

# City of Memphis

## City of Memphis ADA Transition Plan

2025



The [Americans with Disabilities Act \(ADA\)\(External link\)](#) of 1990 is a comprehensive piece of legislation that both prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of American life. The City of Memphis develops its buildings and infrastructure to meet these standards and where possible, updates facilities to meet these standards.

To better assess these needs, the City is developing an ADA Transition Plan as defined in Title II of the American with Disabilities Act, that focuses on identifying gaps and barriers in public Right-of-Ways (curb ramps, crosswalks, and sidewalks), parks (paths, restrooms, picnic areas), and City buildings (doorways, hardware, and walkways). This plan will also define priorities for investments that remove barriers and will guide planning and implementation of necessary accessibility improvements.

The City of Memphis' ADA Transition Plan is a dynamic, living document designed to evolve as we continue to assess and improve accessibility throughout the city. Updates are entered into the BlueDAG software platform, ensuring the plan remains current and reflective of ongoing progress.

The transition plan is updated regularly to capture new information, track completed actions and incorporate changes based on community needs and compliance requirements. It can be printed upon request at any time, in any accessible format, providing the most up-to-date values, statistics and initiatives as recorded in the database.

This living document underscores our commitment to accessibility, transparency and continuous improvement in alignment with the principles of the Americans with Disabilities Act.

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## **1.0 Executive Summary**

### **1.1 Commitment to accessibility and goals**

City of Memphis places a strong emphasis on nurturing an inclusive and diverse community that embraces individuals from all walks of life. This commitment is deeply rooted in a longstanding history of initiatives aimed at ensuring that our services, programs, and activities are easily accessible to individuals with disabilities, with a focus on providing facilities and programs that cater to their needs.

### **1.2 Building on Prior Works**

City of Memphis took significant steps towards ADA compliance by formulating an ADA Transition Plan years ago. That ADA Transition Plan involved the assessment of hundreds of its buildings with public access and the establishment of a policy regarding curb ramp installation, reflecting a strong commitment to accessibility. Subsequently, the other iterations of the City's ADA Transition Plan expanded upon this commitment, by assessing Parks and Recreation facilities, including recreation centers, tennis courts, golf courses, swimming pools, and other miscellaneous public-serving facilities. The City of Memphis' dedication to inclusivity and accessibility persisted, with ongoing integration of ADA standards for new construction into improvement plans, ensuring continued adherence to accessibility requirements.

### **1.3 A Note on Process**

The Self-Evaluation's purpose is to ensure equal access to City of Memphis' programs, services, and activities in a timely manner, reflecting a commitment shared by its elected officials and staff who prioritize accommodating individuals with disabilities. This Self-Evaluation results from a comprehensive assessment of City of Memphis' PSAs, and select facilities. City of Memphis commits to making reasonable accommodations to PSAs in a fair and equal manner, to prevent discrimination based on disability, while avoiding fundamental alterations to the nature of these services. Furthermore, it pledges not to pass to individuals with disabilities, costs to cover accessibility, reinforcing its steadfast commitment to inclusivity and accessibility. The Self-Evaluation includes the creation of a Transition Plan which serves as a dynamic framework for ongoing enhancements and a roadmap for enhancing accessibility to all city facilities, programs, services, roadways, and sidewalks. The Plan is designed to be a living document, with regular updates and public publication, ensuring that residents are regularly informed of our advancements towards achieving complete ADA compliance.

### **1.4 Physical access issue cost to remediate summary**

The table below provides an overview of the expenses associated with addressing the noted deficiencies identified by City of Memphis in their self-assessments of entity-owned streets and property.

### Consolidated PROW Costing

Name	Estimated Total Remediation Cost	Priority	Method
<i>No data available.</i>			

### Consolidated Facilities Costing

Name	Estimated Total Remediation Cost	Priority	Method
1. Quick Capture	\$38,000.00		
Accessible Routes	\$29,000.00		
Assembly Areas	\$1,500.00		
Parking - Off Street	\$6,000.00		
Toilet and Bathing Rooms	\$6,500.00		

The projected expense for addressing the identified deficiencies is **TBD**, and all figures are presented in current dollar estimates. Adjustments for inflation will be necessary for future calculations. Simultaneously, efforts are underway to secure extra funding, aiming to rectify all documented deficiencies within **TBD**.

## **2.0 Introduction**

### **2.1 Commitment to accessibility and goals**

We the City of Memphis strive to, not only comply with the provisions and regulations defined by the Americans with Disabilities Act (ADA) and amendments; and the Rehabilitation Act and amendments, but to also make every attempt to help ensure that the spirit of these historical benchmark pieces of legislation are adopted into our everyday practices and activities. Therefore, we the City of Memphis are committed to the full and equal opportunity of all its citizens, including individuals with disabilities. We recognize that our community's continued vitality, strength and vibrancy is through the realization of the contribution of all its citizens. With this understanding we the City of Memphis have developed this Transition Plan as a guide to assist us in transitioning from our existing status to full physical accessibility regarding all programs, services and activities we provide to our citizens, especially our citizens with disabilities.

### **2.2 Legal Mandates and Responsibilities**

#### **2.2.1 Legislative Mandate**

The Americans with Disabilities Act of 1990 and amendments provide comprehensive civil rights protections to qualified individuals with disabilities in the areas of employment, public accommodations, State and local government services, and telecommunications. A primary goal of the ADA is to ensure equal participation in public life for all Americans with disabilities. Title II of the Act covers programs, services and activities of public entities, such as the City of Memphis.

Under Title II, a public entity may not deny the benefits of its programs, services, and/or activities to individuals with disabilities by maintaining inaccessible facilities, which house these programs, services and activities. City of Memphis programs, services, and activities, when viewed in their entirety, must be made accessible to and usable by individuals with disabilities, except where to do so would result in a fundamental alteration in the nature of the program; result in undue financial and administrative burdens or threaten or destroy the historic significance of a historic property.

Adopted on July 26, 1990, the ADA is a federal civil rights law that provides protections for persons with disabilities against discrimination by both public and private entities. The ADA extends similar protections provided by Section 504 of the Rehabilitation Act of 1973 (504).

- Section 504 requires entities that receive federal financial assistance to ensure they do not discriminate against persons with disabilities when providing their services, programs and activities.



- The ADA prohibits discrimination on the basis of disability for operations conducted by State and local governments and for facilities owned by private businesses, even if no federal financial assistance is received.
- Title II of the ADA requires State and local governments to ensure their services, programs and activities are accessible to and usable by persons with disabilities.

