ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN

WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE OHIO

JUNE 2019

NOTE: Do not delete this page; it is for layout purposes.

EXECUTIVE SUMMARY

William Howard Taft National Historic Site's Accessibility Self-Evaluation and Transition Plan (SETP) includes findings from the self-evaluation process, as well as a plan for improving accessibility parkwide. The Accessibility Self-Evaluation and Transition Plan resulted from the work of a National Park Service (NPS) interdisciplinary team, including planning, design, and construction professionals; and interpretive, resource, visitor safety, maintenance, and accessibility specialists. Site plans, photographs, and specific actions for identified park areas were developed. Associated time frames and implementation strategies were established to assist NPS park staff in scheduling and performing required actions and to document completed work. Park policies, practices, communication, and training needs were also addressed. The goals of the plan are to 1) document existing park barriers to accessibility for people with disabilities, 2) provide an effective approach for upgrading facilities, services, activities, and programs, and 3) instill a culture around creating universal access.

The following are the key park experiences and associated park areas addressed in the transition plan:

- 1) Understand how William Howard Taft's principles of integrity, high academic standards, and work ethic inspired his lifelong commitment to civic duty—locally, nationally, and eventually globally Grounds, William Howard Taft Education Center, William Howard Taft Home
- 2) Learn about William Howard Taft's distinguished career path (judge on the U.S. Circuit Court of Appeals, Governor General of the Philippines, and Secretary of War) and how it prepared him for election to the presidency in 1908, and his appointment in 1921 as Chief Justice of the U.S. Supreme Court – Grounds, William Howard Taft Education Center, William Howard Taft Home
- 3) Follow William Howard Taft's public service career and pragmatic approach as it spanned a period of industrialization, reform, and rapid change in American society as the nation assumed a broader leadership role in world affairs (defining the power and role of the presidency and overhaul of the judicial process) Grounds, William Howard Taft Education Center, William Howard Taft Home
- 4) Understand how the upbringing, family, and home life of William Howard Taft in Mount Auburn influenced his personal values Grounds, William Howard Taft Education Center, William Howard Taft Home
- 5) Learn about William Howard Taft's legacy as a president; how he was more likely to reflect than alter the course of history and how he served from a sense of duty rather than passion Grounds, William Howard Taft Education Center, William Howard Taft Home
- 6) Understand how, as a public figure, William Howard Taft struggled with and influenced a variety of issues that are still part of the public

dialogue, including immigration, global trade, international relations, race, labor relations, and corporate power – Grounds, William Howard Taft Education Center, William Howard Taft Home

Overall, similar services, activities, and programs were found throughout park areas, as were assessment findings for physical and program accessibility.

PHYSICAL ACCESSIBILITY

The physical environment throughout the park was generally found to be accessible. Accessible parking stalls are new and in excellent condition, most routes between parking and the Taft Home and Taft Education Center are gently sloped and either paved or a stable gravel surface, and the Taft Education Center is open and easily maneuverable by all visitors. A notable achievement was the conversion of a dumbwaiter within the historic Taft Home into an elevator, allowing access to all levels and spaces of the home's interior for visitors with mobility impairments. Park staff has made a concerted effort to improve accessibility parkwide, with recent updates to accessible parking and picnic tables. However, a few barriers to accessibility remain in all park areas, mostly obstacles that would only inconvenience a person with a mobility impairment rather than severely limiting their access to services and programs. These include a limited number of accessible picnic tables, some steep running slopes on the carriage path and near the entrance to the Taft Education Center, and restrooms with narrow approaches and incorrectly sized and spaced amenities.

Other physical access issues where improvements are recommended include signing the location of accessible parking near the front entrance to the park, relocating an interpretive wayside to an accessible location, installing standing-level drinking fountains at both the Taft Home and Taft Education Center, and improving the accessibility of restrooms at the Home and Education Center. Upgrades to the small kitchen in the Education Center would better support visitors in wheelchairs. Finally, renovating exhibits, particularly those with protruding plexiglass cases, would ensure visitors who are blind or have low vision do not accidentally run into them.

PROGRAM ACCESSIBILITY

Some of the park's programs and information is accessible, but barriers to programs still exist. The park orientation film is open captioned and assistive listening devices are available; however, audio description for the film and other videos in the Taft Education Center is not. The unigrid is available in Braille, but it and other publications are not available in large print and audio formats. There is no audio tour for exhibits in the Education Center, and live audio description is not provided during guided tours of the Taft Home. A 2021 project to upgrade exhibits in the Taft Home has been funded, and a similar project has been written for the exhibits in the Taft Education Center, although it has yet to be funded. Throughout the park, there are few tactile exhibits to enrich the interpretive experience and explain items for visitors who are blind or have low vision.

Specific instances in which additional programmatic considerations would benefit the user experience include updating the accessibility page of the park website to organize it by type of user (e.g., mobility-impaired, blind or low vision, deaf or hearing-impaired) and including dimensions of the Taft Home elevator; developing a process for hiring a sign language interpreter for events; and training staff on accessibility and proper communication with visitors with disabilities. Renovated exhibits complying with Harpers Ferry Center standards would present the Taft story in a universal way, and combined with new tactile items such as a model of the Taft Home, this action would enhance the experience for all visitors. An audio program and inclusion of audio description on videos would improve the park orientation film and offer additional options to view and experience exhibits.

PARKWIDE ACCESSIBILITY

Some of the more noteworthy park-wide accessibility challenges that were discussed by the planning team during the self-evaluation and assessment process include: developing and providing alternative formats for park publications, renovating exhibits in the Taft Home and Taft Education Center, providing audio description for exhibits, and updating restrooms.

It is recommended that the park employ trained consultants to assist in determining how best to address accessibility improvements park-wide and to ensure that design and implementation of alternate format programs meet the needs of the intended audiences. Notify visitors through signage placed in appropriate locations and in park publications that alternative formats are available.

Creating park-wide accessibility requires staff awareness, understanding, and appropriate action. The assessment process served as a field training tool that increases staff knowledge and commitment toward embracing accessibility as a core park value. Continued training in physical and programmatic access requirements for all park staff, particularly those in maintenance and interpretation, is strongly advised.

Because of fiscal constraints and limited park resources, staff will need to determine which park area improvements will benefit the greatest numbers of park visitors with disabilities. Suggested implementation time frames and relative costs need to be factored into all accessibility investment decisions.

William Howard Taft National Historic Site strives to be inclusive and welcoming. In 2011, the park contracted with the National Center on Accessibility to perform an accessibility assessment. Since that time, the park has acted upon several of the recommendations given by the assessment team. An accessible picnic table was added to the rear parking lot, as was a third accessible parking stall. The park orientation video was made opencaptioned, and a sign was posted at the information desk alerting visitors to the availability of assistive listening devices for the video. A braille version of the park brochure was also made available to visitors. Recognizing that a more complete understanding of how to provide accessibility in a National Historic Landmark and way of tracking accessibility improvements was warranted, the park pursued this second

assessment and drafting of a transition plan. Park staff is committed to making all facilities and programs accessible, and it is evident in the strides they have taken over the last few years.

CONTENTS

EXECUTIVE SUMMARY	3
Physical Accessibility	4
Program Accessibility	4
Parkwide Accessibility	5
INTRODUCTION	9
Park Description	10
Park Purpose and Significance Statements	12
Park Purpose	12
Park Significance	12
Accessibility Self-Evaluation and Transition Plan	13
Implementation of the plan	13
ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN PROCESS	14
Self-Evaluation	14
Step 1: Identify Key Park Experiences and Park Areas	14
Step 2: Identify Park Areas to be Assessed	15
Step 3: Identify Services, Activities, and Programs in Each Park Area	15
Step 4: Conduct Accessibility Assessment	16
Transition Plan	16
Step 5: Draft Transition Plan	16
Step 6: Conduct Public Involvement	17
Step 7: Finalize Transition Plan	17
IMPLEMENTATION STRATEGY FOR WILLIAM HOWARD TAFT NATIONAL	
HISTORIC SITE	
Park Areas Assessed	
Implementation Strategy for Park Areas Assessed	
Grounds	
Site Plan	
Implementation Strategy	
William Howard Taft Education Center	
Site Features	
Implementation Strategy	25

William Howard Taft Home	30
Site Features	30
Implementation Strategy	31
William Howard Taft National Historic Site Policies, Practices, Communication, and Training	. 34
Park Features	34
Implementation Strategy	35
CONCLUSION	40
APPENDIX A: ACCESSIBILITY LAWS, STANDARDS, GUIDELINES, AND NPS POLICIES APPLICABLE TO WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE	43
APPENDIX B: GLOSSARY OF TERMS	55
APPENDIX C: CONTRIBUTORS	58
APPENDIX D: ACTIONS TAKEN BY THE PARK	59
APPENDIX E: GUIDANCE FOR PREPARING PMIS PACKAGES FOR ACCESSIBILITY	60

INTRODUCTION

Since 1916, the National Park Service (NPS) has preserved, unimpaired, the natural and cultural resources and values of the national park system, while also providing for the enjoyment, education, and inspiration of current and future generations.

Many of our national parks were founded because of their stunning views, extreme and unique geography, challenging and sensitive natural environments, and historic and fragile structures. This park, William Howard Taft National Historic Site, and other parks exist because of their history and resources. The NPS mission balances protection of resources (both natural and cultural) with visitation. Facilities, services, activities, and programs were designed and built within parks to accommodate our visitors and help them better understand each park purpose and significance.

Many facilities were constructed prior to the passage of laws and policies that reflect the commitment of the National Park Service to provide access to the widest cross section of the public and to ensure compliance with the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, the Equal Employment Opportunity Act of 1972, and the Americans with Disabilities Act of 1990 (42 USC 12207). The accessibility of commercial services within national parks is also governed by all applicable federal laws. After 100 years of operation, the National Park Service continues to work toward a more inclusive environment. The more than 400 park units that comprise the national park system today include not only the large western parks, for which the agency is well known, but also nationally significant urban parks, historic sites, monuments, parkways, battlefields, and a diversity of other park types across the country.

