception of City access, challenges and opportunities for improvements.

Participants were asked what are the three major challenges the City has regarding compliance with the ADA? Respondents reported:

- The lack of a knowledgeable ADA Coordinator.
- The lack of an ASL interpreter on staff and readily available for residents using City Hall services.
- The lack of training on ADA compliance for City personnel.
- The lack of accessible restrooms at City owned and leased facilities.
- The lack of accessible public parking spaces connecting to accessible routes.
- Construction that obstructs accessible routes, sidewalks and curb cuts.
- Lack of continuity of accessible sidewalks and curb cuts.
- Funding for accessibility projects, auxiliary aids and services.
- Lack of accessible communications, documents and web sites.

Participants were asked how the City could improve access for people with disabilities. The following responses were reported:

- Better inform city officials and law makers of the needs of people with disabilities.
- Listen to your advocates. Many long-time residents have a wealth of knowledge on access and ADA issues. They have knowledge and skills you need. Listen to them and do what they recommend.
- Hire a full-time ADA Coordinator.
- Ensure city leaders & staff are trained on disability issues and the ADA law.
- Enforce the accessibility building code.
- Light rail expansion, more accessible parking, accessibility around longer construction projects.
- Improve accessible public parking and restrooms.
- Make accessible skyway maps in alternative formats.
- Create better and more public transportation routes, especially to and from north Minneapolis, but also extreme south Minneapolis.
- Better and quicker snow removal.
- Make PDF files accessible.
- Don't put in obnoxious audible traffic signals on Nicollet Mall that obscure traffic sounds.
- Better access to descriptive audio services at sports events, such as Timberwolves games.
- More ramps, curb cuts repaired if needed, more accessible parking.
- Hire more city employees who are people with disabilities.

Lastly, participants were asked if there was anything they would like the project team to know about their answers and/or their perceptions regarding access for people with disabilities in the City of Minneapolis? They provided the following responses:

- Have someone in City government that knows what the ADA requirements are for the City and get them implemented.
- How does the message that there is construction being done at a sidewalk intersection get distributed to the disabled? I saw a blind woman with a service dog, try to negotiate a crosswalk that was under construction. I was not in a position to help the lady.

- In the winter, crossing the street is very difficult if not impossible because of the snow at the curb and crosswalk area.
- There are road intersection problems. There needs to be audio information when to cross and when to not, many curb cuts need REPAIR. Many are too steep and/or falling apart. The City needs a better way to transport a wheelchair user to jail. I don't know how, but the City (State and Federal also) needs to find a better way of working with people with mental illnesses. Jail is not a good resource.
- Consider folks with disabilities recreating out in the community. Consider the users of the parks, trails, bathrooms, and facilities.
- When Margot Imdieke Cross and Martha Hage both contact me within the same month about the same issue? I pay attention. The City probably should too! Smiley emoticon thing should go here!
- Yeah, get your act together when it comes to these issues. You are making yourselves vulnerable to lawsuits and really bad press, which I don't think the city needs (or wants). The community of people with disabilities is constantly growing, with both the baby-boomers aging, acquiring disabilities due to this and living longer due to technology. You also have thousands of YOUNG disabled Afghanistan & Iraq war veterans returning home who now need accommodations, wheelchair access and who don't deserve to be discriminated against by their own city's employees because the employees don't know or understand the ADA law that protects them! This should not be difficult to figure out - do your jobs, prioritize this, assign a realistic budget (which should be ongoing, just like ADA compliance throughout the city) & make Minneapolis a shining example of how the ADA is done CORRECTLY...and done RIGHT NOW!
- I think compliance with ADA is becoming more critical as our population ages and as medical care improves lives of some disabled people who can now do things that they could not do in the past.
- ADA compliance is the law. Through effective trainings, ongoing meetings with City departments and the disability community and positive reinforcement the City can effectively and fully comply with the ADA. The City needs to institutionalize the ADA so that every decision includes the questions - how will this impact the disability community and seniors - What does the ADA require?
- ADA compliance is easy if you have a civil rights perspective, it only becomes difficult when viewed as an unfunded mandate from the Federal government to create lawsuits and make architects and developers jobs hard. Everyone deserves access, design with this in mind.
- The ADA is a federal law and should be given respect and followed as a law. It's not just a nice thing to do. It should be on every manager's work plan. Integrate it into all department plans.
- There are many examples of too much talk and not enough fix it if you excuse the expression, if I had the time and the place to sit down and talk to you guys and describe several things in different parts of the city of Minneapolis and St Paul and young we tend to talk forever and we don't do until it's too late.
- There has to be a demonstrated effort at including people with disabilities in ALL aspects of city governance, programs, activities and facilities that emanates from WITHIN instead of that is currently forced from the outside. The end of "lip service" and the integration of people with disabilities within all aspects of the city, including employment, committee appointments, task force membership, etc.

4 CONCLUSION

The perceived overall compliance efforts by the City with a “C” grade by respondents clearly illuminates the opportunity for improvement with implementation of the forthcoming ADA Action Plan. Further, it illustrates the need for improved communication and engagement with the disability community. The most notable perceptions and calls to action from the survey respondents include:

- There is perception that the City does not have an appointed ADA Coordinator. The responsibilities of the ADA Coordinator formerly fell to a Community Outreach Coordinator who vacated the position more than 10 months ago. The ADA responsibilities have been assigned in the interim to the Director of Neighborhood and Community Relations. A communication gap exists, whether in the interim appointment or previous appointment, and respondents perceive the City does not have an appointee active in ADA coordination. The City must make a concerted effort to communicate the appointment of the ADA Coordinator and connect directly to the many disability organizations that serve the area.
- There is a perception that City personnel should have more training on ADA compliance and methods to successfully accommodate people with disabilities. The forthcoming ADA Action Plan should address an annual ADA training calendar for City personnel and partners.
- There is a perception that there is a need and expectation for the City to have an ASL interpreter on staff and readily available for people accessing City programs, services and activities either at City Hall or the Public Services Center. This need should be further assessed and determined on whether this could be a single appointment or by ASL training for customer service representatives.
- There is a perception that accessibility should be improved to restrooms in City buildings, public parking, sidewalks and curb cuts, skyways and around construction zones. There is also an expectation that snow removal for accessible routes be considered a priority for access for people with disabilities. The barrier removal sections of the forthcoming ADA Action Plan should be specific to planned improvements to gain further input from residents with disabilities.
- The comments from the open-ended questions are overwhelmingly negative in regards to the lack of access to City programs, services, activities, and facilities. Many comments also cite instances where accessible services existed at one time, but have since been eliminated. It is critical that the forthcoming ADA Action Plan include a communication and outreach approach to educating the community on the accessible features, services and accommodations available to people with disabilities as they access City programs, services, activities and facilities.

