

**LOS ANGELES UNIFIED SCHOOL DISTRICT**

**DISTRICT-WIDE TRANSITION PLAN UPDATE**

**in**

**Compliance with the Requirements of**

**Title II of the**

**Americans with Disabilities Act**

August 14, 2015



# LAUSD 2015 District-wide ADA Transition Plan Update

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# LAUSD 2015 District-wide ADA Transition Plan Update

## **1. Policy Statement**

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 are federal laws aimed at the elimination of discrimination in employment, services, programs, activities, and benefits (programs) against individuals with disabilities. Title II of the ADA, along with its implementing regulations, require public entities, such as a public schools, to operate each of its services, programs, or activities so that, when viewed in their entirety, they are readily accessible to and usable by children and other individuals with disabilities. 28 C.F.R. 35.150(a). As part of this nondiscrimination obligation, public schools must comply with Title II's accessibility standards for new construction and alteration of existing facilities. See 28 C.F.R. 35.151. Section 504 operates similarly, and has program accessibility standards that are consistent with those of Title II. See 28 C.F.R. 42.520-42.522 (Department of Justice regulations); 34 C.F.R. 104.21-104.23 (Department of Education regulations). This document is an update to the section 504 Plan issued in May 1978. The Los Angeles Unified School District is committed to providing its programs and services in the most appropriate and integrated settings possible to ensure program accessibility.

## **2. Executive Summary**

This District-wide Transition Plan Update describes the methods the District will follow to review its facilities and develop an updated plan to provide program accessibility. The Title II ADA regulations state that at a minimum a transition plan must:

### **a. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities.**

- The District's Access Compliance Unit (ACU) will survey sites developed from a Facilities Master List (Appendix A) described in Section 9 "Barrier Analysis and Action Planning."
- The Facilities Access Compliance Manager will provide a site transition plan for each school facility surveyed. The site transition plans will identify all non-compliant conditions and assign a priority for removal and or modification of barriers to provide program access.
- The site transition plan will provide an estimate of cost for removal of barriers and establish a date to have architectural barriers to program accessibility removed and/or modified.
- The ACU staff that is responsible for conducting ADA surveys is fully trained and experienced in performing and documenting ADA barriers. ACU staff will be formally trained in the identification and the documentation of architectural barriers. A summary of Training and Professional Development is attached in Appendix C.
- Each survey report is checked for quality control by a California Division of the State Architect (DSA) "Certified Access Specialist."

### **b. Describe and detail the methods that will be used to make the facilities accessible.**

- Based on the site transition plans, the District's Facilities Services Division (FSD) will manage Architects and Contractors as needed to remove barriers. Architects will receive Task Orders for school site barrier removal projects and in many cases the District will utilize Job Order Contracts for the selected Contractors needed to remove the barrier. ACU's role will be

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integral to the surveys, design reviews, construction support and final verification of the barrier removal.

- The District will primarily utilize bond program funds to execute Modernization and New Construction projects with ADA scope ensuring ADA barriers are corrected as part of the project. Also, the District will allocate additional funding for stand-alone ADA barrier removal projects as they are prioritized. The District's Chief Facilities Executive (CFE) has estimated the cost of the Architectural Barrier Removal Program established by this District-wide Transition Plan Update as \$1.295 billion.
- In alignment with the Department of Justice's priority items, at a minimum, the District will address the following priority items that have been identified as providing the greatest access:
  1. An accessible entrance;
  2. An accessible route to the altered area;
  3. At least one accessible restroom for each sex or a single unisex restroom;
  4. Accessible telephones;
  5. Accessible drinking fountains; and
  6. When possible, additional accessible elements such as parking, storage, and alarms.
- c. **Include a schedule for taking the necessary steps to achieve compliance with Title II.**
  - The CFE has developed a schedule for the removal of architectural barriers to program accessibility in compliance with Title II. The schedule in Appendix B is the schedule for the complete removal of barriers over a 15-year period commencing in 2015.
  - The Access Compliance Unit will provide architectural ADA design reviews to ensure that all barriers have been identified and/or conditions modified to verify compliance with federal and state building codes.
  - The District has established the ADA Compliance Manager Position. The ADA Compliance Manager is responsible for implementing this District-wide Transition Plan Update which includes the following duties and responsibilities:
    - Establish ADA compliance workshops for teachers, staff and administrators to provide guidance and tools for understanding and implementing ADA and Section 504 of the Rehabilitation Act.
    - Establish an ADA forum of select individuals from key District Divisions / Offices to advise and report on the status of ADA compliance.
    - Establish a working interface with California Department of Education, California Division of the State Architect, U.S. Office of Civil Rights Access Compliance Unit, City of Los Angeles Department on Disabilities and other pertinent organizations.
    - Develop fully accessible District and school web-site guidelines for compliance with WCAG.
    - Assist in the design and development of technical standards for accessible facilities and equipment procurement.

