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SAN MATEO COUNTY
COMMUNITY
COLLEGE DISTRICT

San Mateo County Community College District Americans with Disabilities Act Self-Evaluation and Transition Plan



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A. INTRODUCTION: DEVELOPMENT OF ADA SELF-EVALUATION & TRANSITION PLAN

The Americans with Disabilities Act (ADA) of 1990 provides 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 those provided by San Mateo County Community College District.

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. The District's 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. The U.S. 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 barriers 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 the programs, services or activities of District in all but the most unusual cases.

Recognizing the need to have an ADA Self-Evaluation & Transition Plan, San Mateo County Community College District retained Sally Swanson Architects, Inc. in 2019 to develop the District's documents. The project included a review of all documents provided by the District, a comprehensive Self-Evaluation of policies, procedures and practices based on questionnaires tailored for each of the District's departments as well as interviews with each department's key staff. Another major component of this effort was developing the ADA Transition Plan. This effort included a detailed survey of all District owned facilities, as well as selected Public Rights-of-Way (PRoW), for existing physical accessibility barriers which were integrated into the ADA Transition Plan.

To fully comply with the Title II requirements for accessibility to District programs, services and activities, this Self-Evaluation & Transition Plan:

- Evaluates existing policies, procedures and practices as they pertain to the District's programs, services and activities;
- Provides findings and recommendations with regard to policies, procedures and practices;
- Assesses the extent of physical barriers to program accessibility for District owned facilities as well as in the PRoW operated by the District;
- Specifies the mitigation steps necessary to achieve compliance;
- Estimates costs for mitigation steps;
- Provides a schedule for barrier removal/mitigation;
- Sets priorities for barrier elimination; and
- Indicates the official(s) responsible for implementation of the Transition Plan.

B. OVERVIEW: SELF-EVALUATION OF POLICIES, PROCEDURES, AND PRACTICES

In addition to identifying and modifying physical barriers, Title 28 CFR Part 35, *Non Discrimination on the Basis of Disability in State and Local Government Services*, requires that a public entity evaluate its policies, procedures and practices. While there is overlap between the requirements of an ADA Self-Evaluation and an ADA Transition Plan, a Self-Evaluation is best described as an evaluation and plan to achieve compliance with the non-physical aspects of a public entity's infrastructure for ADA compliance. An ADA Transition Plan is then best described as an evaluation and plan to achieve compliance with the physical barriers identified within a public entity for ADA compliance.

The following outlines the District's Self-Evaluation:

- Evaluate District policies, procedures, and practices as they pertain to its programs, services and activities; and make the necessary modifications to those policies and practices that do not meet the programmatic requirements of Title II of the ADA
- Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments
- Maintain, file and make available for public inspection a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made

It is recommended that the District periodically evaluate such policies, procedures and practices pertaining to communication, auxiliary aides and services, emergency response, publications, determination for undue burden, public activities, employment, and new construction of facilities, in addition to physical accessibility to District facilities.

It is also recommended that for program barrier mitigation, a detailed outline of administrative requirements and detailed requirements of needed policies be included. The policy outline would serve as a guideline upon which the District's future policies may be built.

[SEE Appendix A: ADA Self-Evaluation of Policies, Procedures, and Practices District Office](#)
[SEE Appendix C: ADA Self-Evaluation of Policies, Procedures, and Practices Skyline College](#)
[SEE Appendix G: ADA Self-Evaluation of Policies, Procedures, and Practices Cañada College](#)
[SEE Appendix K: ADA Self-Evaluation of Policies, Procedures, and Practices College of San Mateo](#)

C. OVERVIEW: ACCESS COMPLIANCE SURVEY OF DISTRICT FACILITIES

The ADA Transition Plan is used to document physical accessibility barriers to the District's programs, services, and activities and to outline a schedule / plan (or the basis to produce one) for which the District shall follow to transition from a state of noncompliance to compliance.

The access compliance survey of District facilities fulfills a portion of the first two requirements of an ADA Transition Plan by identifying existing building conditions that deviate from current State and Federal standards for new construction and providing detailed description of proposed solutions for barrier mitigation. For each barrier, the surveys outline the code deviations and requirements from the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the Accessibility Standards in the California Building Standards Code (CBC).