### 2.2.2 Responsibility

City of Memphis during this process has completed an assessment of everything, including its programs, services, and activities; facilities; and current policies, practice and procedures. The self-evaluation identifies and corrects barriers to access that are inconsistent with its Title II requirements of the ADA. In the assessment City of Memphis has inventoried all facilities with public access, public right-of-way, and parks and recreational facilities within the City of Memphis jurisdiction. City of Memphis has also identified programs and services provided in facilities that are not within the jurisdiction of the City of Memphis. The City of Memphis is currently responsible for the following: approximately 300 Buildings, over 6,800 Pedestrian Right-of-Way miles, 150 Recreational Facilities and hundreds of Programs and Services. This document was designed to help City of Memphis adhere to the above ADA/504 requirements as they are defined by related regulations to develop and implement a Transition Plan.

### 2.2.3 Exceptions

Section §35.130 of Title II requires that each program, service or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. The regulation makes clear, however, that a public entity is not required to make each of its existing facilities accessible (§35.150(a) (1)). Unlike Title III of the ADA, which requires public accommodations to remove architectural Findings where such removal is "readily achievable," or to provide goods and services through alternative methods, where those methods are "readily achievable," Title II requires a public entity to make its programs accessible in all cases, except where to do so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burdens. The US Congress intended the "undue burden" standard in Title II to be significantly higher than the "readily achievable" standard in Title III. Thus, although Title II may not require removal of Findings in some cases where removal would be required under Title III, the program access requirement of Title II should enable individuals with disabilities to participate in and benefit from programs, services or activities in all but the most unusual cases.

In a broad context, the ADA does not require City of Memphis to undertake any action—whether related to employment, public accommodation, or the provision of its services, programs, and benefits—if it can demonstrate that such action would fundamentally alter the nature of its programs or activities, create a hazardous condition, or create an undue financial and administrative burden. The assessment of whether an undue burden would ensue must rely on a comprehensive evaluation of all resources at the

disposal of City of Memphis. Moreover, if the elimination of a specific barrier is deemed excessively burdensome, City of Memphis is obligated to explore alternative measures that would grant persons with disabilities access to benefits, services, or programs without incurring an undue burden. The final decision regarding undue burden determination is ultimately made by [Title and name of Person].

### **2.3 Desired Outcomes**

The objectives of conducting a Self Evaluation include providing a comprehensive overview of City of Memphis's historical efforts towards accessibility, assessing its current accessibility status, and developing a long term plan to remediate barriers in a timely and attainable manner. City of Memphis seeks to increase awareness within its organization about the importance of accessibility through stakeholder inclusivity, policy updates, and the promotion of diversity and inclusion in each of its programs and service offerings.

## **3.0 Primary ADA Contacts**

### **3.1 ADA Coordinator(s)**

#### **3.1.1 ADA Coordinator Information**

De Keishia Tunstall,

Title II ADA COORDINATOR

3720 Knight Arnold Road

Memphis, Tennessee 38118

Phone: 901-636-4828

Email: [dekeishia.tunstall@memphistn.gov](mailto:dekeishia.tunstall@memphistn.gov)

#### **3.1.2 ADA Coordinator Responsibilities**

The ADA Coordinator holds a central role in ensuring adherence to the Americans with Disabilities Act (ADA). Responsibilities encompass overseeing ADA policy implementation, conducting accessibility assessments, and providing education for employees. Serving as City of Memphis's point of contact for individuals with disabilities, the coordinator addresses concerns, develops inclusive policies, and ensures physical and communication accessibility. Collaboration with departments is vital to integrate ADA requirements seamlessly, while monitoring changes in regulations is crucial for sustained compliance. Additionally, the ADA Coordinator manages documentation, handles conflict resolution, and contributes significantly to fostering an inclusive environment that grants equal access to programs, services, and employment opportunities for individuals with disabilities.

### **3.2 Transition Plan Coordinator(s)**

#### **3.2.1 Transition Plan Coordinator Information**

De Keishia Tunstall,

Title II ADA COORDINATOR

3720 Knight Arnold Road

Memphis, Tennessee 38118

Phone: 901-636-4828

Email: [dekeishia.tunstall@memphistn.gov](mailto:dekeishia.tunstall@memphistn.gov)

### **3.2.2 Transition Plan Coordinator Responsibilities**

The City of Memphis Transition Plan Coordinator has the responsibility and authorization to fully implement Barrier removal as defined by the finalized Transition Plan. The Transition Plan Coordinator will utilize existing City of Memphis departments, offices and related construction programs to implement capital improvements and maintenance programs for Barrier removal.

## **3.3 Grievance Manager(s) & Other Liaisons**

### **3.3.1 Grievance Manager information**

De Keishia Tunstall,

Title II ADA COORDINATOR

3720 Knight Arnold Road

Memphis, Tennessee 38118

Phone: 901-636-4828

Email: [dekeishia.tunstall@memphistn.gov](mailto:dekeishia.tunstall@memphistn.gov)

### **3.3.2 Grievance Manager Responsibilities**

To ensure the implementation of the Grievance process, City of Memphis has designated the ADA/504 Coordinator, to coordinate efforts laid out by the Transition Plan.

### **3.3.3 Other Roles and Liaisons**

City of Memphis has a Liaison Committee composed of representatives from each department. The ADA Coordinator will work along with these individuals to resolve accessibility issues with programs and services under each department's purview. The ADA Coordinator also works with the Committee to coordinate implementing plans, procedures, and policies around City of Memphis' accessibility compliance goals.

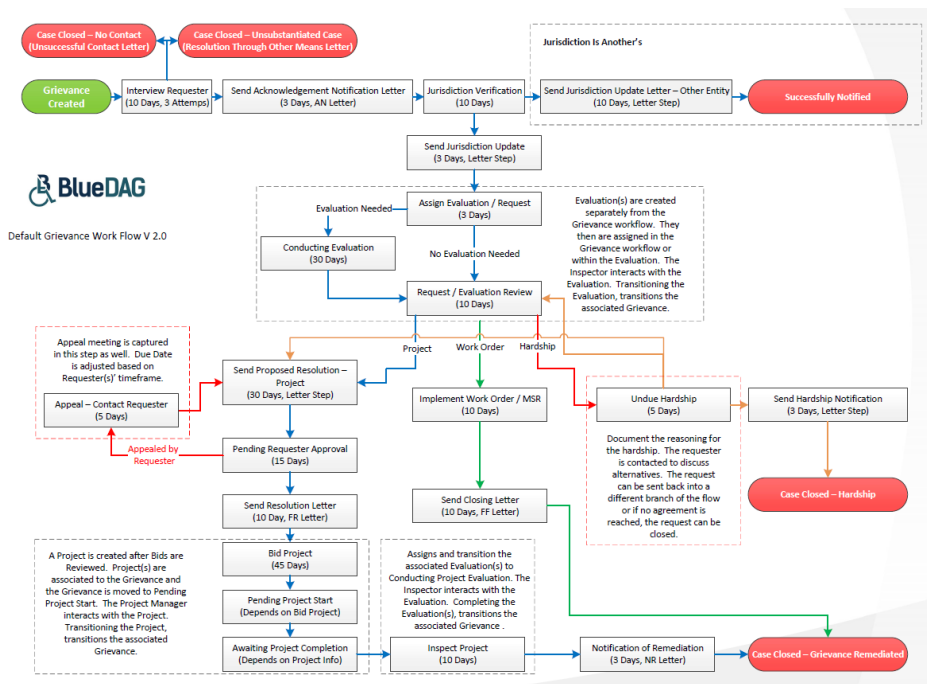
# 4.0 Grievances

## 4.1 Introduction

City of Memphis has established an ADA grievance procedure set forth below and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been subjected to discrimination disability in any of the entity's programs, services or activities may file a complaint with the City of Memphis ADA Coordinator.

