



Title II / ADA Transition Plan

September 2025

INTRODUCTION

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, and amended effective January 1, 2009, is a landmark civil rights law that prohibits discrimination against individuals with disabilities. Under Title II, state and local governments are required to ensure that individuals with disabilities are not excluded from participation in, or denied the benefits of, services, programs, or activities offered by those entities.

To comply with Title II, local governments must develop ADA Transition Plans. The purpose of this plan is to ensure the City of Goshen provides reasonable and accessible paths of travel within the public right-of-way, at government facilities, and across City programs—thereby promoting accessibility for all residents, including those with disabilities. The City of Goshen is committed to achieving long-term improvements in accessibility. This Transition Plan outlines identified physical barriers, prioritizes citywide improvements, and describes existing City policies and programs that support accessibility enhancement.

LEGAL FRAMEWORK & COMPLIANCE

The ADA provides comprehensive civil rights protections to individuals with disabilities across employment, state and local government services, public accommodations, transportation, and telecommunications.

Title II specifically applies to public entities, including state and local governments. It requires that all programs, services, and activities be accessible. According to Title II, Article 8, a Transition Plan must include:

1. A list of physical barriers in public facilities that limit accessibility.
2. A detailed outline of methods for removing these barriers.
3. A schedule for barrier removal; and
4. The name of the official responsible for implementing the plan.

Prior to developing a Transition Plan, public entities must complete an inventory of existing sidewalks and curb ramps. These inventories serve as the foundation for planning and executing ADA improvements to pedestrian infrastructure. The City of Goshen is committed to meeting—and where feasible, exceeding—ADA requirements to ensure full accessibility for all individuals with disabilities. Annual updates will be used to evaluate and communicate progress toward these goals. The City's Transition Plan addresses all the efforts completed to date while also addressing needs that still exist and are in the queue for further improvements. In addition, the City is committed to completing an Action Plan to further evaluate and ensure accessibility for all programming and technology within the next year.

TRANSITION PLAN HISTORY AND OVERVIEW

The City of Goshen prepared its first Americans with Disabilities Act (ADA) Transition Plan in 1992, with a primary emphasis on the removal of architectural barriers within public buildings, facilities, and programs. Concurrently, the City initiated a Sidewalk Replacement Program to expand and enhance accessible pedestrian infrastructure.

On October 5, 2005, the Goshen Common Council adopted Resolution 2005-52, which established priority areas for sidewalk improvements. Pursuant to this resolution, the Council directed the Goshen Engineering Department to conduct a comprehensive inventory of sidewalk conditions and to identify deficiencies and gaps in coverage. The initial inventory was completed in 2010, and records have since been updated to ensure that identified priority areas

are addressed in an orderly manner.

The City of Goshen has also instituted and continues to uphold several key policies pertaining to accessibility, including:

- Installation of ADA-compliant curb ramps in conjunction with adjacent street resurfacing projects
- Integration of sidewalk installation or repair into roadway reconstruction efforts
- Requirements for sidewalk construction in new residential and commercial developments

In 2018–2019, the City conducted comprehensive accessibility evaluations of all public facilities. Implementation of recommended improvements has been ongoing, with the objective of remedying identified deficiencies and enhancing overall accessibility. The Parks Department has likewise undertaken systematic evaluations of all play areas and continues to implement improvements on an annual basis.

Geographic Information System (GIS) technology has become an increasingly valuable tool for developing and maintaining comprehensive accessibility records. The City intends to further expand the application of this technology to support long-term planning and implementation of accessibility improvements throughout Goshen.

ADMINISTRATIVE INFORMATION

ADA Coordinator

The City of Goshen has designated Rita Huffman, HR Director, as its ADA Coordinator. This individual is point of contact for ADA-related inquiries, accommodations, and investigations.

Taskforce for Community Accessibility

To support the vision, the City is establishing a Taskforce for Community Accessibility (TCA). Comprised of representatives from various departments and the ADA Coordinator, the TCA intends to collaborate with the Goshen Community Relations Commission to:

- Advance current accessibility initiatives,
- Advocate for the rights and needs of individuals with disabilities, and
- Raise awareness about accessibility challenges and solutions.

The TCA will bring together diverse leadership perspectives and a shared commitment to inclusion. Its members will work toward a vision of a community where all residents are empowered and equitably supported.

PUBLIC OUTREACH AND PARTICIPATION

The City of Goshen formally adopted its ADA Transition Plan on July 9, 2012. Prior to adoptions, opportunities were provided for public comments through the following methods:

- Document copies were made available, and notices sent to local public libraries
- Document copies were made available on the City of Goshen's website
- An Open House and presentation were made at a public meeting on June 4, 2012.

The City of Goshen published legal notices in The Goshen News starting on May 11, 2012. The legal notices announced the availability of the Transition Plan draft at the local public library with easy public access. These

notices also provided instructions regarding the timetable for comments and where to send them. Public comments were accepted for a period of 30 days, ending June 15, 2012. A copy of the comment form was provided in the 2012 Transition Plan. While this document is considered a Transition Plan Update, no additional comments were requested. However, it is anticipated that additional opportunities will be available for comment as the 2026 goals are pursued to expand accessibility.

GRIEVANCE PROCEDURE

Residents may file accessibility complaints through:

Rita Huffman
Title VI / ADA Coordinator
204 E Jefferson St, Suite 3
Goshen, Indiana 46528
humanresources@goshencity.com

A copy of the Grievance Policy, the Grievance Form and the Grievance Log that is maintained by the City are attached as Appendix A.

ADA STANDARDS AND GUIDELINES

The City of Goshen is committed to ensuring that all its new facilities, including buildings, parks, trails and sidewalks, and all renovations to those facilities, comply with the ADA. The City also works to ensure accessibility by installing accessibility improvements that go beyond physical accessibility to buildings and sidewalks.

On July 31, 2025, the City's Board of Public Works passed Resolution 2025-20, adopting the Americans with Disabilities Act 2010 Standards of Accessible Design and the Public Right of Way Accessibility Guidelines (PROWAG) as the standards to follow for evaluation, design and construction of government facilities and infrastructure in the public right of way (see Appendix D for a copy of the resolution). The City will continue to comply with the ADA 2010 Standards for Accessible Design and PROWAG in all future projects and improvements.

MONITORING AND UPDATES

The ADA Transition Plan will be reviewed biennially, with progress reports published on the City website. The public will be engaged through annual community forums and updated surveys.

SELF-EVALUATION OF THE PUBLIC RIGHT-OF-WAY

As outlined in its 2012 ADA Transition Plan, the City of Goshen had utilized a two-tiered system to identify and evaluate barriers within the public right-of-way. This involved a preliminary evaluation of curb ramps and sidewalks using aerial and street-level imagery to determine non-compliance or potential compliance, with more detailed evaluations implemented to make a final determination of those “potentially compliant” pedestrian facilities. Evaluations and replacement priorities were organized by intersection. A majority of the intersections in the prioritized list of areas had received a preliminary evaluation.

To have a full picture of accessibility, City staff completed a detailed evaluation of all pedestrian facilities in the City’s right-of-way. The use of Geographic Information Systems (GIS) technology has been a foundational component to this effort. GIS technology allows the capture, storage, and analysis of spatial data in a map-based format. With advancements in the capabilities of GIS systems and its integration in the City’s planning and operations by GIS staff, it made sense to evaluate the accessibility and condition of each type of facility the same way, collecting similar data for each.

Goshen’s GIS staff developed web-based applications, including a custom scoring system, that enabled documentation and evaluation of the conditions of sidewalks, shared use paths, curb ramps and associated crosswalks throughout the City. In 2024 and 2025, two Engineering and GIS summer staff recorded the condition of all of these pedestrian facilities. Evaluation of compliance to ADA, and identification of non-compliant barriers, was made with metrics based on the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), developed by the U.S. Access Board.

Sidewalk Evaluation

The City’s sidewalk¹ and shared use path network is broken into segments (typically from one intersection to the next). Field inspectors take representative measurements of sidewalk width, cross-slope, and record the surface type (concrete or asphalt) for each segment in the City’s GIS system. As they walk along the segment, variations in width or cross-slope are noted, and observed defects (i.e. vertical faults, obstructions, cracks, or missing panels) are recorded as point data along with pictures. Defects are categorized and weighted in the scoring system according to whether they affect ADA compliance and are considered barriers to accessibility (see Appendix B for a complete list of all types of sidewalk defects and barriers).

Curb Ramps and Crosswalks

Each curb ramp² or blended transition in the City’s pedestrian and active transit network is evaluated by field

¹ For the purposes of this document, “sidewalks” can be used to indicate both sidewalks (side paths along roadways), for use by pedestrians walking or traveling via a mobility aid (such as a wheelchair), as well as designated shared use paths (or trails) utilized by bicycles, scooters, and other forms of active transit, as well as those walking or traveling via a mobility aid.

² For the purposes of this document, “curb ramps” is used to denote both curb ramps, which are sloped connections cut through a curb, and blended transitions, which are wraparound connections at a corner or flush transitions where there is no curb.

inspectors with measurements recorded in GIS to evaluate conformity to PROWAG standards. Evaluation considers the type of location (such as a street crossing at a typical intersection vs a roundabout), the traffic control at the intersection approach, the type of pedestrian facility, as well as the type of edge transitions on the sides of the ramp.

A set of basic measurements is recorded as a baseline for each ramp, regardless of whether there are obvious non-compliant aspects. These include width, length, cross-slope, and running slope of the ramp, turning spaces, and landings, as well as characteristics of the detectable warning surface. Provided a curb ramp is “potentially compliant” at this stage, further measurements are taken to determine if the entire curb ramp conforms to PROWAG requirements. Evaluations are also made of the crosswalk leading from each curb ramp. Crosswalks are divided into two halves, and data from each half is recorded with the adjoining curb ramp.

Based on the values recorded and utilizing a checklist based on PROWAG, field inspectors evaluate whether each curb ramp, crosswalk, and APS is ADA-compliant. Any questions regarding compliance are referred to Engineering Department staff for final determination. See Appendix B for the compliance checklist for determining all accessibility barriers for curb ramps and crosswalks.

BARRIER REMOVAL METHODS: POLICIES AND PRIORITIES

The City of Goshen employs multiple strategies to remove accessibility barriers in the public right-of-way, including:

- Proactively identifying and addressing barriers,
- Responding to public complaints, and
- Ensuring that all new construction meets the latest design standards.

Specific efforts that illustrate these methods are outlined below:

ADA Improvements within Project Planning Efforts

Curb ramps that are not in compliance are replaced as part of adjacent roadway reconstruction and street resurfacing projects. Opportunities for complete corridor reconstruction, including sidewalk installation or repair, are evaluated during project planning efforts.

