

**TIPTON COUNTY GOVERNMENT**  
**Americans With Disability Act (ADA) Transition Plan**



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by  
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Covington, TN 38019

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# **TIPTON COUNTY GOVERNMENT**

## **Americans With Disability Act (ADA) Transition Plan**

### **1.0 Introduction**

This section is identical with the section of the same name found in the Self-Evaluation report. It is included here for reference.

#### **1.1 Legislative Mandate**

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity of access to County programs, services, and activities for qualified individuals with disabilities.<sup>1</sup> The ADA prohibits discrimination in access to jobs, government services, public transportation, public accommodations, and telecommunications in five titles within the ADA including:

Title I: Employment

Title II: State and Local Government

Title III: Public Accommodations and Commercial Facilities

Title IV: Telecommunications Relay Services

Title V: Miscellaneous Provisions

In practical terms, Title II is concerned with assuring accessibility by individuals with disabilities<sup>2</sup> to County operated programs, services, and activities. This survey, as mandated by Title II Part 34 Nondiscrimination on the Basis of Disability in State and Local Government Services and attendant regulations,<sup>3</sup> is specifically targeted to identify barriers to physical access and communications for qualified individuals in public spaces. A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; or the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or participation in programs or activities provided by Tipton County Government.<sup>4</sup> These rules do not require access for handicapped individuals above that available to non-handicapped individuals. Other sections of these rules allow specific exceptions to accommodations based upon feasibility, cost, and alternative solutions.<sup>5</sup>

The purpose of this document is to outline the steps Tipton County Government is taking to assure current and future conformity to ADA Title II: State and Local Government as part of an ongoing process to serve its citizens and visitors.

## 1.2. Purpose of the Self-Evaluation

According to the Department of Justice, more than 58 million Americans (about 19% of our population) have disabilities and they, like all Americans, participate in a variety of programs, services, and activities provided by their State and local governments. This includes many people who became disabled while serving in the military. By the year 2030, approximately 71.5 million baby boomers will be over age 65 and will need services and surroundings that meet their age-related physical needs.

This Self-Evaluation is the first step in a deterministic process to identify and rectify existing barriers to handicapped individuals prohibiting or impeding access to county programs, services, and activities, as defined by Title II and associated regulations. It also includes a review of County new construction standards and the acquisition of existing structures. The Self-Evaluation will be evaluated and used by Tipton County Government to develop a Transition Plan including feasibility, prioritization, work to be done, and budget allocations to provide cost-effective remedies. In general, existing structures are not required to be updated solely for the purpose of meeting Title II requirements, but are required when facility (including parking areas) components that affect accessibility as defined in 28 CFR Part 36 are affected.

## 1.3 Self-Evaluation Plan Development Requirements and Process

Title II requires that the operation of each service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.<sup>6</sup> The intent is that no qualified individual with a disability will be excluded from participating in, or denied the benefits of, the services, programs, or activities provided by Tipton County because of a disability.<sup>7</sup>

Included in Title II are administrative requirements to:

1.3.1. Notify applicants, participants, beneficiaries, and other interested people of their rights and the public entity's obligations under Title II;<sup>8</sup>

1.3.2. Designate a responsible employee (ADA Coordinator) to coordinate its efforts to comply with and carry out the public entity's ADA responsibilities;<sup>9</sup>

1.3.3. Establish a grievance procedure for resolving complaints related to Title II;<sup>10</sup>

1.3.4. Conduct a self-evaluation:<sup>11</sup>

1.3.4.1. A self-evaluation is an assessment of the public entity's services, programs, and activities and the policies and practices that govern the administration of them. This can include laws, ordinances, regulations, and manuals.

1.3.4.2. The goal is to determine if the policies and practices adversely affect full participation of individuals with disabilities;

1.3.5. Develop a transition plan including any structural changes necessary to achieve accessibility;<sup>12</sup>

1.3.5.1. The Transition Plan will set forth the steps necessary to complete such changes must be developed.

1.3.5.2. The plan will, at a minimum:

- i. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- ii. Describe in detail the methods that will be used to make the facilities accessible; and,
- iii. Specify the schedule for taking the steps necessary to achieve compliance with this section; and,
- iv. If the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period.

#### 1.4. ADA Mandated Priorities<sup>13</sup>

1.4.1. Tier 1: Accessible Approach and Entrance

1.4.2. Tier 2: Access to Services

1.4.3. Tier 3: Access to Public Toilet Rooms

1.4.4. Tier 4: Access to Other Items Such As Water Fountains and Public Telephones

## **2.0 Assessment of Self-Evaluation Findings**

### 2.1 Assessment Methodology

#### 2.1.1. Accessible Approach and Entrance

Donnie Wallace of Tipton County Government conducted a physical survey of all county facility approaches except the Tipton County School System that is served by another ADA system. The results of that survey are summarized in Section 5.0 of the Tipton County Self-Evaluation document.

#### 2.1.2. Access to Goods and Services

Bob Beanblossom, Tipton County ADA Coordinator, conducted the survey of County services, practices, and procedures. This is part of an ongoing review of the practices and procedures of Tipton County Government relative to the ADA as amended. The results of the current survey are included in Section 4.0 of the Tipton County Self-Evaluation document.

### 2.1.3. Access to Public Toilet Rooms

Donnie Wallace of Tipton County Government conducted a physical survey of County water closets and toilet rooms except, as noted elsewhere, for the Board of Education. The results of that survey are summarized in Section 5. of the Tipton County Self-Evaluation document.

### 2.1.4. Access to Other Items Such As Water Fountains and Public Telephones

The physical evaluation of Tier 4 facilities was conducted as part of the Tier 1 and 3 surveys and are summarized in Section 5. of the Tipton County Self-Evaluation document. Access to Tier 4 services is included in Section 4.