## 4.2 Grievances

### 4.2.1 Grievance Procedure



### 4.2.2 Grievance Goals

The key objective for City of Memphis when handling grievances is to facilitate a prompt resolution to a grievance related to accessibility, guaranteeing fair and equitable treatment for individuals with disabilities. Transparency is crucial, and the grievance process must be communicated clearly to all stakeholders, educating them on how to submit grievances and the subsequent resolution steps. The process aims to not only address immediate concerns but also to prevent recurrence by identifying patterns and implementing preventive measures. Through continuous improvement based on feedback received, City of Memphis endeavors to enhance accessibility policies, procedures, and services. By prioritizing the resolution of grievances, City of Memphis seeks to demonstrate a commitment to addressing accessibility issues, and ultimately

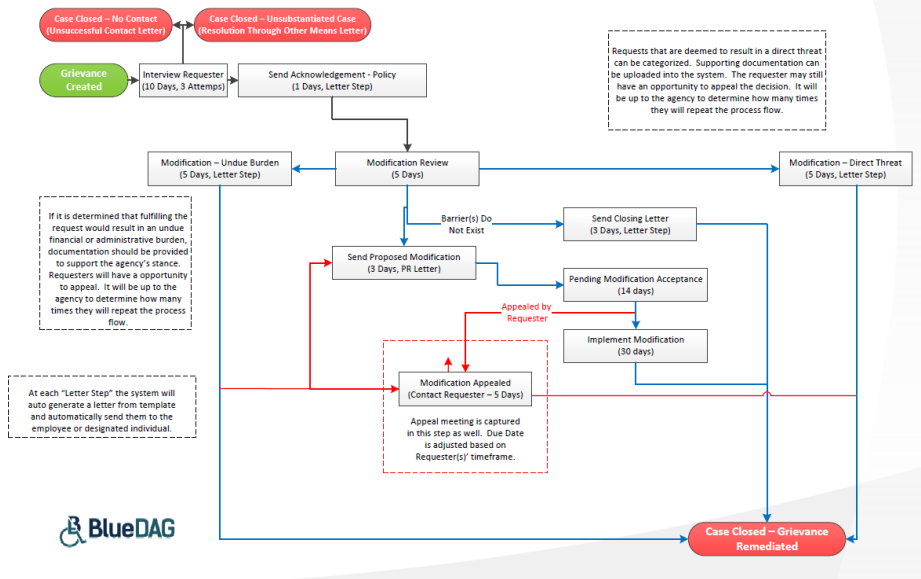
contribute to the satisfaction of individuals with disabilities. The overarching aim is to foster an inclusive organizational culture, ensuring that City of Memphis actively listens to and addresses the concerns of all stakeholders.

### 4.3 Reasonable Modifications

#### 4.3.1 Reasonable Modifications Procedures

City of Memphis has implemented a procedure for reasonable modifications, detailed below, and is dedicated to promptly and reasonably assessing and implementing modifications when warranted. Individuals who believe they require reasonable modifications to participate in any of City of Memphis's programs, services, or activities are encouraged to submit a request to the City of Memphis ADA Coordinator.

#### Programs, Services, and Activities Modification Workflow V 1.0



#### 4.3.2 Reasonable Modifications Goals

City of Memphis endeavors to enhance the accessibility of its programs and services through the implementation of a reasonable modification process, guided by several key goals. Foremost is the commitment to inclusivity, aspiring to create an environment where individuals with disabilities can equally participate in all offerings. City of Memphis seeks to provide tailored modifications to accommodate diverse needs. Prompt response to requests for reasonable modifications is a priority, underscoring the dedication to addressing the specific needs of individuals with disabilities in a timely fashion. Clear and transparent communication is maintained to ensure that stakeholders understand the process for requesting accommodations and the steps involved. City of Memphis aims to prevent discrimination by actively identifying and removing barriers

that might impede the full participation of individuals with disabilities in programs and services. Documentation and tracking of modification requests contribute to accountability and transparency.

## **5.0 Self Evaluations of Programs, Services & Activities**

### **5.1 Introduction**

#### **5.1.1 Accessibility and PSAs**

There are two kinds of accessibility: Program accessibility and Physical accessibility. Absence of discrimination requires that both types of accessibility be provided. Physical accessibility requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility. Program accessibility may include physical accessibility, but also entails all of the policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility may be achieved by either structural or on-structural modification methods.

#### **5.1.2 Methodology**

To comprehensively assess all programs and services provided by City of Memphis, each department head was tasked with presenting a full list of public programs, services, and activities under their purview. A standardized PSA (Program, Service, Activity) checklist, formulated based on the General Requirements outlined in 28 CFR 35.130-35.135, was employed to evaluate each program. Subsequent to the evaluation of PSAs, corrective recommendations were derived and implemented to remove barriers to access for the PSA.

#### **5.1.3 Programs, Services, Activities**

City of Memphis offers PSA's to its stakeholders through its many departments.

#### **5.1.4 Summarized Results**

City of Memphis regularly reviews PSA's it offers to the public. The following are summarized results of the barriers to access found in the assessments and resolutions implemented to bring the PSA offering into compliance:

## **5.2**

### **Policies**

#### **5.2.1 Introduction**



Policies may unintentionally create barriers to access. Policies provide guidance for decision-making at all levels of the organization. Ensuring these policies are inclusive helps guide decisions that impact individuals with disabilities, promoting fairness and equitable treatment. The review process aids in identifying and addressing these barriers, averting widespread issues that could impact a range of activities and services.