Throughout the ADA Evaluation process, department directors and personnel with ADA compliance responsibilities demonstrated a confident commitment to inclusion of people with disabilities and eagerness to learn the best practices for ADA implementation. The information gathered from this survey, coupled with additional feedback from the disability community can further assist decision-makers and put the forthcoming ADA Action Plan into place.

Summary Report

ADA Perceptions Survey of City Personnel

December 2015

Prepared by Skulski Consulting LLC

1 INTRODUCTION

In June 2015, the City of Minneapolis initiated a process to review its programs, services and activities serving people with disabilities and fulfilling the requirements of the Americans with Disabilities Act (ADA). This process included a thorough scan of enterprise policies, practices and procedures along with interviews of key personnel. Prior to the start of the interview process, an online survey was administered from June through August 2015. The purpose of this survey was to assess the perceptions of city personnel regarding compliance with the ADA and establish a benchmark. The survey has been designed to be administered again in the future, 12-24 months, to measure if the knowledge and perceptions of ADA compliance among City personnel have changed.

2 KEY FINDINGS

Approximately 175 employees of the City of Minneapolis participated in the survey. Participants were representative across almost all City departments, Assessor's Office (4%), City Attorney's Office (13%), City Clerk's Office (3%), City Council/Board/Commission (2%), City Coordinator (3%), Civil Rights (7%), Communications (2%), Community Planning & Economic Development (13%), Emergency Management (1%), Finance & Property Services (1%), Fire (1%), Health & Family Support (19%), Human Resources (1%), Information Technology (1%), Intergovernmental Relations (1%), Neighborhood & Community Relations (5%), Police (3%), Public Works (0%), Regulatory Services (5%), Convention Center (6%) and 311 (10%).

Participants were asked how long they have been employed with the City. 33 percent had been with the City for more than 15 years. Of the total number of respondents, 6 percent had been appointed to the Accessibility Liaison Network.

| How long have you been employed with the City? | Responses | N |
|--|-----------|----|
| Less than 3 years | 27% | 47 |
| 4-7 years | 15% | 27 |
| 8-10 years | 12% | 21 |
| 10-15 years | 13% | 22 |
| More than 15 years | 33% | 58 |

Participants were also asked an optional question about disability. Of those respondents, 15 percent reported having a disability. It should be noted that the disability categories used for this question were very specific to how the ADA regulations and standards are developed. In addition, participants were only able to select one disability category, the most prominent of which they most closely identify. The broad categorization of disability and identity is most frequently used and accepted in behavioral research related to ADA policies and practices. The broad categories for disability were used for consistency and comparison to other related ADA research as opposed to using a long list of diagnoses more often associated with medical or rehabilitation research.

| Do you consider yourself to be a person with a disability? | Responses | N |
|--|--------------|-----|
| Yes, I have a physical impairment | 9% | 15 |
| Yes, I have a visual impairment | 1% | 2 |
| Yes, I have a cognitive impairment | less than 1% | 1 |
| Yes, I have a mental wellness impairment | 2% | 4 |
| Yes, I have a hearing impairment | 2% | 3 |
| No | 86% | 148 |

Participants were then asked to rate their knowledge of the Americans with Disabilities Act. 31 percent of the respondents reported either having an advanced knowledge or moderate knowledge of the ADA. 50 percent reported having a basic knowledge of the ADA, while 17 percent reported having a limited knowledge of the ADA. 2 percent reported having no knowledge of the ADA.

Participants were also asked to identify what sources of information they use on the ADA and the accessibility standards. They could select multiple sources. As such, the internet was the number one source for information on the ADA, followed by the ADA standards and regulations specifically. 23 percent reported use of the City ADA Coordinator as a source while 19 percent said they had no source for ADA information.

Through the next series of questions, survey participants were asked specific questions on the City’s ADA compliance. They had the choice to answer yes, no or I don’t know. The last choice was added to serve as an indicator to where additional communication and training on the City’s ADA compliance efforts would be needed.

When asked if the City had an ADA Coordinator, 46 percent reported yes. However, 49 percent reported they did not know if the City had an ADA Coordinator.

When asked if the City uses a Notice to the Public of its intent to comply with the ADA, 65 percent reported they did not know. 35 percent reported the City did in fact use a Notice to the Public.

Similarly, when asked if the City had an ADA grievance procedure, 51 percent reported they did not know, while 49 percent reported yes.

When asked if the City had an active ADA Transition Plan, 70 percent reported they did not know and only 28 percent reported yes.

Alternatively, when asked if the City had a process for providing auxiliary aids and services, such as assistive listening systems and sign language interpreters to people with disabilities upon request, 77 percent responded yes, only 22 percent did not know.

Comparably, when asked if the City had a process for providing publications in alternate formats such as Braille, large print, audio or electronic file to people with disabilities upon request, 64 percent responded yes, while 34 percent did not know.

Participants were then asked if their department included accessibility considerations in decision-making. 66 percent reported their department considered accessibility in decision making. However, when asked about procurement and partnerships, only 47 percent reported that their department requires contractors and partners to be ADA compliant.

Participants were asked to rate the accessibility of City programs, services and activities, along with the accessibility of City facilities. Overall, 60 percent of respondents reported that City programs, services and activities were somewhat accessible for people with disabilities. The same majority of respondents reported City facilities to be somewhat accessible to people with disabilities.

| How would you rate the accessibility of City programs, services and activities for people with disabilities? (Select one.) | Responses | N |
|--|-----------|----|
| Very accessible to people with disabilities | 5% | 8 |
| Accessible to people with disabilities | 47% | 74 |
| Somewhat accessible for people with disabilities | 39% | 61 |
| Limited accessibility for people with disabilities | 8% | 13 |
| Not accessible to people with disabilities | 0% | 0 |

| How would you rate the accessibility of City facilities for people with disabilities? (Select one.) | Responses | N |
|---|--------------|----|
| Very accessible to people with disabilities | 6% | 9 |
| Accessible to people with disabilities | 50% | 80 |
| Somewhat accessible for people with disabilities | 36% | 57 |
| Limited accessibility for people with disabilities | 8% | 12 |
| Not accessible to people with disabilities | less than 1% | 1 |

Participants were asked to give their perception on the ease or difficulty of overall ADA compliance and inclusion of people with disabilities. 51 percent of respondents reported overall ADA compliance neutrally, as neither difficult or easy, while 39 percent reported ADA compliance as either somewhat difficult or very difficult. This is an important indicator of internal perception as it relates to ADA responsibilities and implementation. Essentially, when employees perceive ADA compliance as difficult, the team approach to accessibility management and decision-making with accessibility considerations can fall by the wayside.