Sidewalk Replacement Program

Since 1992, the City of Goshen has offered a Sidewalk Replacement Program. The City contributes funds toward requested replacements depending on the condition score of the segment, up to the full cost for sidewalk that is highest priority and in the worst condition.

GIS Documentation and Evaluation

Goshen’s use of GIS systems has enabled mapping and automatic scoring of all pedestrian facilities across the City. GIS applications allow for relating data spatially, so that those curb ramps, crosswalks, or even sidewalk segments requiring replacement can be identified within or nearby proposed project limits. Sidewalk or curb ramp replacement project limits and quantities can also be generated more easily with GIS tools.

Swift Response to Hazards

The City has developed in-house staff resources to address ADA hazards in a timely manner. When a trip hazard, an obstruction, or another critical defect is reported, a work order is immediately generated and assigned so that the repair can occur quickly. A GIS application will also be employed to track these work orders and repairs.

Improved Inspection and Permitting Processes

Since 2019, the City Building, Engineering, Fire, Planning, Redevelopment, Stormwater, and Street Departments, as well as Code Enforcement, have utilized a land management software to coordinate plan review, project planning, permitting, inspection, and compliance enforcement tasks. The software has helped ensure ADA compliance through tracking plan comments and revisions where site developments, driveways, or other work in the right-of-way involves including scheduling and documentation of permit inspections.

Within the past eight years, improvements have also been made in the right-of-way permit inspection process, ensuring that pedestrian facilities are evaluated both when forms are set and after concrete is cured. Improved inspection equipment is also being utilized, including digital 2-ft electronic levels that quickly and accurately measure sidewalk and curb ramp slopes.

Barrier Removal Priorities

Barrier removal priorities are based on location significance and accessibility condition.

Location Priority

According to the *Special Report: Accessible Public Rights-of-Way – Planning and Designing for Alterations*, the Department of Justice regulation concerning transition plans states that the plan “ ‘shall include a schedule for providing curb ramps’ on ‘walkways’ controlled by the public entity, ‘giving priority to the walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.’ 28 C.F.R. 35.151(d)(2).”

Following both the Department of Justice prioritization and estimated sidewalk usage, sidewalks are scored based on walk-time proximity along the sidewalk network to selected Points of Interest (POIs). POIs include locations such as City buildings, bus stops, the Goshen Public Library, grocery stores, schools, Goshen College, the post office, City parks, healthcare facilities, the Elkhart County Fairgrounds and other key locations. Curb ramp location priority is determined in relation to adjacent sidewalk segments.

Raw POI Score	Conversion	Scaled POI Score (1 – 10)
Number of POIs within 5-, 10-, and 15-minute walk-times of a sidewalk segment	<i>Natural breaks of raw POI score distribution</i>	1 = Highest Density of POI Walkability
X		...
Factor Weight		10 = Lowest Density of POI Walkability

Accessibility Condition

Sidewalks are given a Condition Score based on the number and severity of defects. Of all defects, those affecting ADA compliance are given a higher weight, times 2. Of the ADA Non-Compliant defects, those most severe are factored times 3. This total number is then divided over the length of the segment, normalized, and converted to a scale from 1 to 10, with 1 being the worst condition and 10 the best:

Raw Condition Score	Conversion	Condition Score (1 – 10)
Critical Defects X 3 + (ADA Non-Compliant Defects – Critical Defects) X 2 + (Total Defects – ADA Non-Compliant Defects) <hr/> Segment Length X 100	<i>Natural breaks of raw condition score distribution</i>	1 = Worst Condition ... 10 = Best Condition

Curb ramp compliance is determined for each part of the ramp (as shown below) based on the detailed field evaluations. All parts of the ramp must be compliant for the ramp to be compliant overall. Crosswalks may be evaluated separately in the future; however, changes required for crosswalk compliance (such as correcting cross-slope) may require replacement of the curb or curb ramp.

Curb Ramp Compliance by Part	
Compliant Ramp	Yes / No
Compliant Turning Space	Yes / No
Compliant Landing	Yes / No
Compliant Bottom of Ramp	Yes / No
Compliant DWS	Yes / No
Compliant Crosswalk	Yes / No
Total Raw Compliance Score	Yes / No

Combined Score

The combined score is a simple calculation that weights the Condition Score over the POI score and allows for manual manipulation to elevate sidewalks of particularly high importance (i.e. defined school walking routes).

$$((\text{POI Score} - \text{Segment Override}) * 0.4) + (\text{Condition / Compliance Score} * 0.6)$$

The prioritized Combined Score is based on a 1 – 10 scale, with:

- 1 being the highest priority sidewalks
 - Worst-condition with the greatest number of POIs within walking distance, and
- 10 being the lowest priority sidewalks
 - Best condition and most remote from any POIs

Curb ramps are not prioritized separately from sidewalks, except that locations where a crosswalk exists without connecting curb ramps are given the highest priority. Replacement priority of non-compliant curb ramps is determined in relation to the Combined Score of adjacent sidewalk segments as those pedestrian routes are selected for repair or replacement. Non-compliant curb ramps are also reconstructed when adjacent to roadway reconstruction or resurfacing projects.

ACCESSIBILITY IMPROVEMENTS IN THE PUBLIC RIGHT-OF-WAY

Goshen has made significant efforts in improving accessibility within the right-of-way. Highlighted infrastructure improvements and advances in data collection and evaluation methods are also included. The City is committed to the continued removal of barriers that prevent or limit the use of pedestrian facilities by individuals with disabilities.

Improvements and Progress in the Removal of Barriers

- Between 2015 and 2025, more than 25,000 square feet of sidewalk has been replaced through the City's Sidewalk Replacement Program, alone.
- From 2022-2025, over 30 sidewalk trip hazards and other accessibility barriers have been quickly resolved by Goshen's crews.
- From 2014 through July 2025, more than 130,000 SFT of sidewalk and 20,000 SFT of curb ramps have been replaced or installed as part of the City's projects (not including INDOT-initiated projects).

Improved Data Collection for Evaluation and Planning

- From 2024-2025, City staff have made comprehensive efforts to fully evaluate sidewalks, curb ramps, and crosswalks within the right-of-way.
- Goshen's GIS staff expanded system capabilities, developing tools which allow for the documentation and evaluation of all sidewalks and curb ramps.
- During 2024 and 2025, two pairs of Engineering and GIS summer interns walked all the concrete and asphalt sidewalks and shared use paths in the City, rating and documenting defects on over 185 miles of pedestrian routes. They inspected and evaluated each of the City's 1687 curb ramps in the right-of-way, taking as many as 50 separate measurements to fully investigate each ramp and crosswalk for conformance to PROWAG.
- Utilizing GIS, staff determined walk-time proximity of all sidewalk segments to selected points of interest (POIs).
- Engineering staff is coordinating with Goshen Community Schools and the Parks Department to evaluate and prioritize school walking routes and City trails.

Ongoing Investment in Barrier Removal and Evaluation

- Engineering staff have set a yearly goal of investing \$300,000 into City sidewalk and curb ramps.
- Re-evaluation of all City sidewalks and curb ramps is planned every five years going forward.
- Sidewalks in downtown Goshen are evaluated for trip hazards on an annual basis.

Upcoming Projects

- In 2026, the City plans to invest \$1,000,000 in sidewalk and curb ramp improvements for the Sidewalk Replacement Program as well as several other priority areas in the City.
 - Estimate of almost 30,000 SFT of sidewalk
 - Estimate of over 4,000 SFT of curb ramps
- In 2026, approximately 5,000 linear feet (LFT) (25,000 SFT) of sidewalk and 700 SFT of curb ramps will be reconstructed as part of the North Goshen Neighborhoods Lead Service Line Replacement Project.

SELF-EVALUATION OF PUBLIC FACILITIES

Self-evaluation of public facilities is required to ensure compliance with federal civil rights law by making all programs, services, and activities—when viewed in their entirety—readily accessible to individuals with disabilities. The City of Goshen began the process of reviewing the structural and architectural barriers of city facilities in the 1990's and has made continued efforts to bring all facilities into compliance since that time.

Specifically, the plan addresses architectural and structural barriers in:

- Government buildings.
- Parks and recreation centers; and
- Other public-use infrastructure

Primary Goals

1. Identify existing barriers in public facilities.
2. Outline corrective methods to remove or mitigate those barriers.
3. Set timelines and priorities for implementation.
4. Assign accountability by designating an official responsible for execution.

Inclusive Access

The transition plan reflects a commitment to:

- Equity and inclusion in civic life,
- Independence and dignity for people with disabilities, and
- Public engagement, especially from individuals with lived experience of disability.

Facilities List

A full list is included on the following pages that includes all facilities with their corresponding addresses, evaluation status and information regarding deficiencies requiring correction. City staff will utilize this list to plan for the improvements needed over the next two years. Copies of the full ADA checklist evaluations are maintained at the City's Parks Department Administrative Offices and available upon request.

ADA Transition Plan - City Facility Self-Evaluation Results

Facility Name	Facility Address
Airport	17229 CR 42
No accessibility issues identified.	
Annex Building	204 E Jefferson St
<p>Inadequate number of accessible parking spaces provided. To reconfigure by repainting lines to provide designated accessible space and installing signage. Space location should be selected along the closest accessible route to the building's accessible entrance.</p> <p>Exterior accessible route to accessible entrance is currently 6.2% and should be no more than 5%. Requires reconstruction of sidewalk.</p> <p>Platform lift provides inadequate floor space of at least 36"x 48". To be replaced or the opening to be reconfigured to widen by 2" as current space is 34"x 49".</p> <p>Tactile signage to be installed designating permanent rooms not likely to change.</p> <p>Any signage providing direction should be replaced with signage with required contracting characters.</p> <p>Door pulls not operable with one hand throughout the building and any inaccessible hardware should be replaced.</p>	
Cemetery Office	N 1st St
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
Central Garage	320 Steury Ave
No accessibility issues identified.	
City Hall	202 S 5th St
<p>Curb ramp to be reconstructed as the running slope is too steep.</p> <p>Install signs on route before people get to inaccessible entrances so that people do not have to turn around and retrace route.</p> <p>Install tactile signs for CT's office, Mayor's office, Payroll and IT - See ADA specifications for mounting signs. Install signs with contrasting characters. Ensure 18" x 18" clear floor space centered on the tactile characters so that the baseline of the lowest character is at least 48" above the floor and the highest character is no more than 60" above the floor.</p> <p>Accessible table to be provided in the lobby that is no greater than 34" above the floor. Ensure adequate knee space is provided.</p>	
City Records Facility	1402 Wilden Ave
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	