## 2.2 Administrative Action Plan

This Action Plan is part of an ongoing self-improvement program designed to provide incremental improvements in all aspects of access by handicapped individuals to Tipton County Government programs, services, and activities.

Priorities are established within the ADA guidelines listed at 1.4. above, with individual project priorities established by County Government. This Action Plan will be supplemented as additional opportunities to improve access are discovered, and as citizen interaction brings other access problems are brought to the attention of the ADA Coordinator. Top priority is given to those improvements that can be made in house by existing staff with no additional budgetary burden. Next are those improvements that can be contracted within existing budgetary allocations. The last priority is for those that will require budget allocations to proceed. These will be addressed in the regular budget process of the County. One project (The Agricultural Extension Office) is being considered for replacement due to a projected cost to bring it into ADA compliance of \$250,000. Since this Transition Plan is an ongoing project spanning many County departments and structures, there is no single ADA line item in the County budget. Rather, the prioritized findings as defined in this and subsequent Action Plans are contained in the appropriate departments and budgets, all under the oversight of the ADA Coordinator who is responsible to monitor, review, evaluate, and report both progress and new findings to County Government through the Budget Director and County Executive. This is a systematic program intended to minimize the discovery of specific unexpected barriers while allowing an ongoing re-prioritization of opportunities for improvement as other projects are brought into compliance.

### 2.2.1. Programs, Policies, and Practices

- 2.2.1.1. An ADA Coordinator was appointed in August 2019, and his contact information published on the Tipton County website as well as all County ADA documents.
- 2.2.1.2. Public Notice of compliance was completed in August 2019 with the posting of public information and all County ADA documents on the Tipton County website .

- 2.2.1.3. An ADA Barrier Removal or Modification request procedure was implemented in August 2019, with procedures and forms posted on the Tipton County website.
- 2.2.1.4. An ADA Violation Reporting procedure was implemented in August 2019, with procedures and forms posted on the Tipton County website.
- 2.2.1.4. Notification of Department Heads of various communication services available to them and their employees to help communicate effectively with handicapped individuals.
- 2.2.1.5 A Self-Evaluation survey began in August 2019, and was completed in November, 2019.

See Self-Evaluation Plan 2.3, 2.4, and 2.7

## 2.2.2. Design Standards

See Self-Evaluation Plan 2.5 and 2.6

## 2.2.3. Emergency Notification and Alarms

## 2.2.4. Hiring/Firing Practices and Job Descriptions

The personal policies of Tipton County Government are developed and administered through the Office of the County Executive, in compliance with all applicable federal and state laws and regulations, including ADA's Title I.

## 2.2.5. Boards and Commissions

Tipton County Board of Commissioners and all subservient County boards and commissions conduct their business with the intent to be accessible to all of the citizens of Tipton County and others with business before them.

## 2.2.6. Website

Revize Software, the developer of the Tipton County website ([https://tiptonco.com/title\\_vi\\_and\\_ada/index.php](https://tiptonco.com/title_vi_and_ada/index.php)) advises that the website is in complete compliance with current ADA regulations as specified in Section 508 requirements based upon WCAG 2.0.

## 2.3 Buildings, Facilities, Parking Lots, and Parks Action Plan

The following Plan is a summary of accessibility issues documented during the October-November, 2019, Tipton County Government internal ADA Evaluation. This portion of the document is and will continue to be a work-in-progress as work is prioritized, assets are allocated, progress is evaluated, and additional access problems are identified and integrated into the system.

The actual working governmental review and approval documents, work orders, field inspections, and so on are maintained separately and are referenced to the facility designations below as "ADA Transition. 2.3.1." for data concerning the Administrative Offices, and so on. Properties added or deleted will be so noted in this document without further need for action, however any ADA-related work will require standard administrative procedures of the County.

2.3.1. Administrative Offices

Priority 1: Door closers will be adjusted or replaced by County Maintenance (hereinafter "Maintenance,") as needed. Estimated cost is \$75. No budget action is required.

Priority 1: Signage will be installed and/or updated as necessary by Maintenance. Estimated cost is \$200. No budget action is required.

Priority 2: A suitable portable table will be purchased and made available for wheelchair access. Maintenance is responsible. Estimated cost is \$200. No budget action is required.

Priority 3: Restroom modifications will require construction. Design and budget approval is required. Estimated cost is \$800.

2.3.2. Agricultural Extension Office

Priority 1: This facility does not lend itself to adaptation within either structural or budgetary constraints. County is seeking another location that will meet ADA and other standards. This will require a specific budget. Estimated cost is \$250,000.

2.3.3. Animal Shelter

Priority 1: Re-stripe parking lot and update signage for compliance. Maintenance is tentatively scheduled to complete this improvement. Estimated cost is \$200. No budget action is required.

Priority 1: Repair a gap at sidewalk/entrance landing with work to be completed by Maintenance. Estimated cost is \$50. No Budget action is required.

Priority 1: Replace the entrance door lockset to meet ADA requirements; work to be completed by Maintenance. Estimated cost is \$125. No budget action is required.

Priority 1: Rework entrance thresholds to meet ADA requirements; work to be completed by Maintenance. Estimated cost is \$175. No budget action is required.

Priority 1: Rework passageway partially blocked by an animal cage; work to be completed by Maintenance. Estimated cost is \$50. No budget action is required.

Priority 1: Replace/rework drain grate on north passageway; work by Maintenance. Estimated cost is \$75. No budget action is required.

Priority 3: Restroom modifications will require construction. Design and budget approval is required. Estimated cost is \$2,500.

2.3.4. Court House

Priority 1: Install ADA signage at north and south entrances; work by Maintenance. Estimate cost is \$125.

No Priority: Parking for this facility is streetside. The street is the jurisdiction of the City of Covington. Coordinator will discuss ADA parking signage and striping in front of the entrance to this facility.

Priority 1: Replace and/or rework locksets and door closers to meet ADA requirements; work to be done by Maintenance. Estimated cost is \$1,475. No budget action is required.

