ADA and Section 504
Self – Evaluation and Transition Plan

ADOPTED 03/21/2014
Northwest Louisiana Council of Governments
Non-Discrimination Statement

The Northwest Louisiana Council of Governments (NLCOG) complies with the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and other federal equal opportunity laws and, therefore, does not discriminate on the basis of race, sex, color, age, national origin, religion or disability; in admission to, access to, treatment in or operations of its programs, services, or activities. NLCOG does not discriminate in its hiring or employment practices.

Questions, concerns, complaints, or requests for additional information regarding the non-discrimination policies may be directed to the designated Title VI, ADA and Section 504 Compliance Coordinator:

Lisa M. Frazier
Public Involvement Coordinator
(318) 841-5950 (voice)
lisa.frazier@nlcog.org
625 Texas Street, Suite 200
Shreveport, LA 71101
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About NLCOG

The Northwest Louisiana Council of Governments (NLCOG) is Northwest Louisiana’s Metropolitan Planning Organization (MPO), as designated by the Governor and local governments. Every metropolitan area with a population of more than 50,000 persons has a designated MPO in order to qualify for federal highway and transit funding. Members of NLCOG include Bossier, Caddo, DeSoto and Webster parishes, which also includes the Shreveport / Bossier City Urbanized Area.

MPO membership represents locally elected and appointed officials of the cities and parishes within the urban area of Northwest Louisiana. Other appointed officials include the District 04 Administrator for the Louisiana Department of Transportation and Development (LaDOTD) and representatives of the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

As the MPO, NLCOG must adopt both a long-range transportation plan (LRTP), covering at least 20 years, and a short-range plan, the Transportation Improvement Program (TIP), which selects projects from the LRTP to fund for construction. These plans are to be developed in a “comprehensive, cooperative, and continuous” fashion and cover federal aid surface transportation projects in the MPO area. No federal transportation funds may be spent on a road project in the area unless that project is included in the LRTP and the TIP.

NLCOG is also designated a Transportation Management Area (TMA) by the U.S. Secretary of Transportation. This occurs when an urbanized area has a population of over 200,000 persons, by special request of the Governor and MPO, or under special circumstances designated for the area. NLCOG, within its TMA capacity, is responsible for developing congestion management systems, transportation improvements program project selection, and undergoing joint federal certification review of the planning process at least every four years. As a TMA, NLCOG has the authority to prioritize the projects in the TIP.

For reference, Figure A shows the MPO boundary within Northwest Louisiana, along with the Urbanized Area.
Figure A – Northwest Louisiana’s MPO and Urbanized Area Boundaries
Introduction and Statement of Commitment

As a recipient of federal funding, NLCOG must comply with a variety of federal and state legislative regulations. Regarding matters of non-discrimination on the basis of disability, NLCOG falls under two federal laws: the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 (Section 504). Public entities are required to review both written policies and the actual operating practices used in programs and activities, to ensure that people with disabilities are not discriminated against.

The ADA prohibits discrimination on the basis of disability. Title II of the ADA applies to specifically to all activities of state and local governments, including MPOs such as NLCOG. This act also requires that government entities give people with disabilities equal opportunity to benefit from all of the programs, services and activities that may be offered. Title II contains broad prohibitions against discrimination, addressing issues of equal opportunity, integration, eligibility, methods of administration, location of facilities, and others.

As the federally-designated MPO, NLCOG must adhere to the standards set forth in Title II, which includes both physical accommodations, such as accessibility to buildings and meetings, and in policies, procedures and practices. Under Title II, NLCOG is required to make reasonable accommodations in order to provide access and to communicate effectively with people who have hearing, vision or speech impairments. Likewise, NLCOG is required to make reasonable modifications to policies, practices and procedures where necessary to avoid discrimination.

Section 504 prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors. The standards for determining employment discrimination under Section 504 are the same as those used in Title I of the ADA.

Section 504 states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subject to discrimination under” any program or activity that receives federal financial assistance. Requirements common to the regulations set forth in Section 504 include reasonable accommodation for employees with disabilities, program accessibility and effective communication with people who have hearing or vision disabilities.