The access compliance survey of District facilities covers approximately 109 owned facilities maintained by the District. The surveys identified approximately 5,919 different accessibility related barriers within the District facilities and that the financial cost to mitigate all barriers identified in the surveys to be approximately \$30 million.

Number of Facilities Assessed	Number of Accessibility Barriers	Total Cost Estimated (\$)
109	5,919	\$29,984,391

The District facilities that were assessed are shown in the table below:

<u>Facility #</u>	<u>Facility Name</u>	<u>Address</u>
CAN B2	Building 2 - Bookstore	4200 Farm Hill Blvd, Redwood City, CA
CAN B3	Building 3 - Fine Arts	4200 Farm Hill Blvd, Redwood City, CA
CAN B5	Building 5 - Student Center	4200 Farm Hill Blvd, Redwood City, CA
CAN B6	Building 6 - General Classrooms	4200 Farm Hill Blvd, Redwood City, CA
CAN B7	Building 7 - Maintenance Center	4200 Farm Hill Blvd, Redwood City, CA
CAN B8	Building 8 - Administration	4200 Farm Hill Blvd, Redwood City, CA
CAN B9	Building 9 - Library/LRC	4200 Farm Hill Blvd, Redwood City, CA
CAN B13	Building 13 - Academic Classroom	4200 Farm Hill Blvd, Redwood City, CA
CAN B16	Building 16 - Science	4200 Farm Hill Blvd, Redwood City, CA
CAN B17	Building 17 - Science	4200 Farm Hill Blvd, Redwood City, CA
CAN B18	Building 18 - Science	4200 Farm Hill Blvd, Redwood City, CA
CAN B19	Building 19 - Modular 19	4200 Farm Hill Blvd, Redwood City, CA
CAN B20	Building 20 - Modular 20	4200 Farm Hill Blvd, Redwood City, CA
CAN B21	Building 21 - Modular 21	4200 Farm Hill Blvd, Redwood City, CA
CAN B22	Building 22 - Child Development Center	4200 Farm Hill Blvd, Redwood City, CA
CAN 23	Baseball Field	4200 Farm Hill Blvd, Redwood City, CA
CAN 24	Soccer Field	4200 Farm Hill Blvd, Redwood City, CA
CAN 25	Tennis Court	4200 Farm Hill Blvd, Redwood City, CA
CAN 26	Parking Lot 1	4200 Farm Hill Blvd, Redwood City, CA
CAN 27	Parking Lot 2	4200 Farm Hill Blvd, Redwood City, CA
CAN 28	Parking Lot 3	4200 Farm Hill Blvd, Redwood City, CA