#### 5.2.2 List of policies reviewed

City of Memphis reviewed its policies for accessibility. These policies cover a wide range of Entity policies towards website design, design standards for public right of ways, building codes, voting centers, communication, and land leases. A list of all policies reviewed is below:

**TBD**

#### 5.2.3 Summarized Results and Conclusions

The following are the summarized results of the self-evaluation findings and corrective actions taken to bring the policies into compliance:

**TBD**

### **5.3 Recommendations**

#### 5.3.1 Recommended actions

To comply with requirements of the plan, the City of Memphis must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

1. Relocation of programs to accessible facilities;
2. Modifications to existing programs so they are offered in an accessible manner;
3. Structural methods such as altering an existing facility;
4. Policy modifications to ensure nondiscrimination; and
5. Auxiliary aids provided to produce effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

#### 5.3.2 Staff training

City of Memphis provided staff training on the topic of the Americans with Disabilities Act (ADA) Regulations and disability awareness.

The intent of the training was to receive information on implementing the 2010 ADA Standards for Accessibility, understand when the new rules apply, how they differ from existing codes and if they are more stringent than the State or Building Codes. Which standard or code must be complied with and how they can be incorporated into your master planning to create a framework to meet ADA compliance consistently.

Overview of the access criteria and requirements mandated for state and local government staff interacting with the public. Best practices for sensitive and respectful interactions are explained. Communication topics include correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concluded with a brief overview of maintaining accessibility for people with disabilities.

### 5.3.3 Community input and feedback process

The City of Memphis hosted in person and online meetings with individuals from the public to provide a summary of the self-evaluation process and to receive feedback on any accessibility concerns.

The City of Memphis also solicited feedback through their website from any interested groups regarding accessibility and disability advocacy.

**TBD**

## 6.0 Self Evaluations of Facilities

### 6.1 Introduction

#### 6.1.1 Facilities Introduction

The City of Memphis recognizes that it must examine each program, service or activity to determine whether any physical barriers to access exist. It should identify steps that need to be taken to enable these programs to be made accessible when viewed in their entirety. The City of Memphis also understands that if a program Self-Evaluation determines that physical changes to existing facilities are necessary, those changes must be included in the transition plan.

As part of the City of Memphis Self Evaluation process, it has been determined that the following public buildings, facilities and pedestrian structures and features are required to be field surveyed to determine barriers to City of Memphis programs, services and activities. "Public Facility" is defined here as any building or other facility owned or governed by City of Memphis, that is open to the public or houses City departments or private businesses that meet with or conduct business with the public from that location. This includes parks, trails and sports fields.

#### 6.1.2 Methodology

Field surveying will begin on or about **TBD**. Each surveyor will undergo mandatory training on equipment to be used, data collection methods, procedures, and ADA principles, including class and in-field instruction, and detailed training on the field survey web-based tool. Surveyors will follow the procedures outlined in the ADA Standards for Accessible Design and applicable City of Memphis Building Codes. Field surveyor activities will be spot checked by a City of Memphis selected expert who will ensure the quality of field assessments and data collection.

Completed data will be auto downloaded, in real time, into our accessibility management platform, BlueDAG, as each assessment activity is completed. The database program will consolidate all collected data into tables. The tables will be sortable by data types, locations, structural feature types, and by priority. BlueDAG will auto populate the date into individualized inspection reports pertaining to buildings, parks, parking lots, etc. Overall data from the individualized reports will auto populate into the City of Memphis Transition Plan, which will eventually be displayed as part of this document. Data from the field surveys will be cloud-base and stored by BlueDAG to ensure data protection. In addition to inspection data, an inventory of all public buildings with public access and that are either owned or governed by City of Memphis, will be created and maintained in the system.

Field surveyors will use the BlueDAG mobile application tool to collect information during field surveys. Information collection will include all features within buildings and

other facilities. Some of the type of information will include, but is not limited to the following:

- Measurements of all facility features of all buildings will include, but are not limited to:
  - Parking slopes, signage, markings, and location.
  - Exterior and interior accessible route slopes, changes in level, protrusions, width, and surface requirements.
  - Exterior entrances maneuvering clearances, signage, operable force, and hardware.
  - Restroom signage, clearances, fixture and dispenser locations, fixture and dispenser operable parts, compartment clearances, and other elements.
  - Interior elements such as, lobby counters, tables, interior doors, and signage.
- Other Facilities (Parks, Trails, and Sports Facilities):
  - Exterior accessible route slopes, changes in level, protrusions, width, and surface requirements.
  - Required number of playground/play structure equipment.
  - Trailhead signage, surface requirements, and other elements.
  - Review of assembly seating for sport facilities and other elements.

The City of Memphis will provide assignments to field surveyors based on buildings, parks, trails, and sports facility addresses/location. As field surveyors collect data, utilizing the BlueDAG mobile application, the application will auto generate longitude and latitude coordinates for each assignment and plot assignments onto the master database for ease of the ADA Coordinator to examine.

## 6.2 Facilities

City of Memphis has owns and manages **approximately 300 facilities and over 160 public access parks.**

**Below is a list of City-Owned Properties.**

Full Address	Zip Code
2870 ROCKCREEK PKWY	38016
8395 DEXTER	38016
595 N. SANGA	38018
8457 TRINITY	38018

1 AUCTION AVENUE	38103
1 AUCTION ST.	38103
107 WASHINGTON	38103
110 PEABODY PLACE	38103
114 N. MAIN	38103
118 ADAMS	38103
125 N. MAIN ST. / MID AMERICA MALL	38103
125 NORTH MAIN ST	38103
126 BEALE ST	38103
128 ADAMS	38103
138 BEALE ST	38103
140 BEALE ST	38103
143 BEALE ST	38103
144 BEALE ST	38103
1460 N SECOND	38103
149 BEALE ST	38103
152 BEALE ST	38103
153 BEALE ST	38103
154 BEALE ST	38103
155 N FRONT ST	38103
156 BEALE ST	38103
159 BEALE ST	38103
162 BEALE ST	38103

166 BEALE ST (166-168)	38103
167 BEALE ST	38103
171 MONROE AVE	38103
172 BEALE ST	38103
174 BEALE ST	38103
182 BEALE ST	38103
183 BEALE ST	38103
197 BEALE ST	38103
198 ADAMS	38103
200 BEALE ST (200A)	38103
200 S SECOND ST	38103
201 POPLAR	38103
203 BEALE ST	38103
203 BEALE ST (Suite 200)	38103
205 BEALE ST	38103
209 BEALE ST	38103
220 BEALE ST (220B)	38103
245 WASHINGTON	38103
247 WASHINGTON	38103
255 NORTH MAIN ST	38103
280 MUD ISLAND	38103
310 BEALE ST	38103
314 AUCTION	38103

