



# Tennessee State Parks ADA Transition Plan



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# Executive Summary

The mission of the Tennessee Department of Environment & Conservation's Bureau of Parks and Conservation is to provide safe and enjoyable recreational and interpretive opportunities to all visitors while serving as responsible stewards of the state's valuable natural and cultural resources. Tennessee State Parks (TSP) operates 57 state parks and 84 natural areas encompassing over 200,000 acres of land with a diverse portfolio of park facilities, including lodges, golf courses, cabins, campgrounds, trails, and nature centers. TSP is committed to making all reasonable efforts to ensure that these facilities and their programs are accessible to and usable by visitors of all abilities, including those with limitations.

TSP is continually working to increase accessibility and further its compliance with the Americans with Disabilities Act. TSP promotes accessibility with the expansion of physical access and the use of specialized adaptive recreation equipment, interpretive resources, and reasonable accommodations. All newly-built or renovated facilities and trails, as well as newly developed programs and services, will adhere to the most current standards for accessible design.

TSP has been working toward achieving accessibility for our visitors for multiple years. However, most facilities within the park system were constructed decades ago, predating the American Disabilities Act that was signed into law on January 1, 1990. In addition, structures built to meet the 1990 ADA code may no longer comply with today's current ADA rules. TSP continues to assess all existing facilities, as well as programs and services, for compliance to these standards while it implements a plan to address identified non-compliant features. Despite the volume of work ahead to drive accessibility statewide, TSP remains focused to ensure all who visit can enjoy the beauty of our park system and this Transition Plan will serve as our blueprint.

# Introduction

## Overview

The Americans with Disabilities Act of 1990 (ADA) provides comprehensive civil rights protections to individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. The ADA's purpose is to provide a "clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities." Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities as well as assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. Title II of the ADA covers programs and services provided by public entities, including those offered by TSP. Under Title II, public entities must take all reasonably possible measures to render their programs accessible to individuals with disabilities and reasonably modify policies, practices, or procedures to avoid discrimination against people with disabilities. Entities must start this process by evaluating the accessibility of their programs and facilities. These evaluations must then be used to create a transition plan that aims to achieve accessibility for as many people as reasonably possible. This self-evaluation and Transition Plan has been prepared in compliance with the ADA to assist TSP, its executive staff, directors, managers, and staff to identify policy, program, and physical barriers to accessibility and develop solutions that will facilitate access for all individuals. As TSP operates many diverse parks and natural areas with more than 1,600 buildings and structures, total accessibility is a huge undertaking requiring a great deal of coordination and funding. This report describes the process of the self-evaluation by which policies, programs, and facilities were evaluated for compliance with the ADA; presents the findings of that evaluation; and identifies actions to maximize accessibility. The Transition Plan found in Part III sets out TSP's plans for achieving greater accessibility, method of prioritizing projects, and a timeframe for accomplishing them. The Transition Plan will be revised periodically to reflect TSP's progress in this initiative and ensure that accessibility remains a priority for the Agency.

## Legislative Mandate—The Statutory Framework

Congress first acted to protect the rights of individuals with disabilities in the Rehabilitation Act of 1973. The Act requires all organizations receiving federal funds to make their programs available without discrimination toward people with disabilities. The Act, which has become known as "the civil rights act for persons with disabilities," states:

*"No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." [Rehabilitation Act, Section 504].*

Nearly twenty years after passing the Rehabilitation Act, Congress expanded the protected rights of individuals with disabilities through the Americans with Disabilities Act. TSP must observe all requirements of Title I of the ADA in its employment practices; Title II in its policies, programs, and services; relevant provisions of Titles IV's telecommunications requirements; relevant

provisions of Title V's miscellaneous mandates; and all requirements specified in the ADA Accessibility Guidelines that apply to facilities and other physical holdings.

## **DOJ Implementation— The Regulatory Framework**

The ADA's legislative mandate is implemented by the Department of Justice (DOJ), which promulgates regulations and enforces the ADA. Title II's regulatory scheme adopts the general prohibitions of discrimination established under Section 504 of the Rehabilitation Act and adds specific prohibitions of discrimination for public entities.