Priority 1: Install ADA signage; work to be done by Maintenance. Expected cost is \$300. No budget action is required.

Priority 3: Restroom modifications on basement level will require construction. Design and budget approval is required. Estimated cost is \$2,500.

Priority 3: Restroom modifications on second level will require construction. Design and budget approval is required. Estimated cost is \$750.

Priority 4: Bring drinking fountains on first and second levels to ADA standards; work by Maintenance. Estimated cost is \$100. No budget action is required.

2.3.5. County Fire Station—Drummonds

No modifications are required since there are no public spaces.

2.3.6. Drummonds Park

Priority 1: Restripe parking lot; work by Maintenance. Estimated cost is \$1,500. No budget action is required.

Priority 1: Regrade cross slope on walking trail to conform to 4% ADA rule; work by Maintenance. Estimated cost is \$200. No budget action is required.

Priority 1: Install handrails on little theater stage ramp; work by Maintenance. Estimated cost is \$250. No budget action is required.

Priority 4: Repair outside drinking fountain; work by Maintenance. Estimated cost is 125. No budget action is required.

2.3.7. Election Commission

Priority 1: Restripe parking lot and add ADA signage; work by Maintenance. Estimated cost \$60. No budget action is required.

Priority 1: Modify rail on entry ramp to meet ADA standards; work by Maintenance. Estimated cost \$75. No budget action is required.

Priority 1: Modify exit to conform to ADA standards; work by Maintenance. Estimated cost \$250. No budget action is required.

Priority 3: Modify unisex restroom to conform to ADA standards; work by Maintenance. Estimated cost \$125. No budget action is required. (One priority 4 item has been included in this work.)

2.3.8. EMA

Priority 1: Bring parking lot handicap signage into compliance with ADA standards; work by Maintenance. Estimated cost \$25. No budget action is required.

Priority 1: Bring building signage into compliance with ADA standards; work by Maintenance. Estimated cost \$200. No budget action is required.

Priority 3: Remove and reinstall restroom grab bars to meet ADA standards; work by Maintenance. Estimated cost \$75.00. No budget action required.

#### 2.3.9. Health Department

Priority 1: Restripe parking lot and bring signage into ADA compliance; work by Maintenance. Estimated cost \$1,550. No budget action is required.

Priority 1: Bring building ADA signage into compliance; work by Maintenance. Estimated cost \$200. No budget action is required.

Priority 1: Bring entry doors into ADA compliance; work by Maintenance. Estimated cost \$50. No budget action is required.

Priority 2: Locate portable table to provide wheelchair access when necessary; work by Maintenance. Estimated cost \$200. No budget action is required.

Priority 3: Restroom modifications will require construction. Design and budget approval is required. Estimated cost is \$25,000.

#### 2.3.10. Justice Complex

Priority 1: Restripe parking lot and bring signage into ADA compliance; work by Maintenance. Estimated cost \$2,500. No budget action is required.

Priority 1: Repair concrete walkway/landing; work by Maintenance. Estimated cost \$500. No budget action is required.

Priority 3: Rework restroom grab bars to meet ADA standards; work by Maintenance. Estimated cost \$240. No budget action required.

#### 2.3.10. Justice Center

Priority 1: Bring handrails on main entrance ramp into compliance with ADA standards; work by Maintenance. Estimated cost \$1,500. No budget action is required.

Priority 1: Misc. concrete work at main entrance on walks, ramps, and landing; work by Maintenance. Estimated cost \$500. No budget action is required.

Priority 1: Remodel main entrance doorway to meet ADA standards; work by Maintenance. Estimated cost \$5,000. No budget action is required.

Priority 1: Remodel Planning Department entrance doorway to meet ADA standards; work by Maintenance. Estimated cost \$5,000. No budget action is required.

Priority 2: Locate portable table in Clerk's Office to provide wheelchair access when necessary; work by Maintenance. Estimated cost \$200. No budget action is required.

Priority 2: Locate portable table in Planning Office to provide wheelchair access when necessary; work by Maintenance. Estimated cost \$200. No budget action is required.

Priority 3: Restroom modifications in main lobby will require construction. Design and budget approval is required. Estimated cost is \$3,500.

Priority 3: Restroom modifications in Planning Office will require construction. Design and budget approval is required. Estimated cost is \$1,800.

Priority 4: Bring water fountain into ADA compliance; work by Maintenance. Estimated cost \$50. No budget action is required.

#### 2.3.11. Public Works

Priority 1: Restripe parking lot and bring signage into ADA compliance; work by Maintenance. Estimated cost \$100. No budget action is required.

Priority 1: Bring main entrance doorway and vestibule into ADA compliance; work by Maintenance. Estimated cost \$75. No budget action is required.

Priority 3: Restroom modifications in lobby will require construction. Design and budget approval is required. Estimated cost is \$2,500.

Priority 4: Bring water fountain into ADA compliance; work by Maintenance. Estimated cost \$50. No budget action is required.

#### 2.3.12. Veterans Affairs

Priority 1: Bring parking lot signage into ADA compliance; work by Maintenance. Estimated cost \$50. No budget action is required.

Priority 1: Bring sidewalk into ADA compliance; work by Maintenance. Estimated cost \$250. No budget action is required.

Priority 1: Bring building signage into ADA compliance; work by Maintenance. Estimated cost \$35. No budget action is required.

Priority 3: Bring restroom into ADA compliance; work by Maintenance. Estimated cost \$175. No budget action is required.