Environmental Center	20100 CR 19
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
GFD - Central Fire Station	209 N 3rd St
No accessibility issues identified.	
GFD - College Ave Fire Station	1203 College Ave
No accessibility issues identified.	
GFD - Fire Training Facility	2109 Caragana Ct
Evaluation to be completed in 2026. Facility is a newer facility and no concerns are anticipated but a thorough review will be completed.	
GFD - Reliance Fire Station	1728 Reliance Rd
No accessibility issues identified.	
GFD - Township Fire Station - North	201 S 22nd St
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
GFD - Township Fire Station - South	308 Egbert Rd
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
Kercher Wellfield	1513 N Eisenhower Dr
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	

Police & Courts Building	111 E Jefferson St
<p>Main entrance is not accessible due to a 13.6% slope. An entrance that is accessible should be identified and made available during the same hours as the main entrance. Install signs on route before people get to inaccessible entrances so that people do not have to turn around a retrace route.</p> <p>Install signage at the accessible entrance with the International Symbol of Accessibility.</p> <p>Threshold needs to be lowered to no more than 3/4" with the top 1/2 beveled.</p> <p>Tactile warnings such as partial walls to be installed where paths through the public areas protrude more than 4".</p> <p>Lift signage to be adjusted no be no higher than 60".</p> <p>Lift to be replaced as clear space is currently 1.5" short in width.</p> <p>Install tactile signage designating permanent rooms and spaces not likely to change over time. Ensure that signs have contrasting characters.</p> <p>Light switches to be lowered to be no more than 48" above the floor.</p> <p>Service counter is not accessible. A section to be lowered to no higher than 36" with a 36" depth for knee clearance.</p> <p>Drinking fountain to be lowered to no higher than 36" above the floor for the spout outlet.</p> <p>Public Telephone - Direct line to Fire, Police & Ambulance Only. Bottom of the telephone should be lowered from 37" to no more than 27" and protrudes 5.75" when it should protrude no more than 4" Phone location to be adjusted.</p> <p>TTY to be installed with the appropriate International Symbol of TTY.</p>	
Police Shooting Range	715 E Lincoln Ave
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
Street Department	475 Steury Ave
<p>Signage should be installed at the accessible entrance with the International Symbol of Accessibility.</p> <p>Install signage at inaccessible toilet rooms that give directions to accessible toilet rooms.</p> <p>Toilet Room entrance has only 14" clearance from the pull side of the door where 18" is needed. Automatic door opener to be installed.</p> <p>Move or replace toilet to no more than 18" from the side wall where currently 18.75".</p> <p>Flush control needs to be relocated to the open side of the water closet in the toilet room.</p>	
Utility Billing Office	203 S 5th St
<p>Running slope to the front entrance is too steep. To be reconstructed from 6% to no more than 5%.</p> <p>Carpet to be reviewed to ensure no higher than 1/2". Outside run to be removed or a new rug purchased with appropriate measurements.</p> <p>No access available to conference room, breakroom or toilet rooms. Possible renovation or reconstruction with an accessible route required to avoid existing stairs.</p> <p>Toilet rooms are currently inaccessible. To be reconfigured or combined to create one unisex accessible toilet room. Tactile signage will be required with the International Symbol of Accessibility. Will also require an accessible route.</p>	
Wastewater Plant	1000 W Wilden Ave
A more thorough evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	

Water & Sewer Plant	308 N 5th St
<p>Operable controls should be no higher than 48" above the floor. Currently 49".</p> <p>Toilet Rooms paper dispenser should be located no less than 7" and no greater than 9" from the front of the water closet to the centerline of the dispenser. Current measurement is 22". However, construction occurred prior to 3/15/12 and falls under the 1991 Standards so relocation is not required.</p> <p>A portion of the service counter to be lowered to no more than 36" above the floor and a minimum of 36" long with either a parallel or forward approach feasible.</p>	
PARKS FACILITIES	
Parks - Abshire Cabin	1302 E Lincoln Ave
No accessibility issues identified.	
Parks - Administrative Office	524 E Jackson St
No accessibility issues identified.	
Parks - Bakersfield Park Playground	1302 Baker Ave
No sidewalk connection to the playground - route is grass.	
Parks - Burdick Park Playground	125 W Burdick St
<p>Playground Area #1 has elevated components and no access sidewalk.</p> <p>Perimeter is a raised plastic edging providing to accessibility.</p> <p>Playground Area #2 has ground level play components and sidewalk accessibility to the play area with sidewalks around the entire play area.</p> <p>No access from Area #1 to Area #2.</p>	
Parks - Chiddister Pavilion	1424 Lincolnway East
<p>No van accessible parking space provided.</p> <p>Parking lot is compacted stone.</p> <p>Regular parking space sign to be raised.</p> <p>Restroom coat hook to be lowered.</p> <p>Toilet paper dispenser to be relocated.</p>	
Parks - Church Park Playground	504 N 8th St
2 play areas and both are accessible but no accessible route directly from one to the other. Grass and an incline prevent a direct route.	

Parks - Dam Pond Restrooms	725 Fair Oaks Dr
Door closer to be adjusted. Tactile signage to be added at the appropriate height. Grab bars to be moved away from the rear wall 4" and lowered by 1/2".	
Parks - Dykstra Park Playground	1500 E Lincoln Ave
No accessibility issues identified.	
Parks - Fidler Pavilion	1912 W Lincoln Ave
4 accessible spaces need to be added, including 1 van accessible, with required signage. Tactile warning to be constructed around drinking fountain (i.e. permanent planter or partial wall). Tactile signage to be installed at bathrooms. Pipes beneath lavatory to be insulated. Drinking fountain to be adjusted.	
Parks - Hay Park Pavilion	1414 W Plymouth Ave
No van accessible parking space provided but could be reconfigured to provide one with restriping. Parking signage needed at appropriate height. Bathroom door lock to be lowered from 60" to no more than 48". Door closer to be adjusted. Toilet flush control is on the wall side of the water closet and not the open side.	
Parks - Hay Park Playground	1414 W Plymouth Ave
Swings do not have adequate clear space to be accessible.	
Parks - Kauffman Pavilion	212 Prospect Ave
Accessible parking spaces need appropriate signage installed. Bathroom door locks need to be lowered from 60" to no more than 48". Door closer to be adjusted from 3 seconds to at least 5 seconds. Toilet flush control to be relocated to the open side of the water closet.	
Parks - Maintenance Building	
No accessibility issues identified.	

Parks - McFarland Park Playground	125 Vinson Ct
No accessibility issues identified.	
Parks - Mill Street Playground	212 Prospect Ave
<p>There are a few ground play components that are not accessible due to slope and grass route.</p> <p>There is an accessible play area with engineered wood fiber mulch. Separate play area is not accessible as the surface is grass.</p> <p>There are two lookout decks with ramps that are not accessible due to slope.</p>	
Parks - Millrace Powerhouse	
<p>Route to the entrance is not accessible. Existing gravel to be replaced with concrete.</p> <p>Route from accessible parking to entrance to be regraded. Exterior route is currently sloped at 4.35% for the gravel portion and 3.7% for the cross slope and currently not accessible.</p> <p>Signage to be installed at all inaccessible entrances indicating the location of the nearest accessible entrance and along the route prior to reaching the inaccessible entrances.</p> <p>Sign to be installed at the accessible entrances with the International Symbol of Accessibility.</p> <p>Front approach to the pull side of the door is at least 18" of maneuvering clearance beyond the last side. (Currently 7"). Automatic opener to be installed.</p> <p>Operable parts of door hardware are greater than 48" above the floor. Automatic opener to be installed.</p>	
Parks - Model School Park	310 S Greene Rd
No accessibility issues identified.	
Parks - Oakridge Park Playground	715 N 1st St
<p>Raised plastic playground perimeter curb prevents accessibility.</p> <p>No sidewalk access to playground.</p>	

Parks - Oakridge Pavilion	715 N 1st St
<p>Sidewalk to be installed from the parking lot to the pavilion to create an accessible route.</p> <p>Parking lot constructed of limestone so no parking striping in place.</p> <p>Parking signage to be installed.</p> <p>Aisles adjacent to handicap spaces unable to be added until parking lot is paved.</p> <p>Will need to be regraded, as well, as surface is currently 2:48 slope.</p> <p>Toilet room tactile signage to be installed.</p> <p>Toilet room lock to be lowered to no more than 48".</p> <p>Door closer to be adjusted from 3 seconds to at least 5 seconds.</p> <p>Toilet room grab bars to be lowered.</p> <p>Toilet flush valve to be moved to open side of the water closet.</p> <p>Drinking fountain to be lowered from 37" to no more than 36".</p>	
Parks - Pringle Park Playground	1912 W Lincoln Ave
No accessibility issues identified.	
Parks - Pringle Park Splash Pad	1912 W Lincoln Ave
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.	
Parks - Reith Park Playground	1508 S 13th St
No accessibility issues identified.	
Parks - Reith Interpretive Center	410 W Plymouth Ave
<p>Tactile signage needs to be installed for permanent rooms and spaces.</p> <p>Tactile signage needs to be installed for Toilet Rooms.</p> <p>Door closer needs to be adjusted from 4 seconds to 5 seconds.</p> <p>Constructed prior to 2012 to Toilet Room grab bars are grandfathered. However, they could be adjusted to become compliant.</p> <p>Toilet Room doors are not self-closing.</p>	
Parks - Reith Park Splash Pad	1508 S 13th St
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.	