The regulations specify that TSP may not, either directly or through contractual arrangements:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions;
- Deny persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered to others, even if the entity offers permissibly separate or different activities;
- Select the location of facilities that have the effect of excluding or discriminating against persons with disabilities;
- Discriminate in employment practices against qualified persons with disabilities.

In addition, DOJ requires TSP to:

- Complete a self-evaluation—identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the programs, activities, and services.
- Develop a Transition Plan if the self-evaluation identifies any structural modifications necessary for compliance and retain the Plan for three years.
- Develop an ADA complaint procedure.
- Designate a person to be responsible for overseeing Title II compliance.

This report highlights the results of TSP's ADA Self-Evaluation and establishes its Transition Plan.

## **Standards of Accessibility**

The ADA requires public entities to offer two types of accessibility: program accessibility and physical accessibility. The ADA maintains that entities failing to offer both types of accessibility unlawfully discriminate against individuals with disabilities. The ADA defines disability as a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment. There is no set list of disabilities; any condition that actually impairs or is perceived to impair an individual's "substantial life function" may qualify as a disability.

### **1. Program Accessibility**

Program accessibility includes physical accessibility, but also incorporates all of the policies, practices, and procedures that allow people with disabilities to participate in programs and access important information. It requires entities to provide individuals with disabilities an equally effective opportunity to participate in or benefit from its programs and services. As such, program accessibility must be achieved by both structural and non-structural methods. Non-structural methods include, but are not limited to, the acquisition or redesign of equipment, provision of aids, and the availability of alternate sites for services. When choosing a method of providing program access, TSP will prioritize the option that results in an integrated setting encouraging interaction among all users, including individuals with disabilities.

## **2. Physical Accessibility**

An entity achieves physical accessibility when its facilities are free of barriers and obstacles that restrict their entrances and uses. The requirements for physical accessibility are specified by the Department of Justice's regulations. Prior to March 15, 2012 the Department of Justice required entities to comply with the 1991 ADA Accessibility Guidelines (1991 ADAAG) for new construction and alterations. After that date, DOJ started enforcing the 2010 ADA Accessibility Guidelines for Buildings and Facilities under the new title of ADA Standards for Accessible Design (ADA SAD). The ADA Standards are largely authored by the U.S. Access Board, a federal agency that develops accessibility standards for the built environment, transportation, communication, medical diagnostic equipment, and information technology. In addition to the 2010 ADA Standards, TSP is subject to State Building Code, which contains requirements for accessibility and refers to the International Code Council and American National Standards Institute's guide on Accessible and Usable Buildings and Facilities (ICC/ANSI Sections A117.1-2003) for detailed technical standards. The ADA Standards and Building Code cover a wide variety of facilities and establish minimum accessibility requirements for new construction and alterations to existing facilities. But while the ADA Standards and Building Code cover a wide array of built structures, they do not include standards for many types of outdoor recreation areas. In September 2013, the Access Board finalized its Architectural Barriers Act (ABA) Guidelines for Outdoor Developed Areas. These ABA Guidelines only apply to federal agencies; entities using federal funds; and entities that construct or alter facilities on federal land pursuant to a concession contract, partnership agreement, or similar arrangement. Federal offices that administer recreation sites (namely the Forest Service, Army Corps of Engineers, Bureau of Land Management, Bureau of Reclamation, Fish and Wildlife Service, and National Park Service) had to comply with the ABA Guidelines starting November 25, 2013. In the absence of other guidelines on outdoor developed areas, TSP will consider the ABA Guidelines as it strives to make programs and recreational areas at all parks and historic sites accessible to all individuals.

## **3. Exemptions for Historic Significance, Fundamental Alteration, Undue Burden, & Unsuitable Terrain**

While TSP is committed to making its properties and programs accessible to as many people as possible, its duty to preserve historic and natural resources renders some accessibility measures impracticable. Recognizing that universal accessibility of existing structures is not always possible, the ADA does not require entities to take any actions that would threaten or destroy the historic significance of a historic property; result in a fundamental alteration in the nature of its program or activity; create a hazardous condition; or present an undue financial and administrative burden. The determination that a program or site cannot be made accessible must be made by the Commissioner or her designee and be accompanied by a statement explaining the conclusion. When an accessibility measure appears to present an undue burden to the Agency or is otherwise impracticable, TSP will evaluate all of a program's resources and seek to provide alternative opportunities for individuals with disabilities. For instance, where TSP cannot install an elevator in a historic site, it may design an interpretive exhibit on the ground floor illustrating what can be found on the second floor.

