

# Action Plan

**Public Entity** Riverside County Transportation Commission **Date** 04-11-2022

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The Action Plan includes non-structural solutions to programmatic and physical barriers that have been identified during this self-evaluation. The non-structural solutions consist of development of process or procedures to address the barriers. This may also include staff training or revisions to existing documents (contract, procedure, procurement manual, or employment procedures). RCTC’s programmatic barriers are identified through an evaluation of responses to questions documented in Attachments 2, 3, 4 and 5. The assessment of physical barriers to access are identified in Attachments 6A through 6P through accessibility surveys of each of their sixteen facilities. Nonstructural solutions to a few of those identified physical barriers are included here, as alternates to structural solutions. Structural solutions that are required to remove all physical barriers are listed in Attachment 8, Transition Plan.

RCTC’s ADA Coordinator, John Standiford is responsible for implementation of the Action Plan as per the target dates identified below.

| Issues  | Nonstructural Solutions   | Target Date   | Comments |
|---|---|---|----------|
| <b>General Nondiscrimination</b>  |   |   |          |
| 1. RCTC’s Model Contracts were provided to the self-evaluation team for review. The current contract language for non-federally funded projects provided for review does not specifically mention compliance with the ADA Title II, although it requires consultants and contractors to comply with all Laws and Regulations. | <ul style="list-style-type: none"> <li>RCTC should review the uniform contract language for contracting services (for all consultants and construction contracts) to ensure that it is worded in a nondiscriminatory manner, holding vendors/contractors/ consultants to State and Federal disability civil rights mandates that RCTC is subject to under law, specifically including compliance to the ADA set forth under 28 CFR 35 (and the ADA Standards). Because RCTC receives federal financial assistance, a similar provision requiring compliance with Section 504 of the 1973 Rehabilitation Act should be added as well.</li> </ul> | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan |          |

| Issues  | Nonstructural Solutions  | Target Date  | Comments |
|---|--|--|----------|
| <p>2. There appear to be exclusions/ restrictions preventing persons with disabilities from employment in field construction positions where driving and exposure to live traffic are cited as examples of safety concern.</p>  | <ul style="list-style-type: none"> <li>It is recommended that RCTC's legal counsel review job descriptions for construction field positions prior to their posting to ensure ADA compliance, and to confirm that the exclusions or restrictions are necessary to the operation of the program and/or for the safety of all participants.</li> </ul>  | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <b>Contracting with External Organizations</b>  |  |  |          |
| <p>3. Some of RCTC's staff responsible for contracting with external agencies are not fully familiar that RCTC's ADA obligations apply whether the RCTC provides the service, program, or activity directly or contracts for it.</p> <p>4. RCTC does not specifically require assurances from contractors of their fulfillment of ADA title II requirements for non-federally funded projects</p> | <ul style="list-style-type: none"> <li>As a best practice, RCTC should require assurances from contractors of their fulfillment of Title II requirements.</li> <li>RCTC should update contract provisions and specifications to specifically include that contractors need to provide the services, programs, and activities in a nondiscriminatory manner consistent with ADA Title II requirements.</li> <li>RCTC should provide guidance to staff involved in the purchasing process to ensure that public funds are not being used to create barriers to access. For example, when purchasing new equipment or furniture, RCTC should ensure that any purchased equipment or furniture should be ADA compliant and provide equal access to those with disabilities</li> <li>RCTC should require accessibility reviews of designs for new construction or renovation projects for compliance to ADA standards.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

| Issues  | Nonstructural Solutions   | Target Date  | Comments                                       |
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| <p><b>Reasonable Accommodations</b></p>   |   |  | <p>Service animals, mobility devices, etc.</p> |
| <p>5. The ADA Nondiscrimination Notice on the RCTC website states that “RCTC will make reasonable accommodations to policies and procedures to ensure that all people have an equal opportunity to enjoy all of its programs, services, and activities”. However, some departments were not aware of this notice.</p> | <ul style="list-style-type: none"> <li>On an annual basis, staff in all departments should be provided with the ADA Nondiscrimination Notice that is posted on the RCTC website. <a href="https://www.rctc.org/wp-content/uploads/2018/05/RCTC-ADA_Section-504-Notice-and-Complaint-Procedure-c2_2018.05-w_BBK-Revisions-c2.pdf">https://www.rctc.org/wp-content/uploads/2018/05/RCTC-ADA_Section-504-Notice-and-Complaint-Procedure-c2_2018.05-w_BBK-Revisions-c2.pdf</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |  |