Parks - Rieth Pavilion	1508 S 13th St
<p>Parking area is compacted limestone so no delineated accessible parking spaces.</p> <p>Signage for a van accessible space to be installed.</p> <p>Tactile signage to be installed at Toilet Rooms.</p> <p>Door lock to be lowered to no more than 48".</p> <p>Door closer to be adjusted from 3 seconds to no less than 5 seconds.</p>	
Parks - Riverdale Park	785 W Wilkinson
<p>Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.</p>	
Parks - Rogers Park Playground	102 Chicago Ave
<p>No sidewalk leading to the play area as there is a large curb around the perimeter preventing accessible access.</p> <p>Playground's pea gravel cover makes the play area inaccessible. Pea gravel utilized due to park's frequent flooding.</p>	
Parks - Schrock Pavilion	411 W Plymouth Ave
<p>Tactile signage needs to be installed for Toilet Rooms.</p> <p>A lower mirror to be added at no more than 40".</p> <p>A lower coat hook to be added at no more than 48".</p> <p>Constructed prior to 2012 and grab bars are grandfathered. However, could be adjusted to meet 2010 requirements.</p>	
Parks - Shanklin Park Kiwanis	411 W Plymouth Ave
<p>Tactile signage needs to be installed for Toilet Rooms.</p> <p>A lower coat hook to be added at no more than 48".</p> <p>Insulation to be installed below the lavatory around the pipes.</p> <p>Constructed prior to 2012 and lack of door pulls is grandfathered. However, could be adjusted to meet 2010 requirements.</p>	
Parks - Shanklin Riverside Pavilion	411 W Plymouth Ave
<p>No aisle markings.</p> <p>Accessible route is currently gravel and to be replaced with asphalt or another surface.</p>	

Parks - Shanklin Warming Building	411 W Plymouth Ave
<p>Accessible parking signs to be installed to meet requirements.</p> <p>Parking area to be restriped to create van-accessible space with required markings.</p> <p>No accessible entrance into the building except for the restrooms.</p> <p>Tactile signage to be installed for the Toilet Rooms.</p> <p>Insulation to be installed below the lavatory around the pipes.</p>	
Parks - Sprocket Dog Park	
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.	
Parks - Tommy's Castle	411 W Plymouth Ave
No accessibility issues identified.	
Parks - Walnut Park Splash Pad	224 E Oakridge Ave
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.	
Parks - Walnut Pavilion	224 E Oakridge Ave
<p>No accessible route from sidewalk to pavilion and existing sidewalk does not meet slope requirements.</p> <p>Parking signage to be installed per requirements.</p> <p>Parking lot constructed of compacted limestone. Parking lot markings to be added at the time that parking lot is paved.</p> <p>Tactile signage to be installed at Toilet Rooms.</p> <p>Door lock to be lowered to no more than 48".</p> <p>Door closer to be adjusted from 3 seconds to at least 5 seconds.</p> <p>Flush control to be moved to open side of water closet.</p>	
Parks - Wayne Wogoman Welcome Center	1424 Lincolnway East
<p>Van-accessible parking sign to be added at the proper height.</p> <p>Tactile signage to be added at the restroom.</p> <p>Mirror in the toilet room to be lowered to no more than 40" above the floor.</p>	

CITY PARKING LOTS

City Parking - Lot A

East of S 3rd St between Lincoln and Washington

To be fully evaluated in 2026.

City Parking - Lot B

East of S 3rd St between Washington and Jefferson

To be fully evaluated in 2026.

City Parking - Lot C

West of N 3rd St between Clinton and Pike (off N/S alley)

To be fully evaluated in 2026.

City Parking - Lot D

East of S 5th Street between Washington & Jefferson

To be fully evaluated in 2026.

City Parking - Lot E

East of N 5th Street between Lincoln and Clinton

To be fully evaluated in 2026.

City Parking - Lot F

West of N 5th Street between Lincoln and Clinton (North of E/W alley)

To be fully evaluated in 2026.

City Parking - Lot G

West of S 5th Street between Lincoln and Washington

To be fully evaluated in 2026.

City Parking - Lot H

Southwest corner of Washington and 3rd Street

To be fully evaluated in 2026.

City Parking - Lot J

Southwest corner of Lincoln and 5th Street

To be fully evaluated in 2026.

City Parking - Lot K

Southwest corner of Jefferson and 3rd Street

To be fully evaluated in 2026.

City Parking - Lot L	West of 2nd Street and South of Lincoln Avenue
To be fully evaluated in 2026.	
City Parking - Lot M	North of Washington St between 2nd and 3rd Street
To be fully evaluated in 2026.	
City Parking - Lot N	West of 5th Street between Washington and Jefferson
To be fully evaluated in 2026.	
City Parking - Lot O	East of 3rd Street and west of the N/S alley between 3rd and Main
To be fully evaluated in 2026.	
City Parking - Lot P	South of Jefferson St between 3rd and Main
To be fully evaluated in 2026.	
City Parking - Lot Q	East of Main between Clinton and Pike
To be fully evaluated in 2026.	
City Parking -Lot I	West of N 5th Street between Clinton and Pike Street
To be fully evaluated in 2026.	

SELF-EVALUATION OF PROGRAMS AND SERVICES

The City's programs and services are being evaluated, and a full assessment and Action Plan will be provided in the 2026 ADA Transition Plan update. The intent of the programmatic accessibility review will be to evaluate how individuals with disabilities:

- Access services, activities, and programs
- Receive communication (e.g., availability of ASL interpreters, alternate formats)
- Request reasonable modifications to policies or procedures This will include a full review of:
 - Policies or eligibility criteria that may inadvertently discriminate
 - Emergency procedures
 - Public meetings and events
 - Public participation and grievance procedures

Lastly, a primary goal for the next year is to complete a digital accessibility check that will evaluate the following:

- Assessment to ensure websites, PDFs, and other digital content meet **WCAG 2.1 AA** standards
- Identification of tools, platforms, or content types that need remediation

Documentation Requirements (to be provided in the 2026 Transition Plan Update)

- A written summary of the barriers identified
- A list of corrective actions
- Timelines for implementation
- Evidence of stakeholder engagement, especially with people with disabilities
- Record of public notice and community input opportunities

STAFF TRAINING

Purpose

This training protocol outlines the systematic approach for educating municipal employees on ADA compliance, accessibility best practices, and their roles in the development, implementation, and monitoring of the City's ADA Transition Plan.

Training Goals

- Ensure all relevant staff understand ADA legal obligations.
- Develop internal expertise in identifying and mitigating barriers.
- Standardize ADA training across departments to support consistent implementation of the transition plan.
- Promote ongoing compliance and cultural competency in public service delivery.

Audience

Training is mandatory for:

- Department heads and supervisors
- Staff in Public Works, Engineering, Planning, Parks & Recreation, and Code Enforcement
- Customer service representatives and front desk personnel
- Project managers and contract administrators
- ADA Coordinator and compliance teams

Optional for:

- Volunteers and community partners involved in public-facing roles

Training Components

ADA Basics and Legal Foundations

- Overview of the ADA and its application to local governments (Title II)
- Key definitions: qualified individual with a disability, reasonable modification, program accessibility

ADA Transition Plan Fundamentals

- Purpose and scope of the ADA Transition Plan
- Overview of self-evaluation and barrier identification process
- Prioritization criteria for remediation (safety, location, public use)
- Barrier Recognition and Documentation
- Field training on how to assess facilities, sidewalks, and right-of-way
- Use of ADA checklists and mapping tools
- Procedures for submitting barrier reports
- Accessible Communication and Public Engagement

- Providing effective communication for individuals with hearing, vision, or cognitive disabilities
- Making public meetings and information fully accessible
- Best practices for collecting community feedback

Departmental Integration and Reporting

- How each department contributes to the transition plan's success
- ADA responsibilities in procurement, construction, permitting, and event planning
- Reporting requirements and data collection standards

Training Schedule and Format

Training Type	Frequency	Delivery Method	Duration
Initial Orientation	Onboarding	Online or In-person	1 hour
Annual Refresher	Yearly	Online or Departmental Workshop	2 hours
Specialized Role-Based	As needed	Targeted (e.g. planners, engineers)	Varies

All training must be completed within 90 days of hire or role change for applicable employees.

Responsibilities

- ADA Coordinator: Oversees training content, delivery, and compliance tracking.
- Human Resources: Tracks participation and includes ADA content in onboarding.
- Department Heads: Ensure staff attendance and application of training in workflows.
- Legal: Supports integration of ADA principles into policy and operations.

Documentation and Evaluation

- Maintain attendance and completion records for each training session.
- Evaluate training effectiveness through staff feedback, quizzes, or observation.
- Update materials annually to reflect changes in ADA regulations or transition plan updates.

Continuous Improvement

- Regularly review training outcomes and make adjustments based on:
 - o Regulatory changes
 - o Community accessibility concerns
 - o Internal audits or legal review
- Encourage feedback from staff and the public to enhance training relevance and impact.

LOOKING FORWARD - 2026 ADA GOALS

The City's goals for 2026 aim to advance accessibility across all City programs, facilities, and public spaces through updated evaluation methods, deeper engagement, expanded staff education, and continued investment to remove barriers. These goals support compliance with Title II of the Americans with Disabilities Act while fostering a culture of equity and inclusion.

Enhanced Self-Evaluation of Municipal Programs and Services

GOAL

Conduct a comprehensive review of all City programs, services, and activities to ensure they are accessible to individuals with disabilities—beyond physical infrastructure.

KEY ACTIONS

- Audit program policies, procedures, and eligibility requirements for potential barriers.
- Review digital accessibility of service delivery, forms, and web platforms.
- Interview or survey staff and community stakeholders with disabilities to identify service gaps.
- Develop an internal checklist and reporting tool to document findings consistently.

OUTCOME

An updated self-evaluation report that includes programmatic accessibility priorities and a corrective action plan embedded within the broader transition plan.

Complete Trailway and Greenway Accessibility Assessment

GOAL

Evaluate the City's network of trails, greenways, and shared-use paths for compliance with ADA standards and usability for residents with mobility, vision, or cognitive disabilities.

KEY ACTIONS

- Apply PROWAG (Public Rights-of-Way Accessibility Guidelines) and US Access Board guidance.
- Use GIS-based tools to log conditions, grades, surfaces, and access points.
- Incorporate community feedback, including users with lived experience.
- Prioritize trails near neighborhoods, schools, and transit connections.

OUTCOME

A published inventory of trail barriers with an integrated remediation timeline, included as a standalone section within the transition plan.

Continued Improvements to Public Pedestrian Facilities

GOAL

Completion of planned curb ramp and sidewalk replacements in 2026, ensuring full ADA-compliance.

KEY ACTIONS

- Confirm best-practice ADA curb ramp designs at locations with challenging geometry and limited right-of-way, consulting US Access Board technical guidance.
- Review project details and specific ADA requirements during project pre-construction meetings.
- Highlight upcoming concrete flatwork during project progress meetings to ensure that pedestrian access routes are understood.
- Prioritize inspection of sidewalks and curb ramps during screeding and finishing operations.

OUTCOME

Full removal of accessibility barriers over approximately 50,000 SFT of sidewalk and 4,500 SFT of curb ramps.

Develop and Distribute Staff-Focused Accessibility Resources

GOAL

Equip City staff with practical tools and ongoing guidance to maintain accessibility in daily operations and public interactions.

KEY ACTIONS

- Develop a branded ADA toolkit that includes:
 - Accessibility tip sheets
 - Quick reference cards for communication accommodations
 - Facility inspection checklists
 - FAQs on event and meeting accessibility
- Distribute materials both digitally and in print.
- Integrate materials into onboarding, annual training, and supervisory manuals.

OUTCOME

An internal library of ADA resources accessible to all departments, supporting a proactive approach to access in service design, maintenance, and public engagement.