For a century, the National Park Service has been a leader in connecting people to both our natural and cultural heritage. Visitors today have different needs and expectations, and the agency must adapt to meet these changing demands. Modern scientific research and visitor trend analysis provide new insight into accessibility opportunities and challenges in the national park system. There are approximately 60 million people with disabilities in the United States today, and the number is expected to rise to 71 million in upcoming years as more baby boomers reach retirement age (people 65 and older). This information helps the National Park Service understand changing visitation patterns, the nexus between resource stewardship and accessibility, and the impacts of managing visitors, resources, and infrastructure against the threat of decreased funding. Adequate planning can identify solutions to challenges and provide services with the knowledge and understanding that serves as a trajectory full of opportunity for current and future visitors. The National Park Service is committed to making NPS facilities, programs, services, and employment opportunities accessible to all people, including those with disabilities.

PARK DESCRIPTION

The William Howard Taft National Historic Site (NHS) is at 2038 Auburn Avenue in the Mount Auburn Historic District of Cincinnati, Ohio. The birthplace and boyhood home of the nation's 27th president and 10th Chief Justice, William Howard Taft, was built ca. 1840 in a neighborhood of prominent and stylish homes. During the mid-to-late 19th century, many of the more prosperous residents of Cincinnati moved from the congested lower city along the Ohio River to the suburbs that developed to the north along the higher surrounding hills. Newer neighborhoods such as Mount Auburn offered a mix of urban and rural amenities, fresh air, and cooler conditions.

In 1851, with the success of his law practice and business pursuits, William Howard Taft's father, Alphonso Taft, moved his family (first wife Fanny, their two young children, and Alphonso's parents) from the lower part of town to their new residence situated on about two acres in Mount Auburn. Alphonso remarried following Fanny's death in 1852. He and his second wife, Louise Torrey, their four children (William, the eldest, was born in 1857) and the two children from his first marriage continued to live in the house. The two-story, brick house was about 10 years old when the Tafts acquired the property. It was a modest example of the Greek Revival style popular during the period—square and symmetrical with decorative trim and small front porch. Alphonso soon added a large two-story wing on the east side of the house and made other improvements, including the replacement of the heating, plumbing, and lighting systems.

The front of the house was simply landscaped with lawn, flower beds, shrubs, and trees. The area behind the house, the largest portion of the property, remained primarily rural in character, supporting the family's ties to farm life then common in the area and throughout the Midwest. In this area, the family maintained a carriage barn with room for several horses and a dairy cow and occasionally, a calf. Also at the rear of the house was a large vegetable garden, fruit tree orchard, pasture, beehives for honey, workshop, well, cistern, and other outbuildings. Peter Taft, William's grandfather, assumed much of the responsibility for managing the gardens and agrarian operations. Because of the steep grade at the rear of the house, earth excavated for construction of the house's basement was deposited as fill to help level the area. A fire in 1877 extensively damaged the roof and upper floor of the house, resulting in substantial exterior and interior renovations.

In 1889, Alphonso and Louise moved to California and leased their home in Cincinnati to tenants. The house eventually was sold in 1899. Subsequent owners made a number of modifications to the house and site, including the removal of the garden, carriage barn, and other features behind the house. A later owner divided the deteriorating house into apartments. Efforts to save the house from demolition prompted the establishment of the William Howard Taft Memorial Association in 1937, which acquired ownership of the house in 1968. The property was designated a national historic landmark in 1964. The memorial association donated the property to the federal government in 1969 and it was designated a national historic site under the management of the National Park Service. The agency undertook extensive interior and exterior restoration of the house during the 1980s in efforts to preserve it as a historic house museum reflecting the primary period of Taft family occupation from about 1851 to 1877. Interpretive exhibits are presently

arrayed on the second floor of the house. The first floor has been restored to approximate the home's appearance during the Taft family residency with period furnishings and other decorative elements.

William Howard Taft's home life and the exemplary values and ideals imparted by his parents during his upbringing in Mount Auburn are recognized as substantial influences on his long and varied career of public service. At the home, gala holiday festivities and discussions with visiting dignitaries on topics such as anti-slavery legislation and women's suffrage were not uncommon. Access to his father's extensive library and book collection contributed to young William's literary and intellectual development. Other than for occasional visits, William Howard Taft's association with his boyhood home ended following his graduation from Yale University in 1878 and the Cincinnati Law School in 1880. In 1886, he married Helen "Nellie" Herron and the couple moved to a home on McMillan Street in Cincinnati.

Taft valued his father's hard work and service to the Republican Party, dedication that led Alphonso to the position of city judge and later appointments to Washington, D.C., as President Ulysses S. Grant's secretary of war and later as attorney general. William H. Taft's own diverse career followed a trajectory similar to that of his father, with government positions and appointments ranging from revenue collector, Ohio Superior Court judge, U.S. Solicitor General, U.S. Circuit Court of Appeals judge, first Civil Governor of the Philippines, U.S. Secretary of War in Theodore Roosevelt's cabinet, President of the United States (1909 to 1913), and eventually to the position he most coveted, Chief Justice of the United States (1921 to 1930). He resigned the position of Chief Justice due to illness shortly before his death in 1930.

Taft's presidential legacy reflects his cautious adherence to constitutional law and his reluctance to broadly expand the powers of the office in the manner of his predecessor, Theodore Roosevelt. Taft was therefore criticized by Republican progressives for not doing more to further Roosevelt's reform agenda, and by old guard Republicans for perceived threats to free markets and lucrative monopolies. Nevertheless, his administration supported the constitutional amendment providing for an income tax, strengthened the Interstate Commerce Commission to better regulate transportation and restrain railroad rate wars, and brought dozens of antitrust suits to curtail the power of big business monopolies. As Chief Justice, he was a strong proponent of judicial reform, including measures to alleviate the overwhelming backlog of cases confronting the Supreme Court. His backing of the Judiciary Act of 1925 allowed the high court to select cases for review based on merit. Many of the court's decisions during his tenure strengthened the powers of the federal government.

The modern NPS Taft Education Center is situated immediately north of the Taft House, offering visitors interactive exhibits, an orientation film, and a concessioner-managed gift shop. The center also provides offices for NPS staff, storage of collection items, and a meeting space valued by members of the local community for meetings and events. NPS staff members conduct guided interpretive tours of the house for visitors, school groups, and others. On Sundays during the month of May, NPS staff offer guided walking tours

of the Mount Auburn Historic District, interpreting the neighborhood's history and diversity of 19th century architectural styles.

PARK PURPOSE AND SIGNIFICANCE STATEMENTS

In 2014, William Howard Taft National Historic Site completed a foundation document. Foundation documents provide basic guidance for planning and management decisions by identifying the park purpose, significance, and fundamental resources and values. The William Howard Taft National Historic Site foundation plan identifies special mandates and administrative commitments and provides an assessment and prioritization of park planning and data needs. Understanding these elements helps set the stage for appropriately integrating accessibility into the overall park priorities and plans. The following foundation elements were identified for William Howard Taft National Historic Site.

Park Purpose

The purpose of William Howard Taft National Historic Site is to preserve, protect, and interpret the birthplace, home, and legacy of future President and Chief Justice William Howard Taft.

Park Significance

- 1. The Taft family home is significant as a foundation for instilling William Howard Taft's principles of integrity and high academic standards and inspiring his life-long commitment to civic duty—locally, nationally, and eventually globally.
- 2. William Howard Taft held an important series of positions, including judge on the U.S. Circuit Court of Appeals, Governor General of the Philippines, and Secretary of War. These steps along his distinguished career path prepared him for election to the presidency in 1908, and his appointment in 1921 as Chief Justice of the U.S. Supreme Court. Taft is the only person to head both the executive and judicial branches of U.S. government.
- 3. William Howard Taft's public service career spanned a period of industrialization, reform, and rapid change in American society as the nation assumed a broader leadership role in world affairs. Taft's pragmatic approach and dedication to constitutional law addressed many pressing governmental issues including defining the power and role of the presidency and overhaul of the judicial process.

ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN

The creation of a transition plan is mandated by regulations under the Rehabilitation Act of 1973, as they apply to the U.S. Department of the Interior, which states that "No otherwise qualified handicapped individual in the United States . . . shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance." It specifically requires parks to document architectural barriers, solutions, and time frames for making improvements to increase accessibility.

This Accessibility Self-Evaluation and Transition Plan has been prepared to provide William Howard Taft National Historic Site a tool for addressing overall needs associated with making the park accessible when viewed in its entirety. The plan is based on an understanding of key park experiences and establishes a methodical process that identifies, prioritizes, and outlines improvements to park accessibility. The plan proposes strategies for implementation over time and in a manner consistent with park requirements and protocols.

All key park experiences and all park areas were identified to ensure that all park programs were considered in the plan. Park areas were then evaluated against measurable criteria to determine which would be assessed for purposes of the plan. Each park area assessed was evaluated to identify barriers that prevented participation in park programs, and the best manner in which access could be improved. In some situations, it is not reasonably practicable to create physical or universal design solutions. A transition plan was drafted documenting the barriers and setting forth a strategy for removing them.

IMPLEMENTATION OF THE PLAN

One of the goals of the plan is to increase accessibility awareness and understanding among staff and volunteers of William Howard Taft National Historic Site. The park superintendent is responsible for implementing and integrating the plan. The park-designated accessibility coordinator ensures adequate communication to park employees and works with the superintendent to follow up on the implementation and relevancy of the plan by documenting improvements and keeping the plan updated.

ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN PROCESS

SELF-EVALUATION

The following graphic illustrates the primary steps in the self-evaluation process. Each step is further described in the following text.