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- Maintain a central database of District-provided Auxiliary Aids and Services and other equipment, materials and personal services currently provided by the District.
- Oversee the District's grievance procedure for receiving and investigating complaints arising under the ADA Title II program accessibility requirements.

District facilities that provide programs and/or services include 983 school sites and other facilities<sup>1</sup>. The District has three methods to process and remove ADA barriers for program accessibility.

- 1) The District has established a Rapid Access Program (RAP) to remove simple barriers at school sites to provide program accessibility for students in a rapid manner.
- 2) LAUSD's Asset Management Group is developing projects at various school sites which will include ADA improvements specific to those projects. During the development phase for each of these projects, the ACU will survey the sites for barriers and provide a site transition plan specific to the project which will be provided to the Designer for evaluation and designed removal. ACU will also provide design reviews prior to submission to DSA, construction support and final verification of the barrier removal.
- 3) The District-wide Transition Plan establishes a stand-alone ADA Barrier Removal Program with necessary funding using Bond Program funds to continue to provide program accessibility throughout District school sites and other facilities.

This District-wide Transition Plan Update and implementing process will include the use of an active database of identified barriers that may need to be modified or removed in order to provide program access or remediation during maintenance, repair, alterations, or additions work. The District will actively use this database on an ongoing basis to identify and document physical barriers; analyze their impact on program access; prioritize their removal when required; communicate the information to maintenance, design, and construction teams who may be involved in work that eliminates barriers; manage the removal process ; document the progress of barrier removal work; and communicate information about barriers and accessible features to LAUSD facilities and maintenance staff as well as to program planners and coordinators.

The Facilities Services Division and District Planning and Design Services will use the database of identified barriers to implement the removal of barriers for program accessibility. A database which includes site transition plans will be available for viewing by parents, students, community members and District offices. A District Reference Guide will be issued explaining the process for accessing the database and what information the database contains.

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<sup>1</sup> District-authorized independent charter schools occupying private sites will be required to provide evidence of compliance with ADA Title II Transition Plan requirements.

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## **3. Introduction and Purpose of the 2014 District-wide Transition Plan Update**

### a. Overview of the Americans With Disabilities Act

The Americans with Disabilities Act, enacted on July 26, 1990, provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, and access to public accommodations, transportation, and telecommunications. The ADA is companion civil rights legislation with the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. This legislation mandates that qualified disabled individuals shall not be excluded from participation in, denied the benefit of, or be subjected to discrimination under any program or activity. The Act also provides disabled employees with certain protections and requires employers to make reasonable accommodation for disabled applicants and employees.

This District-wide Transition Plan Update addresses the Los Angeles Unified School District's responsibilities under Title II of the Americans with Disabilities Act for program access.

### b. Title II. Nondiscrimination on the Basis of Disability in State and Local Government Services

Title II prohibits discrimination on the basis of a disability by public entities. It is divided into two parts, the first of which deals with state and local governments and the second with public transportation. This document does not address public transportation requirements. Provisions related to state and local governments are similar to those previously set forth under Section 504 for public and private entities that receive federal funding; Title II extends that nondiscrimination mandate to all public entities, regardless of federal funding status. The U.S. Department of Education's (ED) Office for Civil Rights (OCR) enforces Title II in public elementary and secondary education systems and institutions, public institutions of higher education and vocational education (other than schools of medicine, dentistry, nursing, and other health-related schools), and public libraries. Title II may also be enforced by complaints and/or lawsuits initiated by persons with disabilities, persons who are perceived as having a disability, or individuals who are associated with persons with disabilities.