As an MPO, NLCOG is required to perform the following tasks:

- Apply ADA law
- Apply Section 504 law
- Appoint an ADA / Section 504 Coordinator
- Provide and agency non-discrimination statement
• Perform an agency self-evaluation
• Make auxiliary aids available for use
• Provide assurance of compliance

**Equal Opportunity to Participate and Benefit**

NLCOG is committed to complying with both the letter and spirit of the requirements set forth in both the ADA and Section 504. NLCOG desires to:

• Afford all qualified individuals with a disability an opportunity to participate in and benefit from any program;
• Afford an opportunity equal to and as effective as that provided others; and
• Remove any criteria for participation in programs that may screen out people with disabilities either directly or indirectly, unless such criteria are necessary for the provision of the program’s activities.

**Methodology for Self – Evaluation**

This document was developed by NLCOG’s ADA / 504 Coordinator, after consultation with Mr. Scott Wells, President and CEO of Independence Regained. Mr. Wells assisted in the evaluation of NLCOG’s premises and in the discussion of NLCOG’s policies and practices. Mr. Wells reviewed the Self – Evaluation document and recommended corrections to noted deficiencies.

The Self – Evaluation occurred in two parts:

1. An evaluation of NLCOG’s policies, practices and procedures; and
2. An evaluation of NLCOG’s premises, including those used for public outreach and involvement.

This document describes the policies and procedures that NLCOG uses to comply with ADA and Section 504. Steps to be undertaken to correct any deficiencies are detailed in Appendix A. Public entities are required to make reasonable modifications to policies or practices in order to avoid discrimination towards people with disabilities. A modification is not required, however, if it would fundamentally alter the nature of the program or activity.

**Public Comment**

In accordance with NLCOG’s own policies and procedures, and in compliance with the requirements of the ADA and Section 504 legislation, the public was given a 30-day opportunity for review and comment. Notice was placed in area newspapers and on the NLCOG website on January 12, 2014. The draft Self –
Evaluation was made available through NLCOG’s website, social media notices, and to anyone who requested a copy. For reference, Figure B is the newspaper advertisement and website and social media notice.

Figure B – Public Review and Comment Notice

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**Northwest Louisiana Council of Governments**

**Self – Evaluation and Transition Plan**

**Public Review and Comment Period**

January 12, 2014 – February 10, 2014

The public is invited to review and comment on the Northwest Louisiana Council of Governments (NLCOG) Self – Evaluation and Transition Plan. NLCOG is the metropolitan planning organization for Northwest Louisiana.

NLCOG conducted a self-evaluation of its programs and facility accessibility, and prepared a Transition Plan that describes any deficiencies, remedies, recommendations. This plan also includes a time-frame for carrying out remedies, as well as approximate costs for the recommendations.

NLCOG’s Executive Committee is scheduled to adopt the Self – Evaluation and Transition Plan, pending public comment, at its next scheduled meeting on March 21, 2014. The public comment period is from January 12, 2014 until 4:30 p.m. on February 10, 2014.

All interested citizens are encouraged to access the Draft Self – Evaluation and Transition Plan at [www.nlco.org](http://www.nlco.org) or by requesting a printed copy from the office of NLCOG at (318) 841-5950. Upon request, other versions may be made available.

Comments may be e-mailed to public_comments@nlco.org or mailed to:

NLCOG
Attn: Lisa M. Frazier – ADA/504
625 Texas Street, Suite 200
Shreveport, Louisiana 71101

All written comments relative to this draft document should be postmarked no later than February 10, 2014.
Evaluation of NLCOG Policies and Practices

The following is a description of NLCOG’s policies and practices that may affect people with disabilities.

