

District Department of Transportation

ADA Transition Plan

For the Public Right-of-Way

DRAFT

September 2015



This page is left intentionally blank

Table of Contents

DDOT Commitment to Non-Discrimination and Equal Access	1
I. Executive Summary.....	2
II. Purpose of the ADA Transition Plan and Compliance Requirements	9
Background.....	9
Compliance Requirements	11
III. Methodology, Approach, and Next Steps in Implementation	13
Next Steps in Implementing the ADA Transition Plan	14
IV. Policies and Procedures	16
V. Interdepartmental Coordination and Training.....	18
Policies.....	18
Staffing.....	18
Training.....	19
Monitoring	20
VI. Grievance Program.....	21
Grievance Procedures.....	22
VII. Standards and Regulations	26
VIII. Public Outreach and Advisory Group	27
DDOT ADA Transition Plan Advisory Group Initiative.....	28
Advisory Group Members	28
Meetings	28
Duties of the ADA Transition Team Advisory Group	29
Accommodations	29
IX. Self-Evaluation Process – DDOT Asset Inventory	32
X. Scheduling of Asset Compliance.....	34
XI. Recommendations for Budget and Funding.....	55
XII. Measures for Success	57
XIII. Transition Plan Update Process.....	59
APPENDIX 1: List of Acronyms	61
APPENDIX 2: Glossary of Disability-Related Terms	63

APPENDIX 3: Public Outreach Comments

Appendix 4: Tasks A – H Findings Reports

This page is left intentionally blank

DDOT Commitment to Non-Discrimination and Equal Access Under the Americans with Disabilities Act

The District Department of Transportation has a firm commitment to not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities, and will honor and work to satisfy the requirements of Title I – V of the Americans with Disabilities Act of 1990 (ADA).

The Mission of the District Department of Transportation is to develop and maintain a cohesive sustainable transportation system that delivers safe, affordable, and convenient ways to move people and goods - while protecting and enhancing the natural, environmental and cultural resources of the District. We are responsible for the travel movement of people and goods on the Public Right-of-Way (PROW); to ensure that it is safe, supports the viability of our neighborhoods and businesses, is environmentally positive, and is accessible.

The Department is fully committed to upgrading the PROW so that people with disabilities have equality in access and safety in their travel opportunities in the District. Whenever the Department substantially paves, repaves, resurfaces, or engages in construction of a roadway, bridge, or tunnel, it will bring that portion into compliance with the ADA. The Department adheres to the guidance provided in the [Public Rights of Way Accessibility Guidelines \(PROWAG\)](#), published in the Federal Register on July 26, 2011 by the US Access Board. Specific technical specifications can be found in the [Design and Engineering Manual](#) (latest version).

To assist in meeting the access needs of the users, the Department has established a formal grievance procedure where persons with disabilities can identify accessibility concerns that they may have regarding the PROW and the Department will respond to these concerns in a timely, communicative, and if preferred, confidential process.

This page is left intentionally blank



I. Executive Summary

The Americans with Disabilities Act (ADA) is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles of the ADA relating to different aspects of potential discrimination. With the passage of the ADA, any facility which is constructed for public use is required to be accessible for those with disabilities. Failure to provide accessible facilities is considered discrimination and a violation of the law.

The ADA applies to all facilities regardless if they were built before or after 1990. In order to be compliant under the ADA, state and local governments are required to perform self-evaluations of their current assets and determine whether they meet the accessibility requirements of the 2010 ADA Standards for Accessible Design.

The purpose of this **ADA Transition Plan for the Public Right-of-Way (PROW)** is to establish a strategy for ensuring that the public rights-of-way (ROW) in the District of Columbia are accessible to people with disabilities who are traveling in the Capital City. The District of Columbia Department of Transportation (DDOT) ADA Transition Plan was created to modify the existing ROW so that pathways are accessible and support the Title II of the American's with Disabilities Act. The titles of the ADA focus on equal access and non-discrimination against people with disabilities.

Title I of the Americans with Disabilities Act of 1990 prohibits private employers, State and local governments, employment agencies and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment. The ADA covers employers with 15 or more employees, including State and local governments. It also applies to employment agencies and to labor organizations.

Title I refers to discrimination against potential individuals for employment. Accessible pathways to places of employment are critical in making such employment a reality. While employers hold the responsibility of non-discrimination in their hiring practices, the city must support an environment in which a potential employee might travel, regardless of a person's disability.

Title II applies to State and local government entities, and, in subtitle A, protects qualified individuals with disabilities from discrimination on the basis of disability in services, programs, and activities provided by State and local government entities. Title

II extends the prohibition on discrimination established by section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, to all activities of State and local governments regardless of whether these entities receive Federal financial assistance.

Title II protects individuals with disabilities against discrimination and allows equal access to services, programs and activities provided by State and local governments. Again, the ADA Transition Plan is intended to support Title II by helping to provide accessible pathways to such government sponsored programs.

Title III prohibits discrimination on the basis of disability in the activities of places of public accommodations (businesses that are generally open to the public and that fall into one of 12 categories listed in the ADA, such as restaurants, movie theaters, schools, day care facilities, recreation facilities, and doctors' offices) and requires newly constructed or altered places of public accommodation—as well as commercial facilities (privately owned, nonresidential facilities such as factories, warehouses, or office buildings) – to comply with the ADA Standards.

Title III protects people with disabilities against discrimination by providing equal access to all public places. If such places are accessible, it only makes sense to ensure the pathways within the ROW are also accessible as well. The ADA Transition Plan will work to that end.

Title IV addresses telephone and television access for people with hearing and speech disabilities. It requires common carriers (telephone companies) to establish interstate and intrastate telecommunications relay services (TRS) 24 hours a day, 7 days a week. TRS enables callers with hearing and speech disabilities who use TTYs (also known as TDDs), and callers who use voice telephones to communicate with each other through a third party communications assistant. The Federal Communications Commission (FCC) has set minimum standards for TRS services. Title IV also requires closed captioning of federally funded public service announcements.

DDOT has established a TTY line for individuals with disabilities to communicate with DDOT and are able to report any grievances through this line as well.

Beginning in 2012, DDOT initiated a process to collect an inventory of certain types of assets within the public ROW and determine whether or not they supported the accessibility objectives in accordance with the PROWAG. Such assets include sidewalks, crosswalks, bus stops, curb ramps, and pedestrian signals. To date, the new asset inventory database has captured approximately seven percent of the District's

public ROW. These areas were selected to be surveyed first because they are located near the types of land uses that generate high pedestrian usage, such as schools, hospitals, community centers. The majority of the assets within the surveyed ROW were found to be non-accessible. Assets identified as needing immediate attention will be referred to Cityworks, a District-wide reporting system for work orders.

DDOT will continue to expand the asset inventory, and will take into account assets added as a result of new construction projects as they are completed around the city. DDOT will form a team of inspectors who are experts in asset management. The team will conduct workshops with DDOT planners, inspectors, engineers or other staff to raise awareness of the requirements to transition the District into an accessible community and to recognize that they have ADA responsibilities with regards to their transportation projects.

The inventory for the remaining 93% of the assets in the District's ROW is planned to resume in 2015. Similar to the recent evaluation of assets, newly surveyed assets will undergo prioritization to identify those in urgent need of correction due to usage and safety. Those that are identified as needing immediate attention will be screened through the Capitalworks Program to ascertain if any of the identified deficient assets will be corrected through planned construction projects. If work is scheduled, the improved assets shall be recorded in the Asset Inventory database with the projected date of completion.

DDOT is researching ways to integrate the Asset Inventory with Protrak, the software used to track all projects within the city. No conclusive decision has been made regarding the extent of such an integration, but there is a clear understanding that the two systems should have a means of coordinating ADA needs with recent and upcoming project completions.

DDOT has established a policy to expedite accessibility projects to correct deficient assets that were subject to grievances or provide accessible assets where non-accessible features exist in areas frequented by people with disabilities or were subject to complaints. Rather than waiting until all assets are inventoried, people with disabilities can now request that DDOT accelerate, or initiate projects that convert non-accessible pathways into accessible pathways. This element of the ADA Transition Plan will be presented to the ADA Transition Team Advisory Group, a group that was formed in 2014 to help convey the concerns of the community of people with disabilities. The Plan will also be presented to the public through outreach efforts and posted to a website accessible from DDOT's home page.

Efforts are underway to develop curricula to train all levels of DDOT staff, including consultants and contractors, regarding the details of the ADA, how it will impact their work, and what their responsibilities will be in relation to compliance. The training will range from a high level overview to detailed field work guidelines to be used during construction. DDOT has established an ADA Coordinator who will be responsible for monitoring changes to ADA regulations and keeping all training curricula current. Bi-annual ADA training will be required of all staff. Some computer based training (CBT) will be established in the future to substitute instructor led training to provide more flexibility for course participants.

The following training was conducted for DDOT staff to review ADA requirements:

1. **Accessible Signal Training** - June 3, 2012, well attended with about 40 participants. Taught by Janet Barlow, Certified Orientation and Mobility Specialist, Accessible Design for the Blind and by Daniel Carter, PE – University of North Carolina Highway Safety Research Center

This workshop presents information on current Accessible Pedestrian Signals (APS) technology and guidance on selecting features and designing installations. It consists of seven modules:

- Accessible Pedestrian Signals (APS) and Accessible Public Rights-of-Way
- Travel Needs of Blind or Low Vision Pedestrians / Understanding Traffic Signals and Modern Intersection Design
- APS Features
- When to Install APS
- Designing Installations
- Installation, Operation, and Maintenance
- Public Education on APS

2. **Advanced ADA Design Training** – March 2-4, 2011.

The 3-day training was organized as follows:

- Day 1 included general training: guiding ADA principles, applicable laws and regulations, understanding the user, sidewalks (PAR, surfaces, slopes, etc.), curb ramps (design basics, types, advantages and disadvantages, etc.), detectable warning pavers, and accessible pedestrian signals (APS). In addition, curb ramp inspection forms were also part of discussion.

- Day 2 provided a comprehensive and interactive training on advanced compliant curb ramp design using several DC on-street examples with ‘before’ and ‘after’ design solutions as well. Hands on, in field sessions were also conducted to provide a practical application of classroom instruction for the remediation of a challenging ADA PROW non-compliant condition for both design and post construction conditions.
- Day 3 covered unique design examples with DC on-street examples. Topics reviewed included tabling, accessible lay-by designs, crosswalks, storm water management, and work zones. The training ended at mid-day on Day 3.