### **3.0 Appendix**

#### **3.1 Facilities Locations**

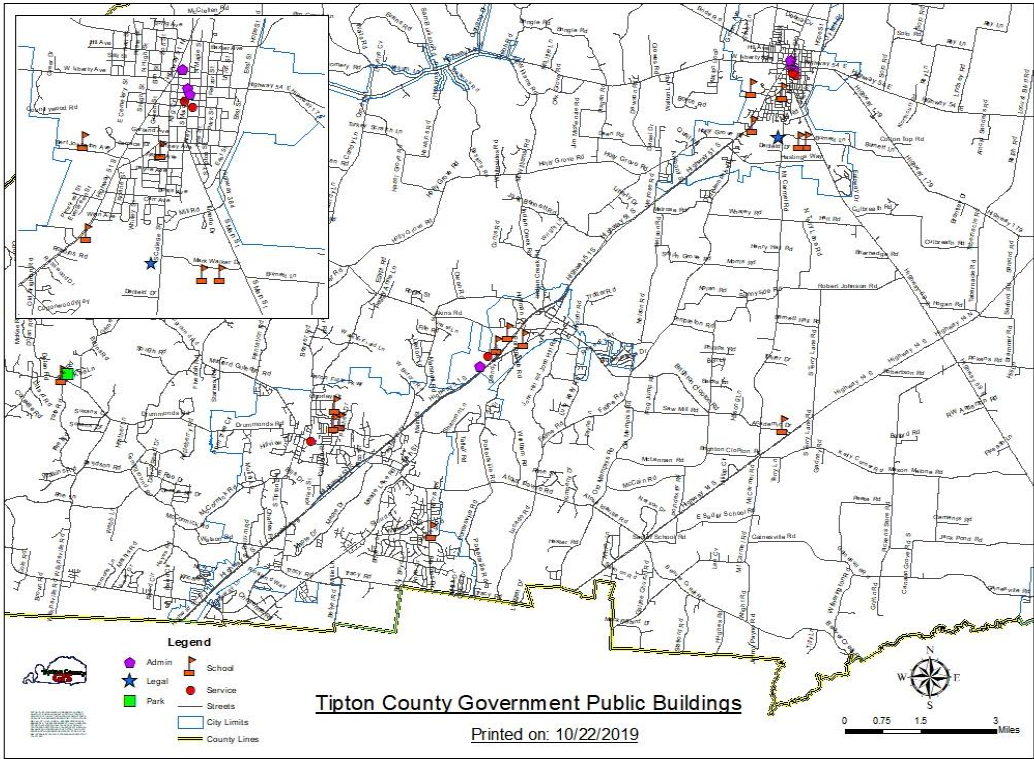
##### 3.1.1. Index of Facilities

This list includes all Tipton County Government properties including those of the Board of Education and those without public spaces. The map provides a general overview of the types and locations of properties owned by the county government. Although all are included, it is again noted that some are purposed strictly for operational functions with no public function. These are not included in the survey. Many are primarily operational with limited public functions and areas such as Public Works, located at 8279 Highway 51 S. in Brighton. The public spaces of these facilities are included in the survey. Some structures house several different departments as well as state-operated functions with public functions such as the Justice Center on 220 N. Main St. in Covington where both county and state offices are housed. The state-operated offices are not included in this survey.

### Tipton County Government Properties

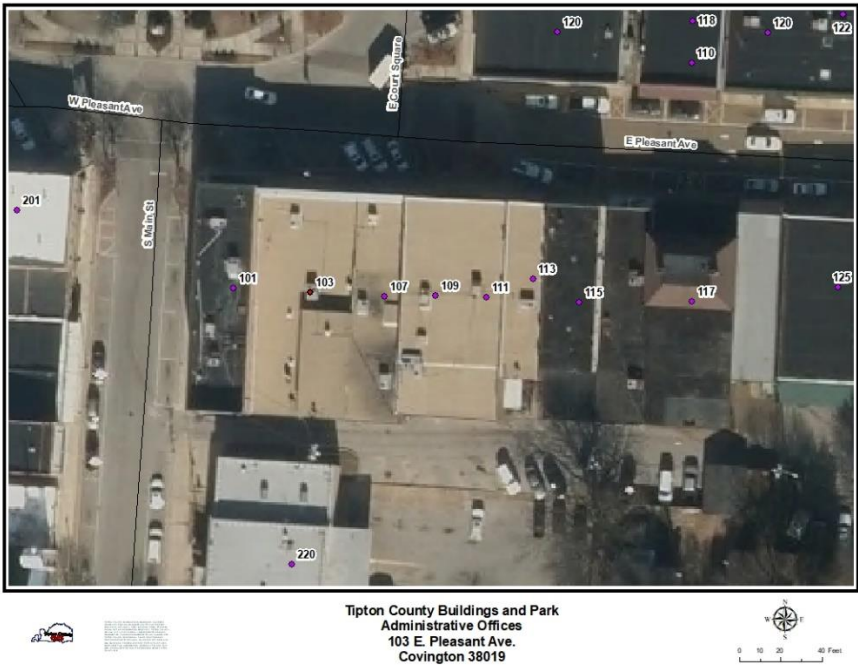
ADDRESS	CITY	ZIP	Property Name	OFFICE/DEPARTMENT	TYPE
103 E. Pleasant Ave.	Covington	38019	Administrative Offices	Budget and Accounts	Admin
				Mayor's Office	Admin
111 W. Washington Ave.	Covington	38019	Agricultural Ext Office		Service
8621 Highway 51 S.	Brighton	38011	Animal Shelter		Service
1580 Highway 51 S.	Covington	38019	Board of Education	Administrative Offices	Admin
870 Rosemark Rd.	Atoka	38004		Atoka Elementary	School
474 Academic Dr.	Covington	38019		Austin-Peay Elementary	School
1201 Old Highway 51 S.	Brighton	38011		Brighton Elementary	School
151 Mark Walker Dr.	Covington	38019		Crestview Elementary	School
5068 Drummonds Rd.	Drummonds	38023		Drummonds Elementary	School
1200 McLaughlin Dr.	Munford	38058		Munford Elementary	School
760 Bert Johnston Ave.	Covington	38019		Covington Integrated Arts	School
7785 Highway 51 S.	Brighton	38011		Brighton Middle	School
201 Mark Walker Dr.	Covington	38019		Crestview Middle	School
100 Education Ave.	Munford	38058		Munford Middle	School
8045 Highway 51 S.	Brighton	38011		Brighton High	School
803 S College St.	Covington	38019		Covington High	School
1080 McLaughlin Dr.	Munford	38058		Munford High	School
1580 Highway 51 S.	Covington	38019		Alternative Learning Center	School
1 W Liberty Ave.	Covington	38019	Court House	Mayor's Office	Admin
				Property Assessor	Service
				Register of Deeds	Service
				Trustee	Service
261 Tate Rd.	Drummonds	38023	County Fire Station		Service
261 Tate Rd.	Drummonds	38023	Drummonds Park		Park
113 E. Church Ave.	Covington	38019	Election Commission	Election Commission	Service
				Keep Tipton Beautiful	Service
8629 Highway 51 S.			EMA		Admin
4700 Mueller Brass Rd.			Health Department		Service
1801 S. College St.	Covington	38019	Justice Complex	Courts	Legal
				Jail	Legal
				Sheriff's Office	Legal
220 Highway 51 N.	Covington	38019	Justice Center	ADA Coordinator	Service
				County Clerk	Service
				E 911	Service
				GIS	Admin
				Planning and Development	Service
8279 Highway 51 S.	Brighton	38011	Public Works		Service
1286 Munford Ave.	Munford	38058	Veterans Affairs		Service