315 BEALE ST	38103
323 BEALE ST	38103
326 BEALE ST	38103
329 BEALE ST	38103
33 SOUTH FRONT STREET	38103
330 BEALE ST	38103
333 BEALE ST	38103
340 BEALE ST	38103
341 BEALE ST (341-349)	38103
345 BEALE ST	38103
35 MONROE AVE	38103
354 ADAMS	38103
392 ADAMS	38103
474 SOUTH MAIN	38103
480 BEALE ST	38103
555 BEALE STREET	38103
65 SOUTH FRONT	38103
85 N FRONT ST	38103
1017 JEFFERSON	38104
1049 SLEDGE	38104
1075 CENTRAL	38104
1826 UNION	38104
1924 POPLAR	38104

1925 UNION	38104
1934 POPLAR	38104
2080 POPLAR AVENUE	38104
2375 S TIGER LN	38104
2411 MISSISSIPPI	38104
315 S. HOLLYWOOD	38104
325 S. HOLLYWOOD	38104
335 S. HOLLYWOOD	38104
712 TANGLEWOOD	38104
949 E H CRUMP	38104
996 EARLY MAXWELL BLVD	38104
1085 POPLAR	38105
1188 N PARKWAY	38105
1363 E. PERSON	38105
190 MILL	38105
211 JACKSON AVE	38105
389 WASHINGTON & HIGH	38105
425 MANASSAS	38105
435 MANASSAS	38105
590 WASHINGTON	38105
600 JEFFERSON	38105
619 ST. JUDE PLACE	38105
652 ADAMS	38105



664 ADAMS	38105
664 ST JUDE PLACE	38105
671 ST. JUDE PLACE	38105
680 ADAMS	38105
1005 ALICE	38106
1040 S THIRD	38106
1048 S THIRD	38106
1239 ORGILL	38106
1620 MARJORIE STREET	38106
2034 S LAUDERDALE	38106
3950 WEAVER	38106
973 ALICE	38106
980 E. MCLEMORE	38106
980 SOUTH THIRD	38106
1141 NORTH SECOND	38107
1192 VOLLINTINE	38107
1225 VOLLINTINE	38107
1235 BROWN	38107
1418 KNEY	38107
1500 N BELLEVUE	38107
1513 N BELLEVUE	38107
1514 N BELLEVUE	38107
1519 LEVEE RD	38107

1522 N. BELLEVUE	38107
1530 N. BELLEVUE	38107
233 HENRY	38107
35 SAFFARANS	38107
509 PEAR ST.	38107
619 N 7TH ST	38107
688 N. BREEDLOVE	38107
701 N MAIN STREET	38107
915 CHELSEA	38107
924 THOMAS	38107
1510 CHELSEA AVE	38108
1530 N. HOLLYWOOD	38108
1560 N. HOLLYWOOD	38108
1616 ASH	38108
1894 TROY	38108
1974 HUNTER	38108
2248 CHELSEA	38108
2669 PERES	38108
3140 HEARD	38108
8505 TRINITY	38108
148 SOUTH PARKWAY W	38109
163 W RAINES RD	38109
1891 KANSAS	38109

1929 S THIRD STREET	38109
2041 WEST SHELBY DRIVE	38109
2389 HENNINGTON	38109
2561 HIGHWAY 61 SOUTH	38109
2685 STEAMPLANT ROAD SOUTH	38109
3095 BUOY	38109
3215 S THIRD (HWY 61)	38109
3676 HWY 61 SOUTH	38109
4364 HORN LAKE ROAD	38109
4376 HORN LAKE	38109
465 S. PARKWAY W.	38109
4715 HORN LAKE	38109
4950 TULANE	38109
5185 S. THIRD (HWY 61)	38109
602 W. MITCHELL	38109
750 HOLMES	38109
810 WESTERN PARK	38109
1150 GETWELL	38111
3030 POPLAR	38111
3050 CENTRAL AVENUE	38111
3300 SHARPE	38111
3371 SPOTTSWOOD	38111
3426 SOUTHERN AVE	38111













281 E. PARKWAY N.	38112
283 SCOTT ST.	38112
298 S. DUNLAP	38112
304 COLLINS	38112
309 SCOTT ST.	38112
317 TILLMAN	38112
333 EAST PARKWAY N	38112
426 TILLMAN	38112
4668 AVERY	38112
51 S. FLICKER	38112
79 S. FLICKER	38112
1670 CHANNEL	38113
2147 ELVIS PRESLEY	38113
2587 CARNES	38114
1141 S BARKSDALE	38114
1720 RKS COMMERCIAL COVE	38114
2129 TROYER	38114
2130 WABASH	38114
2201 LAMAR AVE (2201A)	38114
2201 LAMAR AVE (2201B)	38114
2201 LAMAR AVE (2201C)	38114
2201 LAMAR AVE (2201D)	38114
2203 LAMAR AVE	38114

2471 PARK AVENUE	38114
2572 PARK	38114
2590 PARK	38114
2689 LAMAR AVE	38114
2698 LAROSE	38114
2788 LAMAR AVE	38114
2960 LAMAR AVE	38114
2590 MT MORIAH	38115
2602 MT MORIAH	38115
3064 CLARKE ROAD	38115
3305 S. MENDENHALL	38115
3840 RIDGEWAY RD	38115
3910 RIDGEWAY RD.	38115
6675 WINCHESTER	38115
1025 E RAINES RD	38116
1253 E. HOLMES	38116
1500 FINLEY	38116
2231 E. SHELBY DR.	38116
2555 WINCHESTER	38116
3242 FONTAINE	38116
4120 MILLBRANCH RD	38116
4318 GRACELAND	38116
791 EAST RAINES	38116

819 EAST RAINES	38116
4145 SOUTHERN	38117
4160 PARK AVENUE	38117
4735 WILLOW	38117
4791 WILLOW	38117
4843 WILLOW ROAD	38117
4845 WILLOW ROAD	38117
5094 POPLAR	38117
550 S. MENDENHALL	38117
750 CHERRY	38117
2785 RUDDER RD	38118
3197 FARRISVIEW	38118
3203 FARRISVIEW	38118
3207 FARRISVIEW	38118
3211 FARRISVIEW	38118
3909 KNIGHT ARNOLD	38118
4255 E. RAINES	38118
4655 KNIGHT ARNOLD	38118
4930 PLEASANT HILL RD	38118
4955 COTTONWOOD	38118
1355 ESTATE	38119
1645 RIDGEWAY	38119
2161 RIDGEWAY ROAD	38119

5992 QUINCE	38119
220 N. HUMPHREYS BLVD	38120
3468 JACKSON	38122
3752 GIVEN	38122
4221 MACON RD	38122
4221 MACON RD	38122
4472 POWELL	38122
611 NATIONAL	38122
855 N. WHITE STATION	38122
4602 RIVERDALE	38125
7200 EAST SHELBY DRIVE	38125
1109 MISSISSIPPI	38126
200 LINDEN	38126
3345 MILLINGTON	38126
531 VANCE AVE	38126
625 MISSISSIPPI BLVD	38126
2240 TRUITT	38127
2303 NORTH SECOND	38127
2401 N. SECOND ST.	38127
2401 N. SECOND ST.	38127
2530 WHITNEY	38127
2555 ST. ELMO	38127
2893 N WATKINS	38127