Finally, participants were asked to give a performance grade on the City compliance with the ADA. 54 percent of respondents gave the City a “B” on its ADA compliance efforts. This response is significantly different from the ADA Survey of People with Disabilities, where 44 percent of the respondents gave the City a “C” on its ADA compliance efforts. There is a significant difference in perception of the City’s ADA compliance internally among City personnel versus externally among the public.

| Overall, what grade would you give the City regarding compliance with the ADA and the provision of programs, services and activities that are inclusive of people with disabilities? | Responses | N |
|--|--------------|----|
| A | 5% | 8 |
| B | 54% | 83 |
| C | 36% | 56 |
| D | 4% | 6 |
| F | less than 1% | 1 |

3 CHALLENGES AND OPPORTUNITIES

Participants were asked a series of open-ended questions to gather more qualitative data on their perception of City access, challenges and opportunities for improvements.

When asked what are the three major challenges the City has regarding compliance with the ADA, responses include training, physical access, implementation, leadership and funding.

Training. Far and above, the most frequently cited challenge was the lack of ADA knowledge among personnel and the necessary training to achieve compliance. Many felt that additional training was needed regarding ADA policies and procedures; communication access; employment accommodations; accessible documents and technology; and serving people with either cognitive or psychological impairments.

Physical access. The second most frequently cited challenge for the City was noted as physical access to facilities. This was coupled with the concern that the City has many existing older facilities, either owned or leased, that still need to be made accessible. Instances of parking, entrances, restrooms and signage were listed among the concerns for physical access. Some also mentioned concerns about sidewalks, maintenance of accessible routes and snow removal.

Implementation, leadership and funding. These three were evenly cited as the third challenge for the City regarding ADA compliance. Respondents voiced concerns for the need to understand the compliance mandates and consistently apply them throughout the enterprise. They also expressed concern that leadership extend to ADA compliance and be viewed as a top priority with active and authoritative liaisons. Some suggested that ADA compliance needs to be more fully integrated into the standard operating philosophies of the organization. Respondents also identified the critical need for communication and information exchange within the organization regarding accessibility improvements, policy modifications, and other ADA compliance issues. Most predictably, funding was cited as a challenge with regard to achieving compliance while balancing budgetary constraints.

Respondents made the following recommendations for improving access for people with disabilities:

- Implement the practice of Universal Design in new construction and renovations to existing facilities.
- Add more accessible parking spaces. Meters are red bagged and some of those are needed for handicap access. There are only two (2) handicap spaces for city hall.
- Listen to those with disabilities and hopefully make corrections from the information gathered.

- Engage communities and connect with people with disabilities more often. Consider them as a resource and integral role of planning.
- Keep working at identifying and addressing the needs of disabled citizens.
- Survey groups of people with disabilities who use City facilities and come to City Hall. Each disability group has widely varying needs and even within a disability group, needs vary. Find out what their top 3 challenges are.
- Be mindful.
- Give them something to think of and provide people with the tools so they have access to them.
- Start by getting input from people who have disabilities and explore ideas and options that they have, and the challenges they incur.
- Font size of new stationary is too small.
- Funding for services.
- Offer accommodation through temporary job assignment - an attorney was encouraged to quit because she couldn't walk to court and stand for extended periods of time although she could have easily been assigned to a desk job to accommodate her disability, as had been done in the past.
- Greater resources (financial and staff expertise) dedicated to NCR and individual departments to assist with access.
- Have regular reviews of department processes, materials, and procedures in relation to ADA.
- Periodic audits.
- Improve building access.
- Automatic door openers for bathrooms.
- Safer sidewalks for wheelchairs.
- Ensure all office spaces are ADA compliant, both for staff and residents.
- Make sure any items such as door openers, papers, information etc are within reach of wheelchair riders. Signage is important too.
- Install ADA entrance on the 5th St side of City Hall.
- Build a new business service center that incorporates the latest tools, technology and facility access to deliver services to people that need assistance.
- Have all exterior doors have the handicapped button and maybe widen doors.
- Integrate ADA considerations into decision making processes so it is not an afterthought; having readily available information on ADA requirements.
- Develop a plan with timelines.
- Current information on ADA should be placed visibly for staff to access when they plan services and activities.
- Make sure the policy/procedures/standards are published and communicated to all employees so all are aware of the ADA implications. In addition, make sure all facilities are ADA-accessible and make adjustments accordingly so as to prevent future issues.
- Place information on walls regarding options so City employees know what is available and who to contact with questions, needs, concerns.
- More information on city website for staff so that they have one place to look for information when requested by citizens and/or be compliant with city protocols.
- Inform staff of policies/processes by improving access to vital documents.

- Getting the word out/Communication on what businesses or activities are ADA compliant so that people with disabilities feel more confident in utilizing or participating in city events and being patrons of local businesses. Volunteers to help people with disabilities feel more confident using the cities public transportation systems such as the light rail or different bus routes. Those are scary things for someone with mental and physical impairments to try to navigate for the first few times on their own.
- More emphasis is placed on physical accommodations and not considering what is needed re other conditions deem ADA such as mental health or temporary conditions due to medical health conditions.
- Consider more "quiet rooms" - these are good for meditation, prayer, lactating mothers, AND people with mental wellness issues. It is helpful to consider space needs with "universal" benefits in mind - and not give one group preference over another. This would enable more people to be employed and remain employable.
- Standardized quiet rooms, low sensory-involvement areas as a mandate in all public areas, improved training for sensory-processing disorder accessibility.
- Services available at other areas around the city and not just City Hall. Sort of like satellite offices.
- Better sidewalks.
- To clear the snow and ice in front of City Hall more timely and/or have a cleared/safe path for people with disabilities
- Improved software! Improve city app to comply with ADA requirements.
- The city may have to make things, ex. the website more interactive. If you put a bunch of information online but you have a person that cannot see, you may need to include some type of software or program that will "read" the information out loud or a sign language video of the information that a person can play if they come to the website.
- Some traffic lights are way too fast to cross the street before it turns red.
- Updated wheelchair friendly curb corners, audible semiphore walk/dont walk timers.
- The city could add more wheelchair accessibility in older buildings. Additionally there could be better training of police officers on how to interact with individuals in disability related protected classes.
- Educate 311 to assist people with their accessibility needs and to refer to the correct person.
- Make city staff aware of what ADA compliance is and what they should be considering.
- Raise awareness among non-disabled staff on ADA requirements. Provide information on how to assist people with disabilities in a respectful manner.
- More training and info on resources for staff.
- Sensitivity training for co-workers.
- Better staff training on policies, resources and procedures.
- More opportunities for training and on-going education for ADA complaint resolution would be great as well as an updated list of ADA resources for people when they call in and request information.
- Use the liaison group to inform staff; provide training, provide data on problem areas/gaps, changing needs of people with disabilities between baby boomers and millenials, etc.
- Staff training on City resources related to compliance.