In this manner, TSP can provide individuals with disabilities with access to the many benefits and services of its programs. Unlike existing structures, new facilities must be built in compliance with DOJ's standards unless doing so is structurally impracticable. DOJ notes that this may be the case where unique terrain precludes accessibility features and requires that structures built on such terrain are constructed to be as accessible as possible.

## **ADA Self Evaluation and Transition Plan Development Requirements**

The ADA requires that public agencies perform a self-evaluation of their ability to provide programmatic access to individuals with disabilities.

As part of this Self-Evaluation, TSP proposes to:

1. Identify all of its programs, activities and services; and
2. Review all of the policies, practices, and procedures that govern the administration of its programs, activities, and services.

The self-evaluation is designed to uncover areas that require additional attention and policies that may, directly or indirectly, adversely impact accessibility.

In conducting the self-evaluation, the ADA and DOJ suggest that entities consider:

- Whether any physical barriers prevent access to programs and the steps needed to enable these programs to be accessible, when viewed in their entirety;
- Policy modifications that may provide access to individuals with disabilities, as well as justifications for any exclusionary or limiting policies that will not be modified;
- Methods of communication with the public;
- Alternative communication methods and devices;
- Emergency evacuation techniques;
- Portrayal of individuals with disabilities in written and audio-visual materials.

- Policies and methods to provide access to historic preservation programs;
- The rationale for any determination that providing access would be an undue financial or administrative burden;
- Employment practices;
- Building and construction policies;
- Measures to familiarize staff with the policies and practices for providing full participation of individuals with disabilities.

If a self-evaluation reveals that a public agency must make structural changes to achieve program accessibility, it must create a transition plan providing for the removal of barriers. The ADA requires that transition plans contain at least the following information:

- A list of the physical barriers in the Agency's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II; and
- The name of the individual responsible for the plan's implementation.

## ADA Self Evaluation and Transition Plan Development Process

TSP uses varying methods to evaluate facilities within the Tennessee State Park system. TSP conducts in house surveys of each park that are conducted by the Accessibility Team, Park and Regional Managers, and other park employees. In addition, TSP does conduct third party ADA surveys.

### Accessibility Team

In general, the Accessibility team consists of a third party Architectural and Engineering firm who serves as an ADA consultant, TSP's ADA Coordinator, STREAM's Development Manager, Park Management and Park Staff. Each member has the opportunity to contribute their varied perspectives on accessibility. The team works with our executive staff, to identify and work toward the completion of tasks that will achieve and communicate greater accessibility.

### Policy and Regulation Review Process

The Accessibility Team continually reviews TSP's and State of Tennessee policies and regulations to determine whether they have a discriminatory impact on individuals with disabilities and provide sufficient guidance to the Agency's staff. As a result of this process, The Accessibility Team drafted new protocols for insuring ADA compliance. These protocols make several important commitments:

- New construction will adhere to current ADA Standards;
- Existing facilities will continue to be assessed for compliance with the standards;
- New programs will be accessible to the largest extent possible;
- Existing programs will continue to be assessed for accessibility;
- Reasonable accommodation requests will be directed to facility staff and fulfilled to the greatest extent possible;
- Wheelchairs are permitted in any area open to pedestrian use;
- Service animals are allowed in all location's provided they do not fundamentally alter the nature of the services, programs, or activities of TSP Operations.
- Information regarding accessibility will continue to be made available; and
- Agency employees who deal with the public will be trained to understand their responsibilities to all visitors.