### c. School District Responsibilities under Title II of the ADA

Title II requires a public entity to operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. Title II mandates that public entities, including public school districts, may not require eligibility criteria for participation in programs and activities that would screen persons with disabilities, unless it can be proven that such requirements are necessary for the mandatory provision of the service or program. The District is also required to designate a person or persons to be responsible for coordinating the implementation of ADA requirements and for investigating complaints of alleged noncompliance. This document addresses the Title II administrative requirement that public entities develop a transition plan if structural changes are necessary for achieving program accessibility.

United States Department of Justice (DOJ) Title II regulations at § 35.150(d) require the District to prepare a transition plan outlining the structural modifications it will implement if necessary to make

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its programs, activities, benefits, and services accessible to persons with disabilities. The Title II regulations do not define “services, programs, or activities” under the ADA. It is commonly understood that the lack of a clear definition is an attempt to keep the coverage of the obligation expansive. In short, programs apply in the broadest sense as well as in the most detailed.

Because services, programs and activities within the District are so broadly defined, and the program access obligation is so pervasive throughout the District’s facilities, the District has decided to remove physical barriers to sites offering District programs over a period of time to offer the greatest number of opportunities to provide integrated program access at the most facilities reasonably possible. This District-wide Transition Plan Update and the accompanying process will facilitate not only accomplishing that long-term goal, but also the priority setting and management efforts necessary to handle the large number of barriers to program accessibility in the most efficient and logical sequences practical.

## 4. Modified Consent Decree

In 2003, as part of the *Chanda Smith* litigation, the Board of Education committed to specific facilities obligations under the *Chanda Smith* Modified Consent Decree (MCD). The District’s obligations to make schools accessible are described in the MCD, which was approved by the Board of Education on May 13, 2003, and by the Court on May 16, 2003. Paragraph 76 of the MCD requires that, “All new construction and renovation or repairs by the District shall comply with Section 504 and the Americans with Disabilities Act, 42 U.S.C. § 12101 et seq.” In addition, the MCD Independent Monitor is charged with certifying that, “the District has no systemic program accessibility problems that prevent substantial compliance with the program accessibility requirements of federal special education laws and regulations.” This document and its implementing process is designed to assist the MCD Independent Monitor in making that certification.

## 5. Regulatory Requirements for Accessibility in LAUSD Facilities

In developing this District-wide Transition Plan Update, the following regulatory requirements have been considered:

### a. 2010 ADA Title II Regulations

As described above, among other responsibilities, the Title II regulations of the ADA require public entities, like the LAUSD, to provide access for individuals with disabilities to all programs when they are viewed in their entirety. This obligation applies not only to students but also to parents, family members, friends, and others who are eligible to participate in any program, activity, benefit, or service offered by the District. When physical barriers exist in a facility that limits program access, public entities may use “alternative methods” to provide access to their programs. Examples of some of these types of methods given in the regulations and technical assistance documents include:

- a) Redesigning equipment;

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- b) Reassigning services to accessible buildings;
- c) Assigning aides to beneficiaries or home visits;
- d) Delivery of services at alternate sites;
- e) Alteration of existing facilities;
- f) Construction of new, accessible facilities;
- g) Use of accessible rolling stock or other conveyances; and
- h) Other methods to achieve “readily accessible to and usable by.”

The ADA Compliance Manager will coordinate consideration of these factors with appropriate District staff.

This District-wide Transition Plan Update covers only the obligations under the program access requirement of the ADA Title II regulations. It is important to also note that every location where every program is offered is not required to be accessible or to comply with the ADA Standards. However, when alternative methods are not used or not all programs are accessible at every location, steps must be taken to make certain that they are offered at accessible locations in ways that provide for an equal opportunity for participation, a range of choices that are similar to those provided for others, are appropriately integrated, offer similar opportunities for privacy and confidentiality, and provide for program accessibility for individuals with disabilities. When not all facilities are accessible, they must be reasonably geographically distributed to provide for a reasonable level of convenience for participants with disabilities and their companions. The preamble to the 2010 Title II regulation describes factors to consider when evaluating a multi-site program for “accessibility in its entirety” to include consideration of:

- a) Program features at each site;
- b) Distance between sites;
- c) Travel times;
- d) Number of sites;
- e) Public transportation; and
- f) Integrated setting.