3.1.2. Map of Facilities

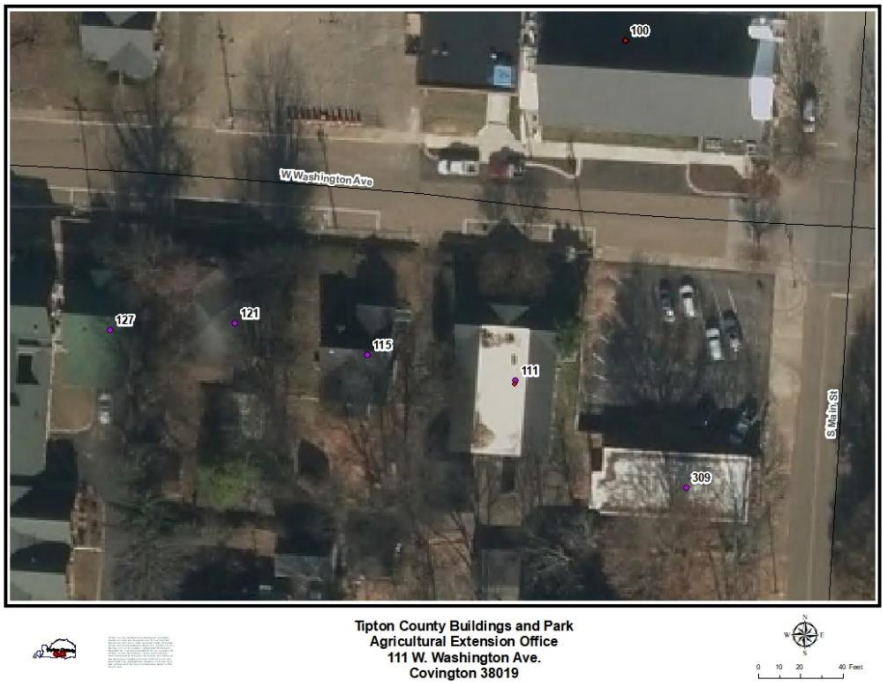


3.2. Aerial Photographs of Facilities

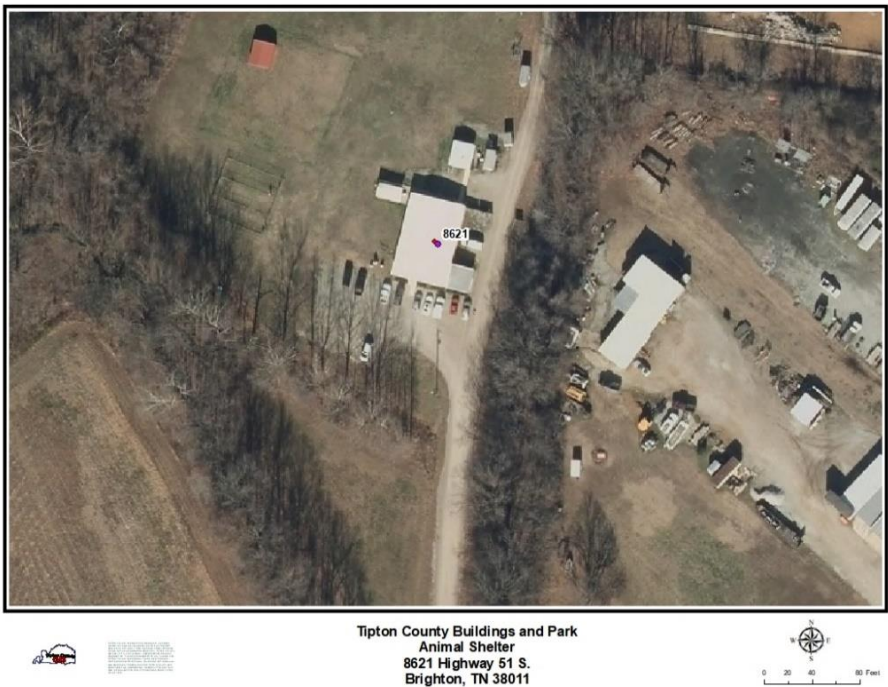
3.2.1. Administrative Offices



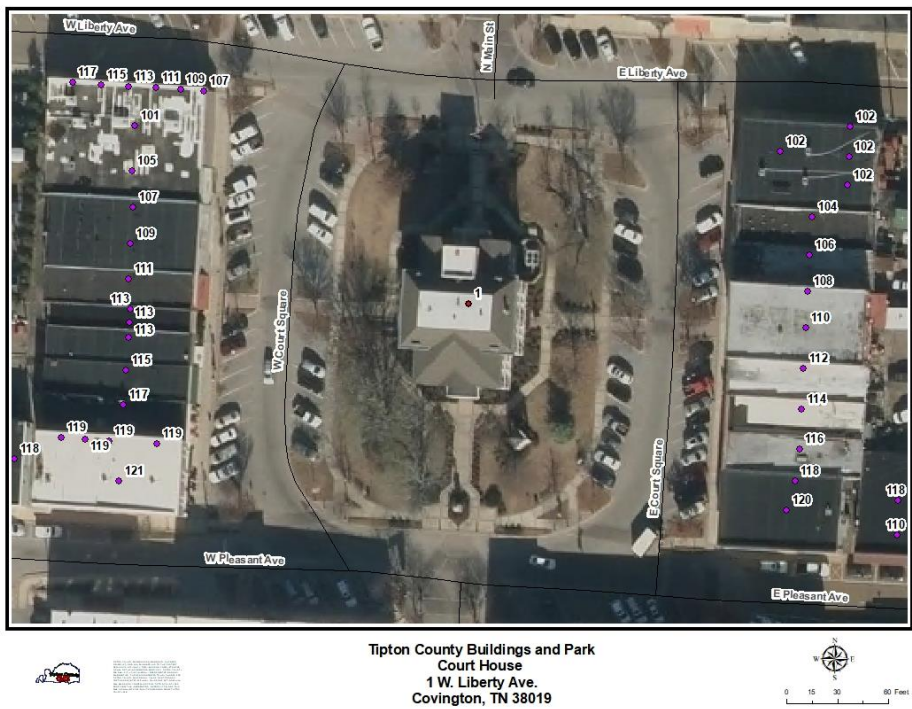