## **Facility Accessibility Assessment Surveys**

To obtain current information on accessibility at its Parks and Historic Sites, TSP conducts Accessibility Assessments at each facility. TSP ADA Coordinator and/or their designee's will conduct each survey with cooperation from park management and/or park staff. The surveys will evaluate parking, entrances, restrooms/bath houses, boat launches, campsites, swimming pools, beaches, nature centers, concessions, offices, visitor centers, fishing areas, golf courses, picnic areas, trails, historic sites, lodges and all other public areas. The survey includes review of TSP's promotional material and websites for additional information regarding ADA availability. The results of the surveys are then reviewed and organized into a database. This database allows TSP to identify which programs and facilities need to be renovated and/or reorganized to increase accessibility. The data will be organized by region, site, and by program offering so the Accessibility Team can get a comprehensive view of the recreational opportunities and barriers that affect individuals with disabilities.

## **Program Evaluation**

TSP offers a wide and varied array of programs. Moreover, the Agency's programs are constantly evolving to keep up with recreational trends and visitor demands.

Major categories of TSP programs are regularly evaluated as part of the facilities ongoing surveys, including:

- Interpretive and educational programs may include audio-visual programs, virtual and augmented reality, museum exhibits, nature centers, animal exhibits, and historic house tours. These sites are generally open to the public as well as popular destinations for school field trips and fundraising events.
- Outdoor recreation programs including camping, hunting, fishing, hiking, biking, mountain biking, rock climbing, picnicking, horseback riding, playgrounds, tennis, golf, volleyball, golf, and disk golf.
- Water-based activities like swimming, kayaking, canoeing, paddle-boarding, and boating.
- Indoor recreation such as fitness rooms

- Events such as concerts, festivals, and competitions.
- Vacation rentals in cabins, campgrounds, and inns.

## **Partners**

TSP has partnered with other government and private entity's to further assess the usability of TSP properties and programs for individuals with disabilities. Partners include, but not limited to, the TN Council of Developmental Disabilities, TN Department of Intellectual and Developmental Disabilities, TN Department of Health, Tuckers House, and the Statewide Independent Living Council of Tennessee. These partnerships have increased day-to-day usability of several state parks (as well as other recreation facilities in Tennessee) and assisted with setting up programs that allow persons with disabilities to enjoy our parks in ways they never have.

## **Public Input**

The public is encouraged to comment on TSP offerings so we may take all suggestions into consideration. Please contact the ADA Assessment Team, attention Don Tate, at William R. Snodgrass TN Tower, 312 Rosa L. Parks Ave., 2nd Floor, Nashville, TN 37243, [TnStateParks.Accessibility@tn.gov](mailto:TnStateParks.Accessibility@tn.gov), or hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

# **Transition Plan**

## **Overview**

The Transition Plan analyzes the Agency's findings on accessibility, sets out TSP's priorities for attaining greater accessibility at its parks and historic sites, and describes upcoming accessibility projects. With the budget constraints and logistical difficulties inherent to the operation of 57 State Parks, eradicating all barriers to access and ensuring full accessibility at all state parks and historic sites is an iterative process. Although much has been accomplished in the 25 years since the ADA's enactment, additional challenges and opportunities exist. The Agency will continue to remove barriers and aim to ensure a wide range of opportunities for individuals with disabilities across all of Tennessee State Parks. In addition, TSP will continue to maintain equipment and features that help provide access to individuals with disabilities.

The following sections compile the information that TSP has gathered from its meetings, review process, surveys, and public input regarding the accessibility status of its sites and programs. Later sections will set out the criteria by which TSP prioritizes accessibility projects and list projects designed to foster access to the Agency's built environment, outdoor recreation areas, historic properties, recreation facilities, programs, and website.

## **Facility and Program Assessment Findings**

Below is a brief summary of issues that need to be addressed across the state park system as well as a brief description of the six TSP Regions.

## **1. System-wide Summary**

The facility assessment surveys revealed that certain facilities continue to present barriers to accessibility across the state. These recurring facilities include:

- Parking lots
- Restrooms/Bath houses
- Paths between facilities
- Trails
- Camping areas

The barriers at these features vary widely in severity due to natural terrain, the age of existing facilities, and the changing regulatory structure. They have been catalogued by the TSP Accessibility Team and are prioritized as described below.