- ADA training for all City employees would be extremely valuable, not only to ensure compliance, but so that employees are prepared to help residents find and access resources.
- Spreading knowledge.
- Adhere to universal design and engage folks from that community more often.
- Go for Universal Design in new facilities and modifications.

Lastly, participants were asked if there was anything they would like the project team to know about their answers and/or their perceptions regarding access for people with disabilities in the City of Minneapolis? They provided the following responses:

- We have a number of aging staff in my department (Housing Inspections) who have difficulty accessing our current facilities, one of which is below grade and has only stair access. As we look for a new single facility for staff that needs to be considered.
- The first time supervisors have access to presented materials is in the effective principles of supervision training from HR. This training is only offered quarterly and it is not mandatory which means our managers and supervisors are working without basic information for, in some cases, years.
- This issue has been ignored for years (maybe not in reality) but I've seen no evidence of the topic mentioned.
- Having a quick reference guide/link for ADA information would help out tremendously.
- I wish I knew more about how the city as a whole works on ADA and how it checks out how new construction is complying with the rules.
- ADA Coordinator" is a term used in City's Anti-Discrimination, Harassment & Retaliation Policy (employment policy). If creating an ADA Coordinator role for PUBLIC ACCESS TO SERVICES, PLEASE call it something different to avoid confusion.
- Compliance "before" something happens is much better than suffering the consequences afterwards.
- Requested paddle to open door to work area, never heard anything. Parking is the huge issue. Since we have an aging demographic, this needs to be a higher priority within City planning and budgets.
- It is important to have all of our residents participating in civic life and discourse and to help remove any barriers, literal or figurative, that may be in their way.
- I am not fully educated or aware of the steps and procedures the City of Minneapolis offers and has in place when it comes to ADA.
- Feedback to the department heads on what their access is presently, vs. time to complete the plan.
- Do we have anyone with impairments working on these issues? Is there anyone working on this who can speak from personal experience?
- Making it a part of the training for staff and managers similar to Ethics and workplace harassment.
- I am not extremely aware of the City's efforts to accommodate residents so my answers may not be an accurate record of the City's efforts.
- Expand upon electronic capabilities to enable ease of connection to the city.

- I work at 311 and we try and assist people that call with questions about various concerns. Usually for ADA concerns we receive contact from family members of differently abled individuals and they get the information and provide it to their loved ones. My concern would be for people that are more isolated and may not have trusted friends or relatives that can assist them and how the city can make sure that everyone has access to the resources and information the city can provide.
- Does the Committee for People with Disabilities still exist? This group used to hold department's accountable to meeting ADA standards.
- Remember not all disabilities are visible. Some medical conditions are not easily observable but are limiting to the person with the disability (i.e. PTSD, mental health disabilities, some physical disabilities such as epilepsy and chronic pain).
- "My answers and perceptions are because I don't live in Mpls and I have a spouse and a mother who I am often unable to enjoy activities downtown with because we have no way to haul an electric wheelchair downtown without using a bus, and they would never use public transportation on their own because they feel it is confusing. I know that one of the hardest things for people living with disabilities to do is get from place to place. Even if they can find parking, the distances to where the business or services they want or need to go to are often too great a distance for them with the Minnesota summer/winter weather. The more accessible we can make things for people with disabilities, the more socialization they will have which will help them with emotional health. People with Multiple sclerosis, learning disabilities, epilepsy, cerebral palsy, Muscular dystrophy, etc. often have limited access to interact in social atmospheres. Often times, diagnoses are accompanied by prescriptions for anti-depressants, and these individuals find themselves closed off to the world and stuck in their homes. With the City of Minneapolis taking a more active role to increase access and making opportunities available for people with disabilities and learning to use public transportation while feeling safe and less vulnerable, we are showing the residents and those who would consider residing in or doing business in/ or operating a business in Minneapolis how committed/dedicated we are to the health, growth and long term success of all it encompasses."
- I'm glad to see some action on this after years of seeming inaction. Hopefully it's not just a quick burst of interest that then goes dormant again until at some point in the future it becomes a hot issue again.
- My guess is that the City's greatest weakness in this area is related to making programs accessible--rather than facilities.
- Provide training, resources, software, etc to staff so we can independently serve individuals with disabilities the same way we serve others.
- I am not aware of who to contact for assistance for an accommodation.
- I think of access in broader terms -I also think of aging and people with injuries or small children.

4 CONCLUSION

There is a dichotomy of responses within the Survey of City Personnel. While the majority gave the City a “B” grade for ADA compliance, there was an overwhelming number of comments relating to the lack of knowledge, resources and training for effective ADA implementation. This dichotomy, coupled with the fact that there is a significant difference in perception of the City’s ADA compliance internally among City personnel versus externally among the public, illustrates the need for intensive communication efforts by the ADA Coordinator with staff and the disability community. The most notable perceptions and calls to action from the survey respondents include:

- There is a perception that most personnel do not know if the City has an ADA Coordinator, ADA Notice to the Public, ADA Grievance Procedure or active ADA Transition Plan. The ADA Coordinator will need to broaden internal communication efforts to ensure all respective personnel are oriented and familiar with these ADA administrative requirements.
- There is a perception that ADA compliance is difficult, that more training is necessary and City leadership must be clear on its commitment to the inclusion of people with disabilities in order for ADA compliance to be efficient and effective. An annual training calendar should be included as part of the forthcoming ADA Action Plan. But more importantly, City leaders, decision makers and influencers, must communicate a shared value within the organization in which inclusion and accessibility for people with disabilities is a supported priority.
- There is a perception that more information should be shared to better understand what it is that makes the City’s programs, services, activities and facilities accessible.
- There is a perception that more engagement with the disability community could provide further direction for accessibility improvements and disability policy developments.

The comments from the open-ended questions offer great insights and recommendations to build upon an accessibility management program. Inclusion and ADA compliance can be perceived as easier and more achievable when people have a personal connection to disability. Throughout the ADA Evaluation process, department directors and personnel with ADA compliance responsibilities demonstrated a confident commitment to inclusion of people with disabilities and eagerness to learn the best practices for ADA implementation. The information gathered from this survey, coupled with additional feedback from the disability community can further assist decision-makers and put the forthcoming ADA Action Plan into place.

Putting Accessibility Into Practice

October 19, 2015

The session sponsored and presented by the Great Lakes ADA Center. The Great Lakes ADA Center serves Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. Great Lakes ADA Center is a member of the ADA National Network. The Great Lakes and Affiliates enhance the Center's mission of voluntary compliance of the Americans with Disabilities Act (ADA) utilizing local resources to provide trainings, technical assistance, and engage in capacity building around the ADA.