CAN 29	Parking Lot 4	4200 Farm Hill Blvd, Redwood City, CA
CAN 30	Parking Lot 5	4200 Farm Hill Blvd, Redwood City, CA
CAN 31	Parking Lot 6	4200 Farm Hill Blvd, Redwood City, CA
CAN 32	Parking Lot 7	4200 Farm Hill Blvd, Redwood City, CA
CAN 33	Parking Lot 8	4200 Farm Hill Blvd, Redwood City, CA
CAN 34	Parking Lot 9	4200 Farm Hill Blvd, Redwood City, CA
CAN 35	Parking Lot 10	4200 Farm Hill Blvd, Redwood City, CA
CSM B1	Building 1 - Administration	1700 West Hillsdale Blvd, San Mateo, CA
CSM B2	Building 2 - Music	1700 West Hillsdale Blvd, San Mateo, CA
CSM B3	Building 3 - Theater	1700 West Hillsdale Blvd, San Mateo, CA
CSM B4	Building 4 - Fine Arts	1700 West Hillsdale Blvd, San Mateo, CA
CSM B4A	Building 4A - Ceramics	1700 West Hillsdale Blvd, San Mateo, CA
CSM B5	Building 5 - Health and Wellness	1700 West Hillsdale Blvd, San Mateo, CA
CSM B7	Building 7 - Maintenance Center	1700 West Hillsdale Blvd, San Mateo, CA
CSM B8	Building 8 - Gymnasium	1700 West Hillsdale Blvd, San Mateo, CA
CSM B9	Building 9 - Library/KCSM	1700 West Hillsdale Blvd, San Mateo, CA
CSM B10	Building 10 - College Center	1700 West Hillsdale Blvd, San Mateo, CA
CSM B12	Building 12 - East Hall	1700 West Hillsdale Blvd, San Mateo, CA
CSM B14	Building 14 - South Hall	1700 West Hillsdale Blvd, San Mateo, CA
CSM B15	Building 15 - Faculty Offices	1700 West Hillsdale Blvd, San Mateo, CA
CSM B16	Building 16 - West Hall	1700 West Hillsdale Blvd, San Mateo, CA
CSM B18	Building 18 - North Hall	1700 West Hillsdale Blvd, San Mateo, CA
CSM B19	Building 19 - Emerging Technologies	1700 West Hillsdale Blvd, San Mateo, CA
CSM B30	Building 30/30A - Team House	1700 West Hillsdale Blvd, San Mateo, CA
CSM B33	Building 33 - Child Development Center	1700 West Hillsdale Blvd, San Mateo, CA
CSM B34	Building 34 - Fire Academy - Ship/Receiv	1700 West Hillsdale Blvd, San Mateo, CA
CSM B35	Building 35 - Regional Public Safety	1700 West Hillsdale Blvd, San Mateo, CA
CSM B36	Building 36 - Science & Planetarium	1700 West Hillsdale Blvd, San Mateo, CA
CSM 38	Corp Yard	1700 West Hillsdale Blvd, San Mateo, CA
CSM 39	Track & Football Stadium	1700 West Hillsdale Blvd, San Mateo, CA
CSM 40	SMAC Athletic Club (Pools)	1700 West Hillsdale Blvd, San Mateo, CA
CSM 41	Tennis Courts	1700 West Hillsdale Blvd, San Mateo, CA
CSM 42	Baseball Tuff Field	1700 West Hillsdale Blvd, San Mateo, CA
CSM 43	Softball Field	1700 West Hillsdale Blvd, San Mateo, CA
CSM 44	Parking Lots 1	1700 West Hillsdale Blvd, San Mateo, CA
CSM 45	Parking Lot 2	1700 West Hillsdale Blvd, San Mateo, CA
CSM 46	Parking Lot 3	1700 West Hillsdale Blvd, San Mateo, CA
CSM 47	Parking Lot 4	1700 West Hillsdale Blvd, San Mateo, CA
CSM 48	Parking Lot 5	1700 West Hillsdale Blvd, San Mateo, CA
CSM 49	Parking Lot 6	1700 West Hillsdale Blvd, San Mateo, CA
CSM 50	Parking Lot 7	1700 West Hillsdale Blvd, San Mateo, CA

CSM 51	Parking Lot 8	1700 West Hillsdale Blvd, San Mateo, CA
CSM 52	Parking Lot 9	1700 West Hillsdale Blvd, San Mateo, CA
CSM 53	Parking Lot 10	1700 West Hillsdale Blvd, San Mateo, CA
CSM 54	Parking Lot 11	1700 West Hillsdale Blvd, San Mateo, CA
CSM 55	Parking Lot 12	1700 West Hillsdale Blvd, San Mateo, CA
SKY B1	Building 1 - Fine Arts	3300 College Drive San Bruno, CA
SKY B2	Building 2 - Campus Center	3300 College Drive San Bruno, CA
SKY B3	Building 3 - Physical Education	3300 College Drive San Bruno, CA
SKY B3A-E	Buildings 3A,B,C,D,E	3300 College Drive San Bruno, CA
SKY B4	Building 4 - Multi-Cultural Center/Cosmetology/Administration	3300 College Drive San Bruno, CA
SKY B5	Building 5 - Library / LRC	3300 College Drive San Bruno, CA
SKY B6	Building 6 - Student and Comm. Center	3300 College Drive San Bruno, CA
SKY B7	Building 7 - Science and Allied Health	3300 College Drive San Bruno, CA
SKY B8	Building 8 - Academic Building	3300 College Drive San Bruno, CA
SKY B9	Building 9 - Automotive Lab	3300 College Drive San Bruno, CA
SKY B10	Building 10 - Automotive	3300 College Drive San Bruno, CA
SKY B11	Building 11 - Automotive Transmission	3300 College Drive San Bruno, CA
SKY B14	Building 14 - Loma Chica	3300 College Drive San Bruno, CA
SKY B15	Building 15 - Athletic Field Restroom	3300 College Drive San Bruno, CA
SKY B17	Building 17 - Track Field House	3300 College Drive San Bruno, CA
SKY B19	Building 19 - Pacific Heights	3300 College Drive San Bruno, CA
SKY B21	Building 21 - Maintenance Office	3300 College Drive San Bruno, CA
SKY B22	Building 22 - Maintenance Shops	3300 College Drive San Bruno, CA
SKY B23	Building 23 - Custodial Grounds Storage	3300 College Drive San Bruno, CA
SKY B24	Building 24 - Equipment/Vehicle Storage	3300 College Drive San Bruno, CA
SKY 25	Tennis Courts	3300 College Drive San Bruno, CA
SKY 26	Baseball Field	3300 College Drive San Bruno, CA
SKY 27	Soccer Field (1)	3300 College Drive San Bruno, CA
SKY 27.1	Soccer Field (2)	3300 College Drive San Bruno, CA
SKY 28	Archery	3300 College Drive San Bruno, CA
SKY 29	Parking Lot A	3300 College Drive San Bruno, CA
SKY 30	Parking Lot B	3300 College Drive San Bruno, CA
SKY 31	Parking Lot C	3300 College Drive San Bruno, CA
SKY 32	Parking Lot D	3300 College Drive San Bruno, CA
SKY 33	Parking Lot E	3300 College Drive San Bruno, CA
SKY 34	Parking Lot F	3300 College Drive San Bruno, CA
SKY 35	Parking Lot G	3300 College Drive San Bruno, CA
SKY 36	Parking Lot H	3300 College Drive San Bruno, CA
SKY 37	Parking Lot J	3300 College Drive San Bruno, CA
SKY 38	Parking Lot K	3300 College Drive San Bruno, CA
SKY 39	Parking Lot L	3300 College Drive San Bruno, CA