When all programs and facilities are not yet accessible and will not be made accessible immediately, some of the most important considerations that should, when possible, be taken into account when determining where to start include:

- a) Highest use programs and facilities;
- b) Most critical programs and facilities for people with disabilities and seniors;
- c) Those where specific corrective work has been requested by users;
- d) Facilities and programs with frequent use without advanced notice;
- e) Facilities offering unique programs and services;
- f) Distributed locations; and
- g) Access to public transportation.

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b. 2010 ADA Standards and regulations

To determine whether a facility, space, or element provides program access under the regulations, it is analyzed against the requirements of the 2010 ADA Standards. However, any element that was covered by and compliant with the 1991 ADA Standards (or in certain cases, the Uniform Federal Accessibility Standards) by March 15, 2012 and that has not been altered since that time is not required to be modified to provide program access. This is the “Safe Harbor” provision of the 2010 ADA regulations. If, however, any elements are altered for other reasons, they must be brought into compliance with the 2010 ADA Standards as well as any stricter state and local accessibility requirements. Since the date of the District’s last Transition Plan, the US Department of Justice has issued new Standards that incorporate, for the first time, advisories on dimensions for child accessibility, plus recreational and play facility requirements. The facility surveys and site transition plans in this District-wide Transition Plan Update include barriers identified using those new requirements.

c. 2013 California Building Code Accessibility Requirements

The California Building Code (CBC) requirements apply to new construction, alterations, and certain types of maintenance and repair work. Existing elements that meet the ADA requirements but not the stricter CBC accessibility requirements are not required to be modified to comply with the ADA or California law. However, if they are altered or modified for any other reasons, they must then be brought into compliance with the 2010 ADA Standards as well as any stricter state and local accessibility requirements.

d. Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under” any program or activity that receives Federal financial assistance. The obligations under 504 for the District are essentially identical to the ADA Title II obligations.

e. Individuals with Disabilities Education Act

The IDEA with its student Individual Education Programs (IEP) and (educational) transition plans are covered by the District under a separate process that is not addressed by this District-wide Transition Plan Update.

f. Fair Housing Act and the Fair Housing Amendments Act

The Fair Housing requirements apply to certain residential facilities when they are newly constructed or altered.

g. California Department of Housing and Community Development’s CBC Chapter 11A Standards

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These standards are similar to the Fair Housing Standards above but include additional obligations not included in the Federal laws. These standards cover new construction and alterations work on projects like those under Fair Housing Act above but do not include a transition planning obligation so these standards are not included in this District-wide Transition Plan Update.

h. Division of the State Architect Project Reviews

The DSA is responsible for reviewing and approving plans for new construction and alterations work in the District's schools. DSA's review includes the accessibility requirements of the CBC. When the 2013 CBC went into effect it attempted to include all of the requirements in the 2010 ADA Standards. This will provide an additional layer of oversight to help the District meet its ADA obligations during construction projects.

i. Settlement Agreements, Resolution Agreements, Consent Decrees, and Court Orders

From time to time, the District becomes subject to legal agreements that specify additional requirements beyond the statutory requirements or that specify how the District will meet those obligations. This District-wide Transition Plan Update is the District's detailed plan for meeting the ongoing ADA Title II program access and physical barrier removal requirements as well as the obligations for the remaining work imposed by the MCD. This Plan, the ADA Barrier Removal System supporting it, and the activities the Plan uses will also identify and facilitate additional barrier removal (that does not limit program access) when required by the applicable standards during maintenance, repairs, alterations, and additions at the District's covered facilities.