## **2. Area Summaries**

### **Area One:**

Area one is made up of nine (9) state parks and historic sites that provide a wide array of programs and host over six (6) million annual visitors. Area one is known for its camping, fishing, boating/canoeing areas, and hiking trails. Select parks within Area One contain: golf courses, marinas, mountain bike trails, stables, and swimming areas. Many of the region's parks were commissioned prior to 1960 and due to the age of these facilities, were not built with accessibility in mind, requiring significant renovations to meet ADA requirements, particularly at bathrooms and hiking paths. Some of the park's older structures cannot be extensively renovated due to their historic nature. The Accessibility teams ongoing regional surveys' detail areas within each park where renovations would be required to meet the most current ADA requirements. Examples included: the visitor's center and visitor center boardwalk, and keystone pavilion / boat launch ramp at Reelfoot Lake State Park and the visitor's center, group camp, and picnic areas located at Pinson Mounds State Archaeological Park. The Accessibility team utilized the information gathered during the survey process and completed a park wide ADA Project at both Reelfoot Lake and Pinson Mounds State Parks. Where facilities cannot be rendered accessible, the region will provide reasonable accommodations and alternative programming.

### **Area Two:**

Area two is made up of ten (10) state parks that span the western portion of Middle Tennessee and contains vast state parks celebrating the natural beauty and cultural history of the Western portion of Tennessee's Highland Rim Region. Area two provides recreation to more than five (5) million visitors each year. In addition, Area two's parks offer trail hiking, camping, boating, fishing, cabin rentals, picnicking, swimming, golf courses, and seasonal cave tours. Ongoing

improvement projects at Natchez Trace State Park Visitor Center will include the installation of TN State Parks First Adult Changing Table. Parks and sites vary in accessibility as the designs and construction of older facilities did not consider the needs of individuals with disabilities. Pedestrian routes, parking, and access to older buildings such as cabins, cottages, shower buildings, and comfort stations require accessibility improvements. In addition, preservation of the numerous historic and cultural resources of this region creates accessibility challenges and may require alternative programming.

### **Area Three:**

Area three is made up of ten (10) state parks and historical sites that allow both residents and visitors to relax and engage in recreational opportunities difficult to find elsewhere in the crowded metropolis of Nashville. Area three provides recreation to over eight (8) million residents and visitors each year. In addition, the parks offer fishing, boating, picnicking, hiking trails, playgrounds, swimming, and natural waterfalls. Some of the most notable barriers to access are found at South Cumberland State Park where the visitor center, Grundy Lake, Foster Falls Overlook and campground, accessible parking, restroom/bathhouse access, and accessible pathways to unique sites. The Accessibility Team worked with our Facilities and Land Management (FLM) team to create a Park Wide ADA Upgrade project with construction scheduled to begin in 2024. Other notable projects in the region include a Park Wide ADA Project to make Henry Horton State Park a fully accessible park and to serve as a model park for our agency. Access to these highly trafficked parks is among the Agency's top priorities; and TSP is striving to bring each of these projects to fruition.

### **Area Four:**

Area four is made up of nine (9) state parks that are home to a vast number of trails and natural waterfalls. Region four provides recreation opportunities to over eight (8) million visitors annually and is the home to Justin P. Wilson Cumberland Trail State Park, Tennessee's first linear park with trails cutting through eleven (11) counties. In addition to hiking trails, region four offers boating and boat rentals, picnicking, fishing, mountain biking, golfing, camping, and swimming. Many accessibility features have been installed to facilitate use of recreational facilities, and the agency continues to pursue additional upgrades. For example, the Accessibility Team is currently assisting with the design of a new Visitor Center at Burgess Falls State Park. The project will include the construction of a new visitor center that provides restrooms, adult changing table, staff contact areas, training areas, and a gift shop that are fully accessible. Although providing access to backcountry hiking trails in this region is inherently challenging, TSP continues to pursue accessibility opportunities.