Step 1: Identify Key Park Experiences and Park Areas

Key park experiences are those park experiences that are iconic and important for visitors to understand the purpose and significance of the park unit. They are "musts" for park visitors. Park legislation serves as the foundation for key park experiences, which are identified through park purpose, significance, interpretive themes, and those programs or activities highlighted in park communications. Key park experiences were identified at William Howard Taft National Historic Site to ensure that planned improvements were prioritized to best increase overall access to the experiences available.

Understand how William Howard Taft's principles of integrity, high academic standards, and work ethic inspired his lifelong commitment to civic duty—locally, nationally, and eventually globally

- 1. Learn about William Howard Taft's distinguished career path (judge on the U.S. Circuit Court of Appeals, Governor General of the Philippines, and Secretary of War) and how it prepared him for election to the presidency in 1908, and his appointment in 1921 as Chief Justice of the U.S. Supreme Court
- 2. Follow William Howard Taft's public service career and pragmatic approach as it spanned a period of industrialization, reform, and rapid change in American society as the nation assumed a broader leadership role in world affairs (defining the power and role of the presidency and overhaul of the judicial process)

- 3. Understand how the upbringing, family, and home life of William Howard Taft in Mount Auburn influenced his personal values
- 4. Learn about William Howard Taft's legacy as a president; how he was more likely to reflect than alter the course of history and how he served from a sense of duty rather than passion
- 5. Understand how, as a public figure, William Howard Taft struggled with and influenced a variety of issues that are still part of the public dialogue, including immigration, global trade, international relations, race, labor relations, and corporate power

After key park experiences were identified, all park areas were listed. Next, a matrix was developed to determine which key experiences occurred in each park area. A park area is a place defined by the park for visitor or administrative use. All park areas within William Howard Taft National Historic Site were evaluated per criteria in step 2, to determine which, if not all, areas would be assessed.

Step 2: Identify Park Areas to be Assessed

The criteria below were used to determine which park areas would receive assessments:

- 1) Level of visitation
- 2) Diversity of services, activities, and programs offered in the area
- 3) Geographic favorability (as a whole, the park areas selected reflect a broad distribution throughout the park)
- 4) Other unique characteristics of the site

The areas selected for assessment provide the best and greatest opportunities for the public to access all key park experiences. These park areas received comprehensive assessments as outlined in steps 3 and 4. Areas not assessed at this time are to be assessed and improved as part of future facility alterations or as a component of a future planned construction project.

Step 3: Identify Services, Activities, and Programs in Each Park Area

During step 3, all services, activities, and programs within each park area were identified. This process ensured that during step 4 all visitor amenities within a park area, including both physical and programmatic elements, were reviewed for accessibility. The comprehensive lists of services, activities, and programs were the basis for conducting the three assessments and documenting all elements as they pertained to improving access to park experiences.

Step 4: Conduct Accessibility Assessment

During step 4, an interdisciplinary assessment team identified physical and programmatic barriers and reviewed possible solutions within each park area.

Existing conditions and barriers to services, activities, and programs were discussed on-site by the assessment team. The assessment team then developed a reasonable range of recommended actions for consideration, including solutions that would provide universal access. Barrier-specific solutions, as well as alternative ways to improve access overall, were addressed and included both physical changes and/or the addition of alternate format methods. In some cases, programmatic alternatives needed to be examined because it was not always possible to eliminate physical barriers due to historic designations, environmental concerns, topography, or sensitive cultural and natural resources. Therefore, a full range of programmatic alternatives was considered that would provide access to the key experience for as many visitors as possible. All field results, including collected data, findings, preliminary options, and conceptual site plans, are organized by park area and formalized with recommendations in the transition plan.

TRANSITION PLAN

The following graphic illustrates the primary steps taken in developing the William Howard Taft National Historic Site transition plan. Each step is further described in the following text.



Step 5: Draft Transition Plan

The next step of the process is drafting the transition plan and implementation strategy. Developing an implementation strategy can be complex because of a large range of coordination efforts associated with scheduling accessibility improvements. All improvement efforts need to consider park activities and operational requirements. The plan recommends accessibility improvements, identifies improvement time frames, and identifies responsible parties for such actions.

Implementation time frames are based on the park's ability to complete the improvements within normal scheduling of park operations and planned projects. Time frames are categorized as follows:

1) **Immediate (0–1 year):** Improvements that are easy, quick, and inexpensive to fix internally. It does not require supplemental NPS project funding.

immediate

2) **Short-term (1–3 years):** If the improvement does not require supplemental NPS project funding, park staff will initiate the elimination of the barrier internally; or, if a project is currently scheduled for funding, the improvement will be incorporated into the project and the barrier eliminated.

short-term

3) **Mid-term (3–7 years):** The park will develop a proposal and submit it for those projects requiring supplemental NPS project funding in the next annual servicewide budget call. For those projects requiring supplemental NPS project funding, the park will submit a request in the next budget call. Improvements will be scheduled dependent upon the year funding is received. If the improvement does not require supplemental NPS project funding, park staff will continue the elimination of the barrier internally.

mid-term

4) **Long-term (>7 years):** The park will eliminate the barrier when other work is taking place as part of facility alterations or as a component of a future planned construction project.

long-term

Step 6: Conduct Public Involvement

Public involvement occurs at the draft stage of the transition plan; however, it is recommended that at the beginning of the SETP process parks initiate public outreach efforts with organizations representing people with disabilities. The draft plan will be released for a 30-day period to solicit input from the public, including people with disabilities and organizations that represent people with disabilities, to provide comments and thoughts on whether the document represents a reasonable review of the park's barriers and a feasible and appropriate strategy for overcoming the barriers.

Step 7: Finalize Transition Plan

After the comment period has closed, the park will analyze all comments to determine if any revisions to the plan are necessary. Those revisions will be made before the implementation strategy is finalized. Once finalized, a notification will be sent to the public to announce the plan's availability.

IMPLEMENTATION STRATEGY FOR WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE

PARK AREAS ASSESSED

All key park experiences at William Howard Taft National Historic Site are represented within the park areas assessed. Park areas not included in the park area list will be upgraded to current code requirements when facility alteration and/or new construction is planned. Each park area identified for assessment is addressed during the implementation strategy exercise. All park areas assessed are listed in alphabetical order and identified in the associated map below.

- 1) Grounds
- 2) William Howard Taft Education Center

3) William Howard Taft Home



IMPLEMENTATION STRATEGY FOR PARK AREAS ASSESSED

The Architectural Barrier Act (ABA) of 1968 requires that any building or facility designed, constructed, altered, or leased with federal funds be accessible and usable by any individuals with disabilities. The Uniform Federal Accessibility Standards (UFAS) and the Architectural Barriers Act Accessibility Standards (ABAAS) were adopted for federal facilities in 1984 and 2006, respectively. Subsequently in 2011, standards for recreational facilities were incorporated into ABAAS as chapter 10.

Dependent upon the date of a building's construction or alteration, different design standards apply. In conducting the transition plan facility assessments, the 2011 ABAAS standards were used as the on-site assessments. Although a barrier may be identified by the current assessment for improvement, facilities constructed pre-1984, or between 1984 and 2011, are only required to be in compliance with the standard in place at the time of construction and/or alteration. Therefore, they may not be in violation of ABAAS. However, any renovation or upgrade of that building will be required to meet the most current standard at the time of work.

Recommended improvements for park policies, practices, communication and training are included. Park policies are adopted by the park and are those defined courses of action for reaching a desired outcome. Park practices are those habitual and/or customary performances or operations park staff employs for reaching a desired outcome. Communication and training strategies help park staff keep informed on how to best deliver services, activities, and programs to visitors with disabilities in the most appropriate and accessible formats.

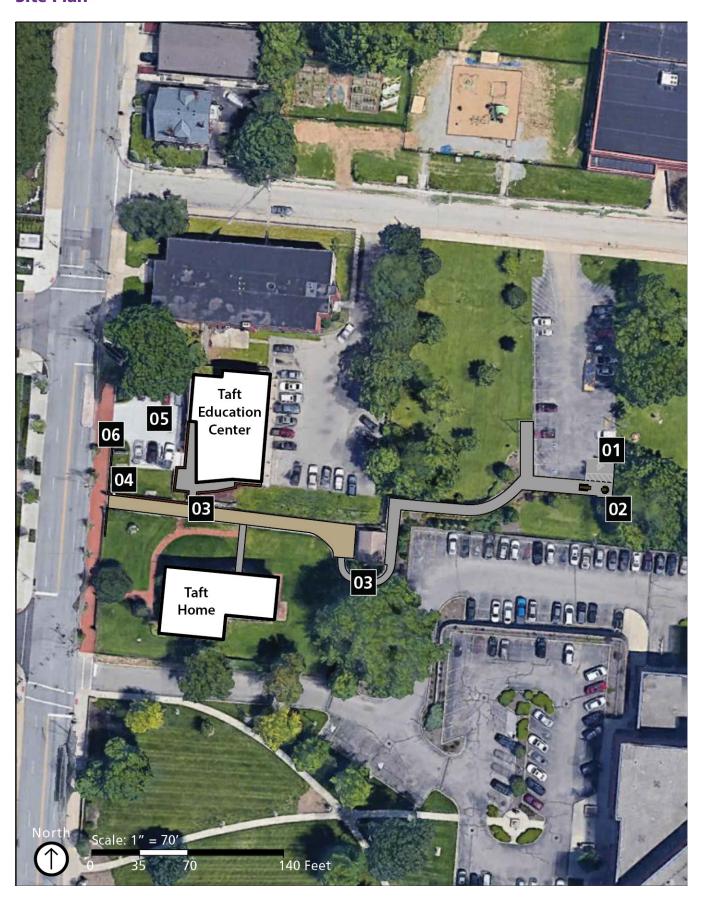
This document does not include strategies for transitioning employee workspaces to be accessible. In the event an employee with a disability is hired by William Howard Taft National Historic Site, the supervisor and employee will discuss the employee's needs. The supervisor will then determine what accommodations are reasonable within the given work environment and determine a plan of action to meet those needs.