In addition to the training, participants were asked to undertake a pre and post-knowledge assessment to indicate the state of their understanding of ADA compliance as applicable to the PROW. The pre-test had 10 questions covering basic ADA requirements while the post-test had 10 questions as well but covered more advanced ADA design elements. The results are shown in the table below:

	Pre-Test	Post-Test
Less than 5	35.5%	33.3%
Between 5-7	48.4%	58.3%
Greater than 7	16.1%	8.4%

The results indicate that awareness and basic ADA knowledge significantly improved among staff and consultants. However, further extensive training is required to educate both staff and consultants on curb ramp design issues (as opposed to utilizing a standard typical on every plan.)

3. **ADA Inspection Training** – Feb. 22, Feb. 29, Mar. 8 and Mar. 15, 2012.

The ADA Inspection Training was designed to assist employees responsible for creating pedestrian facilities that are accessible to all Americans. This often presents many challenges to those involved with roadway design and engineering services. Those seeking to design and/or modify existing facilities must take into account the requirements, guidelines, and special considerations of federal as well as the District Department of Transportation (DDOT) standards.

The various reference standards (2010 ADA Standards, Draft PROW Accessibility Guidelines, and DDOT Standards) created the need for DDOT staff to receive training in the best practices for compliance with ADA regulations. In order to meet ADA compliance requirements the District Department of Transportation (DDOT) Civil Rights Division planned an intensive training program to provide DDOT's engineering and technical staff with targeted, comprehensive, relevant, up-to-date, professional, and time-efficient training in ADA PROW compliance, incorporating specifications established in DDOT's Design and Engineering Manual and current DDOT ADA Coordinator issued guidelines. This course was intended to train DDOT employees in ADA compliance as it applies to PROW by creating a hands-on classroom experience with sample review of numerous public space permit applications.



II. Purpose of the ADA Transition Plan and Compliance Requirements

Background

The purpose of the ADA Transition Plan is to provide a comprehensive strategy to guide the District of Columbia Department of Transportation (DDOT) and District residents to continuously work to create accessible, barrier-free passageways within the ROW throughout the city as required by the Americans with Disabilities Act (ADA). There are many factors that must be considered in creating complete ADA accessibility and it is understood that this plan is an effort to guide the work of future projects, rehabilitate areas that are inaccessible or unsafe to people with disabilities, and create a culture that considers accessibility for people with various disabilities as a normal practice for new development. It is also understood that the capital improvements needed to address deficient or non-accessible assets will take many years and that costs must be calculated into various budgets throughout several cycles and various divisions within the Department.

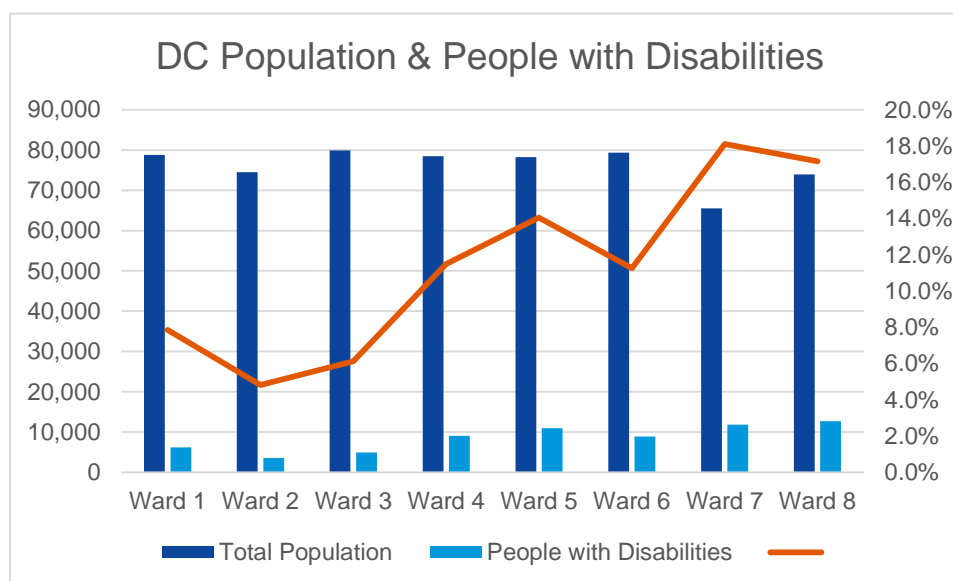
DDOT has reviewed multiple ADA transition plans prepared for other cities and states throughout the country to examine the best practices for scheduling and budgeting infrastructure improvements that meet the standards set forth in the ADA Accessibility Guidelines (ADAAG) and the Public Rights of Way Accessibility Guidelines (PROWAG).

This plan will provide DDOT with a comprehensive ADA compliance program to address the public right-of-way and reaffirms DDOT's commitment to continuously progress towards the goals and objectives of the ADA to remove identified barriers for people with disabilities. The plan will establish a prioritization process for correcting all ADA/Section 504 noncompliant assets.

The ADA Transition Plan is a "living" document. It will be updated on an annual basis to demonstrate intentions to make the appropriate transportation facilities within the ROW ADA accessible. Annual plans will also include cost estimates of ADA projects planned for upcoming years, costs expended during the former year, and any updates to the grievance policy and/or prioritization system.

A comprehensive program to objectively identify deficiencies in the city's ROW that adversely affect people with disabilities and address these deficiencies is a critical undertaking for the District government and its importance can be realized by taking a closer look at the District's population. As of the 2013 US Census, there were 608,630

residents in the District of Columbia, of those, 68,143 reported having a disability. (The population in 2014 was 660,000 and individuals with disabilities have likely increased as well.) Wards 7 and 8 had the highest percentage of people with disabilities at 18.1% and 17.2% of their total populations, respectively. As the nation's capital, millions of visitors tour the city from all over the world, and many of them have disabilities. It is extremely important that DC demonstrates its commitment to the ADA and works diligently to create accessible transportation facilities for all.



DDOT ADA Transition Plan will provide the following elements:

1. **Self-Evaluation:** a detailed description of the procedures involved with identifying the District's inventory of transportation facilities within the public ROW, primarily focusing on sidewalks, crosswalks, curb ramps pedestrian signals and bus stops.
2. **Removal Methods:** a description of how the District plans to begin to make transportation facilities within the public ROW ADA accessible. These efforts are expected to take multiple years to accomplish.
3. **Schedule:** a recommended schedule for completing projects over the next year. This schedule is subject to annual revisions.
4. **The name and contact information of DDOT's ADA Coordinator** who is responsible for the review, implementation, and annual updates of the ADA Transition Plan.

5. Summary of the outreach activities that were used to provide members of the public with opportunities to provide input to the ADA Transition Plan. In addition, this plan includes plans for additional public outreach specifically to gather input regarding this plan, and the future updates to the ADA Transition Plan.

Compliance Requirements


DDOT has completed the following ADA requirements regarding to accessibility of assets in the public ROW:

1. Designated Cesar Barreto as the ADA Coordinator. His contact information is provided below.

Mr. Cesar Barreto
ADA Coordinator - District Department of Transportation
Office of Civil Rights & Infrastructure Project Management
Administration
55 M Street, SE 4th Floor
Washington, DC 20003

Ph.: 202-671-2829
Cell: 202-423-1968
cesar.barreto@dc.gov

2. Provided opportunities for the public to offer input regarding the District's ADA Transition Plan, which consisted of several public meetings in 2014. These meetings are described in detail in Section VIII.
3. Established a grievance process that will allow members of the public to report potentially non-compliant assets in the public ROW, which can lead to projects to address legitimate complaints. This process is described in Section VI, Grievance Program.
4. Adopted internal design standards, specifications, and details are found in Engineering Design and Construction Standards: APPENDIX 4: Task-D Findings Report provides a review of the DDOT Engineering Design and Construction Standards.

5. Directed the ADA Coordinator to develop the ADA Transition Plan and to be responsible for annual updates if the original plan is accepted by the Federal Highway Administration (FHWA), and continuing on an annual basis.
 6. Reviewed schedule of projects planned throughout the District and their respective budgets for improvements to the PROW. The ADA Transition Plan, which will be reviewed and updated on an annual basis and will report progress on projects and PROW improvements. The estimated schedule of work is presented in Section X. The budget and potential funding sources are provided in Section XI. Both the schedule and budget are subject to change throughout the year as priorities shift.
 7. Assigned the ADA Coordinator to monitor and verify the progress of the plans identified in the ADA Transition Plan and to take action if there is a lack of progress. This is further described in detail in Section XII: Measures of Success.
- 

III. Methodology, Approach, and Next Steps in Implementation

DDOT reviewed 33 ADA Self Evaluations and Transitions Plans prepared for other cities and states and also reviewed 27 other related documents as a means of determining best practices. The findings are detailed in APPENDIX 4: Task “A” Findings Report – Review of Nationwide Self Evaluation and Transition Plans. The critical elements of a successful ADA Transition plan are as follows:

1. A commitment from top level management is necessary.
2. Need adequate funding for successful implementation over multiple years.
3. Formulating and planning an overall comprehensive plan at the start of the development of the ADA Transition Plan.
4. Designation of an ADA Coordinator who is empowered and authorized to implement the plan.
5. Appropriate input by staff, committees and stakeholders that are incorporated into the plan.
6. Ensure compliance with the 2010 ADA Standards for Accessible Design is integrated into all levels of the organization.
7. Ensure consistent and comprehensive data collection and management tools to collect field data, provide centralized access and management of data, prioritizations, tracking, monitoring and documenting progress, updating the plan and preparing reports.
8. Establish and adopt procedures to track public concerns and grievances in a timely manner with documentation of the resolution and implications to the organization.
9. Conduct comprehensive and on-going training at multiple levels. Training should include technical and support staff, in addition to policy, procedures and program administrators.

DDOT initiated the ADA Transition Plan by developing software to facilitate the collection of ROW assessments by conducting foot-on-ground surveys in 2012. During the pilot phase of the project, 39 assets were collected with various types of attributes,

which proved to be extremely cumbersome during data analysis. Consequently, the initial set of data were found to be unusable.

During the first and current phases, the data collection effort uses far fewer assets. The assets considered are provided below:

1. Bus Stop
2. Crosswalk
3. Curb Ramp
4. Objects
5. Pedestrian Signal
6. Sidewalk
7. Trip Hazard

These seven assets were considered when surveying the public ROW. Approximately seven percent of the District's ROW has been inventoried to date, and will continue collecting data in all wards throughout the District.


The ADA Coordinator will be responsible for tracking the progress of the Asset Inventory and aligning potential ADA facility improvements that are part of other improvement projects that are planned within the next year and those planned as the result of the grievance program. The ADA Coordinator will monitor the Asset Inventory, Protrak, and Cityworks, and will report progress on a monthly basis.