## 6. Capital Needs Assessment for Facilities Prioritization Planning

The District is in the process of preparing a prioritized list of projects based on the physical condition and functional adequacy of all k-12 schools. Each year projects will be submitted to the Board of Education for approval based on the highest priorities. This assessment includes seismic safety, energy efficiency, operational efficiency, and other priority assessments. The ACU will provide site transition plans for each school modernization project planned. The specific projects to be implemented each year will be developed in consultation with key stakeholders that include the Division of Special Education, Local Districts and school site principals), and FSD. The list of school priorities is subject to change throughout the year if it is determined upon further evaluation that a particular school warrants a change in the priority.

The following are the planning considerations that are used to assist in the development of campus modernization master plans:

- a) Identify most critical facility deficiencies through facility assessments. Identify and prioritize critical needs that contribute to the educational needs of the District and maintaining a safe facility. Analyze these deficiencies, and separate them to see if the deficiencies can be corrected through modernization and/or new construction efforts that may qualify under current and/or future bond programs or under self-funded projects.

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- b) Analyze each campus plan to determine how needs are best addressed in the campus modernization master plan. Prioritize campus needs amongst all campuses. Develop a phasing plan to address the campus needs in order to implement a steady, deliberate and well planned master plan. The phasing plan on each school campus will need to work within the District's funding strategies.

Once the Master Plan is completed and projects are identified, conceptual plans will be prepared to propose solutions that address major deficiencies, including the removal of accessibility barriers identified by ACU site transition plans associated with that project. Conceptual plans will also consider removing temporary or under-utilized buildings, replacing obsolete structures, restoring existing facilities, and recapturing open space. In addition, conceptual plans will incorporate environmentally conscious designs, opportunities for joint use development, and input from key stakeholders in the school community. The development of these facility conceptual plans facilitates consideration by the Board for projects to be executed as capital funds become available.

## 7. Facilities Capital Bond Program

By necessity, the implementation of the Master Plan is dependent on the availability of capital improvement funds from bond program funds. Commencing in 2015, the Board of Education will, based on a number of criteria, confirm the priority of projects based on available bond funds. This process of prioritization and authorization of individual school projects will be repeated each year, based on contemporary criteria and evaluations by the staff and Board. DSA projects such as seismic retrofits, modernization and repairs, etc. will include accessibility improvements. Current bond program funding for modernization improvements are anticipated to take ten to fifteen years to complete.

The District's ADA Barrier Removal Program consists of priority ADA projects developed on an annual basis with an emphasis placed on the removal of barriers in existing facilities to provide program accessibility. The CFE will be responsible for securing funding to support the ADA Barrier Removal Program. Budgets for the District's barrier removal programs will be established for each fiscal year.

## 8. Planning, Coordination, and Input from Interested Parties

As the ongoing details of this District-wide Transition Plan Update are further developed, and as the compliance work progresses, the ADA Compliance Manager will be overseeing the efforts with the following entities who have parallel, supportive, complimentary, and oversight responsibilities related to the program:

- a) Division of Special Education (DSE) Projects;
- b) Office of the General Counsel's Educational Equity Compliance Office;
- c) All other LAUSD divisions, departments, offices, and branches (or "departments") that plan and operate programs, design, construct, maintain, repair, and manage facilities, and communicate information about accessible features and services to program participants;
- d) Los Angeles Bureaus of Street Services & Engineering, and Public Works Department;

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- e) Los Angeles County Department of Public Works for Barriers in the public right of way, etc.;
- f) Charter Schools using LAUSD facilities (but not the Independent Charter Schools who are simply permitted by the District to operate on their own properties without District support);
- g) Other outside entities providing programs for the District; and
- h) Federal, state, and local emergency management agencies and departments who work with the District during and following local emergencies.

As part of preparing each site transition plan, a meeting will be scheduled with the School Principal attended by DSE, ACU and FSD to review and discuss the ADA barrier removal plan with the school. Input from the Principal and other participants will be considered in the development of the barrier removal plan. The District will provide an opportunity to interested persons, including individuals with disabilities, to participate in the development of the individual site transition plans by submitting comments to the ADA Compliance Manager. The District will provide links to the District-wide Transition Plan Update on the District's website and will provide contact information for the District's ADA Compliance Manager who will be available to answer questions, discuss the Update, and receive public input and requests as the primary point of contact. Additionally, a Notice will be posted at District facilities containing contact information for the ADA Compliance Manager to receive questions, concerns, complaints, or requests for additional information regarding the ADA. The Rapid Access Program (RAP) is an integral part of the District's grievance process § 35.107(b) and will be managed by the ADA Compliance Manager. Therefore, the ADA Compliance Manager will be directly responsible for approving projects submitted through the RAP that require removal of architectural barriers to program accessibility.