SKY 40	Parking Lot M	3300 College Drive San Bruno, CA
SKY 41	Parking Lot N	3300 College Drive San Bruno, CA
SKY 42	Parking Lot P	3300 College Drive San Bruno, CA
SKY 43	Parking Lot R	3300 College Drive San Bruno, CA
SKY 44	Parking Lot S	3300 College Drive San Bruno, CA
101	District Office (CSM)	1700 West Hillsdale Blvd, San Mateo, CA

Report Production

The following information contains the minimum data included in the Access Compliance Survey Reports (ACSR) for District facilities:

- Item number of barrier and/or room numbers, corresponding to schematic site and floor plans (Barrier Location Plans)
- Area/location of the barrier; for example room name or number
- Description of the barrier (As-Built Description)
- As-is measurement/dimension
- Detailed description of proposed solution and, if applicable, an alternative or interim solution
- Code citations, specifying the applicable sections in the State and Federal accessibility regulations and standards
- Unit and estimated unit price
- Total estimate cost for barrier removal
- Special site conditions (if applicable)

The information obtained from the survey of the District facilities is maintained on a Microsoft Excel spreadsheet database.

[SEE Appendix B: Access Compliance Survey Report of District Office Facilities](#)

[SEE Appendix D: Access Compliance Survey Report of Skyline College Facilities](#)

[SEE Appendix H: Access Compliance Survey Report of Cañada College Facilities](#)

[SEE Appendix L: Access Compliance Survey Report of College of San Mateo Facilities](#)

PRIORITIZATION CRITERIA FOR BARRIER MITIGATION – DISTRICT FACILITIES

The third requirement of an ADA Transition Plan is to create a schedule that the District shall follow which addresses the order in which barriers shall be mitigated. This schedule shall be a public document and shall be made available for public inspection, maintained, and updated for the duration of the Transition Planning period. The maintaining and updating of this document shall mark the District's good-faith efforts in transitioning from a state of noncompliance to compliance regarding the ADA.

The difficulty and complexity of creating a schedule is recognized. Therefore, to provide a methodology for creating a schedule, a prioritization criterion was formed to rank barriers in order of most important to mitigate first to least important. The prioritization criteria rates each barrier based on two factors, its Priority Score, and its Severity Score. The Priority Score ranks the relative importance of addressing the barrier based on its locational impact on the disabled

population, and the Severity Score ranks the barrier based the degree of deviation exhibited compared to applicable access standards.