2907 N WATKINS	38127
2907 N WATKINS	38127
3448 RANGE HILLS	38127
3712 ARGONNE	38127
4258 OVERTON CROSSING	38127
4341 O K ROBERTSON RD	38127
4349 O K ROBERTSON RD	38127
4371 O K ROBERTSON RD	38127
4380 RANGE LINE ROAD	38127
4381 O K ROBERTSON RD	38127
4399 O K ROBERTSON RD	38127
4517 O K ROBERTSON RD	38127
465 KLINKE ROAD	38127
475 KLINKE RD	38127
3157 POWERS RD	38128
3423 SCENIC HIGHWAY	38128
3510 COLEMAN ROAD	38128
3600 OLD ALLEN RD	38128
3633 OLD ALLEN RD	38128
3678 POWERS	38128
3773 OLD ALLEN RD	38128
3985 EGYPT CENTRAL	38128
4351 NEW ALLEN ROAD	38128

4475 RALEIGH LAGRANGE	38128
4517 RALEIGH-LAGRANGE	38128
4575 RALEIGH-LAGRANGE	38128
4585 RALEIGH LAGRANGE	38128
4985 RALEIGH-LAGRANGE	38128
2350 APPLING CITY COVE	38133
2355 APPLING CITY COVE	38133
2801 APPLING CENTER	38133
6850 APPLING FARMS RD	38133
7495 REESE ROAD	38133
5125 ELMORE ROAD	38134
5884 STAGE ROAD	38134
5921 SHELBY OAKS	38134
4225 RIVERDALE	38141
5881 E. RAINES	38141

## 7.0 Self Evaluations of Public Right of Way

### 7.1 Introduction

#### 7.1.1 PROW Introduction

City of Memphis recognizes the importance of ensuring accessibility within the public right of way to facilitate equal participation in all programs, services, and activities. The City of Memphis undertook a comprehensive self-evaluation examination of public rights of way, including sidewalks, curb ramps, crosswalks, pedestrian signals, and other features situated within the public domain. City of Memphis is committed to implementing proactive design and express remediation of identified access barriers in order to create a fully accessible environment, thereby fostering an inclusive community experience.

#### 7.1.2 Methodology

Field surveying will begin on or about **TBD**. Each surveyor will undergo mandatory training on equipment to be used, data collection methods, procedures, and ADA principles, including class and in-field instruction, and detailed training on the field survey web-based tool. Surveyors will follow the procedures outlined in the ADA Standards for Accessible Design and applicable City of Memphis Building Codes. Field surveyor activities will be spot checked by a City of Memphis selected expert who will ensure the quality of field assessments and data collection.

Completed data will be auto downloaded, in real time, into our accessibility management platform, BlueDAG, as each assessment activity is completed. The database program will consolidate all collected data into tables. The tables will be sortable by data types, locations, structural feature types, and by priority. BlueDAG will auto populate the date into individualized inspection reports pertaining to public right of way assets. Overall data from the individualized reports will auto populate into the City of Memphis Transition Plan, which will eventually be displayed as part of this document. Data from the field surveys will be cloud-base and stored by BlueDAG to ensure data protection. In addition to inspection data, an inventory of all public buildings with public access and that are either owned or governed by City of Memphis, will be created and maintained in the system.

Field surveyors will use the BlueDAG mobile application tool to collect information during field surveys. Information collection will include all features within the public rights-of-way. Some of the type of information will include, but is not limited to the following:

- Public Rights-of-Way
  - Inventorying if curb ramps are present at the corners of intersections.

- Documenting excessive slope and grade of the pedestrian access route, including sidewalks, driveways, curb ramps, and crosswalks.
- Identifying presence and the cause of abrupt changes in sidewalk.
- Identifying protruding objects that obstruct the pedestrian access route including utility boxes, signs, vegetation, street furniture, and other elements.
- Evaluation of transit stops, including, light rail, bus and other.

## 7.2 PROW feature type summary and counts

The City of Memphis has over 6,800 miles of public streets and 20,000 intersections to maintain and upgrade. It has been a priority for the City of Memphis to improve accessibility for pedestrians and the disabled through the expansion of an accessible sidewalk network. The City of Memphis has implemented several programs and policies, and developed funding mechanisms to address the tremendous system needs for accessibility, including:

- Ensuring all new transportation capital projects include pedestrian access and meet the current ADA design standards, as amended and the state building code;
- Completing annual updates of the Transportation Street Standards to address changes and clarifications on ADA design from the federal Access Board and to better incorporate pedestrian facilities;
- Providing funding in all pavement management overlay projects for building missing, or repairing existing ADA curb ramps and sidewalks;
- Requiring that all new developments and site expansions or improvements include ADA facilities and accessible features;
- Creating an on-going funding source for completing projects identified in the system inventory; and to address specific citizen requests and grievances;
- Engaging in the development of a revised Comprehensive Self Evaluation with policies that strive to meet the requirements of the ADA;
- Continuing to seek a funding program to complete the projects identified in the Capital Facilities Plan; and
- Continuing efforts to fully comply with all aspects of the ADA and Section 504, including the Administrative requirements of;
  - a. Identifying a responsible employee empowered to address and implement ADA and Section 504 compliance activities
  - b. Provide notice to the public
  - c. Develop and utilize a grievance procedure
  - d. Develop and implement a Self Evaluation
  - e. Develop and implement a Transition Plan

Out of the **6,800** miles of roadway in the Title II City of Memphis, field surveys are planned to determine the location of features that are inconsistent with adopted accessibility standards and code. As part of the field surveys, data will be collected



showing whether or not there were any existing curb ramps, and whether or not existing curb ramps met ADA standards, including slope, lip, ramp width, side flare slopes and landing area. Additionally, the field data will be collected to determine inconsistencies at crosswalks, pedestrian traffic signals, and other pedestrian features. This data will allow the Title II City of Memphis to create a list of missing curb ramps and a list identifying what elements of existing curb ramps that do not comply or pose barriers to individuals with disabilities.

According to initial assessments, the Title II City of Memphis will not have the funds to correct all problems discovered during the field surveys immediately. Therefore, the data collected will be prioritized, where the primary focus is given to intersections on arterial roadways without existing curb ramps.

Subsequently, the following criteria are used to help determine which intersections will be completed first:

- Proximity to government facilities
- Streets with higher traffic volumes
- Streets with public transit service
- Streets with pedestrian attractors like schools, parks and shopping
- Proximity to medical facilities
- Improved system connectivity

The Title II City of Memphis does allow exceptions to the criteria if it helps ensure public safety, is more efficient or maximizes the overall benefit and utilizes public funds in the most efficient manner.