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| <p>6. There appears to be no policy for providing statements of reasons for reaching a conclusion that a reasonable accommodation might result in undue financial or administrative burden in providing reasonable accommodations.</p> <p>7. RCTC staff is not aware of the person responsible for determination of undue burden who is also required to take other action to ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by RCTC.</p> | <ul style="list-style-type: none"> <li>RCTC should establish an internal procedure for documenting reasonable modification requests (such as allowing service animals) and identify the person/s responsible for deciding which request would fundamentally alter the nature of the goods, services, facilities, privileges, or accommodations. And if so, will take other action to ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by RCTC.</li> </ul>  | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <p>8. RCTC's written policies do not specifically address service animals. Some departments are unaware or unsure of the requirements related to allowing service animals as a type of a reasonable accommodation.</p>  | <ul style="list-style-type: none"> <li>RCTC should provide ADA regulations that address service animals to all staff in all departments.</li> <li>Staff involved in dealing with the public should be provided comprehensive training regarding ADA title II requirements addressing wheelchairs, service animals, provision of adequate space, and relief areas for service animals in public meetings/events. ADA training and training resources are available online at this link <a href="https://adata.org/ada-training">https://adata.org/ada-training</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <p>9. RCTC departments are generally aware but RCTC's PPPM and other policies do not specifically address wheelchairs and other power-driven mobility devices; which power-driven mobility devices will be permitted, and where and when they can be used. These requirements have not been formally communicated to departments either.</p> | <p>RCTC provide ADA regulations regarding power driven mobility devices to all staff in all departments</p>   | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <p><b>Ticketing</b></p>  |   |  |          |
| <p>10. RCTC does not directly sell tickets for any events. So, there are no policies to ensure that individuals with disabilities have an equal opportunity to purchase tickets for accessible seating.</p>  | <ul style="list-style-type: none"> <li>Although requirements for the sale of tickets are not applicable to RCTC, RCTC should consider reserving accessible seats in the front at future ribbon cutting and other public events held by RCTC.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <b>Maintenance of Accessible Routes</b>   |  |  |  |
| <p>11. There does not seem to be a policy in place for maintenance of accessible features, especially where public meetings are held.</p>   | <ul style="list-style-type: none"> <li>RCTC should ensure that staff and consultants responsible for setting off site meetings are aware that ADA requirements need to be complied with such as holding meetings and events on accessible routes, incorporating clear spaces, accessible room set-up and integrated seating. If events are to be coordinated and arranged by external consultants, the consultant's scope of work for the events should clearly include compliance with all ADA requirements.</li> </ul>   | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>Some public meetings are held in venues maintained by others.</p> |
| <b>Staff Training and Support</b>   |  |  |  |
| <p>12. RCTC employees are generally aware and sensitive to disability issues of their own accord, but they have not yet received formal training regarding ADA, disability awareness and first person contact.</p> <p>Note: Training on other ADA related topics is also noted as an action item against other identified issues.</p> | <ul style="list-style-type: none"> <li>Staff having public contact should be trained in "disability" awareness, interactions with people with disabilities, disability civil rights laws, and disability etiquette. A free, self-paced web course for discovering the best practices for effectively working and interacting with people who have disabilities is found at this link: <a href="https://adata.org/project/your-service-welcoming-customers-disabilities-your-one-stop-center">https://adata.org/project/your-service-welcoming-customers-disabilities-your-one-stop-center</a></li> <li>RCTC staff should be provided general and program specific training on State and Federal disability civil rights laws and disability awareness starting with the introductory, ADA Basic Building Blocks course <a href="https://www.adabasics.org/">https://www.adabasics.org/</a> to help increase knowledge and understanding of the basic principles and core concepts in the ADA and the ADA Amendments Act of 2008 (ADAAA).</li> <li>ADA Training on various other topics can also be requested from the Pacific ADA center and Mid-Atlantic ADA center at these links: <a href="https://www.adapacific.org/request_pacific-ada-center-training">https://www.adapacific.org/request_pacific-ada-center-training</a>. <a href="https://www.adainfo.org/training/serving-customers-disabilities">https://www.adainfo.org/training/serving-customers-disabilities</a></li> </ul> |  |  |