Implementation Timeline

Quarter	Focus
---------	-------

Q1 2026	Kick-off, finalize scope, update evaluation tools
Q2 2026	Begin programmatic and trailway evaluations
Q3 2026	Complete facility assessments, draft updated Transition Plan
Q4 2026	Distribute staff resources, finalize public plan update, adopt by resolution

APPENDICES

- Appendix A Non-Discrimination Policy, Notice, Grievance Policy, Grievance Form and Grievance Log
- Appendix B Sidewalk and Curb Ramp Evaluation Guidelines
- Appendix C ADA Priority Maps and Priority Summaries
- Appendix D Resolutions

APPENDIX A

1. Adopted Non-Discrimination Policy
2. Public Notice Documents
3. Grievance Procedure
4. Grievance Form
5. Grievance Log

NON-DISCRIMINATION

Adopted By: Board of Public Works and Safety

Date Adopted: April 22, 1996 (Non-Discrimination in Employment); January 27, 1992 (ADA Coordinator)

Revised: April 17, 2017; January 24, 2022; February 14, 2022

Employees Affected: All Departments, Offices, and Employees

Section 1. Background

- A. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d) provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.
- B. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794) provides that no otherwise qualified individual with a disability in the United States shall, solely by reason of her or his disability, 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.
- C. Section 162(a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. §324) provides that no person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance under this title [Title 23, United States Code] or carried on under this title [Title 23, United States Code].
- D. The Age Discrimination Act of 1975 (42 U.S.C. §6102) provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.
- E. The Civil Rights Restoration Act of 1987 (PL 100-259) amended Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975 to clarify that a recipient of Federal financial assistance must comply with the civil rights laws in all operations of the recipient and not just the program or activity receiving the Federal funding.
- F. Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132) provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.
- G. Presidential Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires Federal agencies to

administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations.

- H. Presidential Executive Order 13166, Improving Access to Services for Persons With Limited English Proficiency, requires recipients of Federal financial assistance to provide meaningful access to programs and activities for persons who, as a result of national origin, are limited in their English proficiency.

Section 2. **Discrimination Prohibited.**

- A. The City of Goshen is an equal opportunity employer and shall comply with and uphold all federal laws and administrative guidelines prohibiting discrimination on the basis of race, color, religion, sex, gender identity, age, gender, disability, ancestry, genetic information, or national origin. It is the policy of the City of Goshen that no employee or applicant for employment shall be discriminated against, excluded from participating in, denied the benefits of, or otherwise subjected to discrimination in any program, activity or other privilege of employment based on the above causes of prejudice.
- B. It shall be the policy of the City of Goshen, Indiana that no person shall, on the grounds of race, color, national origin, sex, age, income status, or limited English proficiency be excluded from participation in, be denied the benefits of, or be subject to discrimination under any of the City of Goshen's services, programs, or activities.
- C. It shall be the policy of the City of Goshen, Indiana that will not discriminate against a qualified individual with a disability in job application procedures; the hiring, advancement or discharge of employees; employee compensation; job training; and other terms, conditions, and privileges of employment. Further, no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of the City of Goshen, or be subjected to discrimination by the City.

Section 3. **Notices.**

- A. Notice of Nondiscrimination. The City of Goshen Notice of Nondiscrimination attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by this policy in the services, programs, and activities of the City.
- B. Notice under the Americans with Disabilities Act. The City of Goshen Notice under the Americans with Disabilities Act attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by the Title II of the Americans with Disabilities Act and this policy in the services, programs, or activities of the City.
- C. The Notice of Nondiscrimination and Notice under the Americans with Disabilities Act shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City

of Goshen's website, and presenting in other accessible formats as may be determined from time to time.

Section 4. **Title VI Coordinator and ADA Coordinator.**

The City of Goshen Human Resources Manager is designated as the Title VI Coordinator and ADA Coordinator. The Title VI Coordinator and ADA Coordinator is responsible for coordinating the efforts of the City of Goshen to comply with the Nondiscrimination Statutes/Rules/Regulations/Policies and to assist in processing any complaint communicated to the City alleging discrimination. The Title VI Coordinator and ADA Coordinator may be contacted at:

City of Goshen Human Resources Department
Attention: Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com

Section 5. **Grievance Procedure.**

- A. The City of Goshen Grievance Procedure under the Americans with Disabilities Act and Nondiscrimination Policy attached to this policy is the City of Goshen's process for a person to file a complaint of alleged discrimination.
- B. This grievance procedure shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City of Goshen's website, and presenting in other accessible formats as may be determined from time to time.
- C. The Title VI Coordinator and ADA Coordinator shall maintain documentation of all complaints received alleging discrimination, resolutions provided, hearings requested, and other pertinent information for at least three (3) years.

Section 6. **Title VI Program/Nondiscrimination Implementation Plan**

The Goshen Board of Public Works and Safety shall adopt and annually update a Title VI Program/ Nondiscrimination Implementation Plan to ensure continuous compliance with Nondiscrimination Statutes/Rules/Regulations and the City's Nondiscrimination Policy. The Title VI Program/Nondiscrimination Implementation Plan shall include, but is not limited to:

- A. This policy, including the current notices, Title VI Coordinator and ADA Coordinator information, and grievance procedures.
- B. Monitoring of program participants and beneficiary demographics and activities promoting compliance with the Title VI Program.
- C. Process and procedures for handling complaints alleging discrimination.
- D. Title VI training of staff.

- E. Title VI Assurances document.
- F. Annual work plan of Title VI activities and actions.
- G. Annual accomplishment report highlighting efforts to ensure nondiscrimination practices in all City of Goshen activities.

Section 7. **Miscellaneous**

- A. The notices and grievance procedure under this policy shall be updated as needed with the name of the current individual employed as the Human Resources Manager and designated as the Title VI Coordinator and ADA Coordinator without amending this resolution.
- B. Resolution 2011-Q, A Resolution of the City of Goshen Board of Public Works and Safety Adopting the Americans with Disabilities Act (ADA) Accessibility Guidelines for Standards for Accessible Design and Guidelines for Pedestrian Facilities in the Public Right-of-Way, adopted December 12, 2011 continues in full force and effect.
- C. Resolution 2012-J, Adopting the Americans with Disabilities Act Transition Plan for Pedestrian Facilities in the Public Right-of-Way, adopted July 9, 2012, continues in full force and effect.



CITY OF GOSHEN NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT ("ADA")

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

Employment: The City of Goshen does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the US Equal Employment Opportunity Commission under Title I of the ADA.

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

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Goshen should contact the ADA Coordinator, using the contact information below, as soon as possible but no later than forty-eight (48) business hours before the scheduled event. The City of Goshen will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs. The ADA does not require the City of Goshen to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Goshen is not accessible to persons with disabilities should be directed to the ADA Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com



CITY OF GOSHEN
NOTICE OF NONDISCRIMINATION

In accordance with the requirements of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, the Civil Rights Restoration Act of 1987, other federal nondiscrimination statutes and executive orders, and the City of Goshen Nondiscrimination Policy, the City of Goshen, Indiana will not exclude a person from participating in, deny a person the benefits of, or discriminate against any person on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency in the City's services, programs, or activities.

Grievance Procedure: Complaints that a person has been excluded from participation in, denied the benefits of, or subjected to discrimination on the grounds of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency under any of the City of Goshen's services, programs, or activities should be directed to the Title VI Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com



**CITY OF GOSHEN GRIEVANCE PROCEDURE UNDER
THE AMERICANS WITH DISABILITIES ACT
AND
NONDISCRIMINATION POLICY**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA") and the City of Goshen's Nondiscrimination Policy. It may be used by anyone who wishes to file a complaint alleging:

- (1) Discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Goshen; or
- (2) Exclusion from participation in, denial of the benefits of, or discrimination under any of the City of Goshen's services, programs, or activities on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency.

The City of Goshen's Discrimination and Harassment Policy, as may be amended from time to time, governs job-related complaints of discrimination in employment with the City of Goshen.

The complaint should be in writing and contain information about the alleged discrimination, including:

- (1) Name, address and phone number of the person alleging the discrimination.
- (2) Name, address and phone number of person filing the complaint if different from the person alleging the discrimination.
- (3) Description of the alleged discrimination, including date and location, and the remedy sought.

Anyone wishing to file a complaint may use the Grievance Form included with this Grievance Procedure. The Grievance Form is also available on the City of Goshen's website at www.goshenindiana.org. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for a person with a disability upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

The Title VI Coordinator and ADA Coordinator will acknowledge the receipt of the complaint within ten (10) working days.

The Title VI Coordinator and ADA Coordinator will forward the complaint to the City of Goshen's Legal Department which will conduct the investigation necessary to determine the validity of the alleged discrimination. The Legal Department may contact the grievant to discuss the matter as part of the investigation. The Legal Department will submit written findings and a proposed resolution within forty-five (45) calendar days of receiving the complaint from the Title VI Coordinator and ADA Coordinator. If a resolution of the complaint is reached during this investigation, the resolution will be documented in Title VI Coordinator and ADA Coordinator's file.

If the grievant is not satisfied with the Legal Department's determination, the grievant may request a hearing before the Goshen Board of Public Works and Safety. The hearing will be scheduled within thirty (30) days of the request unless the grievant and City agree on a different date. The request for a hearing before the Board of Public Works and Safety must be requested with fifteen (15) days of receiving the Legal Department's written findings and proposed resolution. At the hearing the grievant may appear with or without legal counsel. The grievant will be given the opportunity to present evidence, and/or witnesses and will be given the opportunity to question any witnesses that the City presents to the Board of Public Works and Safety.

The resolution of any specific complaint will require consideration of the specific nature of the alleged discrimination, the nature of the access to services, programs, activities, or facilities at issue, the essential eligibility requirements for participation, the health and safety of others, and the degree to which an accommodation would constitute a fundamental alteration to the program, service, activity, or facility or cause undue hardship to City. Accordingly, the resolution of any complaint does not create a precedent for any future complaint.

At any time during the process, a grievant may file a complaint directly with the US Department of Justice, Indiana Civil Rights Commission, or other appropriate state or federal agency. All written complaints received by the Title VI Coordinator and ADA Coordinator or his/her designee, appeals to the Goshen Board of Public Works and Safety or the Board's designee, and responses from these two offices will be retained by the City of Goshen for at least three (3) years.