## 8.0 Transition Plan

### 8.1 Introduction

#### 8.1.1 Introduction to the Transition Plan

1. In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.
2. If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.
3. The plan shall, at a minimum—
  1. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
  2. Describe in detail the methods that will be used to make the facilities accessible;
  3. Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
  4. Indicate the official responsible for implementation of the plan.
4. If a public entity has already complied with the transition plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous transition plan.

#### 8.1.2 Cost Summary by Barrier Type and Priority

The table below provides an overview of the expenses associated with addressing the noted deficiencies identified by City of Memphis in their self-assessments of entity-owned streets and property.

#### Consolidated PROW Costing

Name	Estimated Total	Priority	Method
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	<b>Remediation Cost</b>		
<i>No data available.</i>			

### Consolidated Facilities Costing

Name	Estimated Total Remediation Cost	Priority	Method
1. Quick Capture	\$38,000.00		
Accessible Routes	\$29,000.00		
Assembly Areas	\$1,500.00		
Parking - Off Street	\$6,000.00		
Toilet and Bathing Rooms	\$6,500.00		

## 8.2 Funding

### 8.2.1 Funding Types

The ADA Transition Plan Implementation Program is envisioned as one that will use, to the maximum extent possible, existing and prospective funding programs and sources. The accessibility improvements and Finding removal will be funded by a variety of funding sources either as stand alone projects or as a minor component of a transportation improvement project. Possible funding programs and sources include the following:

#### **Capital Improvement Funds**

### 8.2.2 Funding schedule

Based on the funding types identified and budgetary funds already appropriated, the below funding schedule towards remediation has been developed. It is noted that funding sources may change, as well as appropriated funds, but to City of Memphis's best estimation, the following funding schedule represents what is expected to be available to complete remediation work.

## Every Fiscal Year starting July 1

### 8.3 Remediation

#### 8.3.1 Barrier Remediation Schedule

The final Rules and Regulations of the ADA describe the requirements for program accessibility (Code of Federal Regulations, Title 28, Part 35, Subpart D). A public entity shall operate each service, program or activity, when viewed in its entirety, so that it is accessible to and usable by individuals with disabilities. The ADA does not require the public entity to make all of its existing facilities accessible, nor does it require a public entity to take any action that would fundamentally alter the nature of a service, program or activity. Also, it does not require implementation of the ADA that would result in undue financial and administrative burdens. In such cases where documentation is provided in keeping with strict procedures outlined in the ADA, there are various methods that may be appropriate for providing program accessibility in lieu of making actual physical changes to facilities.

With these facts in mind, the first step in determining what structural changes to existing facilities are necessary is to develop an understanding of the specific public programs and activities occurring at existing facilities within the City of Memphis. It should be noted that this section is not intended to be a self-evaluation, as described in the ADA. A self-evaluation includes an analysis of all programs and services offered by a public entity. The Self-Evaluation may include communications, publications, employment and many other factors that are separate from proposed structural or physical modifications to facilities.

The first step in determining barrier removal will be to examine Findings in detail to establish how each barrier affects overall program accessibility and whether or not program accessibility can be achieved without removing the barrier or if other means of program accessibility exist. For example, if court rooms exist on the third floor of a building and only steps lead to the court rooms, then the courtroom program is inaccessible. In this situation determinations would need to be made regarding how the public court program can be made accessible. Barrier removal to the public court program could consist of the installation of a standard 2,000 lb passenger elevator; where technical infeasibility exists, such as the requirement for the removal of load bearing walls, then a limited use elevator may be an alternative. Additionally, other alternatives exist, public court proceedings could be provided at another alternate fully accessible location and new public court facilities could be constructed to ensure full accessibility. This represents only one example of a Finding to a public program and some of the alternatives that could be allowed to remove Findings in existing facilities.

Such program access determinations regarding barrier removal in existing facilities should be made prior to the beginning of barrier removal construction projects. It should

be understood that in many and, likely most, situations physical construction will be necessary to ensure program access and barrier removal. However, program access considerations should be determined in order to help ensure the most efficient usage of public funds.

Where barriers require construction activities and programs cannot be made accessible through alternate means, barrier removal methods and transitioning will be guided by the set of strategies below. The web-based BlueDAG program provides detailed information pertaining to each barrier and the associated corrective action needed to make each facility/element accessible where construction is required. These deficiencies are then included in upcoming modifications that may be administered through internal departments/staff or contracted means.

The City of Memphis ADA Coordinator has the responsibility and authorization to fully implement barrier removal as defined by the finalized Transition Plan. The ADA Coordinator will utilize existing City of Memphis departments, offices and related construction programs to implement capital improvements and maintenance programs for barrier removal. The following departments, offices and related construction programs will be utilized by the ADA Coordinator:

1. City of Memphis Engineering Division
2. City of Memphis Finance Division
3. City of Memphis Legal Division

With the full and complete understanding that the main purpose of a Transition Plan is to transition from a state of inaccessibility to that of full accessibility, as defined by the ADA and Section 504; the methods adopted by City of Memphis for barrier removal will ultimately be determined by the ADA Coordinator, feedback from the public, individuals with disabilities, and those organizations that represent individuals with disabilities. The ADA Coordinator, related staff and feedback organizations may deviate from barrier removal methods if doing so would help ensure public safety and maximizes the overall benefit and utilizes public funds.

### 8.3.2 Prioritization

#### Finding Removal Priorities

- Priority 1: Grievances from the public and, specifically individuals with disabilities will be the first priority for Finding removal, regardless of what building or facility the grievance pertains to, so long as, the building or facility is owned, operated or governed by the City of Memphis;
- Priority 2: Physical locations identified to be problem areas via public involvement, consumer surveys, and the Transition Plan comment period will be the second priority for Finding removal;
- Priority 3: The following information will determine Findings to be removed under the 3rd Priority:

- City of Memphis owned or governed Buildings, parks, trails and sports fields determined to have high density public activity, including facilities determined to be frequented by individuals with disabilities.
- Pedestrian facilities within the right of ways along Major roadways (Arterials or thoroughfares with a minimum 80-foot-wide right-of-way) and all pedestrian facilities within these right-of-ways, including but not limited to intersections and sidewalks along these arterials or thoroughfares; and
- Intersections and roadway segments serving Priority Level 3 buildings and facilities including:
  - Public schools, hospitals, health clinics and health centers, including those which serve individuals with disabilities;
  - Public housing, homeless shelters, senior facilities, rehabilitation facilities and various facilities which specifically serve individuals with disabilities, such as group homes;
  - Law enforcement facilities, transportation hubs, public agency service facilities, jails, and prisons
- Priority 4: The following information will determine Findings to be removed under the 4th Priority:
  - Street right of ways with minimum 60-foot-wide right-of-way and other roadways, and all pedestrian facilities within the right-of-way including, but not limited to, intersections and sidewalks along these highways; and
  - Intersection and roadways serving level 2 facilities, including:
    - ADA Title III Public Accommodations, such as, supermarkets, strip retail markets and retail centers;
    - Major employment sites; and
    - Housing complexes and apartments
  - The right-of-way along roadways serving industrial areas, single family residential areas and other right-of-way not listed in higher priorities.
  - Buildings and facilities that are owned, operated or governed by Insert agency name not defined in the 3rd and 4th priorities.