ADA / 504 Coordinator

NLCOG’s ADA / 504 Coordinator is charged with the following tasks:

- Collaborate and coordinate ADA / 504 compliance efforts with the program liaisons. NLCOG is a small office with 9 employees composing an administrative team, planning team and geographic information systems (GIS) team. The ADA / 504 Coordinator works closely with all of the teams.
- Serve as a point of contact and liaison to the public on ADA / Section 504 compliance issues. Contact information is provided on the NLCOG website and in all NLCOG publications.
- Establish and maintain collaborative relationships with critical external stakeholders, such as disability advocacy groups and government agencies.
- Monitor the MPO’s policies, procedures, practices, and processes with respect to ADA / 504 compliance; identify shortcomings in compliance and develop remedies.
- Investigate and resolve complaints filed under the MPO’s ADA / 504 grievance procedures. Grievance procedures are described on page 9.
- Monitor and update the implementation of the MPO’s ADA / 504 Self – Evaluation and Transition Plan, as needed.
- Provide or coordinate the provision of requested auxiliary aids and reasonable accommodations to individuals with disabilities.
- Perform ADA / 504 program, process or compliance reviews; inspect facilities for accessibility.

Public Involvement Plan

NLCOG’s Public Involvement Plan (PIP) was developed and adopted April 9, 2009 under the requirements of the SAFETEA-LU transportation legislation. An update to the plan is expected during NLCOG’s Fiscal Year 2014 in order to address compliance with the requirements of the Moving Ahead for Progress in the 21st Century (MAP-21) transportation legislation. The policies and strategies detailed in the PIP reference accessibility, but do not specifically address the requirements of ADA and 504 legislations. Additionally, the PIP is lacking a detailed procedure for dealing with complaints relating to discrimination due to a disability.

Public Meetings and Opportunity for Comment

All meetings held by NLCOG, and / or its consultants, are open to the public. Most committee meetings are held in the second floor NLCOG conference room or the first floor Seminar Room at NLCOG’s office, both of which are fully accessible.
When meetings are conducted in other venues, NLCOG strives to assure that the facility is accessible, both externally and internally. When possible, meeting locations are selected along public transit routes. Consultant meetings are held in public libraries, local public schools, or government meeting rooms when available, all of which are accessible.

Various accommodations, such as sign language interpreters and large – print versions of meeting materials, are made available if requested in advance of the meeting. NLCOG requests a minimum of five days notice for accommodations and will, if feasible, provide an alternate opportunity to participate if accommodations cannot be made in a timely manner. Information regarding this is included in the PIP, in public meeting notices printed in area newspapers, and posted on the NLCOG website.

Promoting integration is a fundamental principle of the ADA and public entities are required to provide programs and activities in the most integrated settings appropriate to the needs of people with disabilities. Separate programs or activities are permitted only when necessary to ensure equal opportunity. When separate programs are provided, qualified people with disabilities still cannot be excluded from participating in regular programs or activities if they choose to do so. Public entities may not impose extra charges upon people with disabilities to cover the costs of effective communication, program modifications, or access features, and may not impose any additional requirements or burdens on people with disabilities that they do not require of all other participants in the program.

**Communications Access**

Information that is communicated visually, such as through printed materials or visual displays, must be made accessible to people with visual and cognitive disabilities through auxiliary aids and services. Title II’s regulations require that public entities provide people with disabilities an opportunity to request the type of communications technology and assistance they prefer to use. In the ADA regulations, communications technology and assistance are called auxiliary aids and services.

Programs that communicate information aurally (by hearing) to participants or that require a participant to use oral communication must make information accessible to people who have hearing or speech disabilities by providing auxiliary aids and services.

When a public entity communicates with the public by telephone, Title II requires that TTY/TDDs or equally effective means be used to communicate with people who have hearing or speech disabilities. NLCOG does not have TTY/TDD available on its phone lines, nor does it subscribe to a TTY/TDD service. NLCOG can educate and encourage your callers to take advantage of the national “711” Telecommunications Relay Service as the TTY/TDD call volume is low. The relay service allows people to dial “711” to access all relay services anywhere in the United States, 24 hours a day, free of any surcharges to all callers within the country. Office telephones are located within easy access, or can be readily put within access.
The Title II regulations require that public entities ensure that people with disabilities can obtain information about the availability and location of accessible programs, services, activities, and facilities. Information regarding the location of accessible entrances, programs, and other access features can be provided in a number of ways, such as in handbooks and listings. Information regarding NLCOG’s programs and activities may be accessed via the NLCOG website, social media or by calling NLCOG’s office. Specific projects and programs may also communicate information through the media such as radio and television public service announcements, signs and banners placed near a projects, or mail-outs such as postcards, newsletters, and flyers. Printed materials are generally not accessible to people with vision impairments, though large print and other accessible means will be made available as requested.