Organizations

- Great Lakes ADA Center - <http://www.adagreatlakes.org/>
- ADA National Network - <http://www.adagreatlakes.org/>
- ADA Minnesota - <http://adaminnesota.org/>
- Minnesota Assistive Technology Program - <http://mn.gov/admin/star/>

Standards and Guidelines

- P.O.U.R. Accessibility Framework - <http://webaim.org/>
- Web Accessibility Content Guidelines 2.0 <http://www.w3.org/TR/WCAG20/>
- Section 508 Refresh - <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh>
- State of Minnesota Accessibility Standard - <http://mn.gov/mnit/programs/policies/accessibility/>
- IBM Accessibility Guidelines- <http://www-03.ibm.com/able/guidelines/>
- Open Accessibility Alliance Rulesets <http://oaa-accessibility.org/>

Captioning Resources

- Captioning Key: Guidelines and Techniques - <http://www.dcmp.org/captioningkey/>
- Best Practices in Online Captioning - <http://joelclark.org/access/captioning/bpoc/>
- Accessibility Features of Synchronized Multimedia Language (SMIL) - <http://www.w3.org/TR/SMIL-access/>
- National Center for Accessible Media - <http://ncam.wgbh.org/>

Non-HTML (Document) Accessibility

- Microsoft Accessibility - <http://www.microsoft.com/enable/>
- Creating Accessible PDFs from Microsoft Word - <http://bit.ly/17Odnk>
- Acrobat Accessibility - <http://www.adobe.com/accessibility/products/acrobat.html>
- Resources for Non-HTML Accessibility - <http://bit.ly/NON-HTML>

Free Accessibility Evaluation Tools

- AInspector - <http://fae20.cita.illinois.edu/ainspector/>
- AChecker - <http://www.achecker.ca/checker/index.php>
- Wave Chrome Extension - <http://wave.webaim.org/extension/>
- Check My Colours - <http://www.checkmycolours.com/>
- Functional Accessibility Evaluator 2.0 - <http://fae20.cita.illinois.edu/>

Accessible Apps

- How WCAG 2.0 and other W3C/WAI Guidelines Apply to Mobile <http://www.w3.org/TR/mobile-accessibility-mapping/>
- Webinar Archive: Android is Accessible. Really! <http://bit.ly/1E4AmfV>
- Webinar Archive: iAccessibility <http://bit.ly/X9UVnw>
- Testing for Accessibility with Android TalkBack - <http://bit.ly/1Pe47nd>
- Testing for Accessibility with VoiceOver - <http://apple.co/1NbkoGj>

Accessibility Process Tools

- Web Accessibility Conformance Evaluation Methodology - <http://www.w3.org/WAI/eval/conformance>
- Partnership on Employment and Accessible Technology TechCheck - <http://www.peatworks.org/techcheck/get-started>
- Accessibility in User-Centered Design - http://www.uiaccess.com/accessucd/ut_conduct.html
- Involving Users in Web Projects for Better, Easier Accessibility - <http://www.w3.org/WAI/users/involving.html>

NOTES:

City of Minneapolis Website

Accessibility Review

October 2015

WCAG 2.0 Guidelines

Level AA: For Level AA conformance, the Web page satisfies all the Level A and Level AA Success Criteria, or a Level AA conforming alternate version is provided.

Web Content Accessibility Guidelines (WCAG) 2.0 defines how to make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.

Firefox Browser 40.0.3

Firefox is the highly popular free web browser that more than 500 million people worldwide are using to surf and interact with the Internet. Firefox is available for Linux, Mac, Windows, handheld devices, and in more than 70 different languages.

Ainspector

AInspector Sidebar is a web accessibility evaluation tool that applies the rules from a selected ruleset, and organizes the results by Rule Categories or WCAG Guidelines. For use with Firefox browser.

FAE 2.0

The Functional Accessibility Evaluator (FAE) 2.0 analyzes web pages for requirements defined by the W3C Web Content Accessibility Guidelines 2.0 Single A and AA Success Criteria. The rules support accessible and usable design by enforcing coding practices that use of the latest accessibility technologies like the W3C Accessible Rich Internet Application (ARIA) 1.0 and W3C HTML5 Specification specification and coding techniques that support features that improve usability of web resources by people with disabilities.

Wave Chrome Extention

WAVE is a web accessibility evaluation tool developed by WebAIM.org. It provides visual feedback about the accessibility of your web content by injecting icons and indicators into your page. All analysis is done entirely within the Chrome browser allowing secure valuation of intranet, local, password protected, and other sensitive web pages.