### **Area Five:**

Area Five is made up of nine (9) state parks and historical areas with scenic valleys, lakes, streams, and mountains, rendering it a microcosm of East Tennessee. This area is home to Fort Loudoun State Historic Park, a National Historic Landmark, featuring one of the earliest British fortifications on the western frontier. Area five provides recreation opportunities along with vast

information about Tennessee and National History and hosts over three (3) million visitors annually. Programs include picnicking, hiking, fishing, camping, swimming, boating, biking, golfing, and museums/exhibits. While many of the region's sites are generally accessible, parking lots, entranceways, and continuous routes of travel require work in several of the parks. Given the historical nature of some of the region's forts, homes, and exhibits, alternative programming opportunities may need to be explored for individuals with limited mobility. The Accessibility Team and FLM have identified multiple accessibility barriers at Fort Loudoun State Historical Park resulting in the creation of a park wide ADA renovation project. This project will provide significant renovations to existing structures and estimates construction to begin on Fort Loudoun in mid-2024.

### **Area Six:**

Area Six is made up of nine (9) state parks that span the most eastern part of Tennessee including: Norris Dam State Park, David Crockett Birthplace State Park and Sycamore Shoals State Park. Area six provides scenic views and outdoor recreation to more than six (6) million visitors annually. In addition, this region also offers swimming, picnic sites, hiking, camping, horseback riding, biking, playgrounds, fishing, and boating. The Accessibility Team assisted in the design and new marina building at Warriors Path State Park. In addition, the accessibility team is working to install a fully accessible canoe and kayak launch for park guests. Though many of the regions' parks were developed decades ago, the Agency is committed to upgrading restrooms, paved surfaces, ramps, and entrance widths to ensure accessibility and compliance with new ADA standards.

## **Prioritization Process**

Enhancing accessibility to state parks and historic sites requires substantial capital investment. TSP is committed to continual improvement; however, funding constraints dictate that providing universal access at all facilities must be a long-term process.

TSP utilizes the following criteria to prioritize facilities and resources for accessibility upgrades:

- Level of Public Use: Facilities with more visitors are prioritized higher.
- Program Uniqueness & Number: Programs that are difficult to find elsewhere may be particularly important to the community.
- Identified Complaints: Facilities with identified accessibility complaints receive consideration over other facilities.

TSP includes physical access projects as part of its overall annual capital project plan. Enhancing accessibility and assuring ADA compliance are critical factors in the selection of projects programmed for design and construction in the capital plan. When a park manager identifies the need for a project, they will notify the Area Park Manager. The Area Park Manager will then notify the Facilities Management Team in Nashville. The Facilities Management team compiles the regional data and applies identified criteria to determine project priority before sharing with leadership for capital funding consideration. TSP strives to further its accessibility goals and allow

individuals with disabilities to experience the state's natural, historical, and recreational resources.

## **Methodology**

TSP's primary method for enhancing accessibility at its facilities is to ensure that all new construction and renovations comply with the most recent relevant provisions of the ADA Standards. In addition, the Agency commences new projects designed to render existing structures accessible. A few projects relating to program accessibility are not directly addressed by any guideline, but are nonetheless important to the Agency. For instance, Fall Creek Falls has installed an accessible overlook for those who cannot access the falls via the hiking trails.

In rare instances, FLM staff may conclude that full compliance with ADA standards cannot be achieved due to unacceptable impacts to historic or natural resources. Whenever FLM Staff believes that an existing feature cannot be made accessible, he or she shall provide all relevant information to the Accessibility Team. Both the Accessibility Team and FLM Team shall make the final decision on whether rendering a feature accessible would result in a fundamental alteration or undue burden. In making this decision, both teams will consider all resources available for the funding and operation of the service, program, or activity. The teams will then produce a written statement explaining why the feature cannot be rendered accessible and what measures the Agency will take to ensure that individuals with disabilities can access TSP programs. Where full accessibility cannot be attained, TSP will continue to focus on equitable distribution of accessibility improvements to ensure all visitors across the state can enjoy the agency's programs. For example, TSP cannot create accessible hiking trails at each park; however, TSP aims to ensure that accessible trails are dispersed throughout each region of the park system.

## **Schedule & Funding**

TSP allows the six (6) Area Park Managers to coordinate with the Accessibility Team and Facilities Management Team to arrange a schedule and funding for barrier removal. TSP utilizes part of the Tennessee Statewide ADA appropriated funds, TSP minor maintenance funding, TSP capital project funding (major maintenance), and Federal Grants to ensure ADA compliance. This funding allows TSP to pursue capital projects that improve and expand infrastructure while continuing programs and services in its parks and historic sites across the state. Barrier removal and other accessibility measures are a critical component of the Agency's ongoing revitalization program, with the highest-priority projects selected annually for immediate consideration for the upcoming budget.