NLCOG’s website is not accessible by people with vision impairments. As part of its annual Work Program, NLCOG has programmed an update to the website in Fiscal Year 2014 (July 1, 2013 – June 30, 2014). NLCOG will work with the developer to create an accessible website, following the recommendations from various ADA checklists.

Publications

A Notice of Non-Discrimination is required to be placed in all plans, studies and processes undertaken by NLCOG. Documents produced should include the statement as shown in Figure C.

Figure C – Notice of Non-Discrimination

The Northwest Louisiana Council of Governments (NLCOG) complies with the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and other federal equal opportunity laws and, therefore, does not discriminate on the basis of race, sex, color, age, national origin, religion or disability; in admission to, access to, treatment in or operations of its programs, services, or activities. NLCOG does not discriminate in its hiring or employment practices.

Questions, concerns, complaints, or requests for additional information regarding the non-discrimination policies may be directed to the designated Title VI, ADA and Section 504 Compliance Coordinator:

Lisa M. Frazier
Public Involvement Coordinator
(318) 841-5950 (voice)
Lisa.frazier@nlcog.org
625 Texas Street, Suite 200
Shreveport, LA 71101
Two documents that directly address the needs of people with disabilities are the PIP and the NLCOG Handbook of Personnel Rules and Regulations (updated July 10, 2009). The PIP is discussed on page six (6) and the Handbook is discussed under grievance procedures on page nine (9).

Grievance Procedures

It is the intent of NLCOG to ensure that no qualified individual, because of a disability, is discriminated against with regard to any term or condition of employment, provided that such individual can perform the essential functions of the job with or without reasonable accommodations.

A disability is defined as:

1. A physical or mental impairment that renders the individual unable to perform, or significantly limits the individual’s ability to perform one or more major life activities as compared to an average person in the general population; or
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

“Qualified individual” is defined as an individual with a disability who satisfies the requisite skill, experience, education, and other job-related requirements of the employment such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

“Reasonable accommodation” is defined as a modification or adjustment to the job, the work environment, or the way things usually are done that enable a qualified person with a disability to enjoy an equal employment opportunity. NLCOG is not required to take such actions to accommodate that would result in undue financial and administrative burdens.

NLCOG, upon request, will provide reasonable accommodation(s) to employee(s) in compliance with the ADA. Any employee who believes he/she needs an accommodation in order to perform the essential functions of the job should notify his immediate supervisor. Requests will be handled on a case-by-case basis.

An employee who believes he has been or is being discriminated against because of, or as a result of, a disability should first contact his immediate supervisor, as outlined in NLCOG’s employee manual. If the employee is not satisfied with the conclusion of that interview, then he may file a grievance with the ADA / 504 Coordinator. Upon receipt of the formal grievance, the ADA / 504 Coordinator will collect information and investigate the complaint, and make a recommendation to the Executive Director.
within ten business days. The complainant will be kept fully informed throughout the process, and will be notified in writing of the resolution.

**Complaint Procedures for the General Public**

NLCOG has established a process for investigating and resolving complaints alleging disability discrimination related to MPO services, programs and its office. Regulations implementing provision of Section 504 and Title II of the ADA can be found at 49 CFR Parts 27 and 37, and 28 CFR Part 35.

NLCOG’s ADA / 504 Coordinator is responsible for overseeing investigations and responses to complaints of discrimination based on disability. Required complaint information includes:

- Complainant’s name, mailing address and daytime phone number, with area code
- Specific information relating to the incident in question:
  - Date, time and location
  - How the person was discriminated against based upon disability
  - Any other pertinent details
- Statement signed and dated

Complaints with incomplete information may result in a delayed investigation and response. NLCOG will not respond to complaints without the complainant’s name and mailing address.