SEE Appendix P: Prioritization Criteria for Barrier Mitigation – Facilities

The above prioritization criteria can be used to sort the access barriers identified in the surveys and create a schedule that order barrier mitigation work starting from barriers of highest importance to barriers of least importance.

Note that the prioritization criteria serve only as one methodology for the District to create a schedule. Other criteria can be used (and is encouraged) as the basis for forming a schedule including: 1) barriers identified by constituents through an ADA grievance, 2) barriers that overlap with a District project already in the pipelines, 3) barriers that can be resolved internally with the District’s maintenance staff, 4) etc. The District shall document all methodology used in justifying a barrier mitigation schedule

Additional Consideration: Age of the Facility

The age of the facility can also determine the District’s obligations to meet ADA compliance. Facilities built before September 15, 2010 are obligated to be in compliance with the 1991 ADAAG, barring that the building has not gone through major reconstruction or alteration henceforth that date. The facility will also be required to comply with the applicable California Building Codes (CBC) at the time of construction.

If a facility was constructed or altered between the transition period of September 15, 2010 through March 15, 2012, an option of choosing either the 1991 ADA or 2010 ADA Standards were allowed.

Facilities built after March 15, 2012 are required to meet the updated 2010 ADA Standards as well as the California Building Code (CBC) at time of construction.

The caveat being that crucial program functions and services must be provided in accessible locations.

Compliance Date for New Construction or Alterations	Applicable Standards
Before September 15, 2010	1991 Standards or UFAS
On or after September 15, 2010, and before March 15, 2012	1991 Standards, UFAS, or 2010 Standards
On or after March 15, 2012	2010 Standards

D. OVERVIEW: ACCESS COMPLIANCE SURVEY OF THE PUBLIC RIGHTS-OF-WAY (PROW)

Barden v. City of Sacramento, 292 F. 3d 1073 established that sidewalks and intersections constitute a service, program, or activity provided by a District, therefore they are subject to accessibility regulations and should be addressed as part of the District’s ADA Transition Plan.

Two different features provided in the PROW were assessed, including sidewalks and curb ramps. Curb ramps were assessed using data collection checklist, based on ADA and Department of Transportation (DOT) requirements as well as Public Rights-of-Way Accessibility Guidelines (PROWAG) recommendations. Traditional measuring and smart-level equipment were used to collect measurements for these surveys. Sidewalks were assessed using sidewalk profilers that were developed for the Federal Highway Administration (FHWA) and adapted for sidewalk ADA surveys. The device captures information on slopes, and surface variations and identifies deviations from the required ADA standards and other applicable requirements.

The access compliance survey of the Public Rights-of-Way (PROW), along with the survey of District facilities, completely fulfill the first two requirements for an ADA Transition Plan. As a part of this effort, approximately 124 miles of sidewalk, 85 curb ramps and 2 pedestrian signals were assessed for access compliance and that the financial cost to mitigate all barriers identified in the surveys to be approximately \$6 million.

Features	Total Number Assessed	Total Cost Estimate (\$)
Sidewalks	124 miles	\$5,713,630
Curb Ramps	85	\$346,000
Pedestrian Signals	2	\$14,100
TOTAL	211	\$6,073,730

The information obtained from the survey of the PROW is maintained on a Microsoft Excel database along with reference maps created in geographic information systems (GIS).

- [SEE Appendix E: Access Compliance Survey Report of Skyline College Sidewalks](#)
- [SEE Appendix I: Access Compliance Survey Report of Cañada College Sidewalks](#)
- [SEE Appendix M: Access Compliance Survey Report of College of San Mateo Sidewalks](#)
- [SEE Appendix F: Access Compliance Survey Report of Skyline College Curb Ramps](#)
- [SEE Appendix J: Access Compliance Survey Report of Cañada College Curb Ramps](#)
- [SEE Appendix N: Access Compliance Survey Report of College of San Mateo Curb Ramps](#)
- [SEE Appendix O: Access Compliance Survey Report of College of San Mateo Pedestrian Signals](#)

PRIORITIZATION CRITERIA FOR BARRIER MITIGATION - PUBLIC RIGHTS-OF-WAY

The third requirement of an ADA Transition Plan is to create a schedule that the District shall follow which addresses the order in which barriers within each feature shall be mitigated. This schedule shall be a public document and shall be made available for public inspection, maintained, and updated for the duration of the Transition Planning period. The maintaining and updating of this document shall mark the District’s good-faith efforts in transitioning from a state of noncompliance to compliance regarding accessibility.