**City of Minneapolis Website
Accessibility Review
October 2015**

| WCAG 2.0 Success Criterion | Home | Minneapolis 79 | City Services Directory | 2015 CPED News |
|---|--|---|--|--|
| 1.1.1 Non-text Content | No issues found | No issues found | No issues found | No issues found |
| 1.2.1 Audio-only and Video-only (Prerecorded) | n/a | n/a | n/a | n/a |
| 1.2.2 Captions (Prerecorded) | n/a | Captions should be provided for all prerecorded audio content in synchronized media. The YouTube automated captions had many errors. | n/a | n/a |
| 1.2.3 Audio Description on Media Alternative (Prerecorded) | n/a | n/a | n/a | n/a |
| 1.2.4 Captions (Live) | n/a | n/a | n/a | n/a |
| 1.2.5 Audio Description (Prerecorded) | n/a | An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media. This is only a warning level, since it appears on first review that in this case there are no "important visual details" which would warrant audio description. | n/a | n/a |
| 1.3.1 Info and Relationships | Missing headings. Headings facilitate page navigation for users of many assistive technologies. They also provide semantic and visual meaning and structure to the document. A first level heading (<h1>) should be present on nearly all pages. | No issues found | No issues found | No issues found |
| 1.3.2 Meaningful Sequence | No issues found | No issues found | No issues found | No issues found |
| 1.3.3 Sensory Characteristics | No issues found | No issues found | No issues found | No issues found |
| 1.4.1 Use of Color | No issues found | No issues found | No issues found | No issues found |
| 1.4.2 Audio Control | n/a | If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. | n/a | n/a |
| 1.4.3 Contrast (Minimum) | Insufficient color contrast. Minneapolismn Line 114, Column 166: Text and Translate. Contrast ratio needed of 4.5:1 for standard text, or 3:1 for larger text | Insufficient color contrast. Minneapolismn Line 114, Column 166: Text and Translate. Contrast ratio needed of 4.5:1 for standard text, or 3:1 for larger text | n/a | Insufficient color contrast. Minneapolismn Line 114, Column 166: Text and Translate. Contrast ratio needed of 4.5:1 for standard text, or 3:1 for larger text |
| 1.4.4 Resize text | No issues found | No issues found | No issues found | No issues found |
| 1.4.5 Images of Text | No issues found | No issues found | No issues found | No issues found |
| 2.1.1 Keyboard | No issues found | No issues found | No issues found | No issues found |
| 2.1.2 No Keyboard Trap | No issues found | No issues found | No issues found | No issues found |
| 2.2.1 Timing Adjustable | n/a | n/a | n/a | n/a |
| 2.2.2 Pause, Stop, Hide | n/a | n/a | n/a | n/a |
| 2.3.1 Three Flashes or Below Threshold | n/a | n/a | n/a | n/a |
| 2.4.1 Bypass Blocks | Six Access Keys Present. Accesskey provides a way to define shortcut keys for web page elements. Accesskeys often conflict with user or assistive technology shortcut keys and should be avoided or implemented with care. | Access Keys Present. Accesskey provides a way to define shortcut keys for web page elements. Accesskeys often conflict with user or assistive technology shortcut keys and should be avoided or implemented with care. | Access Keys Present. Accesskey provides a way to define shortcut keys for web page elements. Accesskeys often conflict with user or assistive technology shortcut keys and should be avoided or implemented with care. | Access Keys Present. Accesskey provides a way to define shortcut keys for web page elements. Accesskeys often conflict with user or assistive technology shortcut keys and should be avoided or implemented with care. |
| 2.4.2 Page Titled | No issues found | No issues found | No issues found | No issues found |
| 2.4.3 Focus Order | No issues found | No issues found | No issues found | No issues found |
| 2.4.4 Link Purpose (In Context) | IFRAME element must have an accessible name to support screen reader navigation. (this IFRAME appears to be for an internal process) | Link "Click Here" could be amiguous. Links (or form image buttons) with the same text that go to different locations are readily distinguishable. | No issues found | No issues found |
| 2.4.5 Multiple Ways | No issues found | No issues found | No issues found | No issues found |
| 2.4.6 Headings and Labels | Missing <h1> | No issues found | No issues found | No issues found |
| 2.4.7 Focus Visible | Inconsistent visible keyboard focs. Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. (Level AA) | No issues found | No issues found | No issues found |
| 3.1.1 Language of Page | No issues found | No issues found | The language of the document is not identified. | No issues found |
| 3.1.2 Language of Parts | n/a | n/a | n/a | n/a |
| 3.2.1 On Focus | No issues found | No issues found | No issues found | No issues found |
| 3.2.2 On Input | No issues found | No issues found | No issues found | No issues found |
| 3.2.3 Consistent Navigation | No issues found | No issues found | No issues found | No issues found |
| 3.2.4 Consistent Identification | No issues found | No issues found | No issues found | No issues found |
| 3.3.1 Error Identification | n/a | n/a | n/a | n/a |

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| | | | | |
|--|---|-----|---|--|
| 3.3.2 Labels or Instructions | n/a | n/a | No label for form for Find A Service input. Sufficient labels, cues, and instructions for required interactive elements are provided via instructions, examples, properly positioned form labels, and/or fieldsets/legends. | No issues found |
| 3.3.3 Error Suggestion | n/a | n/a | n/a | n/a |
| 3.3.4 Error Prevention (Legal, Financial, Data) | n/a | n/a | n/a | n/a |
| 4.1.1 Parsing | n/a | n/a | n/a | n/a |
| 4.1.2 Name, Role, Value | Elements with keyboard, mouse and/or drag events must have widget roles or interactive elements (i.e. form controls or links). ARIA roles, properties and states describes the features of interactive widgets to users of assistive technologies, especially screen reader users | | No issues found | No issues found |
| SECTION 508 (m) - When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l). | n/a | n/a | n/a | The City of Mpls post a significant number of PDF and Word files on it's website. These need to be checked and verified they are accessible. |

Ruleset: HTML5 and ARIA Techniques

URL: <http://www.minneapolismn.gov/>

| | Violations | Warnings | Manual Checks | Passed |
|-----------------|------------|----------|---------------|--------|
| Number of Rules | 5 | 2 | 34 | 13 |

Default Sort

| Rule Category | Number of Rules | | | |
|-------------------|-----------------|---|----|----|
| | V | W | MC | P |
| Landmarks | 3 | - | 2 | - |
| Headings | - | 1 | 1 | 3 |
| Styling/Content | - | - | 5 | 1 |
| Images | - | - | 1 | 3 |
| Links | - | 1 | 3 | - |
| Tables | - | - | - | - |
| Forms | - | - | 6 | 5 |
| Widgets/Scripting | 2 | - | - | - |
| Audio/Video | - | - | 5 | - |
| Keyboard Support | - | - | 4 | 1 |
| Timing | - | - | 3 | - |
| Site Navigation | - | - | 4 | - |
| Totals | 5 | 2 | 34 | 13 |

Ruleset: HTML5 and ARIA Techniques

URL: <http://www.minneapolismn.gov/tv/79>

| | Violations | Warnings | Manual Checks | Passed |
|-----------------|------------|----------|---------------|--------|
| Number of Rules | 4 | 1 | 38 | 19 |

Default Sort

| Rule Category | Number of Rules | | | |
|-------------------|-----------------|---|----|---|
| | V | W | MC | P |
| Landmarks | 3 | - | 3 | 2 |
| Headings | - | - | - | 4 |
| Styling/Content | 1 | - | 8 | 1 |
| Images | - | - | 3 | 3 |
| Links | - | 1 | 2 | - |
| Tables | - | - | - | - |
| Forms | - | - | 4 | 5 |
| Widgets/Scripting | - | - | - | 3 |
| Audio/Video | - | - | 5 | - |
| Keyboard Support | - | - | 4 | 1 |
| Timing | - | - | 3 | - |
| Site Navigation | - | - | 6 | - |

| | | | | |
|--------|---|---|----|----|
| Totals | 4 | 1 | 38 | 19 |
|--------|---|---|----|----|

Ruleset: HTML5 and ARIA Techniques

URL: <http://apps.ci.minneapolis.mn.us/deptdirapp/>

| | Violations | Warnings | Manual Checks | Passed |
|-----------------|------------|----------|---------------|--------|
| Number of Rules | 6 | 1 | 26 | 8 |

Default Sort

| Rule Category | Number of Rules | | | |
|-------------------|-----------------|---|----|---|
| | V | W | MC | P |
| Landmarks | 3 | - | 2 | - |
| Headings | - | - | - | 4 |
| Styling/Content | 1 | - | 7 | - |
| Images | - | - | - | - |
| Links | - | - | 2 | - |
| Tables | 1 | - | - | - |
| Forms | 1 | - | 4 | 2 |
| Widgets/Scripting | - | - | - | 2 |
| Audio/Video | - | - | 1 | - |
| Keyboard Support | - | 1 | 3 | - |
| Timing | - | - | 3 | - |
| Site Navigation | - | - | 4 | - |
| Totals | 6 | 1 | 26 | 8 |