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|  | <ul style="list-style-type: none"> <li>The National ADA Symposium is another resource. It is held annually and is an initiative of the ADA National Network found at this link <a href="http://www.adasymposium.org/">http://www.adasymposium.org/</a></li> <li>The ADA National Network made up of the ten ADA Centers and their state affiliates provide training on every aspect of the ADA. See <a href="http://adata.org/">http://adata.org/</a></li> </ul>   |  |          |
| <b>Emergency Evacuation Procedures</b>   |  |  |          |
| <p>13. Emergency evacuation plans or procedures for stations and some facilities were not available for review. It is unclear if RCTC's ADA coordinator is involved in the emergency plan creation, drills, and debriefings.</p> | <ul style="list-style-type: none"> <li>The ADA coordinator should utilize resources available at this link to become involved in the preparation of emergency evacuation procedures. <a href="https://www.ada.gov/pcatoolkit/chap7emergencymgmt.htm">https://www.ada.gov/pcatoolkit/chap7emergencymgmt.htm</a></li> <li>RCTC should provide comprehensive training to staff involved in emergency planning and preparedness, addressing effective communications, evacuating from a place of danger, sheltering, evacuating people to a place of safety, adaptive evacuation equipment (if or when used), and evacuation of service animals.</li> </ul> <p>The Pacific ADA Center is a resource for webinars, tip sheets, and podcasts on emergency preparedness to help shed light on disability and ADA issues in emergency preparedness and management. National, regional, and local resources and publications related to disability and emergency preparedness are available at this link: <a href="https://www.adapacific.org/emergency-preparedness-webinars">https://www.adapacific.org/emergency-preparedness-webinars</a></p> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <p>14. Emergency evacuation plans or procedures for stations and facilities were not available for review, so it cannot be definitively stated that RCTC's emergency management program is fully accessible to people with disabilities.</p> | <ul style="list-style-type: none"> <li>• Update existing emergency evacuation procedures to include evacuation of individuals with disabilities during an emergency. Include use of pedestrian rail crossings in the procedure, where applicable.</li> <li>• Use the guidance published by the EEOC regarding lawful means of identifying employees who might need assistance during an emergency due to their disability. <a href="https://www.eeoc.gov/laws/guidance/obtaining-and-using-employee-medical-information-part-emergency-evacuation-procedures">https://www.eeoc.gov/laws/guidance/obtaining-and-using-employee-medical-information-part-emergency-evacuation-procedures</a>.</li> <li>• Use US Department of Justice guidance regarding disaster management. <a href="https://www.ada.gov/emergencyprep.htm">https://www.ada.gov/emergencyprep.htm</a></li> <li>• On an ongoing basis, seek and use input from people with different types of disabilities (i.e., mobility, vision, hearing, cognitive, psychiatric, and other disabilities) and organizations with expertise on disability issues regarding all phases of RCTC's emergency management plan</li> <li>• Although not a specific ADA requirement, it is recommended that guidance for handling service animals in emergency situations and evacuation of service animals should also be developed.</li> <li>• If other entities are contracted to provide emergency preparedness or emergency management services, formalize in agreements with those organizations their commitment to compliance with the requirements of Title II of the ADA and use information provided at this link. <a href="https://www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm">https://www.ada.gov/pcatoolkit/chap7emergencymgmtadd1.htm</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |



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| <b>Employment Practices</b>   |   |  |          |
| <p>15. RCTC's employment practices are not deemed discriminatory against people with disabilities. However, a legal review of postings prior to opening is not conducted. Job descriptions are a template style format.</p> | <p>Advertised position classifications and job application forms should be reviewed by RCTC HR director and / or RCTC legal counsel to determine if</p> <ul style="list-style-type: none"> <li>• Positions are available to qualified persons with disabilities</li> <li>• Does the announcement identify the essential functions of the job to attract qualified people with disabilities to apply?</li> <li>• Is information about job openings accessible to people with different disabilities?</li> <li>• Only permissible questions are being asked on application forms. Questions that identify the presence of a disability may not be asked.</li> <li>• Modifications and accommodations are required for position classifications to qualified persons with disabilities</li> </ul> <ul style="list-style-type: none"> <li>• Local certified vocational rehabilitation counselors in Riverside, CA (if needed) can be found at this link<br/> <a href="https://riverside.networkofcare.org/mh/services/subcategory.aspx?tax=ND-9000">https://riverside.networkofcare.org/mh/services/subcategory.aspx?tax=ND-9000</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <p>16. Interview/selection panel members follow the RCTC Interviewing Guide which addresses disability but does not include details regarding disability awareness and interactions with people having disabilities.</p> | <ul style="list-style-type: none"> <li>• The RCTC Interviewing Guide be updated to include details regarding disability awareness and interactions with people having disabilities to assure that job applicants with disabilities are treated in a nondiscriminatory manner.</li> </ul> <p>ADA Training on Title I–Employment can be requested from the Pacific ADA center at this link: <a href="https://www.adapacific.org/request_pacific-ada-center-training">https://www.adapacific.org/request_pacific-ada-center-training</a>.</p> <p>The training covers the following topics:</p> <ul style="list-style-type: none"> <li>• Employment requirements overview</li> <li>• Definition of Disability</li> <li>• Drafting job descriptions</li> <li>• Interviewing people with disabilities</li> <li>• Post-offer/Pre-employment dos and don'ts</li> <li>• Disclosing a disability</li> <li>• Reasonable accommodation: the process, examples, and “Undue Hardship”</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <b>Construction Policies</b>   |   |  |          |
| <p>17. A review of construction policies, revealed that there is no mention in RCTC's Model Contract language about specifically conducting accessibility inspections during construction.</p> | <ul style="list-style-type: none"> <li>• Accessibility construction inspections should be conducted on all projects under construction by RCTC consultants. Progress inspections (on-site inspections of accessibility features and construction elements affecting accessibility compliance) help to verify that all elements will be able to meet the minimum accessibility requirements of the California Building Code at the time of final inspection.</li> <li>• For guidance on conducting accessibility construction inspections, RCTC should recommend their consultants to use the checklist provided by California Commission on Disability Access web site at <a href="https://forms.dgs.ca.gov/content/forms/af/dgs/ccda/ccda-accessibility/public/ccda-accessibility-construction-inspection-checklist-2020-edition.html?">https://forms.dgs.ca.gov/content/forms/af/dgs/ccda/ccda-accessibility/public/ccda-accessibility-construction-inspection-checklist-2020-edition.html?</a> for the "Accessibility Construction Inspection Checklist", which is free of charge and is also used by the building code officials.</li> <li>• RCTC should ensure that construction specifications include construction tolerances [to specify a dimension less than the required maximum (or more than the required minimum) by the amount of the expected field or manufacturing tolerance and not to state any tolerance in conjunction with the specified dimension] This will ensure that facilities and elements accomplish the level of accessibility intended by accessibility requirements.</li> <li>• RCTC should ensure that CM consultant contracts include using local Certified Access Specialist (CASP) services within future construction projects to ensure that appropriate compliance is in place. A list of certified Access Specialists is found at this link. <a href="https://www.apps2.dgs.ca.gov/DSA/casp/casp_certified_list.aspx">https://www.apps2.dgs.ca.gov/DSA/casp/casp_certified_list.aspx</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

| Issues  | Nonstructural Solutions   | Target Date | Comments |
|---|---|-------------|----------|
| <b>ADA Related Policy for Former Illegal Drug Use</b>   |   |             |          |
| <p>18. RCTC's personnel policies and procedures manual does not clearly state nondiscrimination against people involved in former use of illegal drugs.</p> | <ul style="list-style-type: none"> <li>RCTC should create a policy that prohibits discrimination against former users of drugs that complies with 28 CFR 35.131 (2). <a href="https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.131">https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.131</a></li> </ul> |             |          |

| Issues   | Nonstructural Solutions   | Target Date  | Comments |
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| <b>Effective Communication</b>   |   |  |          |
| <p>19. Some RCTC staff responsible for providing auxiliary aids and services are not familiar with some auxiliary aids and services such as VRI, CART, and open captioning, implying that these may not become available to people who are deaf or hard of hearing.</p> <p>20. RCTC's documents are not available in Braille format due to unavailability of vendors providing the service, and optical readers are not provided either.</p> | <p>As a reasonable accommodation, RCTC should identify resources, and contract with vendors that can readily respond to requests for "auxiliary aids and services" to include but not be limited to:</p> <ul style="list-style-type: none"> <li>a) qualified reader; A "qualified" reader means someone who is able to read effectively, accurately, and impartially, using any necessary specialized vocabulary.</li> <li>b) print documents to be placed into alternate formats; such as braille or audio recording</li> <li>c) video/audio description production services;</li> <li>d) qualified notetaker;</li> <li>e) qualified interpreter; A "qualified" interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary</li> <li>f) Video Remote Interpreting (VRI) services; VRI, is a video telecommunication service that uses devices such as web cameras or videophones to provide spoken language or sign language interpreting services.</li> <li>g) real-time captioning; (also known as computer-assisted real-time transcription, or CART) is a service similar to court reporting in which a transcriber types what is being said at a meeting or event into a computer that projects the words onto a screen. This service, which can be provided on-site or remotely, is particularly useful for people who are deaf or have hearing loss but do not use sign language.</li> <li>h) printed scripts;</li> <li>i) captioning production services; and</li> <li>j) qualified speech-to-speech transliterator. (a person trained to recognize unclear speech and repeat it clearly)</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