Process for Implementing the ADA Transition Plan Moving Forward


1. The following plan is recommended to move forward with implementing and updating the ADA Transition Plan.

The ADA Coordinator will provide multi-departmental Asset Inventory workshops to provide training for the following administrations and offices:

- a. Urban Forestry Administration (UFA)
 - b. Infrastructure Project Management Administration (IPMA)
 - c. Progressive Transportation Services Administration (PTSA)
 - d. Public Space Regulations Administration (PSRA)
 - e. Transportation Operations Administration (TOA)
- 

2. The data collection will continue utilizing the Asset Inventory software to establish the work plan for the following year.
 - a) The software application's prioritization process will be modified to match the programming used in DDOT's Cityworks application
 - b) The Asset Inventory will include potential cost calculations
 3. Utilize DDOT's 311 tools, which include both telephone calls and web-based applications.
 - a) Request modifications to the 311 system to address accessibility requirements
 - b) Conduct education campaign to inform the public about the expanded 311 system
 4. Utilize the District's Capitalworks Program (Riva Model – Proof of Concept).
 - a) Determine if a GIS overlays can be used to illustrate upcoming projects in the asset database
 - b) Determine if void areas can be filled in with the asset database
 5. Grievances filed with the ADA Coordinator will be a priority.
 - a) Complaints investigated promptly
 - b) Legitimate complaints will generate work orders that will be completed through Cityworks
 - c) The ADA Coordinator will monitor the status of work orders to ensure projects are completed and are reported back to the grievant
 6. Consideration will be given to reports submitted to Vision Zero.
 - a) ADA concerns will be converted to Cityworks work orders
 - b) Valid safety concerns for accessibility will generate work orders completed through Cityworks
- 

IV. Policies and Procedures

1. A District ADA Policy and Guidelines that address accessibility and other ADA issues that individuals with disabilities may experience City-wide should be developed. It will be beneficial for engineers, developers, inspectors, and contractors in the DC area because it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance. It should encompass all of the current guidelines that are being utilized for design and construction.
 2. Additional staff should be put in place to support the ADA Coordinator in developing, implementing, and monitoring ADA compliance throughout the District. The ADA Coordinator will need assistance in reviewing plans for accessibility and follow up to see that projects are constructed according to ADA compliance guidelines.
 3. Policies and procedures should not only apply to planning, design, and construction, but also to provide access for those people with disabilities to programs, services, and activities conducted by DDOT.
 4. Policies and procedures should monitor accessibility activities by DDOT, their effectiveness, compliance with the ADA, and provide a method for escalation to another level of DDOT management if certain projects or activities prove to be ineffective.
 5. The grievance procedures for tracking and monitoring the resolution of complaints should be centralized throughout the organization. The resolution of complaints needs to be timely and should be able to access funding already in place. For example, some complaints regarding non-compliance may need to be resolved immediately due to legitimate safety concerns, and cannot wait until the next budget cycle and project programming.
 6. Explore possibilities of integration of the grievance and mitigation procedures into the Cityworks Software. This will serve to enhance timely resolution of complaints and communication between DDOT administrations. The system can also be reviewed by DDOT's General Counsel for potential legal issues and emerging trends.
 7. DDOT will ensure there is participation by staff, contractors, and consultants regarding participation in ADA training. They will utilize DDOT University to track all training both inside and outside of the agency. For technical training involving inspections including measurements, a competency exam is recommended. This
- 

type of training should be a certification and renewable every two years should be mandatory.

8. A policy and procedure should be developed and implemented for an accommodations statement to appear on publications sent out and developed outside of the Communications Office. The time for requests to be fulfilled has been established at seven days.
9. A policy requiring ADA compliance standards will be developed and located on the DDOT website. Policies will be updated as legal trends and court decisions emerge.
10. A policy would be created for tracking and reporting DDOT's progress in achieving ADA compliance.



V. Interdepartmental Coordination and Training

While DDOT is making progress towards the implementation of accessibility guidelines throughout the District, DDOT is planning to make administrative changes within its organization in order to become fully proficient in the implementation of ADA accessibility improvements throughout all of its functions. The following recommendations will support DDOT's progress toward full compliance with ADA regulations.

Policies

1. Written policies and procedures will be developed and distributed to all staff. The policies and procedures will clearly define and align with staff's specific roles and responsibilities. The policies and procedures will include guidelines for compliance and methods for responding to customer concerns.
2. The policies and procedures manual of each DDOT administration will include guidelines for implementing ADA accessibility in its daily activities.
3. The ADA Coordinator will take the lead monitoring and reporting on policy development and ensuring that each DDOT administration has its own policy and procedures.
4. The Training Office will coordinate with the ADA Coordinator to prepare, deliver and track all training efforts regarding ADA policies and procedures.
5. DDOT's "Design and Engineering Manual" (DEM) (latest version) will include the ADA policies and procedures so that the Architecture/Engineer/Construction (A/E/C) community is fully aware of the policies. Standards should be consistent with ADAAG and PROWAG.
6. Federal and local funding should be made available for non-capital related projects so that staff can have access to additional funding, if necessary, to ensure ADA compliance in their activities.

Staffing

1. As DDOT is reorganizing and realigning the Department, the Director will designate an Equity and Inclusion Officer, a senior-level executive in the Office of the Director, who will ensure ADA compliance throughout the agency. This person will work directly with the Director and have oversight over the activities of the Office of Civil Rights. This does not remove the current reporting responsibilities of the Office of


Civil Rights, but provides a level of support that is needed to emphasize the importance of ADA compliance throughout DDOT.

2. The ADA Office should consist of a full time team that can perform audits of all DDOT administrations. Prior to hiring any additional DDOT staff skilled in ADA compliance and its application for transportation infrastructure projects, DDOT can procure a program management contract with a reputable A/E firm to provide staff support to the ADA Office.
3. DDOT will consult with their legal staff who have expertise in handling ADA compliance issues when drafting policies and action items for the agency.

Training

1. Training will be provided to all DDOT staff, regardless of their roles or daily activities.
2. Training will be offered on an annual basis, with refresher courses available regularly throughout the year.
3. Training courses will include real-world examples and field trips, if necessary, so that staff can view applications that directly relate to their specific monitoring and inspection responsibilities.
4. Training materials will be developed for staff use. Pocket manuals, checklists, guidelines for various applications, and standard drawings will be made available for staff use after they receive training.
5. Training will be focused on the following areas:
6. ADA regulations, policies, and procedures
 - a) Implementation of ADA policies in planning activities
 - b) Implementation of ADA Policies in Design and Construction to be consistent with “Design and Engineering Manual” (latest version)”
 - c) Interagency coordination for ADA compliance
 - d) Inspecting for ADA compliance in work zones and on construction sites
 - e) ADA compliance for developers, designers, and contractors for projects impacting the public right-of-way

Monitoring

1. As part of the development of policies and action items, DDOT will further explore integration of existing database systems (e.g., Protrak, Cityworks, and Asset Inventory). This will benefit the overall monitoring of progress for ADA compliance.
 2. The same Asset Inventory software tool that was developed to conduct the initial inventory will continue to be used to measure the District's progress in complying with the ADA. Field inspectors will be trained to use these software tools.
 3. The ADA Coordinator will have the ultimate responsibility for coordinating the asset inventory collection, training of all inspectors, and conduct system maintenance.
- 

VI. Grievance Program

Any person with a disability, or any parent or guardian who represents a minor person with a disability, who believes that they have been the subject of disability-related discrimination on the basis of the denial of access to facilities, programs, or services, may file a grievance or complaint.

DDOT is providing training to the telephone operators who work the Customer Service Request (CSR) system, also known as 311, for data entry of ADA related complaints and is adapting the current Cityworks program to meet the tracking and monitoring portion of the requirement. It was discussed with the ADA Coordinator that the system should be able to record and track the following:

- Date of initial request
- Type of request/nature of concern
- Informal complaint or formal grievance
- Person or persons who made the request
- Contact information of person(s)
- Communication by DDOT regarding the request
- Action taken to meet and resolve the request with date(s)
- If resolved, date resolved and the method or methods used to resolve the issue and/or provide the accommodation
- If not resolved, entries should be tracked regarding the action taken, the results and a statement provided as to why assistance or resolution was not provided or was not successful
- Note of any unresolved complaints
- Inclusion of a strategy and timeline for the projected resolution of the unresolved complaint
- Expected expenditure of funds
- Actual expenditure of funds
- Follow-up activities such as permits or planned barrier removal

Cityworks serves as one of the tracking systems recommended to be used to track accommodation requests for persons with disabilities regarding the type of request and

whether or not the accommodation was provided. The tracking system for accommodations will also provide information regarding the work order number and type of accommodation requests made over time and provide security and privacy for requests of a medical or sensitive nature to protect sensitive information. The tracking of accommodations will provide information that will be valuable for planning and budgeting.

Grievance Procedures

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the District Department of Transportation (DDOT). The District of Columbia's Personnel Policy governs employment-related complaints of disability discrimination. The ADA Coordinator is responsible to ensure that reasonable accommodations are made for those individuals with disabilities. All grievances are handled in the strictest confidential manner.

A written complaint should be filed on the ADA Grievance Form attached hereto. The written complaint should contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible, to:

César Barreto

ADA Coordinator

55 M Street SE, 4th Floor, Washington, DC 20003

Phone: 202-671-2829

TTY: (202)671-2800 or 711

E-mail: cesar.barreto@dc.gov

Within 15 working days of the submitted complaint, Cesar Barreto or his designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of DDOT and offer options for substantive resolution of the complaint.

Within 60 working days of receipt, the ADA Coordinator or his designee will conduct the necessary investigation to validate the complaint and description of resolution. If appropriate, the ADA Coordinator or his designee will coordinate a meeting with the grievant to discuss the complaint and to reach an informal determination. Any determination will be documented in the ADA Complaint Form.

If an informal determination of the complaint is not reached, a written determination validating the complaint and the description of the resolution, if appropriate, shall be issued by the ADA Coordinator or his designee. A copy of the determination will be forwarded to the grievant, in an accessible format, within 90 days of the receipt of the ADA Complaint Form.


If the response by the ADA Coordinator or his designee does not resolve the issue, the grievant may request reconsideration if he/she is dissatisfied with the formulated determination. The request for reconsideration shall be prepared and filed with the ADA Coordinator within 10 working days of receiving the determination. The ADA Coordinator shall review the request for reconsideration, make a final determination, and forward a copy to the grievant within 90 days of filing the request for reconsideration.

If the grievant is dissatisfied with DDOT's handling of the grievance at any stage of the process or does not wish to file a grievance through the DDOT's ADA Complaint Form, the grievant may file a complaint directly with the United States Department of Justice or other appropriate state or federal agency. Use of DDOT's ADA Complaint Form is not a prerequisite to the pursuit of other remedies.

The determination of any specific complaint will require consideration of varying circumstances.