The difficulty and complexity of creating a schedule is recognized. Therefore, to provide a methodology for creating a schedule, like District facilities, a prioritization criterion was formed, catered to the in-depth information that is provided utilizing GIS.

The prioritization criteria developed for the PRow rates the relative importance of each barrier based on a combination of rating the activity occurring at the barrier's location, or "Activity Score", as well as rating the severity from which each feature deviates from current State and Federal standards, or "Barrier Score". Each score is rated on a scale of 0 to 100, with 0 being the lowest, and 100 being the highest.

The combination of both the "Activity Score" and "Barrier Score" creates an overall "Priority Score" that can be used to sort features identified in the surveys and create a schedule that orders barrier mitigation work starting from features of highest priority to features of lowest priority. The "Priority Score" is rated on a scale of 0 to 200, with 0 being the lowest priority, and 200 being the highest priority.

[SEE Appendix Q: Prioritization Criteria for Barrier Mitigation – Public Rights-of-Way](#)

E. OFFICIAL(S) RESPONSIBLE

The last requirement of an ADA Transition Plan requires that an official be identified as responsible for the implementation of the entity's Transition Plan.

It is the U.S. Department of Justice's (DOJ) view that compliance with 28 CFR 35.150(a), like compliance with the corresponding provisions of the section 504 regulations for public programs, would in most cases not result in undue financial and administrative burdens on a typical District. In determining undue financial and administrative burdens, all District resources available for use in the funding and operation of District services, programs and activities would need to be considered.

The burden of proving that compliance with paragraph (a) of 28 CFR 35.150 would either fundamentally alter the nature of a service, program, or activity OR would result in undue financial and administrative burdens shall rest with the District. The decision that compliance would result in such alteration and/or burden must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion.

While the U.S. DOJ has acknowledged the difficulty/complexity of not only making such a determination, but also identifying the official responsible to make this decision/determination, the department's intention is clear in that the determination must be made by a high level official, no lower than a Department head, with budgetary authority and responsibility for making spending decisions.

The Official Responsible for the implementation should be able to seek/acquire funding for ADA barrier removal work over the District's Transition Planning period. As such, the District shall designate the District's Official Responsible for maintaining the ADA Transition Plan.

The District's Official Responsible for the Transition Plan contact info is as below:

Michele Rudovsky
Director of Maintenance and Operations
District Office, 1st Floor
3401 CSM Drive
San Mateo, CA 94402
650-358-6733
rudovskym@smccd.edu

In addition, each college will have an Official(s) Responsible for the Self-Evaluation and work plan implementation who will be able to seek/acquire funding for the ADA barrier removal work over the Districts programs, services and activities.

The District's Official(s) Responsible for the Self-Evaluation contact info is as below:

District Office:
Vice Chancellor/Chief of Staff

Mitch Bailey
650-358-6877
baileym@smccd.edu

College of San Mateo:
Vice President of Administrative Services
Michaela Ochoa
650-574-6484
ochoam@smccd.edu

Canada College:
Vice President of Administrative Services
Graziano Mendoza
650-306-3274
mendozag@smccd.edu

Skyline College:
Vice President of Administrative Services
Eloisa Briones
650-738-4227
brionese@smccd.edu

Indication of the Official(s) Responsible for implementation of the Self-Evaluation and Transition Plan fulfills the final requirement of a Transition Plan.

F. PUBLIC INPUT

Per 28 Code of Federal Regulations, Part 35; Subpart D – Program Accessibility; §35.150 – Existing Facilities; (d) Transition Plan (1): The District shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the ADA Self-Evaluation and Transition Plan by submitting comments.

In order to satisfy this requirement and to gain the perspective of persons with disabilities, two (2) public vettings were held by the District on October 1st 2020 at 9am and 3pm, where members of the public were invited to comment on and participate in the District's Draft ADA Self-Evaluation & Transition Plan.

[SEE Appendix R: Public Vetting Meeting and Solicitation of Public Input](#)

G. TRANSITION PLAN IMPLEMENTATION

The document should be maintained and updated for the duration of the Transition Planning period and a copy of the Transition Plan shall be made available for public inspection.