For each park area, site plans illustrate existing conditions and recommended improvements. During the implementation phase, reassessment of the project site conditions and consultation with the Architectural Barriers Act Accessibility Standards is necessary to ensure that specific design and programmatic solutions are addressed correctly. Assistance is available at the Denver Service Center and through the Mid West Region Accessibility Coordinator.

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GROUNDS

Site Plan



Implementation Strategy

The park grounds connect the William Howard Taft Home and William Howard Taft Education Center to parking, public streets and sidewalks, and other support areas and facilities. Included on the grounds are the front parking lot, the rear support parking lot, picnic tables, routes between facilities, interpretive elements, and orientation signage. Visitors generally come to the site by personal vehicle, park in the front or rear lots (with visitors requiring accessible parking using the latter), and then make their way to the Taft Education Center for park orientation. Access to the grounds is self-guided, while access to the Taft Home is by guided tour, which begins at the Taft Education Center. Generally the grounds are accessible, with new accessible parking stalls, fairly level paved and gravel routes between facilities, and an accessible picnic table. Accessibility could be improved with an additional accessible picnic table and level pad connecting accessible parking stalls to the tables, handrails at a ramped section of the route near the Taft Education Center, a relocated interpretive wayside near the street side entrance to the park, and improved orientation signage for visitors unsure where accessible parking is located.

The following improvements to this park area are planned:

01 Car Parking (rear lot)

1) Determine if a third stall is warranted. If stall remains signed accessible, stripe a 5' minimum width adjacent access aisle. Ensure that stall and access aisle are at no more than a 2% slope in all directions.

Short-term

02 Picnic Facilities

1) Convert one picnic table to be accessible, preferably a rectangular table. Pave a pad next to the existing accessible table for the converted table. It shall be at a 2% maximum slope in all directions. Ensure that at least 3' clear space is provided around all sides of each picnic table. Ensure that a route connects the accessible parking stalls to the accessible picnic tables.

Short-term

03 Accessible Route

1) Reduce the vertical thresholds in the path to be no more than $\frac{1}{4}$ " in height or $\frac{1}{2}$ " with a beveled edge. Reduce the width of breaks between sidewalk panels or surfaces to be no wider than $\frac{1}{2}$ ".

Immediate

2) Install handrails on both sides of the ramp run near the education center. Ensure that handrail extensions are provided at the top and bottom of the ramp.

3) As feasible and so as not to damage the historic integrity of the carriage path, regrade the path to have running slopes no greater than 5%. Improve the turning space near the education center ramp to be at least 5" by 5" at a 2% maximum slope in all directions.

Mid-term

04 Interpretive Waysides

1) Relocate the wayside to an accessible location, possibly just inside the park fence along the carriage path. The wayside shall have a forward approach 30" by 48" minimum at a 2% maximum slope in all directions. The bottom edge of the wayside should be no higher than 32". Ensure that at least 27" knee clearance is provided underneath the wayside panel.

Long-term

05 Car Parking (front lot)

1) Install a new sign next to the Auburn Avenue parking lot entrance to direct visitors needing accessible parking to the rear parking lot off Southern Avenue.

Immediate

Orientation Signage

1) Install signage identifying locations of accessible entrances for both the education center and the Taft Home.

Short-term

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WILLIAM HOWARD TAFT EDUCATION CENTER

Site Features



Implementation Strategy

The William Howard Taft Education Center is typically the first stop for visitors to the park. The building houses an information desk, bookstore, restrooms, exhibits, meeting spaces, and staff offices. Visitors come to learn about the park, use the restrooms, watch the orientation film, gather for the park tour, and even gather for local community events such as Toastmasters. Many services in the building are accessible; the information desk is uncluttered and at an appropriate height, the bookstore is open and most items are within reach range, and the park film has open captioning. Assistive listening devices are available for guided tours, and a sign at the information desk informs visitors that the devices are available. The park brochure (unigrid) is available in braille, and a wheelchair is available for visitors with mobility impairments. Physical accessibility could be improved by fully renovating restrooms, installing a second drinking fountain, and lowering a few elements in the conference room's small kitchen. Accessibility to programs could be improved by updating exhibits and installing tactile maps and models, improving interpretation through an audio tour, providing audio description on the park film, and updating publications with large print and braille versions.

The following improvements to this park area are planned:

01 Entrance Door

1) As best practice, install an automatic door opener for the front entrance door.

Mid-term

02 Video in the Entrance Area

1) Provide audio description for the entrance-area video. It shall describe the content and communication visible on the screen.

Mid-term

03 Passport Table

1) Replace the passport table with a unit that has a tabletop between 28" and 34" above the floor. Ensure that at least 27" minimum-height knee clearance is provided underneath.

Short-term

O4 Drinking Fountains

1) Provide a high drinking fountain with a spout between 38" and 43" in height.

Long-term

05 Men's Restroom

- 1) Relocate the braille identification sign adjacent to the latch side of the restroom door. The base of the lowest tactile characters shall be 48" minimum in height above the floor and the tops of the highest tactile characters 60" maximum in height above the floor. Provide a clear floor space 18" by 18" underneath the sign.
- 2) Install door pulls on both sides of the accessible stall door.
- 3) Lower the mirror above the sink so that its bottom edge is no more than 40" above the floor.
- 4) Replace the side wall grab bar with a unit 42" minimum in length. Ensure that the top of its gripping surface is between 33" and 36" above the floor and that it has no more than 1 ½" gap between its inner edge and the wall.
- 5) Relocate toilet paper dispensers to be at least 1 ½" below the side wall grab bars and between 7" and 9" in front of the toilets to the centerline of the dispensers.
- 6) Lower or replace the paper towel dispenser so that it is accessible between 15" and 48" above the floor.
- 7) Relocate the baby changing station so that the working surface is 34" maximum above the floor, and 27" minimum-height knee clearance is provided.
- 8) Relocate or replace the hand dryer so that it does not project into the circulation route.

Short-term

9) Alter the exit approach from the restroom to provide at least 48" depth perpendicular to the door.

Long-term

Women's Restroom

- 1) Relocate the braille identification sign adjacent to the latch side of the restroom door. The base of the lowest tactile characters shall be 48" minimum in height above the floor and the tops of the highest tactile characters 60" maximum in height above the floor. Provide a clear floor space 18" by 18" underneath the sign.
- 2) Install door pulls on both sides of the accessible stall door.
- 3) Lower the mirror above the sink so that its bottom edge is no more than 40" above the floor.
- 4) Lower the sanitary napkin dispenser or replace the unit so that its coin slot, buttons, and dispenser are between 15" and 48" above the floor.

06

- 5) Lower the sink so that its surface is no more than 34" above the floor. Ensure that 27" minimum-height knee clearance is provided underneath.
- 6) Replace the side wall grab bar with a unit 42" minimum in length. Ensure that the top of its gripping surface is between 33" and 36" above the floor and that it has no more than 1 ½" gap between its inner edge and the wall.
- 7) Relocate the toilet paper dispenser to be at least 1 ½" below the side wall grab bars and between 7" and 9" in front of the toilets to the centerline of the dispensers.
- 8) Lower or replace the paper towel dispenser so that it is accessible between 15" and 48" above the floor.
- 9) Relocate the baby changing station so that the working surface is 34" maximum above the floor, and 27" minimum-height knee clearance is provided.

Short-term

07 Kitchen

- 1) Lower at least a 30" minimum-width portion of the counter, including the sink, to be no more than 34" in height, OR provide an accessible option elsewhere. Keep at least this portion of the countertop free of appliances and other items.
- 2) Relocate the microwave to be operable between 15" and 48" above the floor.
- 3) Relocate the paper towel dispenser to the side wall where a user does not have to reach further than 20".

Mid-term

08 Exhibits

- 1) Replace the screen in the "Charlie on the Log" diorama, add open captions, and include the exhibit on a potential audio tour.
- 2) Improve exhibits to use appropriate sans serif fonts, no italics or all caps, and maintain at least 70% contrast between text and images.
- 3) Provide audio description for the exhibits on an audio tour to enrich the experience for visitors who are blind or have low vision.
- 4) As a best practice and to complement park interpretive themes, provide a diverse interpretive experience by including additional tactile exhibits. Examples include a model of the Taft Home and a 3-D or raised-line map of Cincinnati at the time of Taft's residency. Ensure that tactile exhibits use forward approaches where feasible.

09 Theater

1) Provide at least one accessible seating space by moving a chair. As best practice, identify that space by indicating its use in the floor.

Immediate

2) Consider establishing a room plan with standard operating procedures for integrated seating within the theater.

Short-term

3) Provide tactile signage in the theater and all other permanent rooms identifying the rooms and exits.

Mid-term

4) Provide audio description for the park film describing what can be seen on screen.

Long-term

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WILLIAM HOWARD TAFT HOME

Site Features



Implementation Strategy

The William Howard Taft Home was where William Howard Taft was born and raised. Most visitors to the park come to see and experience this National Historic Landmark, a home that shaped Taft's character and philosophy. The home is surprisingly accessible; few 19th-century, multi-story homes offer visitors with disabilities the ability to explore all stories and rooms in the building. This one does. By guided tour, visitors with disabilities enter the home through a ground-level entrance in the basement and access the second and third stories through a converted dumbwaiter that is now an elevator. Rooms within the home are mostly open and uncluttered, and visitors view furniture, objects, and exhibits from over railings and ropes. Due to the historic significance of the building, some accessibility improvements cannot feasibly be made, such as removing steps to provide an accessible front entrance, updating doorknobs with handles, and enlarging the bathrooms to provide additional maneuvering clearance. Accessibility could be improved by relocating items in the single-user restroom in the basement, installing a second drinking fountain, updating exhibits, providing audio description in an audio tour, and providing tactile replicas of important and unique home items.