- The specific nature of the disability;
- The nature of the services, programs, or facilities at issue and the essential eligibility requirements for participation;
- The health and safety of others;
- The degree to which an accommodation would constitute a fundamental alteration to the program, service, or facility, or cause an undue hardship

Accordingly, the determination of any one complaint does not constitute a precedent upon which DDOT is bound or upon which other complaining parties may rely.



The ADA Coordinator shall maintain ADA Complaint Files for a period of 5 years.

GOVERNMENT OF THE DISTRICT OF COLUMBIA

DEPARTMENT OF TRANSPORTATION



Office of Civil Rights

ACCESSIBILITY COMPLAINT/ GRIEVANCE FORM

It is the policy of the District of Columbia Department of Transportation (DDOT), not to discriminate on the basis of disability in admission to, access to, or operations of its programs, services, or activities. All attempts will be made to resolve such matters through informal means at any stage of the process.

DDOT has established a grievance procedure to meet with the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, and Title II of the Americans with Disabilities Act of 1990. This Accessibility Complaint form should be used by individuals wishing to file a complaint to DDOT on the basis of disability, regarding access to the services, activities, programs and facilities of DDOT.

Grievant:

Name:	Date:
Address:	
City:	Zip:
Phone Number:	Email:

Is the person filing the grievance the same as grievant? Yes No

If No - Name of person filing the grievance:

Address:	
City:	Zip:

Phone Number:	Email:
---------------	--------

Location of Grievance Occurred:

Address:		
City:	Zip:	Date:
Description of Area:		

Has Complaint been filed with another agency?

Yes

No

If Yes;

Name of Agency:

Contact Person:

Date Filed:

Complaint:

Requested Action to correct complaint:

Grievance/ Complaint Received by:

Date Received:

VII. Standards and Regulations

Since the emphasis is on Public Right-of-Way, two documents most often referred to in planning ADA Transition Plans are the ADA Accessibility Guidelines (ADAAG) and the Public Rights of Way Accessibility Guidelines (PROWAG). However, DDOT has more stringent requirements in place and use their own “**Design and Engineering Manual**” (**DEM**) (*latest version*) as the primary reference throughout DDOT Administration. The DEM goes above and beyond the ADAAG and PROWAG requirements and is considered to be DDOT’s guideline of preference to be followed for accessibility compliance.

PROWAG is currently awaiting final rule making so it is functional as guidance. The proposed guidelines are developed specifically for pedestrian facilities in the public right-of-way and address conditions and constraints that exist in the public right-of-way. It is expected that PROWAG will become the minimum Federal requirement soon. However, as this guidance cannot be diminished in the administrative rulemaking finalization, it does set forth what can be regarded as baseline standards for ADA compliance. Depending on the modifications and contents of the final regulations, the ADA Transition Plan may also have to be revised. Similarly, when other regulations are implemented, the ADA Transition Plan will also need to be updated to reflect those changes. If DDOT chooses to abide by the requirements set forth in their own “**Design and Engineering Manual (DEM)**”, which is more rigorous than ADAAG and PROWAG, no changes to the ADA Transition Plan will be necessary.

The goal of the District is to make all pedestrian access routes in the public right-of-way accessible to people with disabilities. Sidewalks, street crossings, and other elements in the public right-of-way can pose challenges to accessibility.




VIII. Public Outreach and Advisory Group

Two public meetings were conducted in an effort to allow District residents to participate in the development of the ADA Transition Plan. In addition, DDOT collaborated with multiple organizations to plan three events to inform the public of the ADA Transition Plan and give them an opportunity to participate.



Americans with Disabilities Act (ADA) Transition Plan





Public Outreach Meeting
Mt. Pleasant Library
September 30, 2014

Welcome



Jesse Oak
Consultant Team Project Manager
Parsons Brinckerhoff

Team Members







What is Public Rights of Way?



- The Public Rights of Way (PROW) is the network of streets and sidewalks creating public pedestrian access within a public entity's jurisdictional limits.
 - Sidewalks
 - Crosswalks
 - Intersections
 - Alleys
 - On-Street Parking
 - Bus shelters & stops
 - Trails
 - Curb ramps
 - Kiosks
 - Street lights
 - Traffic signals
 - Pedestrian signals
 - Tree boxes
 - Bicycle lanes
 - Building entrances
 - Loading zones
 - Work zones

Public Involvement



Charise Geiling
Consultant Team Member
Sharp & Co



- Overview of public involvement activities
- Opportunities for public comment
- Introduction to interactive activities

The ADA Transition Team conducted a brief presentation, including a participatory activity in which attendees were asked to prioritize the areas they felt needed the most attention in regards to accessibility.

The events were held at Mt. Pleasant Library on September 30, 2014 and Matthews Memorial Baptist Church October 2, 2014.

- In addition, the team attended these events to share information packets:
 - Gallaudet Homecoming
 - Mayor's Disability Awareness Expo
 - Columbia Lighthouse for the Blind 5K

DDOT ADA Transition Plan Advisory Group Initiative

An advisory group for the DDOT ADA Transition Plan was established to provide a committee of interested citizens and experts to review the direction of the plan, its findings, recommendations, and conclusions. The group is a barometer of the community by providing important feedback as to the direction of the plan and can offer suggestions for improvement. The group is also a conduit to the community to raise awareness of the plan and solicit input.

Advisory Group Members

The ADA Transition Plan Advisory Group is made up of 11 individuals who expressed interest in joining the committee. Advisory Group members include persons with disabilities, organizations that represent persons with disabilities, and other interested stakeholders. Below is a list of the individuals on the Advisory Group.

Mr. H. Clifton Grandy

Mr. Clarence "Buddy" Moore

Mr. William Haynes

Mr. Bernard Crawford

Mr. Jerry Wall

Mr. William Staderman, Ph.D.

Ms. Donna Smith

Ms. Angela C. Belfort

Mr. Siavosh Hedayati, M.S., R.T.C.

Mr. Oliver Washington

Mr. Michael Arrington

Meetings

The Advisory Group has held two meetings to date, at DDOT Headquarters, 55 M Street, SE, Washington, DC 20003 from 10 AM to 12 noon. The purpose of the first meeting, conducted on December 18, 2014, was for introductions and to provide an overview and discussion of the DDOT ADA Transition Plan team's progress and work to

date. A follow up meeting was held on January 22, 2015 to discuss the layout of the final report, and for the group to provide any suggestions and concerns regarding the plan, address any concerns that might be raised during plan implementation. The group is also encouraged to provide input to the DDOT ADA Transition Plan team.

Duties of the ADA Transition Team Advisory Group

The Advisory Group provides an important role for DDOT, which is to review and discuss the information presented and provide recommendations and suggestions. Similar to past meetings with the Advisory Group, future discussions, recommendations and suggestions from the Advisory Group will be open and topics will not be restricted as long as they pertain to the ADA Transition Plan and its implementation. The group's recommendations will be evaluated and incorporated to help improve the final plan. As a representative of the citizens of the District of Columbia and the groups most impacted by accessibility barriers, the group's input will continue to be critical. Methods for communicating information and input from the Advisory Group will be established to allow members to provide their input to DDOT for further plan updates.

Accommodations

Advisory Group members needing special accommodations to participate in the meetings held to date were able to contact DDOT to make such arrangements. For future meetings, members needing accommodations (e.g., meeting handouts in Braille) should contact Cesar Barreto, the ADA Coordinator, at (202)671-2829.

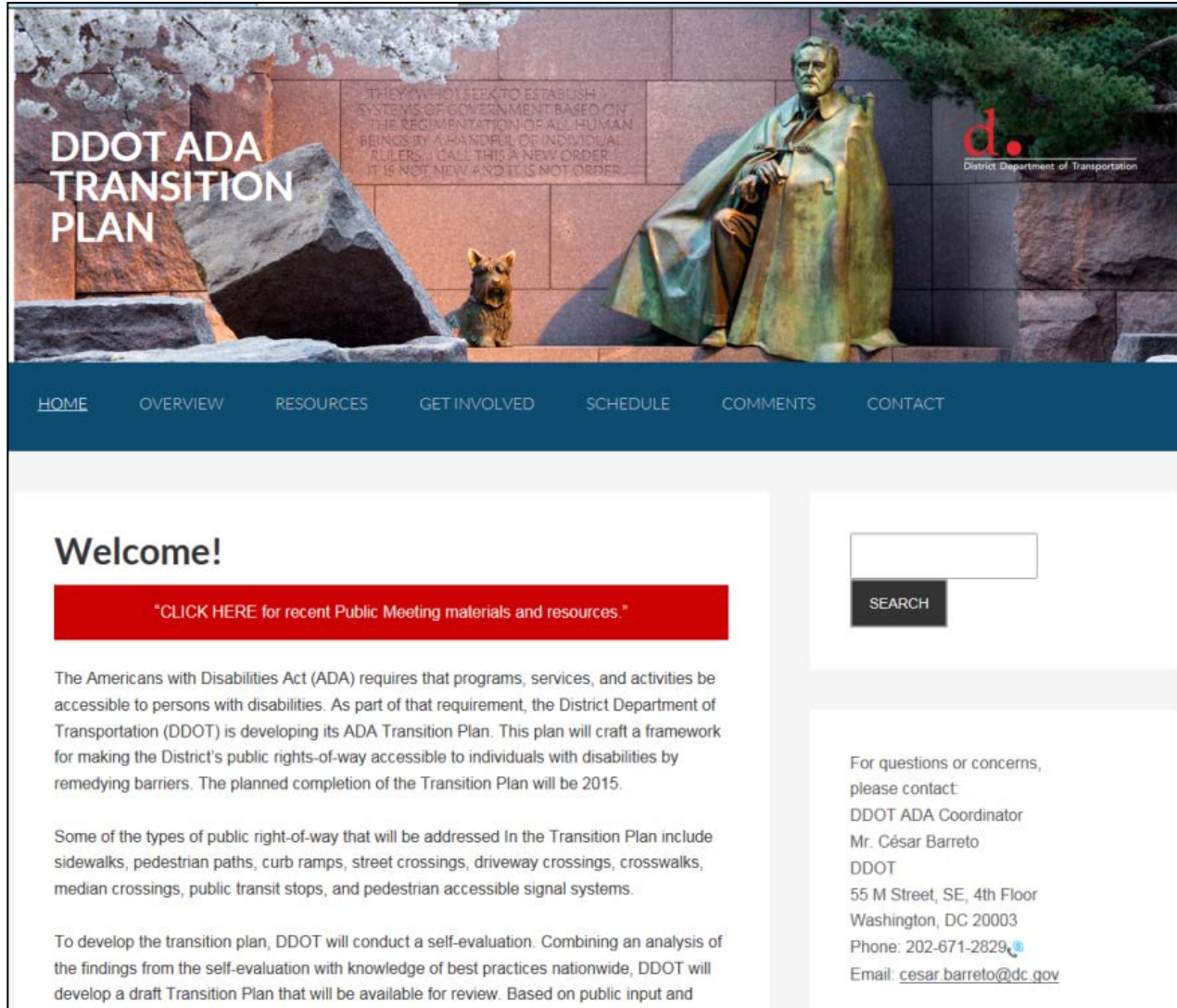
The following chart indicates some examples of the comments that were provided during the public outreach effort for the ADA Transition Plan.