CITY OF GOSHEN GRIEVANCE FORM

Date: _____

Name of Person Alleging Discrimination: _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Name of Person Filing Complaint (if different than above) _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Description of the alleged discrimination, including date and location: _____

Remedy sought: _____

Return to: City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

TITLE II / TITLE VI GRIEVANCE LOG



[illegible]



APPENDIX B

1. Guideline Used for Sidewalk Defect Documentation
2. Guideline Used for Curb Ramp and Crosswalk Evaluation

Guideline for Sidewalk Defect Documentation

Defect	Description	Example
Cracked Panel	<p>Cracked panel defects are considered a condition-based issue and are not part of ADA compliance assessment. Cracks resulting in trip hazards should always be inputted as a vertical fault which is the more severe defect and does impact ADA compliance.</p> <p>Cracked panels can have two severities:</p> <ol style="list-style-type: none"> 1. Several 2. Alligator 	<p>"Several"</p> <p>"Alligator"</p>
Spalling	<p>Spalling defects are considered a condition-based issue and are not part of ADA compliance assessment. If the impacts of spalling result in a more critical defect, the more critical should be inputted.</p> <p>Spalling can have two severities:</p> <ol style="list-style-type: none"> 1. First Signs 2. Severe 	
Vertical Fault	<p>Vertical faults includes a jutting of pavement that causes an uneven surface. Since they can cause tripping, they carry some of the most liability and are considered a very high priority ADA non-compliant defect.</p> <p>They can fall into one of the following categories which impacts the type of corrective action activity needed.</p> <ol style="list-style-type: none"> 1. 1/4 - 1/2 in 2. 1/2 in - 2 in 	

	<ol style="list-style-type: none"> 3. greater than 2 in 4. Utility Box (curb stop, valve, manhole, etc.) 5. "Pothole" (missing concrete causing a trip hazard rather than heaving or joint issues) <p>Secondarily, the cause of the fault gives insight into whether the issues is expected to be recurring or may benefit from a one-time fix.</p> <ol style="list-style-type: none"> 1. Tree root 2. Other 3. Unknown 	
Missing Panel	<p>Missing panels indicates a spot where sidewalk is missing within a stretch of existing sidewalk.</p> <p>Long stretches with no sidewalk are not categorized as missing panels.</p>	
Bad Cross Slope	<p>To be ADA compliant, cross slopes should not exceed 2% as measured across the panel's width.</p> <p>Many occurrences of bad cross slopes occur at drive and alleyway crossings. Those are inputted under crossing defects.</p>	
Obstructions	Obstructions are noted only when the pathway around the obstruction is less than 4 feet.	

	<p>Infrastructure with plenty of navigable sidewalk space are not considered an obstruction.</p> <p>Obstructions can be categorized as one of the following</p> <ol style="list-style-type: none"> 1. Pole 2. Tree 3. Hydrant 4. Bollard 5. Vegetation 6. Protrusion (less than __ feet of vertical navigable space). 	
Crossing Defect	<p>Crossing defects are noted when a defect occurs at a drive or alleyway crossing. Differentiating in this way allows for analysis that can include or exclude areas where more than just panel replacement may be needed in order to resolve the issue.</p> <p>Crossing defects include the following:</p> <ol style="list-style-type: none"> 1. Asphalt in poor condition (potholes, alligator cracking, etc.) 2. Concrete in poor condition 3. Non-compliant cross slope ($> 2\%$) 4. Non-compliant running slope ($> 8.3\%$) <p>Running slope is measured lengthwise along the segment and is most likely to occur where there are dips down to a drive or alleyway. Some alleys would have a curb ramp and would thus be assessed differently.</p>	

Guideline for Curb Ramp and Crosswalk Evaluation

Curb Ramp Data Term	Typical Compliance Measurement/Range	Units	Min / Max	Non-Typical Compliance Measurement/Range	Compliance / Measurement Notes
Curb Ramp ID					
Install Date					
GENERAL					
Intersection Type					
Intersection Control					
Curb Ramp Type	All may be compliant, except: Crossing - No Ramp; No Ramp Needed, Insufficient Buffer				
Pedestrian Access Route Type					
Edge Treatment					
Detectable Surface Type					
BASE MEASUREMENTS					
Curb Ramp Width	4	ft	Min	Width of Multiuse Path	

Curb Ramp Length	Running slope controls	ft		If curb ramp type is Perpendicular and must extend beyond 15 ft to achieve 8.3% running slope, ramp must be at least 15 ft	
Running Slope	8.3	%	Max	<p>If curb ramp type is Blended Transition and serves only one pedestrian access route: 5% max</p> <p>If curb ramp type is Blended Transition and serves more than one pedestrian circulation path (prepared surface for pedestrian use, such as sidewalk): 5% max running slope if there is a minimum 4 ft wide Bypass; otherwise, 2.1% max.</p> <p>If curb ramp type is Perpendicular and must extend beyond 15 ft to achieve 8.3% running slope, ramp must be at least 15 ft and running slope may be greater than 8.3%</p>	
Cross Slope	2.1	%	Max	For Perpendicular ramps (leading into crosswalk) or Blended Transitions, no greater than cross slope of crosswalk	

Turning Space Width	4	ft	Min	Width of Multiuse Path	
Turning Space Length	4	ft	Min		
Turning Space Running Slope	2.1	%	Max	If turning space serves two ramps, no greater than cross slope of crosswalk that is perpendicular to turning space running slope.	
Turning Space Cross Slope	2.1	%	Max	No greater than cross slope of ramp that turning space serves. If turning space serves two curb ramps, no greater than cross slope of crosswalk that is perpendicular to turning space cross slope.	
DWS Length	2	ft	Min		
DWS Width	Full width of ramp			Where required for proper installation, a 2-inch border is allowed around outside of DWS	Width excludes flared sides
DWS Visual Contrast	Yes, Contrasted				
Landing Width	4	ft	Min		Width measured perpendicular to direction of travel on ramp above it
Landing Length	4	ft	Min		Length measured in direction of travel on ramp above it

Landing Running Slope	2.1	%	Max	For landing on Parallel ramp, running slope no greater than slope of crosswalk or roadway. For setback on Perpendicular ramp, running slope no greater than 5.0%.	Running slope measured in direction of travel on ramp above it
Landing Cross Slope	2.1	%	Max	For setback on Perpendicular ramp, cross slope no greater than cross slope of crosswalk.	Cross slope measured perpendicular to direction of travel on ramp above it
Crosswalk Width	6	ft	Min	Width of Multiuse Path	Width measured between transverse lines or to outside of longitudinal ("ladder") lines (if there are no transverse lines)
Curb Ramp within Crosswalk	Yes			At a Blended Transition: If Path Type is Multiuse Path, then full width of blended transition needs to be contained within width of crosswalk(s) it serves; if Path Type is not Multiuse Path, a minimum of 48" of blended transitions needs to be contained within crosswalk(s).	
Grade Break within Ramp (slope change)	No				More gradual grade changes within a ramp are being ignored
Grade Break Perpendicular to Ramp	Yes				

OTHER					
Grate Opening Max Width	0.5	in	Max		
Grate Opening Perpendicular?	Yes				This refers to the length of the opening. A 0.5" slot may be of any length, as long as the length of the opening is perpendicular to direction of travel
Ramp Run Slope + Counter Slope (autocalculate)	13.3	%	Max	If over 13.3%, transitional space needed at bottom of running slope of ramp. Minimum 2 feet in direction of pedestrian travel, with 2.1% max running slope and cross slope no greater than cross slope of crosswalk.	
RAMPS AND FLARES					
Ramp Running Slope, Cross Slope	(See above under Base Measurements)				
Flare Slope	10	%	Max		Measured along back of curb. Only applies where there is a pedestrian circulation path that is adjacent to curb ramp flares (such as a sidewalk).

DETECTABLE WARNING SURFACE (DWS)					
DWS Placement	All except Non-compliant placement				<p>Parallel Ramp: DWS in Landing, front of tile along back of curb or 6 inches from edge of pavement if no curb</p> <p>Blended Transition: Front corners of DWS at back of curb (with 2 inch concrete border allowed) or 6 inches from edge of pavement if no curb</p> <p>Perpendicular Ramp: DWS at bottom grade break of ramp if max distance from back of curb to grade break is 60 inches or less; otherwise, place as Blended Transition</p>
DWS max Distance from Curb	0 / 2 / 6 / 60	in	Max		(see DWS Placement)

DWS Condition	All may be compliant except Missing, Detached or Loose				
DWS Voids				If Yes and DWS is not stable to walk on, then it is non-compliant	
DWS Compliant Domes?	Yes				Twice the normal spacing between domes allowed at cut edges. Partial domes are permitted along cut edges.
APPROACHES					
	Do not Factor Approaches into Curb Ramp Compliance				
TURNING SPACE					
By-Pass Width	4	ft	Min		Minimum width required only when bypass is required.
BOTTOM OF RAMP					
Counter (gutter) Slope	5	%	Max	(Rare) If roadway is superelevated at crosswalk, running slope may be the same as superelevation	
Gutter Cross Slope	2.1	%	Max	No greater than cross slope of crosswalk	