| Issues  | Nonstructural Solutions  | Target Date  | Comments  |
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| <p>21. There is no policy or procedure which requires decision makers to give primary consideration to the auxiliary aid or service requested by the person with a disability when deciding which auxiliary aid or service to provide and, if the requested auxiliary aid or service would be an undue financial and administrative burden.</p> | <ul style="list-style-type: none"> <li>• Prepare a procedure for determining if the requested auxiliary aid or service would be an undue financial and administrative burden and if so, what other action will be taken in to ensure that individuals with disabilities will receive the benefits or services provided by RCTC. When choosing an aid or service, title II entities are required to give primary consideration to the choice of aid or service requested by the person who has a communication disability. RCTC must honor the person’s choice, unless it can demonstrate that another equally effective means of communication is available, or that the use of the means chosen would result in a fundamental alteration or in an undue burden. If the choice expressed by the person with a disability would result in an undue burden or a fundamental alteration, the public entity still has an obligation to provide an alternative aid or service that provides effective communication if one is available</li> <li>• Train employees so they know the policies and the appropriate procedures to follow when they receive a request for an interpreter or other auxiliary aid or service</li> <li>• Responsible staff should enroll in ADA Training on effective communication which can be requested from the Pacific ADA center at this link: <a href="https://www.adapacific.org/request_pacific-ada-center-training">https://www.adapacific.org/request_pacific-ada-center-training</a>.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |   |
| <p>22. RCTC’s website includes instructions for riders with hearing or speech impairments to use the California Relay Service, 711, but business cards and letter heads do not list this.</p>   | <ul style="list-style-type: none"> <li>• Examine voice mail systems and telephone information lines to ensure they are accessible for people who are deaf or hard of hearing.</li> <li>• Provide additional training to staff on the use of ” 711, California Relay” as to why this is one effective option for communicating with people who are deaf, hard of hearing, or have speech disabilities.</li> </ul>   | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>Consider adding “711 the California Relay” on business cards and letter heads also</p> |

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| <p>23. Electronic announcements are sent by email to people who have signed up to receive the email blasts, but accessible PDF and Word documents are not sent out.</p> | <ul style="list-style-type: none"> <li>When announcements are distributed electronically, they should be sent out in accessible PDF and Word documents simultaneously.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

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| <b>Website Accessibility</b>   |   |  |   |
| <p>24. RCTC does not currently have a policy requiring compliance with DOJ recommended guidelines for website accessibility. RCTC reviews/scans the website on a monthly basis to check for accessibility compliance but people with disabilities who use screen reading software and other assistive technology have not participated in the evaluation. Responses regarding plans for making existing and future web content accessible, are inconclusive.</p> | <ul style="list-style-type: none"> <li>• A website accessibility policy should be created and distributed to the staff responsible for developing the website, requiring the web content to be accessible in compliance with ADA Title II and Section 508 of the Rehabilitation Act of 1973. Policy must ensure that content is not added to the website until it has been made accessible.</li> <li>• RCTC should instruct their web developer team to utilize the WAVE tool (or other online tools) and remove the identified barriers to improve accessibility of its web content. Also refer to the checklist available on <a href="https://www.ada.gov/pcatoolkit/chap5chklist.htm">https://www.ada.gov/pcatoolkit/chap5chklist.htm</a> for conducting a preliminary assessment.</li> <li>• RCTC should engage users to check the accessibility features and/or hire an independent external web and internet access consultant team for evaluating the accessibility of the website, webpages, and assisting in the implementation of the access improvements which are needed for making the content accessible to people with disabilities. A list of website accessibility consultants is available from <a href="https://wimgo.com/s/usa/accessibility-consultants/">https://wimgo.com/s/usa/accessibility-consultants/</a> and <a href="https://www.dor.ca.gov/Home/Vendors">https://www.dor.ca.gov/Home/Vendors</a></li> <li>• The RCTC website development team should also be provided comprehensive training on making website, webpages, and documents accessible to people with disabilities in compliance with the DOJ recommended standards (WCAG).</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>The Great Plains ADA center is a resource that provides training on various topics including website accessibility, which is available at this link, <a href="https://gpadacenter.org/training-tailored-your-needs">https://gpadacenter.org/training-tailored-your-needs</a>. WebAIM is another resource recommended by Great Plains ADA Center for website accessibility knowledge, consultation, and training, which is available at this link, <a href="https://webaim.org/services/">https://webaim.org/services/</a>.</p> |