DDOT ADA Transition Plan Public Meetings – Public Comments					
What barriers or difficulties have you encountered that do not allow you access as a pedestrian?	What do you think is the most important barrier to be removed?	What other barriers would you like removed?	List any other areas that you feel are important for accessibility:	List any areas or improvements that have assisted you with access that you find to be helpful:	Other comments or concerns?

DDOT ADA Transition Plan Public Meetings – Public Comments					
What barriers or difficulties have you encountered that do not allow you access as a pedestrian?	What do you think is the most important barrier to be removed?	What other barriers would you like removed?	List any other areas that you feel are important for accessibility:	List any areas or improvements that have assisted you with access that you find to be helpful:	Other comments or concerns?
5th Street NE, Florida Ave., NE to K St. NE. The sidewalks are no good – curb assembly.	When construction is being done, I already have a headache.	Poles are blocking sidewalks also.	Wheelchairs – also bus stops and seats available.	N/A	Remember - this could be you, your parents, your grandparents or your children.
Uneven sidewalks & curbs, lengthy crosswalks, snow banks in winter.	Uneven sidewalks & curbs, lengthy crosswalks, snow banks in winter.	Uneven sidewalks & curbs, lengthy crosswalks, snow banks in winter.	Bicycles on sidewalks.	Proactive ANCs & Commissions.	More public outreach & forums.
Two unpaved alleys on both sides of 1200 Talbert St. SE 20020.	Fallen stone wall on Mt. View near Talbert Street entrance.	N/A	At least one sidewalk on all streets. Pave alleys, especially when resident calls it in.	N/A	N/A
Crumbled sidewalks, steep curb ramps, signs covered by tree branches. No signs indicating elders and disabled persons crossing. Curb not cut for wheelchairs. My daughter is disabled. Excessive speeding drivers.	Speeding drivers. More signage. Lights like at Metro in front of Recreation Center.	Stop signs at intersections on top of hills- 18th Pl. & Erie. Stop sign at bottom of hill at Morris Rd. by OLPH Church (Elvans Rd.)	Double parking, blocking sidewalks with cars not moving- 24104 block of 18th St. cars parked over 12 months.	Crossing Street before corners.	Thank you!

The ADA Transition Plan team developed a website to provide interested community members with information regarding upcoming meetings, a portal for collecting comments, and a tool for connecting to resources. This website will be updated to include the ADA Transition Plan as submitted to the Federal Highway Administration and comments will be solicited from the public.

The website address is <http://adaplanddotdc.com>.



DDOT ADA TRANSITION PLAN

THEY WHO SEEK TO ESTABLISH SYSTEMS OF GOVERNMENT BASED ON THE REGIMENTATION OF ALL HUMAN BEINGS BY A HANDFUL OF INDIVIDUAL RULERS... CALL THIS A NEW ORDER. IT IS NOT NEW AND IT IS NOT ORDER.

d. District Department of Transportation

[HOME](#) [OVERVIEW](#) [RESOURCES](#) [GET INVOLVED](#) [SCHEDULE](#) [COMMENTS](#) [CONTACT](#)

Welcome!

[CLICK HERE for recent Public Meeting materials and resources.](#)

The Americans with Disabilities Act (ADA) requires that programs, services, and activities be accessible to persons with disabilities. As part of that requirement, the District Department of Transportation (DDOT) is developing its ADA Transition Plan. This plan will craft a framework for making the District's public rights-of-way accessible to individuals with disabilities by remedying barriers. The planned completion of the Transition Plan will be 2015.

Some of the types of public right-of-way that will be addressed in the Transition Plan include sidewalks, pedestrian paths, curb ramps, street crossings, driveway crossings, crosswalks, median crossings, public transit stops, and pedestrian accessible signal systems.

To develop the transition plan, DDOT will conduct a self-evaluation. Combining an analysis of the findings from the self-evaluation with knowledge of best practices nationwide, DDOT will develop a draft Transition Plan that will be available for review. Based on public input and

For questions or concerns, please contact:
 DDOT ADA Coordinator
 Mr. César Barreto
 DDOT
 55 M Street, SE, 4th Floor
 Washington, DC 20003
 Phone: 202-671-2829
 Email: cesar.barreto@dc.gov

IX. Self-Evaluation Process – DDOT Asset Inventory

The DDOT Asset Inventory System collects and stores pedestrian right-of-ways in a digital form in an enterprise database. This spatial data is then served up through a customized web application capable of viewing the status and priority of assets along with a variety of reporting tools. It is planned to move forward collecting/maintaining five principle asset types (sidewalks, curb ramps, crosswalks, bus stops, and traffic signals). Asset collection/assessment is performed in one of two ways: (1) Collection and attribution via field equipment and (2) Desktop heads up digitization and attribution through the web application.

The system establishes compliance versus non-compliance based on attributes collected/stored per asset when compared against criteria dictated by the PROWAG ADAAG or the Design and Engineering Manual (DEM). The system also provides the ability to estimate the cost to bring an asset into compliance. This estimate, along with the non-compliant count, allows the system to calculate a rough cost of repairs necessary to bring assets into compliance. The Asset Inventory system calculates a priority ranking for non-compliant assets based on its use and condition. The more an asset is used, the higher the priority. The poorest condition, unsafe, are also higher priorities.

Non-compliant assets with the highest priority rank can be aligned with current and future capital improvement projects in the public right-of-way. In order to align the non-compliant ADA assets with capital program projects, there needs to be a sharing of data between the Asset Inventory system and the capital projects system. The Asset Inventory Evaluation System uses a DDOT street referencing system that is also utilized by their ProTrack system (DDOT project tracking). This can allow for the exchange of project data from ProTrack to the ADA system in future system upgrades. Additionally, future ADA system upgrades should provide a mechanism for the exchange of non-compliant asset information with ProTrack to establish scheduling of repairs.

Additional recommendations to the self-evaluation process include:

1. The ADA Coordinator will conduct a series of Asset Management workshops to provide DDOT staff with appropriate knowledge of how to collect ADA compliance information.
2. An inspector will not have the ability to close an intake page without completing all required information. Consistency of inspection results due to the properly

completed forms will provide a more thorough and reliable database, and will allow for photographs of all assets in the database to be viewed.

3. The capability and methodology will be developed to allow the field inspector to edit their own work in order to make corrections in the office or in the field.
4. The Asset Inventory software tool has a feature that allows the user to edit assets following their construction and are considered accessible. This feature will color code the point of the asset to show compliance and the history remains with the asset. This will allow DDOT to see progress in achieving accessibility in the ROW.
5. Reporting differences among inspections teams will be noted and clarified. A quality control (QC) audit will be used is to review the consistency and reliability of all data collected among the different inspectors. The data collected should be consistent, reliable, and accurate between surveyors.
6. The ADA Coordinator will manage additional desk and field QC audits following the completion of the reporting and management features of the software.

X. Scheduling of Asset Compliance

One hundred percent ADA compliance in the District is not expected within the next year or even next several years. Rather, the expectation is that this process is a transition that will likely take place over the next decade as ADAAG and PROWAG become standards for all future transportation projects in the District.

Consistent and comprehensive data collection and management will be used to collect field data; provide centralized access to and management of data, prioritize, track, monitor, document progress, update plans, and prepare reports. Data collection and management was defined as a key component for a successful plan. The importance of an electronic method for data collection and reporting was noted to be of paramount importance and the use of web based software to design and document the implementation of the transition plan. The importance of the capability of the web based program is to produce a wide variety of reports and the items required for an effective transition plan.

When developing the schedule for projects to complete to bring the District's public right-of-way into ADA compliance, DDOT should first determine if there are any existing projects planned that may absorb additional work identified as non-compliant and include it with the budgeted project.

If there are no plans to modify the area which has been determined non-compliant, DDOT must identify funding sources to cover these expenses.

If the work planned is the result of a grievance or a complaint, it is important to bring the area into compliance in a timely manner but also provide clear and concise information to the grievant. Especially if the construction is to be absorbed into another project and may result in a delay, it is important to communicate specific timelines from start to completion.

Table A: Federal Projects Scheduled for ADA Compliance Upgrades FY 2016

WARD 1					
STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
Georgia Avenue NW	W St	V St	2139	Sidewalk Repair	\$149,808.23
New Hampshire Avenue NW	V St	W St	2101	Sidewalk Repair	\$86,748.99

New Hampshire Avenue NW	V St	W St	2100	Sidewalk Repair	\$86,748.99
New Hampshire Avenue NW	Rock Creek Church Rd			Intersection Improvements	\$8,296.28
Columbia Rd NW	Belmont St			Intersection Improvements	\$11,631.60
Columbia Rd NW	18th St	Champlian St	1767	Sidewalk Repair	\$212,710.00
TOTAL:					\$555,944.09

WARD 2

STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
14th St NW	Independence Ave NW				\$78,450.00
14th St NW	N St	Rhode Island Ave	1314	Sidewalk Repair	\$97,405.58
K St NW	25th St	26th St		Sidewalk Repair	\$101,576.87
23rd St NW	N St	P St			\$122,031.84
21st St NW	E St				\$23,903.54
13th St NW	I St NW				\$30,125.00
19th St NW	N St				\$33,331.00
18th St NW	H St	I St			\$213,075.00
18th St NW	Massachusetts Ave				\$39,464.09
16th St NW	M St				\$16,411.40
Virginia Ave NW	20th St	21st St	2100-2103	Sidewalk Repair	\$202,602.67
4th St NW	F St	E St	555	Sidewalk Repair	\$51,030.00
4th St NW	F St	E St	501	Sidewalk Repair	\$81,020.00
G St NW	5th St	4th St	441	Sidewalk Repair	\$93,775.00
Pennsylvania Ave NW	14th St NW			Curb & Gutter Repair	\$131,005.00
TOTAL:					\$575,844.07