The following improvements to this park area are planned:

01 Restroom (downstairs)

- 1) As feasible and so as not to damage the historical significance of the door, improve the door handle to be operable with a closed fist.
- 2) The restroom is required to be 60" minimum in width. However, due to the historic significance of the building, it is not feasible to widen this restroom. When the restroom is renovated in the future, document why the restroom could not be improved in this way. Inform visitors that a wider, fully-accessible restroom is available in the education center.
- 3) The angled wall in the restroom projects into the circulation route.
- 4) Provide a braille identification sign adjacent to the latch side of the restroom door. The base of the lowest tactile characters shall be 48 "minimum in height above the floor and the tops of the highest tactile characters 60 "maximum in height above the floor. Provide a clear floor space 18 by 18 underneath the sign.
- 5) Lower the mirror above the sink so that its bottom edge is no more than 40" above the floor.
- 6) Lower the sink so that its surface is no more than 34" above the floor. Ensure that 27" minimum-height knee clearance is provided underneath.
- 7) Replace the side wall grab bar with a unit 42 " minimum in length. Ensure that the top of its gripping surface is between 33" and 36" above the floor and that it has no more than 1 ½ " gap between its inner edge and the wall.

- 8) Relocate the rear wall grab bar to be 12" from the centerline of the toilet towards the side wall and 24" from the centerline of the toilet in the other direction.
- 9) Wrap the pipes underneath the sink to prevent burns and abrasions.

Mid-term

02 Drinking Fountains

1) Provide a high drinking fountain with a spout between 38" and 43" in height.

Mid-term

03 Elevator

1) Remove the tape on the braille identification next to the elevator gate and ensure that braille has the appropriate identification.

Short-term

04 Exhibits

- 1) Improve exhibits to use appropriate font sizes (24 pt.), sans serif fonts, and 70% minimum contrast between text and images. Remove projecting items (more than 4") from the circulation route. Relocate text items away from reader rails so that they are readable by both standing and seated visitors.
- 2) As a best practice and to complement park interpretive themes, provide a diverse interpretive experience by including additional tactile exhibits. Examples include unique and tangible items from the home, 3-D maps, and models. Ensure that tactile exhibits use forward approaches where feasible.

Mid-term

3) Provide audio description for the exhibits and house on an audio tour, or have park guides share live audio description to enrich the experience for visitors who are blind or have low vision.

Long-term

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WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE POLICIES, PRACTICES, COMMUNICATION, AND TRAINING

Park Features



Implementation Strategy

Instructions: Update all language and time frame bars to match the separate implementation strategy table Excel file. Delete any services, activities, and programs within this section that are not pertinent to the park.

Park policies and practices are specific to the park unit and provide guidance for reaching desired outcomes. Park policies are defined courses of action adopted by the park, while park practices are those habitual and/or customary performances of operations that the park employs.

Posting and Publications

01 Accessibility Flyers Posted in Common Areas

1) Place posters in common areas of staff and visitor buildings that provide accessibility-related information, including requirements, contacts, questions, and complaints.

Immediate

02 **Publications**

- 1) Provide braille publications and tactile wayfinding maps.
- 2) Provide audio-described publications.
- 3) Provide large-print format publications. Use a minimum readable typeface at 18-point font. Align flush left and rag right. Avoid hyphens. Use black or white type color and avoid red text. Avoid italicized and underlined text. Provide graphics with at least 70% contrast.

Long-term

4) Add accessibility information in all publications, as they relate to services, activities, and programs.

Mid-term

Staff Training and Park Protocols

03 Accessibility Awareness Training

1) Provide ongoing accessibility awareness training for all staff, including permanent and nonpermanent employees.

Short-term

04 Accessible Facilities and Maintenance Training

1) Provide ongoing training for maintenance staff on planning, maintaining and constructing accessible facilities, including, but not limited to, restrooms, walks and trails, door pressure requirements, assistive devices, accessible routes, and universal design principles.

Short-term

05 Emergency Preparedness

1) Develop, distribute, and practice standard operating procedures for assisting people with disabilities in the case of an emergency.

Immediate

Movable Seating

1) Develop and distribute standard operating procedures for movable seating arrangements and moving things to create an accessible route and maintain integrated accessible seating. Post a map in an area with accessible layout and instructions for use of the space.

Mid-term

Other Power-Driven Mobility Devices (OPDMDs)

1) Provide guidance outlining the use of OPDMDs within the park.

Short-term

08 Wheelchairs

- 1) Provide a standard operating procedure or guidance on protocol for pre- and post-inspecting, cleaning, and maintenance of wheelchairs.
- 2) Inform visitors and program participants that wheelchairs are available upon request. Provide information on wheelchair/beach wheelchair availability in all publications and on signage. Inform visitors using services, activities, and programs that wheelchairs are available upon request.

Immediate

Audio and Visual Programs

09 Assistive Listening Devices (ALDs)

1) Develop and distribute standard operating procedures or guidance for checking out and returning assistive listening devices.

- 2) Develop and distribute standard operating procedures or guidance describing protocol for pre -and post-inspection of the devices and for cleaning and maintaining all devices.
- 3) Provide signage and information where programs are offered stating device availability. Verbally inform visitors and program participants that auxiliary aids are available. Add information to all publications and communications stating that assistive listening devices are available and provide information on how they can be attained.

Mid-term

10 Live Audio Description

1) Provide live audio description on guided interpretive tours when needed.

Short-term

11 Open Captioning and Audio Description

1) Provide open captioning on videos and indicate its availability on the park's website.

Short-term

2) Provide audio description of all images shown on the videos.

Mid-term

12 T-Coil Hearing Loops or Neck Loops

- Purchase T-coil hearing loops and neck loops. Inform visitors and program participants that auxiliary aids are available and provide information on checkout procedures. Post signage in appropriate locations and in all publications specifying availability of services.
- 2) Develop and distribute standard operating procedure or guidance for checking out and returning T-coil hearing loops and neck loops.
- 3) Develop and distribute standard operating procedures or guidance for pre-and post-inspection of T-coil hearing loops and neck loops and cleaning and maintenance of all devices.

Mid-term

Visitor Information

13 Communication

1) Provide park e-mail address and telephone number on the park's website and in publications for questions: wiho information@nps.gov.

2) Develop an accessibility guide for William Howard Taft National Historic Site that outlines accessible services, activities, and programs.

Mid-term

14 Outreach

- 1) Conduct outreach via social media (Pinterest, Facebook, Snapchat, Twitter, etc.) to describe accessible programs, services, and activities available at the park.
- 2) Conduct outreach via traditional media and other advertising methods to describe accessible programs, services, and activities available at the park.
- 3) Contact groups with disabilities to inform them about the accessible programs, services, and activities that have become available at the park as solutions are implemented.
- 4) Outreach to and engage groups with disabilities to determine appropriate ways to involve them in park accessibility improvement projects as they occur (caseby-case basis).

Short-term

15 Signage

1) Provide signage at the education center that states availability of accessible alternative formats.

Immediate

16 Website

- 1) Provide information on the park's website that accessible programs, services, and activities are available, including, but not limited to, audio description, assistive listening devices, Braille/tactile features, accessible tours, open captioning, trails, etc.
- 2) Provide a manual switch on all websites to enable changing font size. Provide flush left and rag right alignment. Avoid hyphens. Use black or white type color. Avoid the use of red or green text. Avoid italicized and underlined text. Avoid use of all caps or italics. Provide graphics with at least 70% contrast. Provide Word documents as an alternative to PDFs.

Short-term

Tours, Programs, and Special Events

Tours (Guided and Self-Guided), Educational Programs, and Special Events

 Upon request, provide alternative formats such as trail information in large print; audio descriptions for tours; educational programs; or special events. Provide alternative formats on park website and in publications at visitor center.

Mid-term

2) Provide information on the physical conditions of the tour, education program, or special event (e.g., number of steps, slopes, other barriers that exist, etc.) on-site, in a publication and/or on a website.

Short-term

18 Sign Language Interpreters

- 1) Develop the process for requesting sign language interpreters. Provide sign language interpreters within five days of request.
- 2) Develop and distribute standard operating procedures for contacting and scheduling sign language interpreters.

Short-term

19 Special Events

- 1) Provide a system for people to call in and request a sign language interpreter within five days of service. Provide assistive listening devices and a T-coil or neck loop system. Post signage indicating devices and systems are available for special events. Provide large print of any handouts or waivers being provided.
- 2) Provide information on how people can contact the park for accommodations for special events, and release event announcements in a variety of accessible methods (e.g., large-print flyers, electronic accessible PDFs, etc.)
- 3) Develop and distribute a standard operating procedure on how to post accessibility information and how to request accommodations on event announcements.

Mid-term

CONCLUSION

William Howard Taft National Historic Site is committed to providing all visitors the opportunity to connect with and learn about the park's unique natural, cultural, and recreational resources. Accessibility improvements identified in the William Howard Taft National Historic Site Self-Evaluation and Transition Plan will make it easier for individuals with cognitive, hearing, vision, and mobility disabilities to discover, understand, and enjoy the range of experiences available at the park. Implementation of the plan will ensure that William Howard Taft National Historic Site will continue to work toward accommodating all park visitors while sustaining its legacy to preserve, protect, and interpret the birthplace, home, and legacy of future President and Chief Justice William Howard Taft.

The Self-Evaluation and Transition Plan for William Howard Taft National Historic Site is a living document intended to be used as a guiding reference for the park as it implements accessibility upgrades and documents accessibility accomplishments. As barriers to accessibility are removed and/or improved, the changes will be updated in this plan. The park will conduct periodic reviews to evaluate and update conditions to reflect accomplishments and to document new programs or other changes that occur over time. Revisions to the plan may include conducting additional assessments for areas not originally conducted as a part of this plan.

The primary goal of the transition plan is to define key park experiences and document modifications needed to provide independent program participation for the widest range of disabilities possible. As the park works towards its accessibility goals and makes the implementation strategy a reality, both physical and programmatic accessibility will improve across the breadth of key park experiences at William Howard Taft National Historic Site.