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| <b>Administrative Requirements</b>   |   |  |   |
| 25. The Public ADA Notice of compliance is posted on the website in print format but is not available in audio format.   | <ul style="list-style-type: none"> <li>• Provide the Nondiscrimination Statement in print and audio format on the RCTC website, social media such as Twitter and Facebook, print notices at facilities and in local newspapers, program announcements, and include the statement when making public service announcements on local radio and television stations.</li> <li>• The Nondiscrimination Statement should be disseminated to all staff on an annual basis.</li> </ul> | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan  |   |
| <b>RCTC Facilities</b>   |   |  | Also See Attachment 8, Transition Plan. |
| 26. Some curb ramps outside of the RCTC owned station property limits that will be used to access RCTC stations were found to be non-compliant to ADA standards. | <ul style="list-style-type: none"> <li>• RCTC needs to coordinate with other entities responsible for maintaining sidewalks, and roads outside of RCTC properties, and inform them of their obligations to comply with the accessibility requirements including compliance with Title II of the ADA, compliance with the ADA standards, and applicable local accessibility standards.</li> </ul>  | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan  |   |
| 27. At South Perris Station, there is no sidewalk or pedestrian route outside the RCTC property limits, for pedestrians to access this station.                  | <ul style="list-style-type: none"> <li>• RCTC needs to coordinate provision of pedestrian access on the public Right of Way with the City or the responsible entity, to make South Perris Station accessible.</li> </ul>  | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan. |   |

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| <p>28. The layover facility at South Perris was not evaluated due to not having access to this restricted facility used and maintained by Metrolink.</p>  | <ul style="list-style-type: none"> <li>RCTC needs to inform Metrolink, of their obligation to conduct a self-evaluation to identify any physical barriers in this facility. OR provide access to RCTC staff/consultants to complete the self-evaluation.</li> </ul>  | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <p>29. In almost all the stations that were evaluated, uneven joints and cracks were observed in the accessible route. Sealant/filler in some deep joints was missing.</p>  | <ul style="list-style-type: none"> <li>Once the physical barriers are removed as required by the transition plan, update and implement the maintenance plan for ongoing routine inspections and repairs of all components of the accessible routes in accordance with ADA standards and applicable local accessibility standards.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <p>30. Moveable furniture pieces blocking the maneuvering clearances at doors are identified barriers in RCTC facilities in Attachments 6J through 6P. These are considered issues requiring non-structural solutions and are noted here.</p> | <ul style="list-style-type: none"> <li>Once the physical barriers are removed as required by the transition plan, create, and implement a maintenance plan for ongoing routine inspections, and maintenance of all components of the accessible route.</li> </ul>  | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

| Issues   | Nonstructural Solutions   | Target Date  | Comments |
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| <p>31. In most elevators, audible signals which sound as the car passes or is about to stop at a floor are rather low and missed especially when a train passes the station.</p>   | <ul style="list-style-type: none"> <li>• Check the annual elevator certification for compliance with all code and ADA requirements.</li> <li>• Perform a test of the audible levels to confirm compliance with ADA requirements, “For new elevators, the audible signal and verbal annunciator shall be 10 dB minimum above ambient, but shall not exceed 80 dB, measured at the hall call button” Also, “For elevators in facilities constructed or altered before November 29, 2006, 1991 ADAAG applies and the volume of the audible signals is permitted to be no less than 20 decibels with a frequency no higher than 1500 Hz”</li> </ul>   | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |
| <p>32. Clear space and reach ranges at telephones and emergency phones are found to be compliant, however, there is no procedure in place for testing the instruments to ensure direct, equal access. Some of the phones connect directly to the Police/911/Sheriff while others connect to the Security Control Center at Riverside Downtown Station.</p> | <ul style="list-style-type: none"> <li>• RCTC should ensure that all instruments maintained by RCTC are regularly tested to determine whether TTY equipment functions properly and ensure that responding personnel have been adequately trained to handle TTY calls correctly. An internal testing program should be implemented.</li> <li>• RCTC should: <ol style="list-style-type: none"> <li>1. Prepare a written description of equipment used for emergency communications and how that equipment handles TTY calls;</li> <li>2. Prepare policies or procedures regarding how the emergency communications services handle silent, open line calls;</li> <li>3. Prepare materials used in training emergency communications call takers about TTYs and the handling of TTY calls and information about the frequency of such training. Both primary and secondary public safety answering points have the same responsibilities under the ADA.</li> <li>4. Prepare a policy regarding maintenance and back-up of TTY equipment and the policy regarding maintenance and back-up of equipment for handling standard voice telephone calls;</li> </ol> </li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |          |