## 9. Barriers Analysis and Action Planning

Using the Barrier Removal Prioritization list below, the ADA Compliance Manager will coordinate with other District departments to communicate the priorities for surveying the schools and their buildings and grounds. These priorities may be modified when needed but will mostly be carried straight through to the barrier removal work so that planning for the removal of physical barriers can be scheduled after they are identified or when construction work is undertaken for other reasons. The District considers the following factors in setting priorities:

- a) Removal of architectural barriers to program accessibility in existing District facilities as identified by the ACU site transition plans.
- b) Board of Education (BOE) approved Bond projects where construction or repair work is imminent.
- c) Disabled student matriculation from ES to MS to HS starting with Pre-K as the highest priority.
- d) Sites identified with the highest use programs & facilities with Multiple Disabilities Severe (MDS), Multiple Disabilities Visual (MDV), Multiple Disabilities (MD), Visual Impairment/Deaf and Hard of Hearing (VI/DHH).
- e) Sites identified with the highest use programs & facilities with the most number of special education programs or Total Special Education Programs.
- f) Sites where users with disabilities have requested that specific work be completed.
- g) Sites where there are formal complaints or agreements.

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- h) Ensure facilities are distributed geographically across the District.

Given that High Schools often have the largest programs, a normalization will be used to ensure Elementary Schools and Middle Schools' are equally prioritized in the ADA Barrier Removal Program. Once the priorities are set and survey data becomes available, FSD will execute the barrier removal work that is approved by the Board of Education. School sites will be selected from the Master Facilities List. The ADA Compliance Manager will establish the ADA survey priority with input from other District offices. .

## 10. Coordination of Program Access Barrier Removal Work with Other District Access Efforts

Once priorities are set, the ADA Compliance Manager will manage the priorities of the District-wide Transition Plan Update utilizing an ADA task force consisting of representatives from the Facilities Services Division, Division of Special Education, Access Compliance Unit, and school site principals to ensure receipt of adequate feedback as needed and to confirm that the necessary ADA barrier removal work is being taken care of in a timely manner.

## 11. Barrier Removal Work for Program Access

The following tasks will have to be carried out to effectively and efficiently accomplish the barrier removal phase of this Transition Plan:

- a. Removal of barriers by the District Facilities Services Division

FSD will manage and coordinate design construction and inspection to ensure the timely removal of barriers in existing facilities.

- b. Barrier Removal Work with Other Alterations

Under the ADA and the CBC, whenever "alterations" projects are performed, barriers to persons with disabilities that are related to the work must be removed. Alterations are defined in Section 202 of the California Building Code as:

*"Alteration. A change, addition or modification in construction, change in occupancy or use, or structural repair to an existing building or facility. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility."*

- c. All newly constructed projects will be designed and constructed to latest ADA standards and California Title 24 Requirements.
- d. ACU is responsible for ADA quality assurance reviews of new construction and alteration project designs to verify that path of travel work is included as required, that new barriers will not be created due to design errors, and that the work, when completed, is compliant with the applicable standards and provides program access as required. ACU will perform post-construction barrier

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removal verification. ACU will update the active database of identified barriers as barriers are removed to provide program accessibility.

e. Provide Access to the Transition Plan Database to Other LAUSD Departments for Barrier Removal

The Transition Plan Database is available to other departments within LAUSD that are responsible for removing barriers (i.e., purchasing is required to provide accessible tables for a cafeteria, or the Office of the General Counsel needs to write a letter to the local city government to request installation of a curb ramp leading to the public transportation stop at a football stadium).

f. Schedule and Consult with Maintenance and Repair Teams Doing Barrier Removal Work

A portion of the barriers that are identified in the District-wide Transition Plan Update may be removed during normal maintenance and repair work. Maintenance and Operations will be provided access to the database to facilitate the removal of barriers during routine maintenance operations. Barriers removed during this process will be inspected by ACU personnel to verify compliance. The ACU will regularly update the active database of identified barriers as part of this verification process.

g. Conduct Post-Barrier Removal Verification Site Visits and Update Database

ACU will conduct post-construction surveys to verify architectural barriers have been removed. ACU will update the database accordingly. ACU will be responsible for maintaining the ADA Barrier Removal Program database.