WARD 3					
STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
Cleveland Ave NW	34th St	33rd Place	3300	Sidewalk Repair	\$33,400.00
Cleveland Ave NW	29th St NW	Woodlawn Dr NW	2900-3000	Sidewalk Repair	\$44,556.48
Connecticut Ave NW	Devonshire Place	Cathedral Ave	3001	Sidewalk Repair	\$134,071.86
Connecticut Ave NW	Appleton St	Albemarle St	4500	Sidewalk Repair	\$8,965.54
Massachusetts Ave	Observatory Lane	30th St	3114	Curb & Gutter Repair	\$56,800.35
Massachusetts Ave	Observatory Lane	30th St	3006	Sidewalk Repair	
42nd St NW	Van Ness St	Nebraska Ave	4120	Sidewalk Repair	\$36,040.71
21st St NW	Virginia Ave	E St NW		Sidewalk Repair	\$202,602.67
TOTAL:					\$438,481.13

WARD 4					
STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
Grant Circle NW				Curb & Gutter Repair	\$91,471.07
				Sidewalk Repair	
5th St NW	Roxboro Place	Rittenhouse St	6201	Sidewalk Repair	\$22,736.57
Cedar St NW	Blair Road	Maple St	327	Sidewalk Repair	\$80,830.58
TOTAL:					\$195,038.22

WARD 5					
STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
30th Street NE	Franklin Street	Evarts Street	2700-2799	Sidewalk Repair	\$46,264.21
Central Ave NE	30th Street	Bladensburg Road	2718	Sidewalk Repair	\$48,318.20
South Dakota Ave NE	Rhode Island Ave	26th Street	3116	Sidewalk Repair	\$48,890.23
South Dakota Ave NE	26th St NE, Myrtle Ave NE	Irving St NE		Sidewalk Repair	\$37,158.02

Benning Rd NE	18th Street	19th Street	1830	Sidewalk Repair	\$88,187.76
Gallaudet St NE	Corcoran St NE			Sidewalk Repair	\$17,545.90
New York Ave NE	Fenwick ST NE			Sidewalk Repair	\$11,122.80
2nd St NE	Season Place NE			Sidewalk Repair	\$18,102.63
Fenwick St NE	New York Ave NE	West Virginia Ave NE		Curb & Gutter Repair	\$175,037.48
				Sidewalk Repair	
TOTAL:					\$309,996.57

WARD 6

STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
Canal St SW	First St				\$16,411.40
2nd St SE	Q St				\$26,109.17
2nd St NE	D St	C St	313	Sidewalk Repair	\$88,340.00
6th St NW	Q St	P St	1519	Sidewalk Repair	\$35,983.31
Constitution Ave NE	Massachusetts Ave	8th St	700	Sidewalk Repair	\$95,700.00
TOTAL:					\$262,543.88

WARD 7

STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
Benning Rd SE	E St SE				\$40,440.02
Pennsylvania Ave SE	Anacostia Pkwy				\$38,199.37
Pennsylvania Ave SE	9th St SE			Sidewalk Repair	\$36,000.00
L'Enfant Square SE	Minnesota Ave SE	Pennsylvania Ave SE	2828	Sidewalk Repair	\$159,749.26
Potomac Ave, S.W.	South Capitol St	First St SW	UNIT BLK	Sidewalk Repair	\$272,166.67
Massachusetts Ave SE	Bayley Place	30th Street	3006	Curb & Gutter Repair	\$21,581.48
46th St SE	Benning Rd SE	H St SE		Sidewalk Repair	\$75,083.28
TOTAL:					\$602,780.06

WARD 8					
STREET NAME	FROM	TO	BLOCK	WORK TYPE	ESTIMATE
2nd St SE	Oakwood St				\$30,000.00
2nd St SE	Orange St SE				\$5,622.50
25th St SE	Alabama Ave SE	Wagner St SE	2500	Bus Stop Relocation & Intersection Improvements	\$42,579.29
16th St SE	R St SE			Sidewalk repair	\$19,454.63
TOTAL:					\$97,656.42

Table B: Local Projects Scheduled for ADA Compliance Upgrades FY 2016

WARD 1				
STREET NAME	FROM	TO	BLOCK	WORK TYPE
Harvard Street NW	Georgia Ave NW	5th Street	527	Sidewalk Repair
Hobart Place NW	5th St	Georgia Ave	642	Curb & Gutter Repair
Park Place NW	Otis Place	Newton Place	3626	Sidewalk Repair
Park Road NW	Manor Place	Park Road	439	Sidewalk Repair
Park Road NW			1029	Sidewalk Repair
Warder Street NW	Newton Place	Manor Place	3560	Sidewalk Repair
Warder Street NW	Quebec Street	Rock Church Road	3644	Sidewalk Repair
Columbia Rd NW	Belmont Rd NW	Kalorama Rd NW		Sidewalk Repair
Georgia Ave NW	Irving Street NW			Sidewalk Repair
Harvard Street NW	5th St NW, Michigan Ave NW	Georgia NW		Sidewalk Repair
Newton Place NW	Warder Street	Park Place	453	Sidewalk Repair

WARD 2				
STREET NAME	FROM	TO	BLOCK	WORK TYPE
19th Street NW	N Street	Jefferson Place	1229	Sidewalk Repair
M Street NW	Potomac Street	Wisconsin Ave	3241	Sidewalk Repair
11th Street NW	E Street NW	F Street NW		Sidewalk Repair
22nd Street NW	H ST NW	I ST NW		Sidewalk Repair
9th Street NW	G ST NW	G PL NW		Sidewalk Repair

H Street NW	10th Street	9th Street	940	Sidewalk Repair
H Street NW	7TH ST NW	8TH ST NW		Sidewalk Repair
H Street NW	9TH ST NW	10TH ST NW		Sidewalk Repair
I Street NW	6TH ST NW	7TH ST NW		Sidewalk Repair

WARD 3

STREET NAME	FROM	TO	BLOCK	WORK TYPE
34TH ST NW	Massachusetts Ave., NW	Fulton St., NW		Sidewalk Repair
37TH ST NW	Quebec St., NW	Tilden St., NW		Sidewalk Repair

WARD 4

STREET NAME	FROM	TO	BLOCK	WORK TYPE
KENNEDY ST NW	1ST St., NW	2ND ST NW		Sidewalk Repair
OREGON AVE NW	Horse Stable Rd., NW	Rittenhouse St., NW		Sidewalk Repair
WEST BEACH TER NW	Dead End, NW	West Beach Dr., NW		Sidewalk Repair

WARD 5

STREET NAME	FROM	TO	BLOCK	WORK TYPE
Sargent Rd., NE	Galloway St., NE	Eastern Ave., NE		Sidewalk Repair

WARD 6

STREET NAME	FROM	TO	BLOCK	WORK TYPE
11TH ST SE	Independence Ave., SE	C St., SE		Sidewalk Repair
12TH ST SE	Independence Ave., SE	Walter St., SE		Sidewalk Repair
6TH ST NW	P St., NW	Q St., NW		Sidewalk Repair
South Carolina, SE	6th Street	7th Street	604	Sidewalk Repair

The Federal projects listed in Table A, will be supported with federal funds. During Fiscal Year 2016, the federal dollars funding these projects totals \$3 Million dollars.

Local projects listed in Table B, and multiples locations to be added based on request, will be completed with DDOT funds totaling approximately \$10 Million dollars.

During Fiscal Year 2015, DDOT invested \$7 million dollars in local funds and \$2.3 million dollars in federal funds given in projects to make improvements to the right-of-way infrastructure.

The Current Active Signal Design List for 2015

The following signals have been identified for installation or modification of signals. They will follow the Design and Engineering Manual (DEM) for ADA compliance when the work is completed.

No.	Location	Qd	Ward	Type	Status	Additional Comments	Planned NTP to Construct
1	19th St & H St	NW	2	Installation	Initial submittal reviewed. Waiting for 90% plan submittal.	65% Plan; ADA and communication comments need to be incorporated	
2	5th St & Quincy St & Rock Creek Church Rd	NW	4	Modification	Final design received. Abdi reviews, then to Bill's final approval.	100% Plan; Consultant addressed all comments	
3	S Captiol St & Livingston Rd, SE	SE	8	Modification	Final design received. Needs final review & approval.	All comments (ADA & Comm) sent to Brudis 9.8.14	
4	4th St & Virginia Ave	SE	6	Installation	Final design received. Needs final review & approval.	All comments (ADA & Comm) sent to Brudis 9.8.14	
5	41st and East Capitol Street	NE/SE	7	HAWK	Final design submitted 6.2.15. Yigzaw reviewed, To Bill for final plan approval.	90% Plan; Consultant addressed comments; Harvey to review communication plan	Early Fall 2015

6	Connecticut Ave & Wyoming Ave, NW	NW	1	HAWK	65% plan reviewed. Waiting for next submission.	65% Plan; NTP issued 8.5.14. Awaiting 90% plan submittal	Early Fall 2015
7	Georgia Avenue and Sheridan Street	NE	4	Installation	S-2262 Reviewed 90% plan, comments to consultant next week. Promised to build Spring 2015.	90% Plan; Old 2009 drawings fr E. Robinson.	NTP to Const.
8	Minnesota Avenue and Metro Bus Exit	NE	7	Installation	90% plan submitted 6.1.15. Yigzaw reviewed. Harvey to review communication plan. To Bill for final plan approval.	90% Plan; NTP issued 10.1.14. 90% complete under Minn. Ave project Phase II.	E.O. June 2015
9	5th Street and Harvard Street	NW	1	Modification	S-108-A Reviewed 100% plan; communication plan to revise, then to Bill for approval.	90% Plan; BAI to address communication plan comments	
10	Wisconsin Avenue and Ingomar Street	NW	3	HAWK	S-2407 Ready for Bill's review & Approval. Comm sent to Harvey for review 9.29.14	Comm comments received 10.1.14	UC
11	18th St, R St and Minn. Ave	SE	8	RRFB	S-2405 Ready for Bill's review & Approval. 9.26.14	NTP issued 7.22.2014. Design first round received	
12	New Hampshire Ave and Otis PL	NW	1	RRFB	S-2406 Bill's final approval. 9.26.14	NTP issued 7.22.2014. UC in FY2015	
13	7th St and New Hampshire Ave and Shepherd St	NW	4	Modification	S-321-C Plans look good. Ready for Bill's review & approval. Comm sent to Harvey for review 9.26.14	Comm comments received 10.1.14	E.O. June 2015
14	13th Street and Spring Rd/Kansas Avenue & 13th Street and Quebec PI/Kansas Avenue	NW	1	Modification	S-2360-A, S-2361-A Plans look good. Ready for Bill's review & Approval. Comm sent to Harvey for review 9.26.14	Comm comments received 10.1.14	