| Issues       | Nonstructural Solutions  | Target Date | Comments |
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| 32 continued | <p>5. Prepare a policy regarding testing of TTY equipment and the handling of TTY calls and, policy regarding testing of standard voice call-taking equipment and the handling of standard voice calls; TTY equipment must be maintained and tested as often as voice equipment to ensure that it is working properly</p> <p>6. Review and record the results of unannounced test calls made to emergency communications services telephone number with a TTY;</p> <p>7. Record statistics for response time to standard voice calls as compared to TTY calls received by the service (if one cannot identify which emergency calls were TTY calls, use the response time for unannounced TTY test calls);</p> <p>Include, at a minimum, the date and time of each test call; the identification of the call taker and the call-taking position; whether each call was silent or transmitted tones; whether the caller received a TTY response and the content of the TTY response</p> <ul style="list-style-type: none"> <li>• RCTC should meet with hearing impaired people to find out their experiences in contacting 9-1-1 and emergency communications services</li> <li>• RCTC should train their call takers to effectively recognize and process TTY calls. Training should be mandatory for all personnel who may have contact with individuals from the public who have hearing or speech disabilities. RCTC should offer a refresher training as often as they require, but at a minimum, once every six months.</li> <li>• Stay informed about emerging communication technologies as well as the technical abilities of telecommunications equipment and service providers.</li> <li>• Utilize information in the link below to determine if emergency communications service is providing effective communication as required by Title II of the ADA at this link, <a href="https://www.ada.gov/pcatoolkit/chap4chklist.htm">https://www.ada.gov/pcatoolkit/chap4chklist.htm</a></li> </ul> |             |          |

| Issues  | Nonstructural Solutions   | Target Date  | Comments   |
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| <p>33. Drinking fountains in some stations did not appear to have adequate water flow.</p>  | <ul style="list-style-type: none"> <li>• Test and adjust waterflow to comply with these ADA Water Flow requirements, “The spout shall provide a flow of water 4 inches (100 mm) high minimum and shall be located 5 inches (125 mm) maximum from the front of the unit. The angle of the water stream shall be measured horizontally relative to the front face of the unit. Where spouts are located less than 3 inches (75 mm) of the front of the unit, the angle of the water stream shall be 30 degrees maximum.</li> <li>• Where spouts are located between 3 inches (75 mm) and 5 inches (125 mm) maximum from the front of the unit, the angle of the water stream shall be 15 degrees maximum.”</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |  |
| <p>34. Security staff booths are not accessible. The guard booth is provided as a shelter against weather and for use during breaks by security staff who are expected to walk around the station site and physically address emergency situations.</p> | <ul style="list-style-type: none"> <li>• Inform all contractors of their ADA obligations and require assurances from contractors of their fulfillment of Title II requirements, including providing reasonable accommodation to the known disability of a qualified employee.</li> </ul>  | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>In order to be protected by the ADA, an individual with a disability must be able to perform the essential functions of the job, with or without a reasonable accommodation. Employer is required to make an accommodation to the known disability of a qualified employee.</p> |