## 12. Communicate Information about Accessible Facilities and Features with Staff and the Public

As barriers are removed and ADA compliant program access is known to be available at specific District facilities, accessibility-related information will be made available through the LAUSD web site. To allow new students to plan their routes around campus before their first arrival and to allow non-students to pre-plan their visits for sporting events, parent conferences, concerts, career days, and all other events where non-students will be visiting, information about accessible features will be made available in visual and written formats. Web design will meet the current Web Content Accessibility Guidelines (WCAG) 2.0 specifications promulgated in 2008 to assure usability by people with communication-related disabilities. This information will include at least the following:

- a) Accessible site arrival points:
  - 1. Transportation stops,
  - 2. Parking,
  - 3. Passenger loading zones,
  - 4. Sidewalks;
- b) Accessible site-specific program access elements;
- c) Accessible routes, ramps, elevators, and lifts where not all routes are accessible;
- d) Accessible entrances when not all are accessible;
- e) Accessible classrooms and other program access spaces;
- f) Accessible toilet rooms for students, staff, and visitors;
- g) Accessible assembly area seating; and

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h) Alternative methods for providing program access.

## 13. Maintain Accessible Features - Provide Ongoing Consulting - Verify Continued Compliance

ACU will continue to monitor existing District facilities to verify ongoing compliance with the program access requirements of the ADA and provide annual updates for the prior year and summarizing or listing program access barriers remaining for future removal. The site transition plan reports will serve as an annual District-wide Transition Plan Update ensuring that the District will be able to remain in substantial compliance with the ADA program access requirements into the future.

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**Schedule of Architectural Barrier Removal in Compliance with ADA Title II  
2015-2030**

		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
	<b># of Schools</b>																
EEC & PC		25	25	23	21	19	17	15	13	11	9	7	5	3	1	0	0
ES & Adult ED		467	446	415	383	351	319	287	255	223	191	159	127	95	63	31	-1
MS		76	73	63	53	49	45	40	35	30	25	20	16	12	8	4	0
HS		54	43	38	32	30	28	26	24	21	18	15	12	9	6	3	0
	<b>Schools Remaining</b>	622	587	539	489	449	409	368	327	285	243	201	160	119	78	38	-1
<b>ACU Surveys</b>			33	50	50	50	50	50	50	50	50	50	50	50	39		
	<b>Total Surveys Complete</b>		33	83	133	183	233	283	333	383	433	483	533	583	622		
<b>Modernization (Major &amp; seismic)</b>																	
EEC & PC																	
ES & Adult ED			1														
MS			3	6	6												
HS			11	4	4												
	<b>Construction Complete/year</b>				2	2	7	8	8	8							
	<b>Total Modernizations Completed</b>				2	4	11	19	27	35	35	35	35	35	35	35	35
<b>Stand-Alone</b>																	
EEC & PC			2	2	2	2	2	2	2	2	2	2	2	2	1		
ES & Adult ED		20	31	32	32	32	32	32	32	32	32	32	32	32	32	32	32
MS			4	4	4	4	5	5	5	5	5	4	4	4	4	4	4
HS			1	2	2	2	2	2	3	3	3	3	3	3	3	3	3
	<b>Construction Complete Stand-Alone/year</b>		2	36	38	40	40	42	42	42	42	42	42	44	45	45	45
	<b>Total Stand-Alone Completed</b>		2	38	76	116	156	198	240	282	324	366	408	452	497	542	587
	<b>Total (Modernization &amp; Stand-Alone)/year</b>		2	36	40	42	47	50	50	50	42	42	42	44	45	45	45
	<b>Cumulative Construction Complete</b>		2	38	78	120	167	217	267	317	359	401	443	487	532	577	622