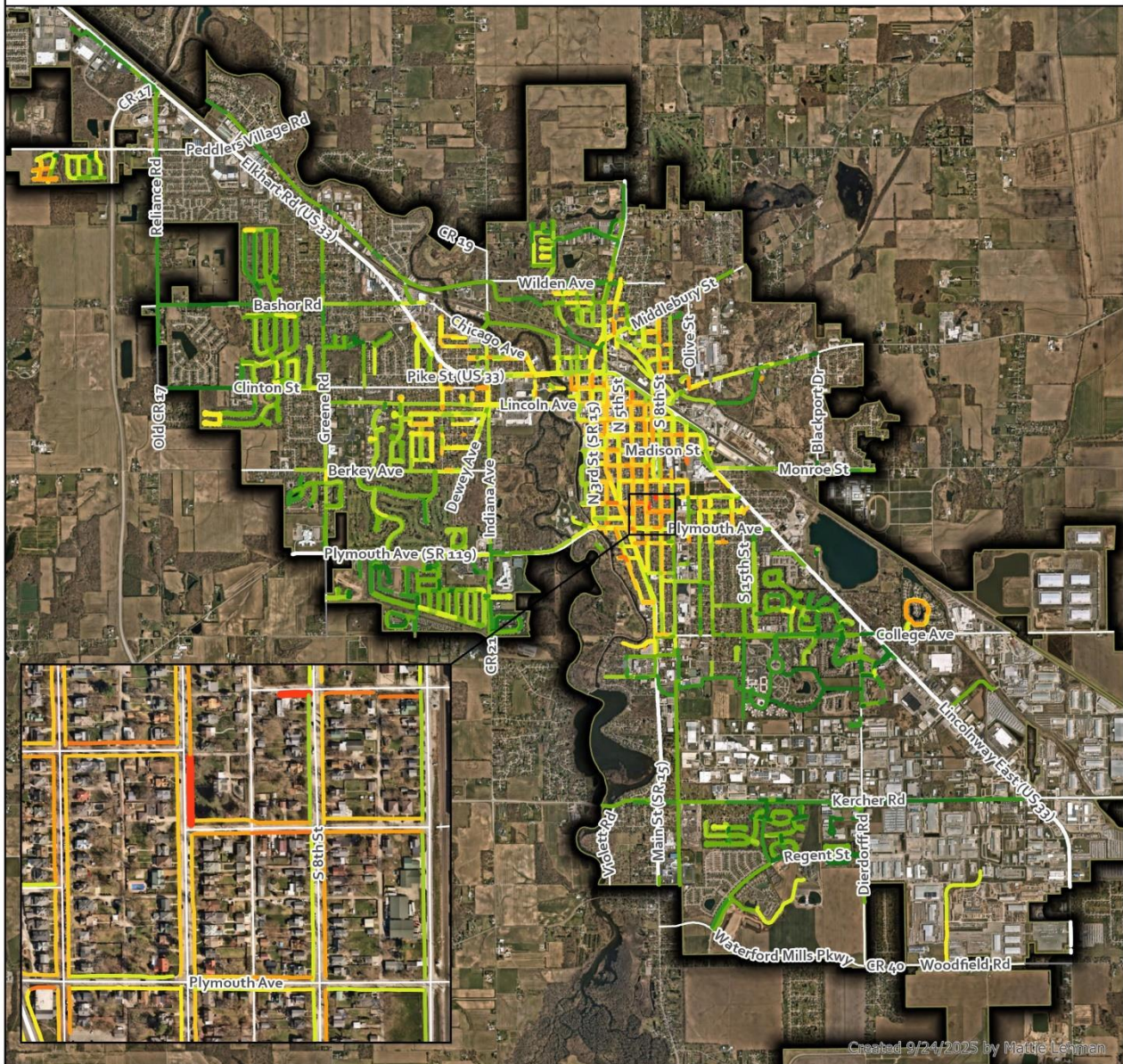
Clear Area (in pavement) Run Slope	5	%	Max		Clear area applies to perpendicular curb ramps only. NOTE: "in pavement" is a mis-label... clear areas can be mostly within the setback / behind curb
Clear Area Cross Slope	2.1	%	Max	No greater than cross slope of crosswalk	Clear area applies to perpendicular curb ramps only
Clear Area Width	4	ft	Min		Measured within crosswalk (or assumed lines if unpainted), outside of roadway travel lanes parallel to crosswalk
Clear Area Length	4	ft	Min		Within crosswalk, beyond bottom grade break of a perpendicular ramp
CROSSWALK					
Crosswalk Run Slope	5	%	Max	(Rare) If roadway is superelevated at crosswalk, running slope may be the same as superelevation	
Crosswalk Cross Slope	2.1	%	Max	If Intersection Control is Light/Signal or None/Uncontrolled, cross slope no greater than 5%	

APPENDIX C

1. ADA Priority Map for Sidewalks
2. ADA Priority Map for Curb Ramps
3. Points of Interest and Walk-Time Analysis
4. Priority Summary for Sidewalks and Curb Ramps



Priority Sidewalk for Repair or Replacement



Location Weighted Condition Combined Score

Red	≤ 1 Highest Priority	Yellow	≤ 5	Green	≤ 9
Orange	≤ 2	Light Green	≤ 6	Dark Green	≤ 10 Lowest Priority
Light Orange	≤ 3	Lightest Green	≤ 7	Grey	<out of range>
Yellow-Orange	≤ 4	Very Light Green	≤ 8		



0 6,000
US Feet

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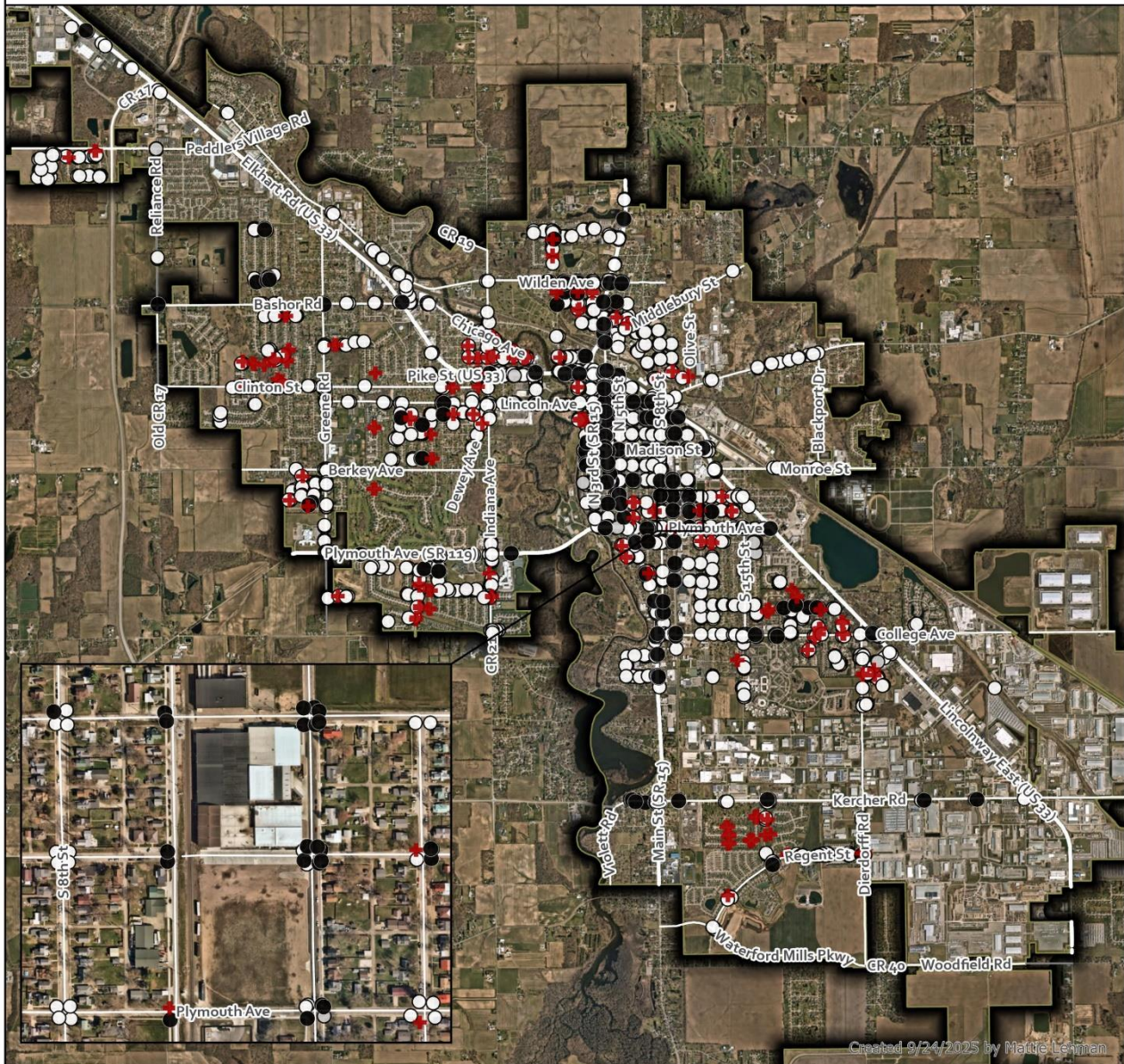
The City of Goshen

Department of Public Works & Safety
Office of Engineering

204 East Jefferson Street, Goshen, Indiana 46528
Phone: 574-534-2201 engineering@goshencity.com



Curb Ramp ADA Compliance



Created 9/24/2025 by Mattie Lehman

ADA Compliant Ramps

- | | |
|--------------------------------|--------------------|
| ○ No | Missing Ramps |
| ○ Further Investigation Needed | + Curb Ramp Needed |
| ● Yes | |



0 6,000
US Feet

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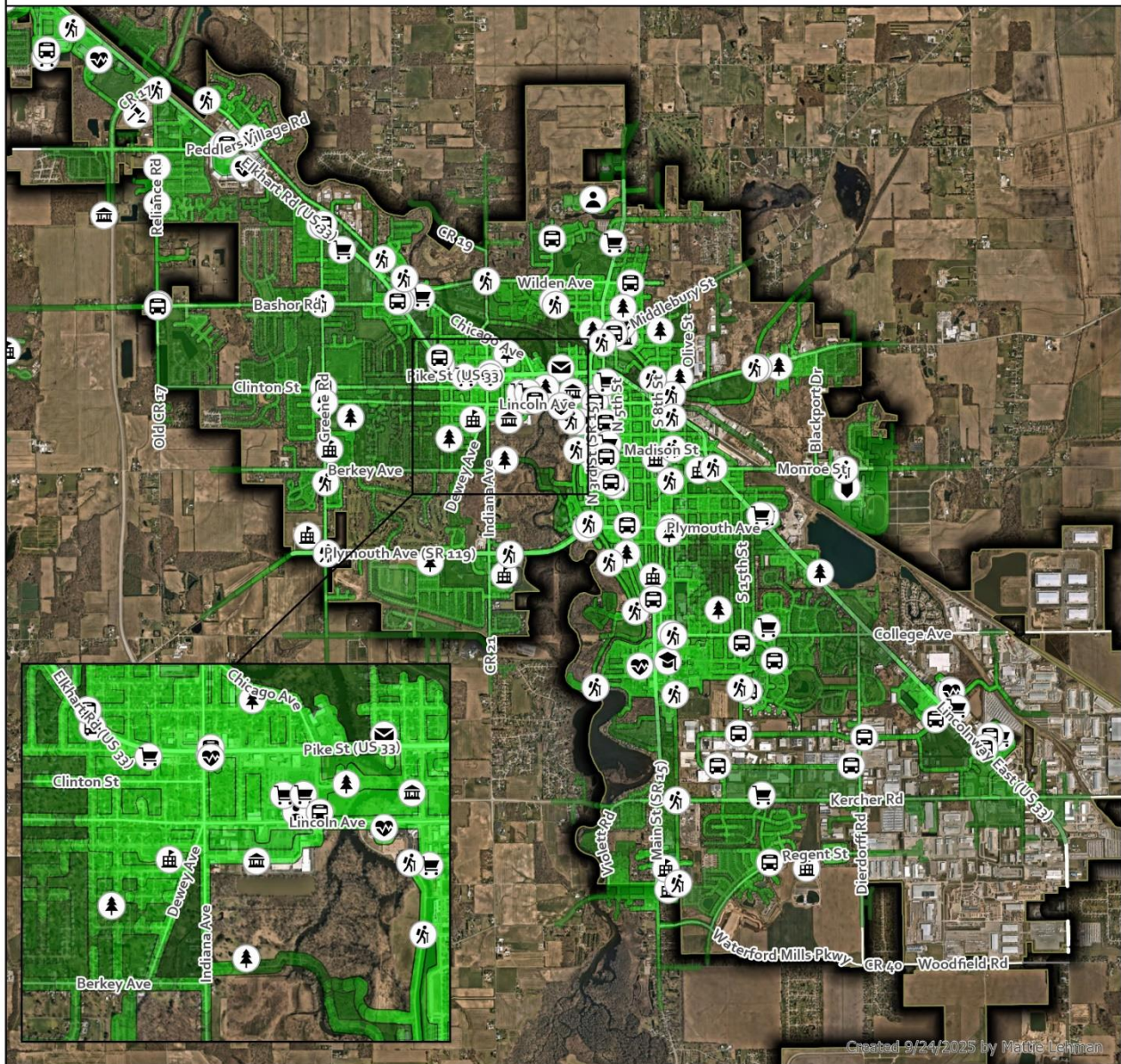
The City of Goshen