Ruleset: HTML5 and ARIA Techniques

URL: http://www.minneapolismn.gov/cped/cped_news

| | Violations | Warnings | Manual Checks | Passed |
|-----------------|------------|----------|---------------|--------|
| Number of Rules | 3 | 1 | 26 | 12 |

Default Sort

| Rule Category | Number of Rules | | | |
|-------------------|-----------------|---|----|---|
| | V | W | MC | P |
| Landmarks | 3 | - | 2 | - |
| Headings | - | - | - | 4 |
| Styling/Content | - | - | 8 | 1 |
| Images | - | - | 3 | 3 |
| Links | - | 1 | 2 | - |
| Tables | - | - | - | - |
| Forms | - | - | - | 1 |
| Widgets/Scripting | - | - | - | 2 |

| | | | | |
|------------------|---|---|----|----|
| Audio/Video | - | - | 1 | - |
| Keyboard Support | - | - | 3 | 1 |
| Timing | - | - | 3 | - |
| Site Navigation | - | - | 4 | - |
| Totals | 3 | 1 | 26 | 12 |

**City of Minneapolis 311 Mobile App
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WCAG 2.0 Guidelines

Web Content Accessibility Guidelines (**WCAG**) **2.0** defines how to make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.

iPhone with iOS 8, using VoiceOver

VoiceOver is a gesture-based screen reader that lets you enjoy the fun and simplicity of iOS even if you can't see the screen. With VoiceOver enabled, just triple-click the Home button to access it wherever you are in iOS. Hear a description of everything happening on your screen, from battery level to who's calling to which app your finger's on. You can adjust the speaking rate and pitch to suit you.

Samsung Galaxy Tab A 8" with Android 5.0, using Talkback

TalkBack is an Accessibility Service that helps blind and vision-impaired users interact with their devices. Talkback adds spoken, audible, and vibration feedback to your device. It is a system application that was pre-installed on most devices and is updated when the accessibility service is improved. *Talkbalk has some consistency issues.*

**City of Minneapolis 311 Mobile App
iOS (iPhone)
Accessibility Review
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[WCAG 2.0 Success Criterion](#)

| | Home | Report | Issues |
|---|---|--|---|
| 1.1.1 Non-text Content | No issues found | No issues found | No issues found |
| 1.2.1 Audio-only and Video-only (Prerecorded) | n/a | n/a | n/a |
| 1.2.2 Captions (Prerecorded) | n/a | n/a | n/a |
| 1.2.3 Audio Description on Media Alternative (Prerecorded) | n/a | n/a | n/a |
| 1.2.4 Captions (Live) | n/a | n/a | n/a |
| 1.2.5 Audio Description (Prerecorded) | n/a | n/a | n/a |
| 1.3.1 Info and Relationships | Missing headings | No issues found | Issues are not in a list |
| 1.3.2 Meaningful Sequence | No issues found | No issues found | No issues found |
| 1.3.3 Sensory Characteristics | No issues found | No issues found | No issues found |
| 1.4.1 Use of Color | No issues found | No issues found | No issues found |
| 1.4.2 Audio Control | n/a | n/a | n/a |
| 1.4.3 Contrast (Minimum) | Insufficient color contrast: 1) White (#FFFFFF) "In case of emergency call 911" text on blue (#598EB0) has a color contrast ratio of 3.6:1; 2) The tile text when pressed and held is blue (#598EB0) on a white (#FFFFFF) background and has a color contrast ratio of 3.6:1. | Insufficient color contrast: 1) Blue (#007AFF) "Cancel" text on a light gray (#F7F7F8) background has a color contrast ratio of 3.8:1; 2) Gray (#C4C4C4) "Submit" button text on a light gray (#F7F7F8) background has a color contrast ratio of 1.6:1; 3) Gray (#AAAAAA) "Issue Title," "Description," and "Click to Enter Location" text on a white (#FFFFFF) background has a color contrast ratio of 2.1:1. | Insufficient color contrast: 1) Blue (#007AFF) "Filter" and "Map" text on a gray (#F7F7F8) background has a color contrast ratio of 3.8:1; 2) White (#FFFFFF) "List" button on a blue (#007AFF) background has a color contrast ratio of 3.8:1; 3) White (#FFFFFF) "Closed" text on a blue (#2486B5) background has a color contrast ratio of 4.1:1; 4) White (#FFFFFF) "Acknowledged" text on a green (#73B304) background has a color contrast ratio of 2.6:1; 5) White (#FBFDFE) "Open" text on an orange (#EF7F25) background has a color contrast ratio of 2.7:1. |
| 1.4.4 Resize text | No issues found | The location text, current location (e.g., Minneapolis), and note text do not resize when Larger Accessibility Sizes is set to largest. | None of the text resizes when Larger Accessibility Sizes is set to largest. |
| 1.4.5 Images of Text | n/a | n/a | n/a |
| 2.1.1 Keyboard | n/a | n/a | n/a |
| 2.1.2 No Keyboard Trap | No issues found | No issues found | No issues found |
| 2.2.1 Timing Adjustable | n/a | n/a | n/a |
| 2.2.2 Pause, Stop, Hide | n/a | n/a | n/a |
| 2.3.1 Three Flashes or Below Threshold | No issues found | No issues found | No issues found |
| 2.4.1 Bypass Blocks | n/a | No issues found | No issues found |
| 2.4.2 Page Titled | No issues found | No issues found | No issues found |
| 2.4.3 Focus Order | No issues found | Camera icon is not focusable and cannot be activated with VoiceOver running. | No issues found |
| 2.4.4 Link Purpose (In Context) | n/a | n/a | No issues found |
| 2.4.5 Multiple Ways | No issues found | No issues found | No issues found |
| 2.4.6 Headings and Labels | No issues found | No issues found | No issues found |
| 2.4.7 Focus Visible | n/a | n/a | n/a |
| 3.1.1 Language of Page | No issues found | No issues found | No issues found |
| 3.1.2 Language of Parts | n/a | n/a | n/a |
| 3.2.1 On Focus | No issues found | No issues found | No issues found |
| 3.2.2 On Input | n/a | No issues found | No issues found |
| 3.2.3 Consistent Navigation | No issues found | No issues found | No issues found |
| 3.2.4 Consistent Identification | No issues found | No issues found | No issues found |

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| | | | |
|--|--|---|---|
| 3.3.1 Error Identification | n/a | No issues found | No issues found |
| 3.3.2 Labels or Instructions | n/a | n/a | No issues found |
| 3.3.3 Error Suggestion | n/a | No issues found | No issues found |
| 3.3.4 Error Prevention (Legal, Financial, Data) | n/a | n/a | n/a |
| 4.1.1 Parsing | n/a | n/a | n/a |
| 4.1.2 Name, Role, Value | Tile names (e.g., Report, Issues, Neighbors, etc.) and location text (e.g., Minneapolis) is static text that is not reported to the screen reader as actionable. | Issue Title, Description, and Location text is static text that is not reported to the screen reader as actionable. | Issue Title, Description, and Location text is static text that is not reported to the screen reader as actionable. |