3.2.2. Agricultural Extension Office



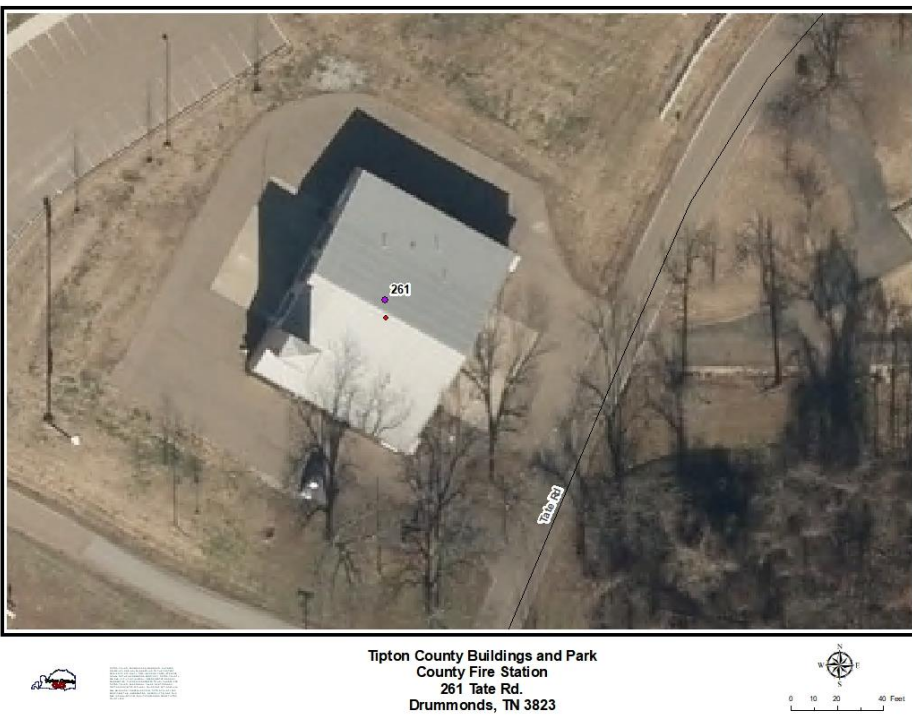
3.2.3. Animal Shelter



3.2.4. Court House



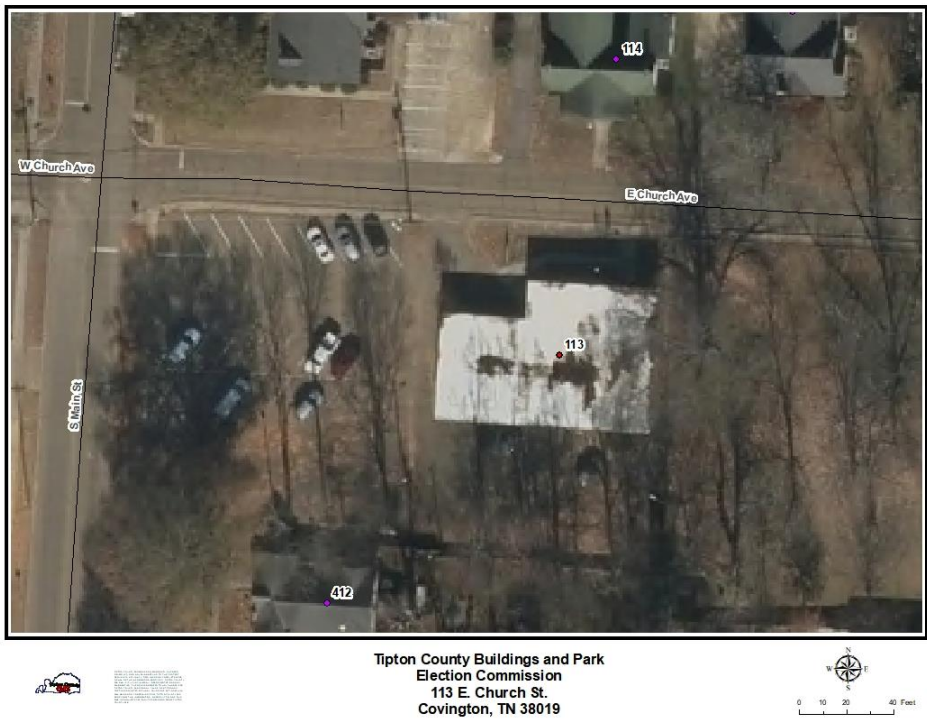
3.2.5. County Fire Station—Drummonds



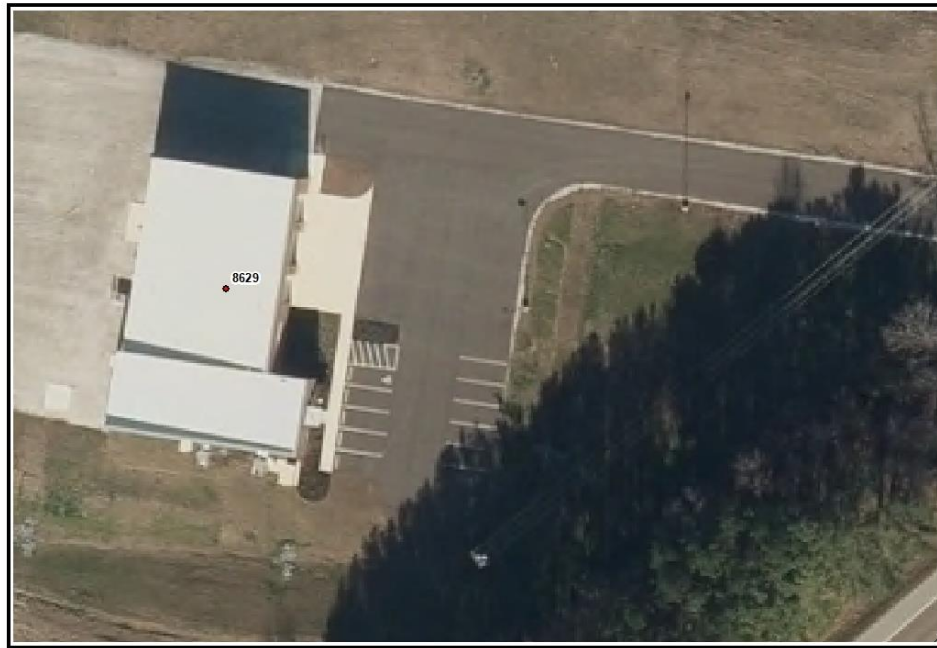