Department of Public Works & Safety
Office of Engineering

204 East Jefferson Street, Goshen, Indiana 46528
Phone: 574-534-2201 engineering@goshencity.com



Points of Interest Proximity Analysis



Points of Interest

Points of Interest

- | | | | |
|------------|-------------|----------------|---------------|
| Healthcare | School | Courthouse | Trailhead |
| Bus Stop | Library | Social Service | Government |
| College | Post Office | Land Mark | Grocery |
| | | | Park Entrance |

High Density of 5 Minute Proximity Walk Times

Low Density of 15 Minute Walk Time



0 6,000
US Feet

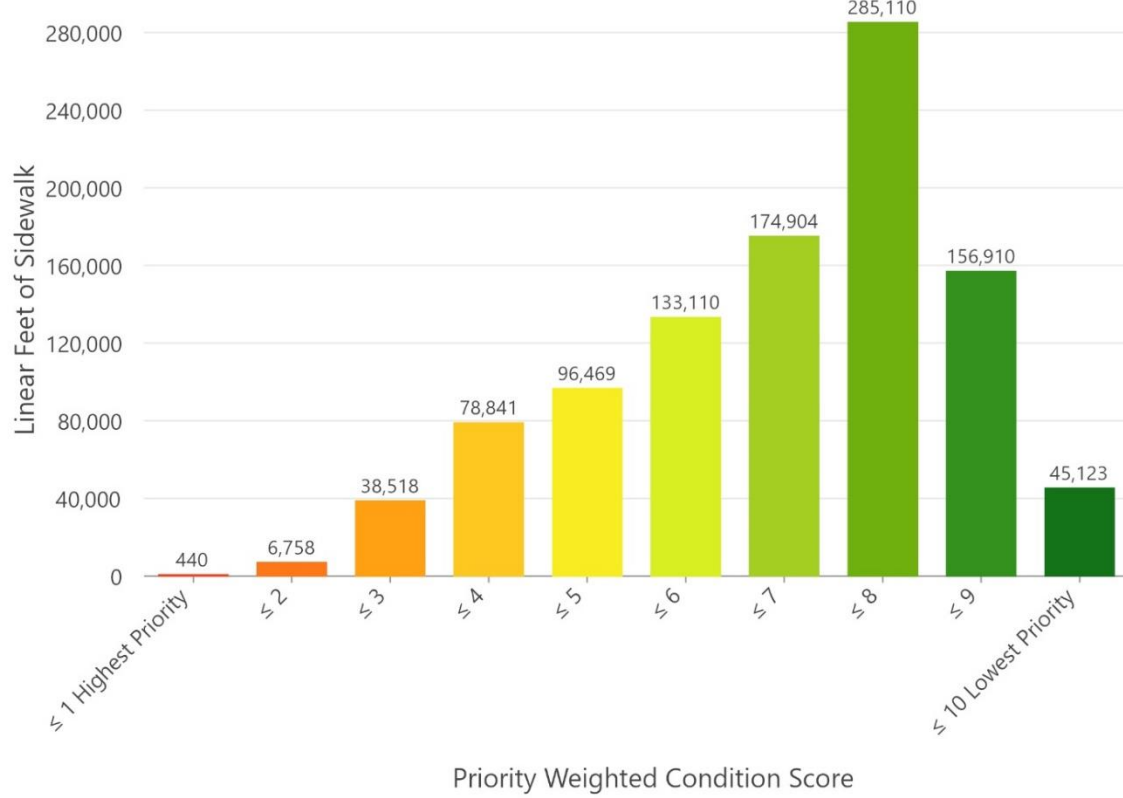
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The City of Goshen

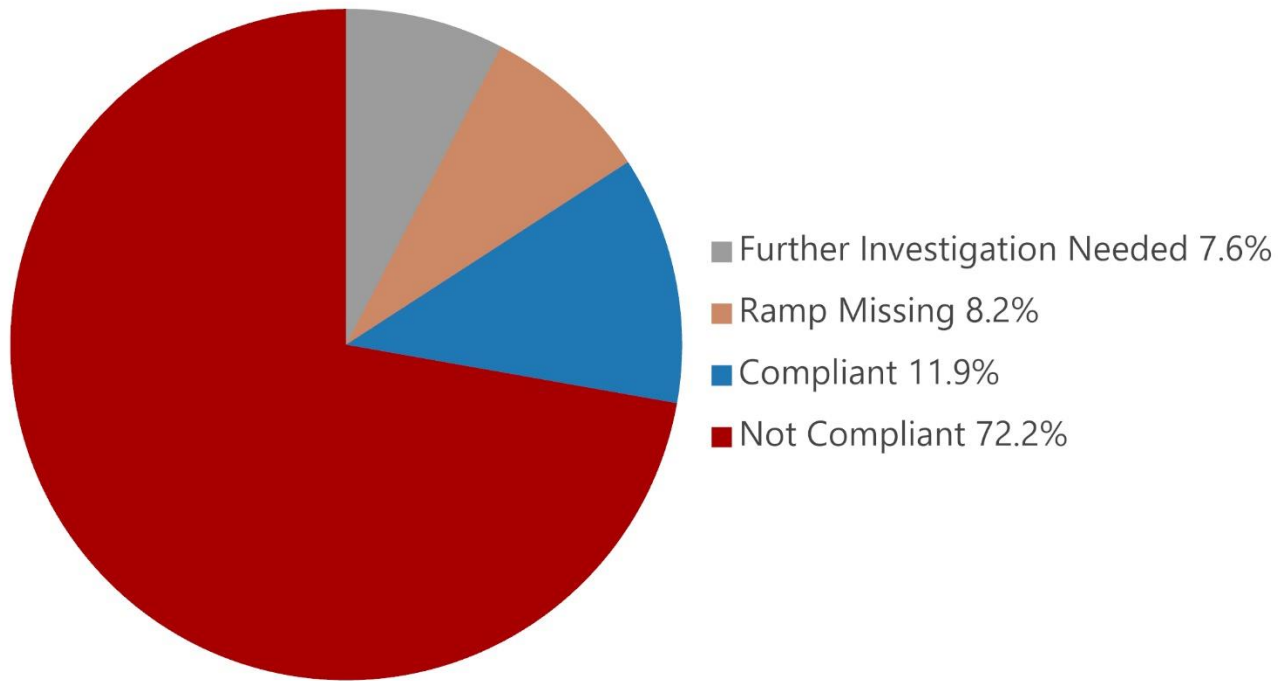
Department of Public Works & Safety
Office of Engineering

204 East Jefferson Street, Goshen, Indiana 46528
Phone: 574-534-2201 engineering@goshencity.com

Linear Feet of Scored Sidewalk



Curb Ramps by ADA Compliance



APPENDIX D

1. Resolutions

**GOSHEN BOARD OF PUBLIC WORKS AND SAFETY
RESOLUTION 2025-20**

**Adopting the Americans with Disabilities Act
Standards For Accessible Design and
Public Right-of-Way Accessibility Guidelines**

WHEREAS by Resolution 2011-Q adopted December 12, 2011, the Board of Public Works and Safety previously adopted the 2010 Americans with Disabilities Act Accessibility Guidelines Standards for Accessible Design and the 2011 Guidelines for Pedestrian Facilities in the Public Right-of-Way.

WHEREAS the 2011 Guidelines for Pedestrian Facilities in the Public Right-of-Way have been superseded by the Americans with Disability Act 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG").

WHEREAS it is necessary for the City of Goshen to adopt PROWAG.

NOW, THEREFORE, BE IT RESOLVED by the Goshen Board of Public Works and Safety that the following City of Goshen Policy for Adopting the Americans with Disabilities Act Standards For Accessible Design and Public Right-of-Way Accessibility Guidelines attached hereto and made a part hereof, is hereby approved.

BE IT FURTHER RESOLVED by the Goshen Board of Public Works and Safety that, upon the approval of the above-described policy, Resolution 2011-Q, Adopting the Americans with Disabilities Act (ADA) Accessibility Guidelines for Standards for Accessible Design and the Guidelines for Pedestrian Facilities in the Public Right-of-Way is repealed.

PASSED and ADOPTED by the Goshen Board of Public Works and Safety on July 31, 2025.



Gina M. Leichty, Mayor



Mary Nichols, Member



Orv Myers, Member



Michael A. Landis, Member

Barb Swartley, Member

CITY OF GOSHEN POLICY
Adopting the Americans with Disabilities Act
Standards For Accessible Design and
Public Right-of-Way Accessibility Guidelines

Adopted By: Board of Public Works and Safety
Date Adopted: July 31, 2025
Revised: N/A

Employees Affected: All Departments, Offices, and Employees

Section 1. **Background.**

- A. The Federal government enacted the Americans with Disabilities Act of 1990 ("ADA") to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities.
- B. Title II of the ADA requires that municipalities adopt the Americans with Disabilities Act 2010 Standards for Accessible Design that provide accessibility, through proposed structural modifications to remove accessibility barriers.
- C. Title II of the ADA recommends that municipalities adopt the Americans with Disability Act 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG") for pedestrian facilities in the right-of-way that provide accessibility, through proposed structural modifications to remove accessibility barriers.
- D. The City of Goshen remains committed to the ADA and the elimination of barriers to public facilities.

Section 2. **Policy.**

The City of Goshen, Indiana hereby adopts for public rights-of-way the 2010 Americans with Disabilities Act Standards for Accessible Design and the 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG") for pedestrian facilities in the right-of-way and will adhere to such and any subsequent revisions thereto.