15	Southern Avenue and Massachusetts Avenue/Byers	SE	8	Modification	S-1933-C completed/BUILT	Replacement of old infrastructure and span cable	
16	11th St, Vermont Ave and S St	NW	1	Modification	Needs ADA & upgrade of infrastructure	Proposal requested 9.30.14. Proposal received 10.1.14. NTP not issued yet.	
17	13th St and Taylor St	NW	1	Installation	Unsignalized. Warranted? Yes. Baker 12/2003.	Proposal requested 9.30.14. Proposal received 10.1.14. NTP not issued yet.	
18	S. Capitol St & Atlantic St	SE	8	Modification	2nd submission 1.5.15. Under review.	ADA & infrastructure upgrade. NTP issued 10.08.14. Yigzaw 5.1.15	
19	S. Capitol St & Elmira St	SE	8	Modification	Awaiting 2nd submission. Initial review 1.5.15.	ADA & infrastructure upgrade. NTP issued 10.08.14. Yigzaw 5.1.15	
20	New York Avenue and Montana Avenue	NE	5	Modification	WaR review , then Bill's approval.	Separate Master/Sub. Make Phase based. UC in FY2015	
21	4555 Overlook Ave and Shepherd Pkwy	SW		Modification	CityWorks issue; Inhouse eval w/ Bill & Anthony; Infrastructure upgrade needed. Proceed to design.	0% Plan; NTP 5.19.15	
22	Georgia Avenue and Webster Street	NW		Installation	School crossing warrant met by DCI study.	0% Plan; NTP 6.1.15	
23	18th St and Benning Rd	NE		Installation	Because of PHB as well as Streetcar service, a full signal is recommended by SWA study.	NTP 7.20.15	

24	Michigan Ave and Perry PI	NE		HAWK	Peak Hr and PHB warrant met by SWA study	NTP 7.20.15	
	3rd and I St, SW	SW		Modification	CityWorks issue, Per Anthony & Wasim; Need Infrastructure upgrade for ADA compliance. Perform Signal Modofication design for whole intersection, use west-leg ped signal now, shelve reminder for future when funding available.	NTP 7.27.15	
25	SB MLK Approach - Advance signal	NW	8	Advance warning sign	S-337-G. Final plans received. Yigzaw reviewed. To Bill for final plan approval.	NTP issued 8.16.2014. First round Design received, Comments 10.16.14. Final Plan 11.10.14	
26	Eastern Ave and Laurel St	NW	4	Installation	Unsignalized. Warranted? Yes. Baker 10/2004. No submission yet; To Abdi when submission comes.	NTP 12.31.14, Finish design, hold on construction, low priority	
27	Irving St, Hobart PI and Michigan Ave	NW	1	Modification	Needs upgrade of infrastructure. 65% submittal on 5.19.15, under review.	65% plan; NTP 12.31.14	
28	Maryland Ave and 10th St	NE		Installation	100% submittal on 6.4.15. To Bill for final plan approval (Street light issue).	100% Plan; NTP 3.11.15. Abdi 3.25.15	E.O. July 2015
29	3000 Block of Bladensburg Rd	NE		HAWK	ADA issues on 4.28.15, 65% submittal 6.2.15, Abdi to review soon.	65% plan; NTP 4.13.15. Abdi5.1.15	Early Fall 2015
30	Bladensburg Rd and T St	NE		RRFB	Ongoing; ADA issue with JMT;	60% Plan; NTP issued 3.25.15. Yigzaw on	Early Fall 2015

						5/1/15	
31	11th St, I-695, M St, SE	SE		Modification	Design started/ongoing.	0% Plan; NTP 5.26.15	
	Southern Avenue and UMC Eme Entr	SE		HAWK	Only HAWK signal warrant met based on SWA study report. Design started/ongoing.	0% Plan; NTP 7.7.15	
32	Canal Rd and Reservoir	NW		Installation	Awaiting construction NTP	100% Plan; PEPCO letter to be issued/NOI	E.O. June 2015
33	27th, O St and Pennsylvania Ave	SE		Modification	100% Plan; design completed by Rohit.	100% Plan; Yigzaw final review	UC

Current Active Projects of Policy Planning and Sustainability Administration

The following spreadsheet, maintained by the Policy Planning and Sustainability Administration, shows the current and active projects, as of 9/16/2015. This list is updated weekly. These projects will be inspected for ADA compliance upon completion.

Case				Status		
	Case No.	Project Name Applicant Address	Land Use Program (x amt of residential, x amt of office, x amt of retail etc)	Phase	Status	Pending DDOT Reporting Due Date
ZC	06-11L 14-00576	GWU Hillel 2300 H St. NW	17,000 square foot facility 9,1250 SF of leased office space to GWU	Hearings	Hearing	6/13/2014
BZA	18878	Alba 12th Street, LLC 1017 12th Street NW	10-story; 15,144 sf office 0 vehicle parking	Hearing	Waiting for Zoning Order	12/30/2014
BZA	18891	14th & H, LLC 1401 Florida Ave NE 1402-1410 H Street NE	6-story mixed use; 34 DU 0 vehicle parking	Hearing	Waiting for Zoning Order	1/29/2015
BZA	18916	Carver Terrace 4700 block of East Capitol Street SE	178 Senior DU 21 Townhomes 160 parking spaces	Permitting	Awaiting CTR	2/3/2015
ZC BLRA	14-12 15-00606	Angelika Theater Site Edens 1309 5th Street	Consolidated: 38,000-42,000 SF theater 104,000-112,000 office 0 parking spaces Stage 1: 260,000-290,000 SF office or retail 300-475 parking spaces	Hearings	Handover Memo	2/17/2015
BLRA	15-00610	900 11th St SE	49 DU/27 parking spaces	Analysis	Permitting	3/20/2015
ZC	14-22	Walter Reed Zoning	Proposed zoning for 66-acre LRA land	Hearings	Waiting for Zoning Order	3/23/2015
ZC	14-07	Shapiro Site Edens 1250 4th Street NE	420-520 dwelling units 39,600 SF retail 400-550 vehicle parking spaces 142-175 bicycle parking spaces	Permitting	Handover Memo	4/16/2015
BLRA	15-00612	KIPP DC 5300 Blaine St NE	PCS - 1000 students/106 staff/72 parking spaces	Analysis	Permitting	4/20/2015

BZA	18905	Jemal's 9th Street Gang of 3 LLC 1218 9th Street NW	Historic rowhouse conversion to commercial use 20,095 sf 0 vehicle parking	Hearing	Waiting for Zoning Order	4/21/2015
BZA	18915	Aminta, LLC 1330-1336 Pennsylvania Ave SE	4-story mixed use; residential retail 10 DU 0 vehicular parking, 4 bicycle parking	Hearing	Waiting for Zoning Order	4/21/2015
BLRA LTR	14-00603	2800 8th St NE	Self-Storage	Pre- Process	Permitting	4/23/2015
ZC SO	14-18 14-20357	Brookland Manor Rhode Island Avenue NE, Montana Avenue NE, Brentwood Road NE, Saratoga Avenue NE, Downing Street NE, and 14th Street NE	535 existing DU; 2,235 proposed 50,000 sf of existing retail; 226,000 sf proposed retail	Hearing	Waiting for Zoning Order	4/27/2015
ZC BLRA	14-14 14-00602	Jemal's CDC 501 H Street NE	6-story mixed use; 29,725 sf residential 13,482 sf retail 26 DU 8 vehicle parking spaces	Hearing	Waiting for Zoning Order	5/4/2015
ZC	15-01	320 Florida Ave NE	325 dwelling units 8,650 sf retail 153 vehicle parking spaces	Hearing	Waiting for Zoning Order	5/25/2015
ZC	05-38B	View at Waterfront Mill Creek Residential 1162-1198 6th Street , SW	Modification of existing PUD 260 new DUS (down from 324) 5,200 SF retail (down from 8,300) 290 vehicle parking spaces (down from 569)	Hearings	Waiting for Zoning Order	6/1/2015
ZC	15-11	One M Street SE	115,858 SF Office 165 DU 4,851 SF Retail 228 parking spaces (101 residential + 127 office/retail)	Hearings	Waiting for Zoning Order	6/15/2015
ZC SO BLRA	14-21 & 11-15D 15-23238 15-00617	Barry Place 900 Block of Barry Place NW	275-320 DU 9,000 SF Retail 140 Parking Spaces	Hearing	Handover Memo	6/17/2015
ZC	06-46B	Square 701 Jair Lynch 1250 Half Street SE	4 scenarios: 445 residential DU & 60,100 SF retail, 430 residential DU & 68,000 SF retail, 365 residential DU, 80 key hotel, & 60,100 SF retail, or 350 residential DU, 80 key hotel, & 68,000 SF retail.	Permitting	Waiting for Zoning Order	6/22/2015

ZC	14-19	300 M St. NE	400 DU 12,000 SF retail 126 parking spaces	Hearings	Waiting for Zoning Order	6/29/2015
BLRA	15-00619	DGS Kenilworth Recreation Center 1300 44th St. NE	Rec center 17 parking spaces	Analysis	DDOT Report	7/1/2015
BLRA	15-00620	Tilden Hall 3945 CT Ave NW	101 DU - 18 parking spaces 25 DU building addition	Analysis	DDOT Report	7/1/2015
BZA	18967	Buddhist Congregational Church of America 5401 16th St NW	11,000 SF building addition	Analysis	Hearing	7/14/2015
BZA	19030	1826 12th St NW	Convert SFH to Flat	Analysis	Hearing	7/14/2015
BZA	19046	1511 28th St SE	SFH - 2nd Story Addition	No Comment	Hearing	7/14/2015
BZA	19052	2905 28th St NW	SFH - Deck with staircase	No Comment	Hearing	7/14/2015
BLRA	15-00618	Fort Davis Recreation Center 1400 41st Street, SE	Recreation center renovation and addition of a surface parking lot.	Analysis	DDOT Report	7/17/2015
BZA SO	19020	Jemal's Bulldog 1011 K Street NW	downtown 200 room hotel; 4,000 sf restaurant	Analysis	Hearing	7/18/2015
ZC	15-04	Totten Mews PUD	40 townhomes 40 vehicle parking and bicycle parking	Hearing	Hearing	7/20/2015
BZA	19024	1012 Harvard St NW	10 DU 3 parking spaces (5 required)	Hearings	Hearing	7/21/2015
BZA	19054	Barbara Chambers Childrens Center 1470 Irving St NW	Add catering service to existing CDC	Analysis	Hearing	7/21/2015
BZA	19058	3416 Wisconsin Ave. NW Starbucks	Expand an existing prepared food shop from 18 to 28 seats	Pre- process	Hearing	7/21/2015
BZA	19060	1614 Wisconsin Ave NW	New fast food establishment	Analysis	Hearing	7/21/2015
BLRA	15-00624	Columbia Place 901 & 915 L Street NW				7/23/2015
NEPA		FBI Bldg. Exchange GSA 935 Pennsylvania Ave NW	TOS review of exchange of the FBI bldg. for private development	Analysis	Awaiting CTR	8/5/2015
BLRA ZC	15-00625	2715 Pennsylvania Avenue NW	mixed use building in Georgetown; 8 rental DU 5,750 sf restaurant no vehicular parking; bicycle parking	Scoping	DDOT Report	8/10/2015
BLRA SO	15-00626 15-23823	1522 22nd St NW	Convert existing office to residential use 197 DU/10,600 SF retail/116 parking spaces	Analysis	DDOT Report	8/10/2015
BZA BLRA	18610 15-00627	1063 Wisconsin Avenue, N.W.	Variance from FAR to subdivide existing bldgs for nonresidential use	Permitting	Permitting	8/10/2015
BLRA	15-00631	1100 Maine Ave SW	Fish Wharf	Permitting	Permitting	