3.2.6. Drummonds Park



3.2.7. Election Commission



### 3.2.8. EMA

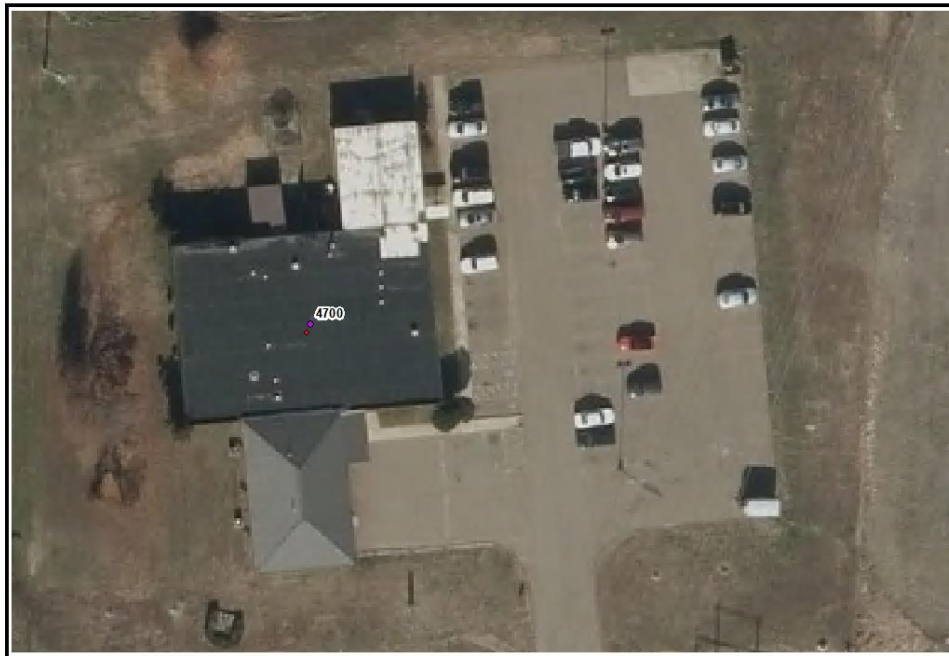


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**Tipton County Buildings and Park  
EMA  
8629 Highway 51 S.  
Brighton, TN 38019**