Complaints may be submitted to NLCOG as follows:

- By telephone to NLCOG, (318) 841-5950. The ADA / 504 Coordinator will talk to the complainant and obtain detailed information relating to the complaint. Information obtained from the telephone interview will be recorded in writing and read to the complainant.
- In writing to the NLCOG ADA / 504 Coordinator, Lisa M. Frazier, 625 Texas Street, Suite 200, Shreveport, Louisiana 71101. Complaints may also be faxed to (318) 841-5952 or e-mailed to lisa.frazier@nlcog.org.
- In person at NLCOG’s office located at 625 Texas Street, Suite 200, Shreveport, Louisiana 71101. Normal office hours are from 8:00 a.m. until 4:30 p.m., Monday through Friday. It is advisable to call the ADA / 504 Coordinator in advance to schedule an appointment.

Within three business days upon receipt of a complaint, a letter or card will be mailed to the complainant with the following information:

- Acknowledgement that the complaint was received and is pending investigation, and
- Estimated dated by which a response will be sent to the complainant.
The ADA / 504 Coordinator will investigate the complaint and respond in writing within a reasonable time, not to exceed 30 days from receipt of the complaint. The response will provide information concerning the resolution of the complaint.

A record of all ADA / 504 complaints will be maintained by NLCOG for a minimum of five years. Each record will include the name and address of the complainant, nature of the complaint, problems identified, resolution of the complaint and resulting modifications made to an NLCOG program, policy or its office facility.

**Evaluation of NLCOG Premises**

NLCOG leases a portion of the second floor in the Shreveport Bar Association building, located at 625 Texas Street, Suite 200, Shreveport, Louisiana. The building is located on the corner of Texas Street and Louisiana Avenue, approximately four blocks from the main SporTran bus terminal. The main entrance to the premises is on the Texas Street side with two additional exterior entrances in the back of the building in the parking lot off of Louisiana Avenue.
Figure D – Floor Plan for the Second Floor
Access to the Building

All exterior doors are equipped with an intercom/card reader to gain access to the building. A visitor must buzz a receptionist prior to the doors magnetically releasing. During the site evaluation it was noted that the intercoms are placed too high for someone in a wheelchair to comfortably reach them. A maximum of 42 inches from the ground should be where the intercoms are placed. The external Texas Street entrance to the building is wheelchair accessible. The front glass doors are equipped with push button exit to automatically open them, though at the time of the self-evaluation it did not work.

The second ground floor external entrance is off of the parking lot. This entrance is not accessible as there is approximately a six (6) inch step just inside the door. Another entrance is located on the second floor, accessible by exterior stairs. There are not signs posted at the inaccessible entrances directing visitors to the accessible entrance at the front of the building. The building lobby is wheelchair accessible, as are the elevators.

Elevator

During the self-evaluation, it was noted that the elevator does not always stop flush with the floor. This creates a hazard to individuals in a wheelchair or using other means of assistance. It was discussed that consultation with the elevator company is needed to resolve the issue.

Doorways and Hardware

All internal and external doorways are wheelchair accessible. Most hardware located throughout the building is compliant and in good working order. The hardware that is not lever-style should be replaced to increase accessibility. For interior doors equipped with door closers, they should open with a maximum 5 pounds of force. Also, for doors with closers, it should take at least three (3) seconds for the door to close.

Reception Area

NLCOG’s reception area is accessible by both visitors and employees. The accessible route leading into the offices is 36 inches. The reception desk is 31 inches high which is within the acceptable limits.

Kitchens

The entrance to NLCOG’s suite kitchen is accessible. The refrigerator, microwave, and coffee maker are all accessible, as is the toaster oven. Access to eating utensils and cleaning supplies is also acceptable. NLCOG subscribes to a bottled water service, so used and unused bottles stay in the corner of the kitchen, though they may restrict access to amenities within the kitchen. When NLCOG replaces its
current refrigerator, it was suggested a side-by-side style would increase the accessibility within the kitchen.

During the self-evaluation it was noted that the sink in NLCOG’s kitchen does not have a cut-out to allow wheelchair users to use the sink. The sink in the upstairs conference room, as well as in the kitchen in the first floor Seminar Room, both have cut-outs allowing wheelchair users to use the sink. All sinks were noted as needing lever or loop handles to allow those with limited use of their hands easier access.

It was suggested that in the fully-equipped kitchen in the Seminar Room, that a mirror be installed to allow visual identification of what is in pots cooking on the stove. Also, the pass-through counter is too high and should be lowered to an acceptable, accessible height.