For visitors with mobility disabilities, access will be improved from the moment they enter the park. Facilities, as well as numerous programs, services, and activities the park offers will be more universally accessible. Experiences such as learning about William Howard Taft and his legacy, visiting the Taft Home, picnicking, and immersion into the history and significance of the park will be enhanced.

Park programs will be created and delivered for all visitors, including visitors with mild to severe disabilities impacting their mobility, vision, hearing, and/or cognitive abilities. Ranger led walks/talks, visitor center exhibits, films, trail waysides, and all materials that interpret park resources to the public will be provided in formats that allow visitors with disabilities to participate fully. Some of those formats include, but are not limited to: large-print transcripts for printer materials, audio description for exhibits and films, assistive listening devices and sign language interpreters for ranger-led tours and programs, T-coil hearing loops for park films.

Over time, the results of this collective effort will make William Howard Taft National Historic Site a truly welcoming and accommodating place for all visitors and will provide equal opportunity to access the many places, resources, stories, and experiences the park has to offer.

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APPENDIX A: ACCESSIBILITY LAWS, STANDARDS, GUIDELINES, AND NPS POLICIES APPLICABLE TO WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE

As a national park, William Howard Taft National Historic Site is required to comply with specific federal laws that mandate that discriminatory barriers be removed to provide equal opportunities to persons with disabilities. The following laws, design guidelines, and Director's Orders specifically pertain to William Howard Taft National Historic Site.

LAWS AND STANDARDS

A law is a principle and regulation established in a community by some authority and applicable to its people, whether in the form of legislation or of custom and policies recognized and enforced by judicial decision. A standard is something considered by an authority or by general consent as a basis of comparison; an approved model. It is a specific low-level mandatory control that helps enforce and support a law.

Architectural Barriers Act of 1968

http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba-standards

The Architectural Barriers Act of 1968 requires physical access to facilities designed, built, altered, or leased with federal funds. The Uniform Federal Accessibility Standards (UFAS) are the design guidelines used as the basis for enforcement of the law. The UFAS regulations were adopted in 1984. Architectural Barriers Act Accessibility Standards (ABAAS) were revised and adopted in November 2005. Four federal agencies are responsible for the standards: the Department of Defense, the Department of Housing and Urban Development, the General Services Administration, and the U.S. Postal Service. The United States Access Board was created to enforce the Architectural Barriers Act, which it does through the investigation of complaints. Anyone concerned about the accessibility of a facility that may have received federal funds can easily file a complaint with the United States Access Board.

Section 504 of the Rehabilitation Act of 1973

http://www.law.cornell.edu/cfr/text/43/17.550

To the extent that section 504 of the Rehabilitation Act of 1973 applies to departments and agencies of the federal government, the parks operated by the National Park Service are subject to the provisions of that statute. As will be discussed in the following text, both section 504 and the Architectural Barriers Act require the application of stringent access standards to new construction and the alteration of existing facilities. The Rehabilitation, Comprehensive Services, and Developmental Disabilities Amendments of

1978 (PL 95-602) extends the scope of section 504 of the Rehabilitation Act of 1973 (PL 93-112) to include Executive Branch agencies of the federal government. As amended, section 504 states:

Section 504: No otherwise qualified handicapped individual in the United States, as defined in Section 7 (6), shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. The head of each such agency shall promulgate such regulations as may be necessary to carry out the amendments to this section made by the Rehabilitation, Comprehensive Services, and Developmental Disabilities Act of 1978. Copies of any proposed regulation shall be submitted to appropriate authorizing committees of Congress, and such regulation may take effect no earlier than the thirtieth day after the date on which such regulation is so submitted to such committees.

As noted above, section 504 and the Architectural Barriers Act govern new construction and alterations. However, as a civil rights law, section 504 goes further. Unlike the construction-driven ABA mandates, section 504 also requires covered entities to consider the accessibility of programs, services, and activities.

Section 508 of the Rehabilitation Act of 1973

http://www.section508.gov/

In 1998, Congress amended the Rehabilitation Act of 1973 to require federal agencies to make their electronic and information technology (EIT) accessible to people with disabilities. Inaccessible technology interferes with an ability to obtain and use information quickly and easily. Section 508 was enacted to eliminate barriers in information technology, open new opportunities for people with disabilities, and encourage development of technologies that will help achieve these goals. The law applies to all federal agencies when they develop, procure, maintain, or use electronic and information technology. Under section 508 (29 USC §794 d), agencies must give disabled employees and members of the public access to information that is comparable to access available to others. It is recommended that you review the laws and regulations discussed in the following sections to further your understanding about section 508 and how you can support implementation.

Accessibility Standards for Outdoor Developed Areas

http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/final-guidelines-for-outdoor-developed-areas

Achieving accessibility in outdoor environments has long been a source of inquiry because of challenges and constraints posed by terrain, the degree of development, construction practices and materials, and other factors. The new provisions address access to trails, picnic and camping areas, viewing areas, beach access routes, and other components of outdoor developed areas on federal sites when newly built or altered. They also provide

exceptions for situations where terrain and other factors make compliance impracticable. In 2013, this final rule amended the Architectural Barriers Act Accessibility Guidelines by adding scoping and technical requirements for camping facilities, picnic facilities, viewing areas, trails, and beach access routes constructed or altered by or on behalf of federal agencies. The final rule ensures that these facilities are readily accessible to and usable by individuals with disabilities. The final rule applies to the following federal agencies and their components that administer outdoor areas developed for recreational purposes: Department of Agriculture (Forest Service); Department of Defense (Army Corps of Engineers); and Department of the Interior (Bureau of Land Management, Bureau of Reclamation, Fish and Wildlife Service, National Park Service). The final rule also applies to nonfederal entities that construct or alter recreation facilities on federal land on behalf of the federal agencies pursuant to a concession contract, partnership agreement, or similar arrangement.

Accessibility Standards for Shared Use Paths

http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths

Shared use paths provide a means of off-road transportation and recreation for various users, including pedestrians, bicyclists, skaters, and others, including people with disabilities. In its rulemaking on public rights-of-way and on trails and other outdoor developed areas, comments from the public urged the board to address access to shared use paths because they are distinct from sidewalks and trails. Shared-use paths, unlike most sidewalks, are physically separated from streets by an open space or barrier. They also differ from trails because they are designed not just for recreation purposes but for transportation as well.

In response, the board is supplementing its rulemaking on public rights-of-way to also cover shared-use paths. The proposed rights-of-way guidelines, which address access to sidewalks, streets, and other pedestrian facilities, provide requirements for pedestrian access routes, including specifications for route width, grade, cross slope, surfaces, and other features. The board proposes to apply these and other relevant requirements to shared-use paths as well. This supplementary rulemaking also would add provisions tailored to shared-use paths into the rights-of-way guidelines.

Draft Accessibility Standards for Public Rights-of-Way

http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way

Sidewalks, street crossings, and other elements in the public right-of-way can pose challenges to accessibility. The United States Access Board's ADA and ABA Accessibility Guidelines focus mainly on facilities on sites. While they address certain features common to public sidewalks, such as curb ramps, further guidance is necessary to address conditions and constraints unique to public rights-of-way.

The board is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to onstreet parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The board's aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. Once these guidelines are adopted by the Department of Justice, they will become enforceable standards under ADA Title II.

Effective Communication

http://www.ada.gov/effective-comm.htm

People who have vision, hearing, or speech disabilities ("communication disabilities") use different ways to communicate. For example, people who are blind may give and receive information audibly rather than in writing and people who are deaf may give and receive information through writing or sign language rather than through speech. The ADA requires that Title II entities (state and local governments) and Title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with disabilities is equally effective as communication with people without disabilities.

- The purpose of the effective communication rules is to ensure that the person with a vision, hearing, or speech disability can communicate with, receive information from, and convey information to, the covered entity.
- Covered entities must provide auxiliary aids and services when needed to communicate effectively with people who have communication disabilities.
- The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person's normal method(s) of communication.

The rules apply to communicating with the person who is receiving the covered entity's goods or services, as well as with that person's parent, spouse, or companion in appropriate circumstances.

Reasonable Accommodations

http://www.opm.gov/policy-data-oversight/disability-employment/reasonable-accommodations/

Federal agencies are required by law to provide reasonable accommodation to qualified employees with disabilities. The federal government may provide reasonable accommodation based on appropriate requests (unless so doing will result in undue

hardship to the agencies). For more information, see the Equal Employment Opportunity Commission's <u>Enforcement Guidance</u>: <u>Reasonable Accommodation and Undue Hardship</u> under the Americans with Disabilities Act (external link).

Reasonable accommodations can apply to the duties of the job and/or where and how job tasks are performed. The accommodation should make it easier for the employee to successfully perform the duties of the position. Examples of reasonable accommodations include providing interpreters, readers, or other personal assistance; modifying job duties; restructuring work sites; providing flexible work schedules or work sites (i.e., telework); and providing accessible technology or other workplace adaptive equipment. Telework (external link) provides employees additional flexibility by allowing them to work at a geographically convenient alternative worksite, such as home or a telecenter, on an average of at least one day per week.

Requests are considered on a case-by-case basis. To request reasonable accommodations:

- Look at the vacancy announcement.
- Work directly with person arranging the interviews.
- Contact the agency <u>Selective Placement Program Coordinator</u>.
- Contact the hiring manager and engage in an interactive process to clarify what the person needs and identify reasonable accommodations.
- Make an oral or written request; no special language is needed.

Other Power-Driven Mobility Devices

http://www.ada.gov/regs2010/ADAregs2010.htm

The definition and regulation to permit the use of mobility devices has been amended. The rule adopts a two-tiered approach to mobility devices, drawing distinctions between wheelchairs and other power-driven mobility devices such as the Segway Human Transporter. Wheelchairs (and other devices designed for use by people with mobility impairments) must be permitted in all areas open to pedestrian use. Other power-driven mobility devices must be permitted for use unless the covered entity can demonstrate that such use would fundamentally alter its programs, services, or activities, create a direct threat, or create a safety hazard. The rule also lists factors to consider in making this determination.

