

ADA Facilities Compliance Strategies for Private Entities

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- 1.) **TASK FORCE** - Set up an interdepartmental ADA Task Force to coordinate all ADA compliance efforts for your organization.
- 2.) **STUDY** - Carefully review the requirements of each applicable section of the Regulations and ADA Accessibility Guidelines (ADAAG).
- 3.) **CONSULT** - Discuss your facilities' accessibility with your own employees who have disabilities and, if available, with local accessible design consultants and/or local disability support agencies. Remember, however, in consulting with such individuals that an individual with a particular disability may not be sensitive to the needs of individuals with other disabilities.
- 4.) **ADOPT** - Develop a detailed policy on accessibility for your facilities, communications, programs, services, policies, procedures, legal agreements and accommodations. Adopt it and communicate it, with implementation procedures, to all affected people.
- 5.) **NOTIFY** - Discuss the requirements of the ADA with your architects, interior designers, landscape architects, facility managers, maintenance, custodial staff, public relations staff and others who affect the accessibility of your facilities.
- 6.) **REVIEW** - Study all construction and remodeling projects in progress to minimize future problems with "readily achievable" barrier removal and/or failure to meet the "readily accessible" standard for those projects which are required to meet the full ADAAG.
- 7.) **REMOVE BARRIERS** - Survey your existing "public accommodations" facilities to identify barriers to people with disabilities. Analyze, set priorities and remove those barriers immediately where such removal is readily achievable. Where it is not readily achievable to remove them, provide alternative methods where they are readily achievable. If all barriers cannot be removed immediately, develop a phased implementation plan for removal.
- 8.) **MAINTAIN** - Assure that policies and procedures followed by custodial and maintenance staff or facility users do not reduce accessibility or create new barriers to individuals with disabilities.
- 9.) **DOCUMENT** - Keep detailed records of both the plan and process you are following and your progress in removing barriers. Track costs for all items. This is your "good faith effort" defense log.
- 10.) **UPDATE** - Review the accessibility of your facilities on an ongoing basis. Changes in technology, accessibility codes and guidelines may automatically upgrade the readily achievable standard, possibly requiring you to remove additional barriers in future years.
- 11.) **MONITOR** - Track all expenditures for alterations and renovations as well as for upgrades along the path of travel as required. These must be cataloged by date of expense per 36.403(h).