| Issues   | Nonstructural Solutions   | Target Date   | Comments |
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| 35. Trash dumpsters in some older stations are not accessible.   | <ul style="list-style-type: none"> <li>RCTC needs to make reasonable accommodations to provide access to employee work areas for known disabilities of a qualified employee.</li> <li>Inform all contractors of their ADA obligations and require assurances from contractors of their fulfillment of Title II requirements, including providing reasonable accommodation to the known disability of a qualified employee.</li> </ul> | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan |          |
| 36. Room Identification signs are not provided at ADA compliant staff toilets in stations. Identification signs are removed to deter misuse.     | <ul style="list-style-type: none"> <li>Since general public may be allowed to use the staff toilets in stations, upon requesting the security staff, RCTC should have a written policy of providing guidance/ assistance to users with disabilities if they make a request to use the ADA compliant staff toilets.</li> </ul>   | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan |          |
| 37. Within RCTC staff facilities, some accessible doors with closers close too fast and do not comply with 2010 ADA standards for closing speeds | <ul style="list-style-type: none"> <li>Once the doors are adjusted to comply with closing speed requirements per the latest ADA Standards, create and implement a maintenance plan for ongoing routine inspections, and repairs of all components of the accessible route.</li> </ul>   | Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan |          |

| Issues   | Nonstructural Solutions   | Target Date  | Comments   |
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| <p>38. In all RCTC facilities, fire alarms test results were not available at the time of evaluation to verify compliance to ADA standards.</p>  | <ul style="list-style-type: none"> <li>RCTC should have written policies to ensure that maintenance and testing are performed by trained persons to ensure safe and reliable operations of the systems in all facilities, also complying with ADA standards.</li> </ul>                       | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>ADA Standards require that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance.</p> |
| <p>39. In the CSC, Server room and Transponder room were not evaluated due to access being strictly restricted to authorized personnel only.</p> | <ul style="list-style-type: none"> <li>Qualified personnel with authority to access these spaces need to review all restricted rooms for ADA compliance to ensure that that individuals with disabilities can approach, enter, and exit the employee work area as required by ADA.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> |  |

| Issues  | Nonstructural Solutions  | Target Date  | Comments   |
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| <p>40. The unoccupied upper floor in the warehouse portion of the FAM building and the warehouse itself are inaccessible.</p>                             | <ul style="list-style-type: none"> <li>Designate responsible staff to obtain any items stored in the warehouse or on the upper inaccessible floor when a request is made by a person/employee unable to access the warehouse or climb the stairs due to a disability.</li> <li>Secondary means of egress doors passing through the warehouse are currently inaccessible. Until this building is modified to allow approach, entry, and exit of people having disabilities in all employee areas, RCTC should arrange meetings in other accessible RCTC facilities and/or make reasonable accommodations for employees having disabilities. A Personal Assistance Service (PAS) can be provided as a reasonable accommodation to enable an employee to perform the essential functions of a job. See <a href="https://www.transportation.gov/drc/personal-assistance-as-reasonable-accommodation">https://www.transportation.gov/drc/personal-assistance-as-reasonable-accommodation</a></li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>See Attachment 6N and Attachment 8, Transition plan for details</p>       |
| <p>41. In the Toll Utility Buildings, barriers to physical access are identified in Attachments 6O and 6P. These facilities are not fully accessible.</p> | <ul style="list-style-type: none"> <li>Until this building is modified to allow approach, entry, and exit of people having disabilities, RCTC should make reasonable accommodations for any employees using wheelchairs to be able to use the TUB -1 or TUB -2 facilities, to conduct essential functions of their jobs. A Personal Assistance Service (PAS) can be provided as a reasonable accommodation to enable an employee to perform the essential functions of a job. See <a href="https://www.transportation.gov/drc/personal-assistance-as-reasonable-accommodation">https://www.transportation.gov/drc/personal-assistance-as-reasonable-accommodation</a></li> </ul>   | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>See Attachments 6O, 6P, and Attachment 8, Transition plan for details</p> |



| Issues   | Nonstructural Solutions  | Target Date  | Comments   |
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| <p>42. RCA has many public lands where there are unmaintained, unintentional passive recreation trails. The lands are for conservation and the trails are not maintained to be accessible. General public is not invited to view the natural beauty or wild-flower blossoming events, but nor are they prevented from accessing these trails</p> | <ul style="list-style-type: none"> <li>• RCTC/RCA should continue working with individuals who use wheelchairs to provide access to specific wilderness areas, and to provide reasonable accommodation by using a county vehicle to provide access to areas that are reasonably accessible by vehicle, upon request at least 72 hours prior to the visit.</li> <li>• Take action to prevent general public access to the conservation lands and trails.</li> </ul> | <p>Within 0-2 years from adoption of the ADA Self-Evaluation and Transition Plan</p> | <p>If action is not taken to prevent access to the trails, RCTC does have obligation to provide access to people with disabilities also.</p> |