The finalized barrier removal schedule will be based on funding availability. Once funding has been determined, the following barrier removal schedule and activities will provide a guidance mechanism for construction activities:

Detailed descriptions of proposed access improvement projects are included in the BlueDAG Master Database. A table of Capital Improvement Projects will be included and a summary of the projects per year is shown in Table 3 below. The City of Memphis plans to allocate approximately **[TBD]** annually to implement the ADA Transition Plan and remove identified Findings to programs, and also plans to apply for competitive funds to accelerate the transition process.

The access improvement projects will be subdivided by fiscal year as part of a **[TBD]**-year implementation plan. It is estimated that this period would yield a degree of

compliance that could be described as compliance with the Barrier Removal Methods priorities #1, #2 and #3. It is felt that a detailed breakdown of projects past these periods would be inappropriate, since conditions would be subject to numerous changes over such a time span. It is anticipated that overall compliance with all use and Condition Priorities could be achieved in 25 to 30 years.

The locations of work are subject to review and recommendations by the City of Memphis, the ADA Coordinator, any established accessibility committees, and the public. Likewise, it is probable that specific locations and project groupings will need to be adjusted among the various years of the plan, after a more detailed review by the agencies departments, offices and related construction programs. Other breakdowns of proposed work locations and extent will be available, including by types of work or funding sources. It should be noted that the detailed field surveys undertaken form the basis of existing conditions requiring correction under the proposed projects. It should also be noted that the detailed reports include projects that may be part of the ADA Transition Plan work implemented and funded by other jurisdictions or municipalities.

Construction and soft costs given in both the detailed and summary tables of improvement projects should be considered schematic, order of magnitude costs, based upon the unit costs and estimating parameters developed specifically for this ADA Transition Plan. The costs include all incidental soft costs, such as engineering, bidding and permitting costs, utilities and other appurtenances and contingencies.

The detailed table of improvement projects does not necessarily depict the complete and exact locations of all sidewalks, driveway repair or buildings and other facilities work to be undertaken as part of the ADA Transition Plan, since much of this work will be determined by public input requests and will be evaluated in conjunction with intersection work or other construction projects.

Information of the Transition Plan for right-of-way, buildings, or other facility types can be found at the following link: {LINK TO Public BARRIERS}

### 8.3.3 Public Review

**City of Memphis established an internal ADA Liaison Committee (ALC) in 2025 to assist with accessibility decision making involving numerous Divisions, Offices and Departments including, Police Services, Fire Services, Public Works, Animal Services along with other City Divisions. In order to help comply with the public input and involvement provisions of Title II, City of Memphis implemented an external Disability Advisory Committee (DAC) which consists of 13 committee members, including De Keishia Tunstall, ADA Coordinator. The membership of the Memphis Advisory Council for Citizens with Disabilities represents a diverse population from across the community by including individuals with disabilities and those who represent individuals with disabilities. MACCD provides input to City of Memphis ADA/504 policies, practices, procedures, project priorities, and methods of communicating with community advocates.**

City of Memphis seeks extensive public involvement in all ADA-related activities including the development of new and revised notice to the public on the City of Memphis ADA compliance activities to help ensure individuals with disabilities have opportunity to provide feedback and comments, including how and where to provide such notice, methods of the provision of notice, and best practices in the provision of notice.

Citizens were and still are able to take advantage of the following outreach efforts:

- **Advisory Groups:** The ALC and DAC were formed and meet regularly for the purpose of reviewing documents and providing feedback pertaining to the Transition Plan. The advisory group act as a sounding board, where members review and provided feedback on project documents and submittals. In addition, the advisory groups work toward achieving consensus on project issues.
- **Outreach and accommodations available to persons with visual impairments:** The ADA Transition Plan is to be made available to persons who are visually impaired via large print text document and Braille master copy. Persons with visual impairments who have access to software that converts text to audio will be provided the document via email, floppy disks or CDs. Other auxiliary aids and services, specific to the individual's needs, are available upon request, by contacting the ADA Coordinator.
- **Web Site:** The City of Memphis web site is fully accessible and makes the Transition Plan available at [www.memphistn.gov](http://www.memphistn.gov). By using the web site, the public is able to obtain information on the project's purpose, schedule and timeline, pedestrian/disability access consumer survey, archived articles, approved and revised documents and discussion papers, public involvement opportunities and contact information. In addition, the draft and final ADA Transition Plan will be posted on the City of Memphis web site for approximately 3 years after final approval and adoption.
- **Consumer Survey:** A pedestrian and disabled access consumer survey was developed and distributed to identify hotspot locations or physical barriers to public buildings and facilities. This process included distribution to persons with disabilities and those representing disability service organizations.

Requests for copies of the ADA Transition Plan and additional public comments should be directed to the City of Memphis ADA/504 Coordinator, De Keishia Tunstall, 3720 Knight Arnold Road Memphis, TN 38118, Telephone: 901-636-4828, E-mail: [dekeishia.tunstall@memphistn.gov](mailto:dekeishia.tunstall@memphistn.gov), TTY: 711. The ADA Transition Plan is provided in various alternative formats upon written request.



## 9.0 Notice

### 9.1 Public Notice Under the ADA

#### 9.1.1 Notification of our Commitments

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

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

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

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of City of Memphis, should contact the office of [name and contact information for ADA Coordinator] as soon as possible but no later than 48 hours before the scheduled event.

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

Complaints that a program, service, or activity of City of Memphis is not accessible to persons with disabilities should be directed to De Keishia Tunstall, ADA Coordinator.

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

### 9.1.2 Building Codes

The Title II City of Memphis currently utilizes all state and federal accessibility standards and codes in the on-site surveys and remedial efforts. This includes but is not limited to the 2010 ADA Design Standards and state building codes.

[Chapter 6 - BUILDINGS AND BUILDING REGULATIONS | Code of Ordinances | Shelby County, TN | Municode Library](#)

[Guidance on the 2010 ADA Standards for Accessible Design | ADA.gov](#)