The final product is a working document to be modified as barriers are removed or alterations are made. The Official(s) Responsible and project managers overseeing the barrier-removal projects will document all such ADA improvements/upgrades. Also, as part of this process, technical infeasibility, if any, to meet necessary accessibility compliance will be documented and filed for the District's records by the Engineer-of-Record on the said project. It is also recommended to provide accessibility site audits (inspections) of on-going projects as part of the project close-out/certification. This documentation and verification of barrier-mitigation will be integrated into the District's ADA Transition Plan on a regular basis to ensure that barriers are "checked-off" and the Transition Plan remains current with a record of barrier-mitigation work. Annual reports of barrier-mitigation work may also be provided to the District Board of Trustees to document good-faith efforts taken by the District in maintaining the Transition Plan.

This is a living document and is open to and expected to be modified throughout the transitioning period.

The District is tasked with analyzing the District's ADA Compliance efforts and implement, where necessary, changes to the District's policies, procedures and infrastructure to ensure that they adhere to the guidelines set forth in this Transition Plan and that the District's programs, services or activities are accessible to people with disabilities.

Maintenance of Accessible Features

The Maintenance of accessible features is mandated by State and Federal Regulations and is an integral part of the District's plan to transition into a more accessible destination. Both, Chapter 28 Code of Federal Regulation, Part 35, Section 35.133 as well as the California Building Code section 1101B.3 – Maintenance of accessible features, state:

1. A public accommodation shall maintain in operable working condition those features of facilities and equipment that are required to be accessible to and usable by persons with disabilities.
2. This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

These sections recognize that it is not sufficient to provide features such as accessible routes, ramps, or elevators, if those features are not maintained in a manner that enables individuals with disabilities to use them. Inoperable elevators, are neither "accessible to" nor "usable by" individuals with disabilities.

It is, of course, impossible to guarantee that mechanical devices will never fail to operate. As such, the 2nd paragraph provides that this section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. This paragraph is intended to clarify that temporary obstructions or isolated instances of mechanical failure would not be considered violations of the ADA or this part. However, allowing obstructions or "out of service" equipment to persist beyond a reasonable period of time would violate this part, as would

repeated mechanical failures due to improper or inadequate maintenance. Failure of the public entity to arrange prompt repair of inoperable elevators or other equipment intended to provide access would also violate this part.

A District-wide formal policy specifically addressing the legal requirements (28CFR Part 35.133 & CBC1101B.3) of maintaining accessible features would be of long-term benefit to the District. When, over time, an accessible feature fails, institutionalizing organizational commitments towards protocols and maintenance ensures an appropriate action is taken.

Implementation Policies

San Mateo County Community College District proposes the following implementation policies for transitioning into compliance with the ADA and meeting the requirements of an ADA Transition Plan:

- 1) The District shall maintain and keep current an inventory of access barriers identified in the Access Compliance Survey Reports (ACSR) of District owned facilities and the Public Rights-of-Way (PRoW). The District elects to maintain the inventory of access barriers identified in District facilities and PRoW on a Microsoft Access/Excel database, to be maintained by the Official Responsible.
- 2) Where projects in the District's pipeline are identified whose scope of work overlaps with the location of access barriers identified in the Access Compliance Survey, the District shall ensure that the project incorporate the mitigation of the corresponding barriers. The project and completion of mitigation work shall be appropriately documented in the corresponding inventory.
- 3) The District will enlist maintenance staff to mitigate barriers that are within their scope, e.g. trimming vegetation, adjusting door closers, remounting bathroom accessories at proper heights, etc.
- 4) The District will dedicate a minimum budget of \$3 million in 2021, funded through the District's Capital Improvement Plan, for the sole purpose of providing accessibility improvements for barriers identified in the ACSR. The District shall utilize this budget by analyzing the schedule maintained by the ADA Transition Plan and creating projects solely dedicated to the barrier mitigation work. The District will assess each year the status and cost of remaining barriers and dedicate a minimum budget per year for additional ADA barrier removal.
- 5) The District will continue to seek out sources of funding beyond to fund accessibility improvements throughout the District and will use this document in all funding applications to show good-faith efforts in planning for orderly transition to compliance.

Existing Implementation Policies/Programs

- 1) The District maintains a bi-annual check of all door closers.
- 2) The District elevates any public requests or notification of barriers to the highest priority for mitigation.