**City of Minneapolis 311 Mobile App
Android (tablet)
Accessibility Review
October 2015**

[WCAG 2.0 Success Criterion](#)

1.1.1 Non-text Content

| | Home | Report | Issues |
|---|-----------------|--|-----------------|
| | No issues found | The Google map image and photo placeholder image are missing accessible names. | No issues found |
| 1.2.1 Audio-only and Video-only (Prerecorded) | n/a | n/a | n/a |
| 1.2.2 Captions (Prerecorded) | n/a | n/a | n/a |
| 1.2.3 Audio Description on Media Alternative (Prerecorded) | n/a | n/a | n/a |
| 1.2.4 Captions (Live) | n/a | n/a | n/a |
| 1.2.5 Audio Description (Prerecorded) | n/a | n/a | n/a |

1.3.1 Info and Relationships

| | | | |
|--|--|---|---|
| | 1) Missing headings. 2) Report button (upper right) is missing an accessible name. 3) Menu list items are missing nesting - e.g., My Reports and My Comments, Minneapolis. | 1) Missing headings 2) Location textbox, Edit Location button, and Set Location button are missing accessible names. | 1) missing headings (needed for the Issues section of the page and the issues titles) 2) issues are not in a list 3) Star, Comment, Like, and Alert checkboxes and change status drop-downs are missing accessible names. |
|--|--|---|---|

1.3.2 Meaningful Sequence

| | | | |
|--|-----------------|---|-----------------|
| | No issues found | The current reading order is incorrect: 1) Menu 2) Reset Button 3) Send Report button 4) Draft 9/24/15 4:19PM, Note: Requests may be delayed or unresolved if address is invalid or inaccurate, Category, Minneapolis 311, Photo, Image 99 Unlabeled, Sensitive Issue? 5) Google Map image 6) Location textbox 7) Edit location button 8) Use my current location checkbox 9) Camera button 10) Gallery button 11) Keep it anonymous checkbox 12) "Don't show my name on this issue, or show it on my profile page..." text 13) Send Report button" | No issues found |
|--|-----------------|---|-----------------|

1.3.3 Sensory Characteristics

1.4.1 Use of Color

1.4.2 Audio Control

1.4.3 Contrast (Minimum)

| | | | |
|--|--|--|---|
| | No issues found | No issues found | No issues found |
| | No issues found | No issues found | No issues found |
| | n/a | n/a | n/a |
| | Insufficient color contrast: 1) Gray (#6A6A6A) "Nearby" button text on a light gray (#E5E5E5) background has a color contrast ratio of 2.9:1; 2) Gray (#8F8F8F) tile text (Report, City Web, etc.) on a light gray (#F1F1F1) background has a color contrast ratio of 2.9:1; 3) The tile text when pressed and held is gray (#666667) on a blue (#06AFF6) background and has a color contrast ratio of 2.3:1. | Insufficient color contrast: 1) Gray (#6A6A6A) "Report" button text on a light gray (#E5E5E5) background has a color contrast ratio of 2.9:1; 2) Orange (#ED9F5E) "Draft" text on a gray (#E5E5E5) background has a color contrast ratio of 1:7:1; 3) Gray (#818181) Date/time text on a light gray (#E5E5E5) background has a color contrast ratio of 3:1:1; 4) Blue (#4EBCE5) "Learn More" text on white (FFFFFF) background has a color contrast ratio of 2:2:1; 5) White (FFFFFF) "Send Report" button text on orange (#F2842C) background has a color contrast ratio of 2:6:1. | Insufficient color contrast: 1) Gray (#C1C1C1) address text (e.g., 913-999 S 7th St Minneapolis, Minnesota) text on a white (FEFDFD) background has a color contrast ratio of 1.8:1; 2) White (FFFFFF) "Open" text on an orange (#F1F1F1) background has a color contrast ratio of 3.2:1. |

1.4.4 Resize text

| | | | |
|--|-----------------|-----------------|-----------------|
| | No issues found | No issues found | No issues found |
|--|-----------------|-----------------|-----------------|

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| | | | |
|--|--|--|---|
| 1.4.5 Images of Text | No issues found | No issues found | No issues found |
| 2.1.1 Keyboard | n/a | n/a | n/a |
| 2.1.2 No Keyboard Trap | No issues found | No issues found | No issues found |
| 2.2.1 Timing Adjustable | No issues found | No issues found | No issues found |
| 2.2.2 Pause, Stop, Hide | n/a | n/a | n/a |
| 2.3.1 Three Flashes or Below Threshold | No issues found | No issues found | No issues found |
| 2.4.1 Bypass Blocks | No issues found | No issues found | No issues found |
| 2.4.2 Page Titled | No issues found | No issues found | No issues found |
| 2.4.3 Focus Order | The "in case of emergency" text is the first focusable content and the content above it may be missed by a screen reader user. | 1) A swipe stop comes after the "Google Map" stop, but the screen reader does not report anything. 2) The Category drop-down and the Learn More link are not focusable. | No issues found |
| 2.4.4 Link Purpose (In Context) | No issues found | "Learn More" link text does not clearly indicate the links destination or function. | No issues found |
| 2.4.5 Multiple Ways | No issues found | No issues found | No issues found |
| 2.4.6 Headings and Labels | No issues found | No issues found | No issues found |
| 2.4.7 Focus Visible | n/a | n/a | n/a |
| 3.1.1 Language of Page | No issues found | No issues found | No issues found |
| 3.1.2 Language of Parts | n/a | n/a | n/a |
| 3.2.1 On Focus | No issues found | No issues found | No issues found |
| 3.2.2 On Input | n/a | After a user edits the location, focus returns to the top of the page, causing a screen reader user to navigate back to the location. | No issues found |
| 3.2.3 Consistent Navigation | No issues found | No issues found | No issues found |
| 3.2.4 Consistent Identification | No issues found | No issues found | No issues found |
| 3.3.1 Error Identification | n/a | When the user submits a report with an invalid address, focus moves to the field in error, but the error is not described to the user in text. | No issues found |
| 3.3.2 Labels or Instructions | n/a | No issues found | No issues found |
| 3.3.3 Error Suggestion | n/a | No issues found | n/a |
| 3.3.4 Error Prevention (Legal, Financial, Data) | n/a | n/a | n/a |
| 4.1.1 Parsing | n/a | n/a | n/a |
| 4.1.2 Name, Role, Value | "Nearby" and menu items are static text that is not reported to the screen reader as actionable. | No issues found | Comment icon is presented as a checkbox, but does not function as a checkbox. |