Supply Room

The supply room is accessible, as are most supplies contained therein. The work table accommodates wheelchair users and is 29 inches high. Temporary obstacles, consisting of boxes and supplies, are deposited in the room prior to putting them away.

First Floor Seminar Room, NLCOG Offices and Second Floor Conference Room

The First Floor Seminar Room is accessible via two entrances directly into the room and through the first floor kitchen. The lighting may present a challenge to those with limited vision. All furniture in the seminar room is moveable; therefore, accessibility challenges may be alleviated quickly.

NLCOG’s offices were constructed to permit access and use. All doors are 36 inches wide with light switches positioned at 36 inches, as well.

The Second Floor Conference Room is accessible, as are the mediation rooms located off of it. The conference room includes one large conference table with rolling chairs. The conference table is an acceptable height. The lighting may present a challenge to those with limited vision. The mediation rooms are accessible with the exception of Room 202C. The door to this room opens into the space needed for a wheelchair to fully enter the room and turn around as needed.

Restrooms

All of the men’s and women’s restrooms on the first and second floor have one stall designated as accessible. The restrooms are not labeled indicating ADA-compliance or provide Braille identification. The accessible stall in each of the restrooms is not conducive to a wheelchair turning around. There is one unisex, fully accessible restroom on the first floor within the suite of the Shreveport Bar Association. Signage above the door indicates the availability, though it is not indicated on any other restroom the
location of the unisex facility.

All lavatories in the restrooms are pedestal-style with a clear front and side access. The lavatory rims are no higher than 34 inches. Soaps and paper towels are within reach ranges. The faucet cannot be operated with a closed fist; therefore, lever or paddle style handles are needed.

**Internal Navigation**

Office hallways are accessible and generally free of obstacles, except on an occasional basis.

**Conclusions**

Deficiencies noted within this Self-Evaluation are recorded in the Transition Plan, along with recommendations for creating an accessible environment and a timeframe for implementing recommended improvements. NLCOG reviews its public documents, including this one, on an annual basis. Any changes to programs, policies or procedures are noted and the document is revised as needed, with appropriate public notice and involvement.
Appendix

Americans with Disabilities Act of 1990 and
Section 504 of the Rehabilitation Act of 1973
Transition Plan

Introduction

As a recipient of federal funding, the Northwest Louisiana Council of Governments (NLCOG) must comply with a variety of federal and state legislative regulations. Regarding matters of non-discrimination on the basis of disability, NLCOG falls under two federal laws: the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973.

Transportation legislation (MAP-21) requires that MPOs conduct a self-evaluation of its programs and facility accessibility, and to prepare a Transition Plan that describes any deficiencies or recommendations, time-frame for carrying out recommendations and approximate costs. In December of 2013, NLCOG conducted a Self-Evaluation of its policies and procedures and physical premises.

This Transition Plan was developed as a result of the Self-Evaluation.

Deficiencies identified in evaluation of NLCOG policies and procedures

<table>
<thead>
<tr>
<th>Deficiency</th>
<th>Recommendation</th>
<th>Approximate Cost</th>
<th>Time Frame</th>
</tr>
</thead>
<tbody>
<tr>
<td>NLCOG’s Employee Handbook of Personnel Rules and Regulations does not include the grievance procedures detailed in the Self – Examination.</td>
<td>Amend the Employee Handbook of Personnel Rules and Regulations to include the grievance procedures detailed in the Self – Evaluation.</td>
<td>Minimal (cost of administrative time and publication of legal notice)</td>
<td>March 2014 (to allow for Executive Committee review)</td>
</tr>
<tr>
<td>The Public Involvement Plan (PIP) does not directly address ADA and Section 504 requirements.</td>
<td>Amend the PIP to include specific language that reflects NLCOG’s actual and intended policies and procedures.</td>
<td>Minimal (cost of administrative time and publication of legal notice)</td>
<td>June 2014 (to allow for the plan update, Executive Committee review and public comment period)</td>
</tr>
</tbody>
</table>
### Deficiencies identified in evaluation of NLCOG premises