Service Animals

http://www.nps.gov/goga/planyourvisit/service-animals.htm

The following is excerpted from the Department of Justice and Americans with Disabilities Act Revised Regulations (effective 3/15/2011).

34.104 Definitions: Service animal means any dog for miniature horse as outlined in the following text] that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. The work or tasks performed by a service animal must be directly related to the handler's disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, providing nonviolent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors. The crime deterrent effects of an animal's presence and the provision of emotional support, wellbeing, comfort, or companionship do not constitute work or tasks for the purposes of this definition.

- a. General. Generally, a public entity shall modify its policies, practices, or procedures to permit the use of a service animal by an individual with a disability.
- b. Exceptions. A public entity may ask an individual with a disability to remove a service animal from the premises if-
 - (1) The animal is out of control and the animal's handler does not take effective action to control it; or
 - (2) The animal is not housebroken.
- c. If an animal is properly excluded. If a public entity properly excludes a service animal under § 35.136(b), it shall give the individual with a disability the opportunity to participate in the service, program, or activity without having the service animal on the premises.
- d. Animal under handler's control. A service animal shall be under the control of its handler. A service animal shall have a harness, leash, or other tether, unless either the handler is unable because of a disability to use a harness, leash, or other tether, or the use of a harness, leash, or other tether would interfere with the service animal's safe, effective performance of work or tasks, in which case the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means).

- e. Care or supervision. A public entity is not responsible for the care or supervision of a service animal.
- f. Inquiries. A public entity shall not ask about the nature or extent of a person's disability, but may make two inquiries to determine whether an animal qualifies as a service animal. A public entity may ask if the animal is required because of a disability and what work or task the animal has been trained to perform. A public entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal. Generally, a public entity may not make these inquiries about a service animal when it is readily apparent that an animal is trained to do work or perform tasks for an individual with a disability (e.g., the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability).
- g. Access to areas of a public entity. Individuals with disabilities shall be permitted to be accompanied by their service animals in all areas of a public entity's facilities where members of the public, participants in services, programs or activities, or invitees, as relevant, are allowed to go.
- h. Surcharges. A public entity shall not ask or require an individual with a disability to pay a surcharge, even if people accompanied by pets are required to pay fees, or to comply with other requirements generally not applicable to people without pets. If a public entity normally charges individuals for the damage they cause, an individual with a disability may be charged for damage caused by his or her service animal.
- i. Miniature horses.
 - (1) Reasonable modifications. A public entity shall make reasonable modifications in policies, practices, or procedures to permit the use of a miniature horse by an individual with a disability if the miniature horse has been individually trained to do work or perform tasks for the benefit of the individual with a disability.
 - (2) Assessment factors. In determining whether reasonable modifications in policies, practices, or procedures can be made to allow a miniature horse into a specific facility, a public entity shall consider
 - i. The type, size, and weight of the miniature horse and whether the facility can accommodate these features;
 - ii. Whether the handler has sufficient control of the miniature horse;
 - iii. Whether the miniature horse is housebroken; and
 - iv. Whether the miniature horse's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.

(C) Other requirements. Paragraphs 35.136 (c) through (h) of this section, which apply to service animals, shall also apply to miniature horses.

Section 17.549 Program Accessibility: Discrimination Prohibited

http://www.law.cornell.edu/cfr/text/43/17.549

Except as otherwise provided in §17.550, no qualified handicapped person shall, because the agency's facilities are inaccessible to or unusable by handicapped persons, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity conducted by the agency.

The reference to §17.550 in the below quotes is intended to address exclusions available to covered entities in connection with existing facilities.

Section 17.550 Program Accessibility: Existing Facilities

http://www.law.cornell.edu/cfr/text/43/17.550

- **(a) General.** The agency shall operate each program or activity so that the program or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. This paragraph does not:
 - (1) Necessarily require the agency to make each of its existing facilities or every part of a facility accessible to and usable by people with disabilities;
 - (2) In the case of historic preservation programs, require the agency to take any action that would result in a substantial impairment of significant historic features of an historic property; or
 - (3) Require the agency to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens. In those circumstances where agency personnel believe that the proposed action would fundamentally alter the program or activity or would result in undue financial and administrative burdens, the agency has the burden of proving that compliance with §17.550(a) would result in such an alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the agency head or his or her designee after considering all agency resources available for use in the funding and operation of the conducted program or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, the agency shall take any other action that

would not result in such an alteration or such burdens but would nevertheless ensure that handicapped persons receive the benefits and services of the program or activity.

(b) Methods.

- (1) **General.** The agency may comply with the requirements of this section through such means as redesign of equipment, reassignment of services to accessible locations, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, use of accessible rolling stock, or any other methods that result in making its programs or activities readily accessible to and usable by people with disabilities. The agency is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section. The agency, in making alterations to existing buildings, shall meet accessibility requirements to the extent compelled by the Architectural Barriers Act of 1968, as amended (42 USC 4151–4157) and any regulations implementing it. In choosing among available methods for meeting the requirements of this section, the agency shall give priority to those methods that offer programs and activities to qualified handicapped persons in the most integrated setting appropriate.
- (2) **Historic preservation programs.** In meeting the requirements of paragraph (a) of this section in historic preservation programs, the agency shall give priority to methods that provide physical access to handicapped persons. In cases where a physical alteration to an historic property is not required because of paragraph (a)(2) or (a)(3) of this section, alternative, methods of achieving program accessibility include:
 - (i) Using audio-visual materials and devices to depict those portions of an historic property that cannot otherwise be made accessible;
 - (ii) Assigning persons to guide people with disabilities into or through portions of historic properties that cannot otherwise be made accessible; or
 - (iii) Adopting other innovative methods.
- (3) **Recreation programs.** In meeting the requirements of paragraph (a) in recreation programs, the agency shall provide that the program or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. When it is not reasonable to alter natural and physical features, accessibility may be achieved by alternative methods as noted in paragraph (b)(1) of this section.

Section 17.551 Program Accessibility: New Construction and Alterations

http://www.law.cornell.edu/cfr/text/43/17.551

Each building or part of a building that is constructed or altered by, on behalf of, or for the use of the agency shall be designed, constructed, or altered so as to be readily accessible to and usable by handicapped persons. The definitions, requirements, and standards of the Architectural Barriers Act (42 USC 4151–4157) as established in 41 CFR 101 – 19.600 to 101 – 19.607 apply to buildings covered by this section.

NATIONAL PARK SERVICE DIRECTOR'S ORDERS AND MANAGEMENT POLICIES

A policy is a definite course of action adopted and pursed by a government, ruler, or political party. It is an action or procedure conforming to or considered with reference to prudence or expediency.

Director's Order 16A

http://www.nps.gov/policy/DOrders/DOrder16a.html

Director's Order 16A establishes the framework for meeting reasonable accommodation requirements in all areas of employment, including: application, hiring, retention, promotion, recognition, and special hiring authority. Within this framework, NPS Human Resources and Equal Opportunity Program officials will take the lead in providing specific guidance and services to applicants, employees, and supervisors and other managers with respect to the provision of reasonable accommodation.

Director's Order 42

http://www.nps.gov/policy/DOrders/DOrder42.html

Director's Order 42 addresses accessibility for visitors with disabilities in National Park Service programs and services. It is the goal of the National Park Service to ensure that all people, including persons with disabilities, have the highest level of access that is reasonable to NPS programs, facilities, and services. The order gives detailed guidance based on the minimum requirements set forth in laws, rules, and regulations with the goal to provide the highest level of access that is reasonable, exceeding the minimum level of access required by law. The order sets forth six implementation strategies:

- 1. to increase employee awareness and technical understanding of accessibility requirements
- 2. to ensure all new and renovated buildings and facilities, and all new services and programs (including those offered by concessioners and interpreters) will be "universally designed" and implemented in conformance with applicable regulations and standards

- 3. to ensure existing programs, facilities and services will be evaluated to determine the degree to which they are currently accessible to and useable by individuals with disabilities
- 4. to ensure that barriers that limit access be identified and incorporated into the NPS Assets Management Program
- 5. to develop action plans identifying how identified barriers will be removed (where feasible)
- 6. to ensure action will be taken on a day-to-day basis to eliminate identified barriers, using existing operational funds or other funding sources or partnerships

National Park Service Management Policies: Section 1.9.3 – Accessibility for Persons with Disabilities

http://www.nps.gov/policy/mp/policies.html

All practicable efforts will be made to make NPS facilities, programs, services, employment, and meaningful work opportunities accessible and usable by all people, including those with disabilities. This policy reflects the commitment to provide access to the widest cross section of the public and ensure compliance with the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, the Equal Employment Opportunity Act of 1972, and Americans with Disabilities Act of 1990. Specific guidance for implementing these laws is found in the Secretary of the Interior's regulations regarding enforcement and nondiscrimination on the basis of disability in Department of the Interior programs (43 CFR par 17, subpart E), and the General Service Administration's regulations adopting accessibility standards for the Architectural Barriers Act (41 CFR part 102-76, subpart C).

A primary principle of accessibility is that, to the highest degree practicable, people with disabilities should be able to participate in the same programs, activities, and employment opportunities available to everyone else. In choosing among methods of providing accessibility, higher priority will be given to methods that offer programs and activities in the most integrated setting appropriate. Special, separate, or alternative facilities, programs, or services will be provided only when existing ones cannot reasonable be made accessible. The determination of what is practicable will be made only after careful consultations with persons with disabilities or their representatives. Any decisions that would result in less than equal opportunity is subject the filing of an official disability right complain under the departmental regulations cited above.

GUIDELINES

A guideline is an indication of a future course of action. It consists of recommended, nonmandatory controls that help support standards or serve as a reference when no applicable standard is in place.