### 3.2.9. Health Department



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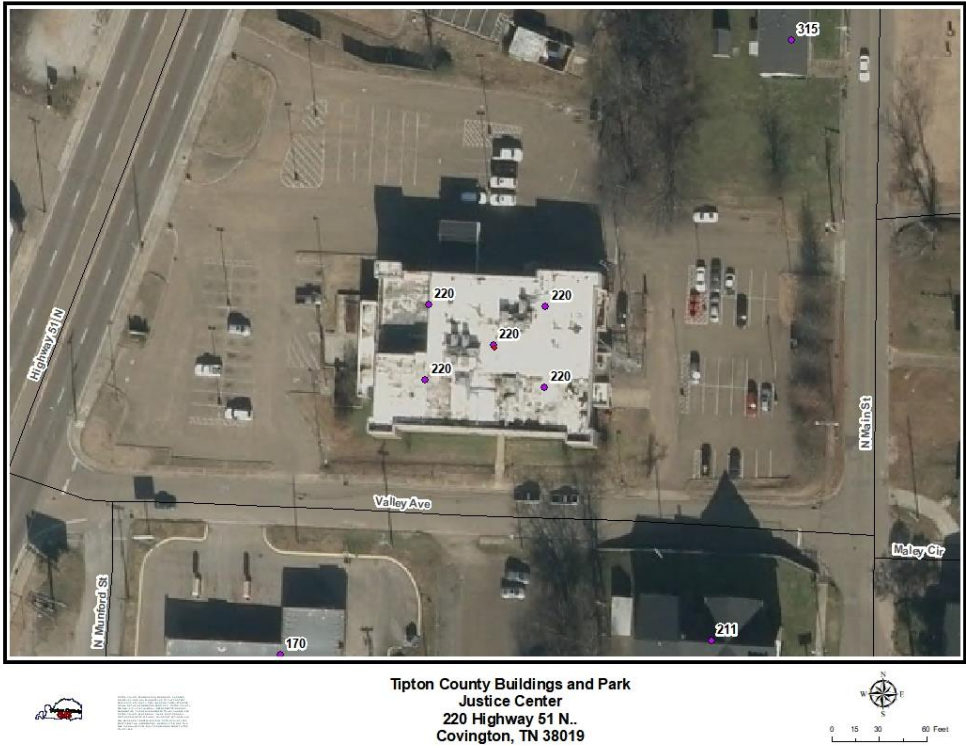
**Tipton County Buildings and Park  
Health Department  
4700 Mueller Brass Rd.  
Covington, TN 38019**



3.2.10. Justice Complex



3.2.11. Justice Center

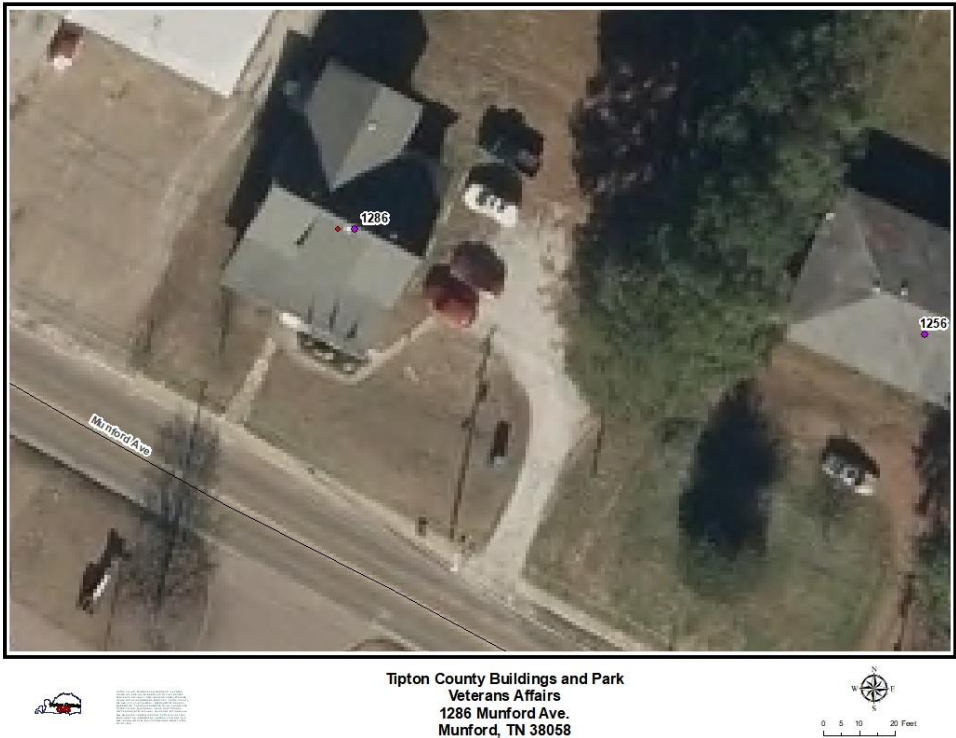


3.2.12. Public Works



Tipton County Buildings and Park  
Public Works  
8279 Highway 51 S.  
Brighton, TN 38011

3.2.13. Veterans Affairs



Tipton County Buildings and Park  
Veterans Affairs  
1286 Munford Ave.  
Munford, TN 38058

## Endnotes

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<sup>1</sup> See 28 C.F.R. § 35.108 Definition of disability for a more complete discussion of "disability" under ADA.

<sup>2</sup> A working definition of an ADA disability with respect to the individual has been summarized from the various ADA Rules and Regulations by Tennessee Department of Transportation to include: (1) A physical or mental impairment that substantially limits one or more of the major life activities of such an individual; (2) A record of such impairment; or, (3) Being regarded as having such an impairment. "TDOT ADA Self-Evaluation & Transition Plan," prepared by Kimley Horn, Accessology, and Gresham Smith and Partners (12 September 2019, 5).

<sup>3</sup> 28 C.F.R Part 35 (CRT Docket No, 105; AG Order No. 3180-2010); RIN 1190—AA46 (Nondiscrimination on the Basis of Disability in State and Local Government Services). This Final Rule is effective 15 March 2011.

<sup>4</sup> An extensive list of program definitions can be found at 28 C.F.R. § 35.104 Definitions.

<sup>5</sup> 28 C.F.R. § 35.151 (a)-(d), (g)

<sup>6</sup> 28 C.F.R. §§ 35.149-150

<sup>7</sup> 42 U.S.C. § 12132; 42 U.S.C § 12102(2)(B) & (C)

<sup>8</sup> 28 C.F.R. § 35.106

<sup>9</sup> 28 C.F.R. § 35.107(a)

<sup>10</sup> 28 C.F.R. § 35.107(b)

<sup>11</sup> 28 C.F.R. § 35.105

<sup>12</sup> 28 C.F.R. § 35.150

<sup>13</sup> <https://adachecklist.org/about.html>