<table>
<thead>
<tr>
<th>Deficiency</th>
<th>Recommendation</th>
<th>Approximate Cost</th>
<th>Time Frame</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal navigation is occasionally impeded for people with disabilities by the presence of temporary obstacles.</td>
<td>Remove any obstacles that interfere with the free flow of pedestrian traffic.</td>
<td>None</td>
<td>On-going and as needed</td>
</tr>
<tr>
<td>Telephone is not equipped with TDD/TTY.</td>
<td>Educate and encourage callers needing TDD/TTY service to call the national “711” relay service</td>
<td>None</td>
<td>On-going and as needed</td>
</tr>
<tr>
<td>Website is not accessible to visually-impaired persons.</td>
<td>Work with website developer(s) to update the website for accessibility.</td>
<td>None</td>
<td>June 2014</td>
</tr>
<tr>
<td>Signage indicating accessible entrance</td>
<td>Display signage mounted on wall adjacent to latch side of door with raised characters, Grade II Braille and that meets all other requirements for permanent signage</td>
<td>Minimal</td>
<td>June 2014</td>
</tr>
<tr>
<td>Exterior access via intercom</td>
<td>Lower the intercoms to an acceptable height – no more than 42 inches</td>
<td>Need quote from alarm company</td>
<td>June 2014</td>
</tr>
<tr>
<td>Push button exit at Texas Street entrance</td>
<td>Correct the inoperable button</td>
<td>Need quote and diagnosis of malfunction</td>
<td>June 2014</td>
</tr>
<tr>
<td>Location</td>
<td>Action Description</td>
<td>Cost/Quote</td>
<td>Deadline</td>
</tr>
<tr>
<td>---------------------------</td>
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</tr>
<tr>
<td>Elevator</td>
<td>Adjust the elevator to stop flush with the floor so as not to create a hazard</td>
<td>Consultation and quote with elevator company</td>
<td>June 2014</td>
</tr>
<tr>
<td>Hardware throughout the building</td>
<td>Replace knob-style hardware with lever- or paddle-style hardware on all doors</td>
<td>Minimal; most doors are compliant</td>
<td>June 2014</td>
</tr>
<tr>
<td>Doorways</td>
<td>Adjust door closers on interior doors to no more than 5 pounds of force required to open the door</td>
<td>Minimal</td>
<td>June 2014</td>
</tr>
<tr>
<td>Sinks throughout the building</td>
<td>Replace knob-style hardware on all sinks with lever- or paddle-style hardware</td>
<td>$1,000.00</td>
<td>June 2014</td>
</tr>
<tr>
<td>Seminar Room (first floor)</td>
<td>Lower the pass-through to an acceptable height of no more than 36 inches; replace bulbs to alleviate challenges to those with limited vision</td>
<td>Minimal</td>
<td>June 2014</td>
</tr>
<tr>
<td>Refrigerator in NLCOG’s kitchen</td>
<td>Replace refrigerator with side-by-side style</td>
<td>$1,000.00</td>
<td>As needed</td>
</tr>
<tr>
<td>Room Type</td>
<td>Description</td>
<td>Work Level</td>
<td>Deadline</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Conference room and mediation rooms</td>
<td>Lighting in the conference room may not be adequate for people with limited visual abilities; replacement of the bulbs is needed. Reverse the door swing in Room 202C.</td>
<td>Minimal</td>
<td>March 2014</td>
</tr>
<tr>
<td>Restrooms</td>
<td>Place ADA-complaint signage at all of the restrooms along with instructions to the unisex restroom on the first floor.</td>
<td>Minimal</td>
<td>June 2014</td>
</tr>
</tbody>
</table>
The Northwest Louisiana Council of Governments is an intergovernmental association of local governments established to assist in planning for common needs, cooperating for the mutual benefit, and coordinating for sound regional development. NLCOG’s purpose is to strengthen both the individual and collective power of local governments and to help them recognize regional opportunities, eliminate unnecessary duplication, and make joint decisions for the benefit of the entire Northwest Louisiana community. This is achieved by developing and implementing constructive and workable policies and programs for solving area-wide problems. These issues include, but are not limited to, matters affecting transportation, economic, health, safety, welfare, education, and regional development issues.

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