The Accessibility Team reviews all Accessibility Assessment Surveys annually and categorizes all facilities as a deferred maintenance project or capital projects. Projects categorized as maintenance will then be sent to each areas maintenance supervisor for completion. Projects identified as a Capital Project will be prioritized for future appropriations request. The Accessibility Team maintains an updated spreadsheet which includes the projected schedule and costs for upcoming capital project requests. The spreadsheet also gives a comprehensive view

of capital projects requests for the next five (5) years. Once a capital project has been approved and the design process starts, the Accessibility Team will notate the capital project's estimated cost and completion date. The spreadsheet tracker is a fluid document, being updated regularly based on the ongoing assessments of all Tennessee State Parks.

## **Policies and Procedures**

Any noncompliant policies will be directed to the Accessibility Team who will work with the relevant office to adopt a revised policy that complies with the ADA. In addition, TSP seeks to maximize program access by providing auxiliary aids and services wherever possible. This includes the provision of audio descriptions, braille, large print documents, scaled models, and displays, and closed captioning wherever they would reasonably increase access to TSP programs and interpretive exhibits.

## **Training Needs**

The Accessibility Team conducts statewide training on accessibility requirements and reasonable accommodations to increase employees' awareness of ADA requirements. The facility assessment survey and policy reviews identified three primary groups of people at TSP that make daily decisions involving accessibility:

- Individuals who direct capital improvements are instrumental in determining which structures will be renovated or constructed and are often heavily involved in construction planning.
- Bureau and Regional employees who shape program rules and policies determine a program's level of accessibility.
- Employees who work directly with visitors at state parks and historic sites must be sensitive to the needs of individuals with varied abilities as they often make spontaneous decisions regarding reasonable accommodations.

These three groups of TSP employees should therefore be trained in ADA compliance to reinforce their knowledge of the detailed technical standards established by the ADA, ADA's program access requirements, and its standards for reasonable accommodations. While many employees have received training in these areas over the years, there is an ongoing need for training as both accessibility standards and the Agency's workforce are subject to frequent changes. In light of this need, statewide capital facility staff, regional capital facility managers, and park and historic site managers across the state are notified of and encouraged to participate in online webinar trainings offered through the National Center on Accessibility.

## **Communication—Signage, Website, and Publications**

Facility signage, TSP website, and publications shall inform the public which facilities are accessible. As improvements are made, the Accessibility Team will submit specific accessibility information to the Agency's webmaster for inclusion in the Agency's website (TNStateParks.com) and appropriate social media outlets. A detailed guide has been made available on the TSP

website showcasing accessible areas and programs at each state park. In addition, TSP publications are provided to ensure that the information regarding accessibility at state parks is available to individuals with varying abilities. Information regarding accessibility at individual state parks can also be obtained by contacting the Park Manager.

## **Public Involvement**

Interested persons, including individuals with disabilities or organizations representing them, may participate in TSP compliance efforts by submitting comments to this document. To make this possible, the document is made available on the Agency's website. TSP is eager to receive input from its visitors so it can improve accessibility at all of its sites while serving as steward of the natural, ecological, historic, cultural, and recreational resources within its system.

## **Responsible Party**

Don Tate serves as Capital Project Manager for Tennessee State Parks and serves as the Coordinator of the Accessibility Team. He works with Executive Staff, Regional Offices, and the Bureaus to coordinate TSP accessibility efforts. All grievances, suggestions, and requests for a reasonable accommodation should be submitted to:

Tennessee Dept. of Environment and Conservation  
Attention: Don Tate  
William R. Snodgrass TN Tower  
312 Rosa L. Parks Ave. 2nd Floor  
Nashville, TN 37243

Or contact by:

Phone: 1-615-416-1078

Email. [TnStateParks.Accessibility@tn.gov](mailto:TnStateParks.Accessibility@tn.gov)

Fax: 615-532-5589

Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).