Programmatic Accessibility Guidelines for National Park Service Interpretive Media

http://www.nps.gov/hfc/accessibility/

The "Programmatic Accessibility Guidelines for National Park Service Interpretive Media" is for media specialists, superintendents, and other NPS employees and contractors who develop and approve interpretive media. Publications, exhibits, audiovisual programs and tours, wayside exhibits, signage, and web-based media provide park visitors with information and context so that their experience of visiting national parks can be both safe and meaningful. Park visitors who have physical, sensory, or cognitive disabilities have legally established civil rights to receive the same information and context that NPS interpretive media products have always provided to their fellow citizens.

APPENDIX B: GLOSSARY OF TERMS

Accessibility assessment: A process in which physical and programmatic barriers to accessibility are identified at a park unit.

Accessibility assessment team: This group is a subgroup of the Interdisciplinary Design Team (see definition below) and includes an accessibility specialist and/or technician, coordinators, a regional representative, the primary facilitator for the process, architect, engineer and/or landscape architect, and typically the chiefs of interpretation, resources management, and facilities management.

Accessibility Self-Evaluation and Transition Plan: A tool that establishes a methodical process for identifying and improving parkwide access and proposes strategies for implementing the plan over time, in a manner consistent with park requirements and protocols.

Architectural Barriers Act Accessibility Standard (ABAAS): Standards issued under the Architectural Barriers Act apply to facilities designed, built, altered, or leased with certain federal funds. Passed in 1968, the Architectural Barriers Act is one of the first laws to address access to the built environment. The law applies to federal buildings, including post offices, social security offices, federal courthouses and prisons, and national parks.

Barrier: Architectural and programmatic obstacles to accessibility that make it difficult, and sometimes impossible, for people with disabilities to maneuver, understand, or experience.

Best practice: A method or technique that has consistently shown results superior to those achieved with other means, and that is used as a benchmark for meeting accessibility requirements.

Consultation: A formal or informal process for discussing an action or process for implementing a solution, such as section 106 (cultural resource compliance), or design for an Accessibility Self-Evaluation and Transition Plan.

Facility Management Software System (FMSS) work order: The process for documenting work needs and collecting information to aid the work scheduling and assignment process within the Facility Management Software System. Information collected should include labor, equipment and material costs, hours, types, and quantities.

Guideline: A guideline is an indication of a future course of action. It consists of recommended, nonmandatory controls that help support standards or serve as a reference when no applicable standard is in place.

Interdisciplinary design team: This team is composed of all the people involved in the workshop at the park unit, potentially including planning, design, and construction professionals; and interpretive, resource (natural and cultural), visitor safety, maintenance and accessibility specialists.

Key park experience: For the purpose of the Self-Evaluation and Transition Plan, key park experiences are those experiences that are iconic and essential for visitors to understand the purpose and significance of a given park unit. They are those experiences that are "musts" for all park visitors. Key park experiences can be identified through a consideration of park purpose, significance, interpretive themes, and those programs or activities highlighted in park communications.

Law: A law is a principle and regulation established in a community by some authority and applicable to its people, whether in the form of legislation or of custom and policies recognized and enforced by judicial decision.

National Environmental Policy Act (NEPA) Requirements: NEPA defines a process that federal agencies must follow when proposing to take actions that have environmental impacts. NEPA requires federal agencies to fully consider the impacts of proposals that would affect the human environment prior to deciding to take an action. NEPA also requires federal agencies to involve the interested and affected public in the decision-making process.

Park area: A park area is the geographic location that is home to a single or multiple key park experience(s).

Park Asset Management Plan-Optimizer Banding (PAMP-OB): Provides a 5-year asset management strategy for park units, allowing for annual updates that coincide with the budget and planning processes already occurring in park units. As this approach includes life cycle total cost of ownership, analysis, processing, and calculations, it also helps park units and the service as a whole to manage the gap between what should be spent on facilities and what is actually being spent.

Park policy: A policy is a definite course of action adopted and pursed by a government, ruler, or political party. It is an action or procedure conforming to or considered with reference to prudence or expediency.

Park practice: Those habitual and/or customary performances or operations for reaching a desired outcome that the park employs.

People-first language: A type of disability etiquette that aims to avoid perceived and subconscious dehumanization when discussing people with disabilities. It emphasizes the person rather than the disability, noting that the disability is not the primary defining characteristic of the individual but one of several aspects of the whole person.

Project Management Information System (PMIS) Facility: A separate and individual building, structure, or other constructed real property improvement.

Project Management Information System (PMIS) Nonfacility: A project that includes anything not covered by the definition for PMIS facility.

Project Management Information System (PMIS) # (number): A unique Project ID Number that is automatically generated when adding a new project into the Project Management Information System.

Project planning team: This group is a subgroup of the interdisciplinary design team and includes DSC planners and PWR staff. This team collects baseline data, facilitates calls, develops the participant guide, plans for and facilitates the workshop, and produces the draft and final documents.

Readily achievable: Easily accomplished and able to be carried out without much difficulty or expense.

Recommended solution: The action to eliminate the identified barrier.

Responsible person: The person/position responsible for seeing that the elimination of a barrier is completed.

Service, activity, and program: A service, activity, or program that is undertaken by a department and affords benefits, information, opportunities, and activities to one or more members of the public.

Standard: A standard is something considered by an authority or by general consent as a basis of comparison; an approved model. It is a specific low-level mandatory control that helps enforce and support a law.

Time frame: Time frames for implementation of a recommended solution are primarily based on park's ability of the park to complete the improvements within normal scheduling of park operations and planned projects. They describe when staff will eliminate the barrier. Recommended solutions are divided into four time frames including: immediate, short-term, mid-term, and long-term.

APPENDIX C: CONTRIBUTORS

WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE

Hugh Hawthorne, Superintendent

Kerry Wood, Chief of Interpretation, Education, and Operations

DENVER SERVICE CENTER

Laurie Domler, Project Manager
Colin Heffern, Landscape Architect
Laura Watt, Contract Editor

APPENDIX D: ACTIONS TAKEN BY THE PARK

Identification no
Record this identification number in the implementation table where this action is identified. Use this template to track and document accessibility actions and accomplishments throughout the park.
Action Taken by William Howard Taft National Historic Site
Location: [Park Area]
Barrier:
Action taken:
Date work was completed:
PMIS Number(s) and Title(s):
Cost:
Photograph(s), sketches, or notes documenting completed work:
Submitted by:

APPENDIX E: GUIDANCE FOR PREPARING PMIS PACKAGES FOR ACCESSIBILITY IMPROVEMENTS

<u>Project description</u>: Clearly identify what improvements will be addressed as part of the package. Also identify the park location and facility for planned work. Reference work orders for all applicable types of planned work, e.g., deteriorated conditions to be improved (deferred maintenance), health and safety improvements, and code compliance issues such as accessibility improvements. Provide measurements of areas to be improved, e.g., square footage, lineal footage, etc.

Project justification: Reference the recently completed "Accessibility Self-Evaluation and Transition Plan" for your park and the implementation strategy dates. Identify the number of visitors affected and other beneficial aspects of the project. You can cite legal and management policies as noted below:

- The Architectural Barriers Act (ABA) of 1968 requires that any building or facility designed, constructed, altered, or leased with federal funds be accessible and usable by any individuals with disabilities. In addition, Section 504 of the Rehabilitation Act of 1973 requires covered entities to consider the accessibility of programs, services, and activities. In 2006, the Architectural Barriers Act Accessibility Standards (ABAAS) were adopted for federal facilities. Subsequently in 2011, standards for Recreational Facilities were added to ABAAS as Chapter 10.
- The National Park Service recommitted to making our parks and programs truly accessible to all in the "A Call to Action". The recently released "ALL IN! Accessibility in the National Park Service 2015-2020" included three goals for improved visitor access. This project addresses: Goal 1: Create a welcoming environment by increasing the ability of the National Park Service to serve visitors and staff with disabilities; Goal 2: Ensure that new facilities and programs are inclusive and accessible to people with disabilities; and Goal 3: Upgrade existing facilities, programs, and services to be accessible to people with disabilities.

<u>Potential eligible fund sources</u>: Accessibility projects are potentially eligible for a number of NPS fund sources and can be competitive in regard to the capital investment strategy. The following is a list of possible fund sources:

- 1. Repair/rehabilitation program—identify all work orders that pertain for deferred maintenance, code compliance, health and safety, etc.
- 2. Flex park base—accessibility is a NPS emphasis area for years 2015-2020.
- 3. Recreation fee 80% park—excellent fund source for accessibility as the project provides for visitor improvements. This should be a top choice for Fee80 parks.
- 4. Recreation fee 20% park—excellent fund source for accessibility as the project provides for visitor improvements.
- 5. Concession/permitted facilities—consider these fund sources when the facility is included in a Concession contract or permit.

- 6. Regular cyclic maintenance—excellent fund source for replacement of picnic tables, grills, trash containers, etc.
- 7. Exhibit cyclic maintenance—excellent fund source for replacing non-compliant waysides, exhibits, etc.
- 8. FLHP—include accessibility improvements with parking lot, parking spaces, accessible routes, curb cuts, sidewalks, signage, etc. as part of road improvement projects where appropriate.
- 9. Line item construction (LIC) —if you have a project in the LIC program, ensure inclusion of all appropriate accessibility improvements.

PMIS packages: Conduct a search in PMIS for projects previously funded for accessibility.

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WILLIAM HOWARD TAFT NATIONAL HISTORIC SITE ACCESSIBILITY SELF-EVALUATION AND TRANSITION PLAN [DATE]

This Accessibility Self-Evaluation and Transition Plan has been prepared as a collaborative effort between William Howard Taft National Historic Site and the Denver Service Center and is recommended for approval by the superintendent.

Approved Date

Superintendent, William Howard Taft National Historic Site



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

WIHO [TIC number ###/#####]
June 2019

Back Cover