BLRA	15-00629	Deanwood Hills 5201 Hayes St NE				
BLRA	15-00603	2100 K St NW				
BLRA	15-00628	646-654 H St. NE	26 DU 5,800 SF Retail	Pre- Process	Early DDOT Feedback	8/17/2015
ZC	15-07	MRP 315 H Street NE	8-story mixed use; 6,000 sf retail 125 DU 29 vehicle parking; bicycle parking TBD	Analysis	Reviewing CTR/DDO T Report	8/31/2015
BZA BLRA	19004 15-00622	16th and Oates St NE or 920 Bladensburg Road NE	Medical Dialysis Building - Parking relief (20 proposed/25 required)	Analysis	Hearing	9/5/2015
BZA	18985	2701 11th St NW	3 DU Apt.	Analysis	Hearing	9/8/2015
BZA	19029	1338 Fairmont St NW	4 DU Apt.	Analysis	Hearing	9/8/2015
BZA	19034	1931 11th St NW Industrial Bank	Accessory parking lot - 9 spaces	Analysis	Hearing	9/8/2015
BZA	19061	1106 Montello LLC 1140 Florida Ave NE	Conversion to 7 dwelling apartment building Variance for 0 parking spaces (4 required)	Pre- Process	Early DDOT Feedback	9/8/2015
BZA	19062	1106 Montello LLC 1112 Montello Ave NE	Additional dwelling unit (9 DU total for this lot) Variance from size of parking space (2 compact spaces instead of 1 full space)	Pre- Process	Early DDOT Feedback	9/8/2015
BZA	19063	2306-2308 16th St. SE	3 new single family homes	Analysis	DDOT Report	9/8/2015
BZA	19064	1007 F St. NE	Deck	No Comment	DDOT Report	9/8/2015
BZA	19065	2131 Observatory Pl. NW	SFH two-story addition and second- story deck	No Comment	DDOT Report	9/8/2015
ZC	08-33C	Conference Center Associates Iriving/Michigan/N Capitol	Hotel	Pre- Process	Early DDOT Feedback	9/14/2015
BZA	19057	1851 9th St. NW	29 dwelling units No parking (according to attorney, no zoning relief since 31 parking credits but only 9 spaces required) previous use - school	Hearings	Hearing	9/15/2015
BZA	18979	400 K St NE	Convert carriage house to artist studio	Analysis	Hearing	9/15/2015
BZA	18983	5236 Sherrier Pl NW	SFH - Additional Principal Structure Parking and use variances	Analysis	Hearing	9/15/2015
BZA	19044	1508 Caroline St NW	SFH - Rear Addition and Basement Entrance	No Comment	Hearing	9/15/2015
BZA	19066	1100 Euclid St. NW	Existing flat to 3 DU apartment	Pre- Process	Early DDOT Feedback	9/15/2015
BZA	19068	727 Hobart Pl. NW	Convert Church to Four flats with no parking	Pre- Process	Early DDOT	9/15/2015

					Feedback	
BZA	19091	Embassy of Kyrgyz Republic	Conversion of a SFH to a chancery & deck extension	Pre-Process	Early DDOT Feedback	9/15/2015
BZA	19040	6002 Clay St NE	New SFH on vacant lot	Analysis	Early DDOT Feedback	9/15/2015
BZA	19051	1609 Levis St NE	New SFH	Analysis	Hearing	9/15/2015
BZA	19041	4926 Foote St NE	New SFH on vacant lot	Analysis	Early DDOT Feedback	9/15/2015
BZA	19042	4275 6th St SE	New SFH on vacant lot	Analysis	Early DDOT Feedback	9/15/2015
BZA	19018	2026 N. Capitol St NW	Flat - 3rd story addition/deck expansion	No Comment	DDOT Report	9/22/2015
BZA	19053	Ridge Lofts, LLC 446-452 Ridge St. NW	4 flats (8 DU) No parking (4 required) - no alley access, historic, no curb cuts on street	Hearings	Hearing	9/22/2015
BZA	19055	Valor Minnesota, LLC 4409 Minnesota Ave. NE	30 townhomes 1 SFH	Hearing	Hearing	9/22/2015
BZA	19021	Amazing Love Health Services 702 15th St. NE	medical office use 8 public parking spaces to meet zoning standards	Hearings	Hearing	9/22/2015
BZA	19069	4005 Anacostia Ave. NE	Conversion of cellar to accessory DU	Analysis	Early DDOT Feedback	9/22/2015
BZA	19070	1207 Kenyon St. NW	Four room boarding house	Analysis	Early DDOT Feedback	9/22/2015
BZA	19074	1329 Holbrook St. NE	Two-story garage addition	Analysis	Early DDOT Feedback	9/22/2015
BZA	19075	2118 2nd St. NW	Addition	No Comment	Early DDOT Feedback	9/22/2015
BZA	18138C	201 Allison St. NW	Continue operation of a private school in R-5	Pre-Process	Early DDOT Feedback	9/22/2015
BZA	18275A	1200 Potomac Ave. SE	Allow office use in R-5 zone	No Comment	Early DDOT Feedback	9/22/2015
BZA	19056	3324 Dent Pl. NW	2 single family dwellings	Analysis	Early DDOT Feedback	9/29/2015
BZA	19076	1544 9th St. NW	Convert SFH to restaurant	Pre-Process	Early DDOT Feedback	9/29/2015
BZA	19078	4108 Garrison St. NW	Rear addition	No comment	No Contact Yet	9/29/2015

BZA	19079	2002 11th Street LLC and Industrial Bank	10-story mixed use; 33 DU existing bank to remain	Scoping	Applicant Scoping Meetings	9/29/2015
BZA	19082	37-39 Missouri Ave. NW	16 DU 16 parking spaces	Pre-Process	Early DDOT Feedback	10/13/2015
BZA	19084	1028 D St. NE	SFH with no parking			10/13/2015
BZA	19083	2205 16th St. SE	4 DU Apt. - Parking Variance (1 space)	Analysis	Early DDOT Feedback	10/13/2015
BZA	19085	1336 Emerald St. NE	SFH - 3rd Floor Addition	No Comment	DDOT Report	10/13/2015
BZA	19087	602 A St. NE	SFH - 2nd Floor Addition	No Comment	DDOT Report	10/13/2015
BZA	19086	215 A St. NE	Addition			10/13/2015
ZC	13-09	Stanton Square Hornig Brothers Stanton Rd/Elvans Rd/Pomeroy Rd	128 dwelling units 42 townhomes 130,000 SF community space	Analysis	Awaiting Scoping Form	
EMS SO	14-14605 (Resubmitted)	DC United Stadium	20,000-25,000 seat stadium Public alley and street closing	Permitting	Permitting	
SO	14-21786	Department of the Navy	Transfer of Jurisdiction and utility easement for Magazine Road and Overlook Road, SE	Analysis	DDOT Report	
SO	14-7194	Eisenhower Memorial	New presidential memorial	Analysis	DDOT Report	
BLRA	15-00609	Bancroft ES Modernization 1755 Newton St NW	Facilities upgrade	Analysis	DDOT Report	
ZC	15-02	Holy Redeemer Madison Home 3112 7th St NE	41 townhomes Holy Redeemer College to remain 58 vehicular parking	Analysis	Awaiting CTR	
ZC	15-03	1315 Clifton Street NW	155-170 dwelling units 36 vehicle parking spaces (52-57 spaces required)	Analysis	Awaiting CTR	

ZC	15-05	Riverside Baptist 7th St. and Maine Ave.	10-story mixed use; 11,455 sf church 6,900 sf retail 170 DU 135-170 vehicle parking; TBD bicycle parking	Analysis	Awaiting CTR	
ZC	15-09	Residents of Lanier Heights and ANC -1C	Map amendment to rezone properties from R-5-A to R-4 to limit pop-up developments	Analysis	Early DDOT Feedback	
ZC	15-10	Deanwood Hills PUD 5201 Hayes Street NE	150 DU; affordable housing apartments 75 vehicle parking; bicycle parking	Analysis	Awaiting CTR	
ZC	15-13	Watkins Alley 1309-1323 E St SE	45 row houses 45 parking spaces	Scoping	Internal Scoping Review	
ZC	15-14	DC Water Headquarters	167,180 sf office building	Scoping	Applicant Scoping Meetings	
ZC	15-16	MRP Rhode Island Avenue Investors 680 Rhode Island Ave NE	1,550 proposed DU 245,000 sf proposed retail	Scoping	Applicant Scoping Meetings	
SO	15-23283	Square 70 1255 22nd Street LP	Alley closing to facilitate residential infill addition w/ 113 DU/90K SF	Analysis	DDOT Report	
SO	15-25098	Square 5603	Proposed closure of portions of Fairlawn Avenue, SE	Analysis	Early DDOT Feedback	
SO	15-26384	1319 South Capitol St SE - Square 653	Alley closing - 227 DU/2,569 SF retail	Analysis	Analysis	
ZC	15-XX	Kenilworth Court 4500 Quarles St. NE	430 DU 430 parking spaces	Scoping	Awaiting CTR	
ZC	15-XX	810 O Street NW	60 DU 6,452 SF retail 60 parking spaces	Scoping	Awaiting CTR	
ZC		Takoma Metro Development 7000 Eastern Ave NW EYA	208 DU 148 Parking spaces 106 Metro parking spaces to replace 158 existing spaces	Analysis	Awaiting CTR	
NEPA		Foreign Mission Center Department of State Walter Reed Campus	1.1 Million SF Chanceries	Analysis	Reviewing TIS/DDOT Report	
NEPA		National China Garden	addition of garden & impact of two large events/year on transportation network	Scoping	Awaiting Scoping Form	
BZA PS		Evarts/Reed 2607 Reed St. NE	vaults, sidewalk, RPP	Pre- Process	Early DDOT Feedback	
NEPA		Federal Triangle South NEPA Study	TIS review for relocation of GSA Regional Office and Cotton Annex	Analysis	Reviewing CTR/DDO T Report	

NEPA		National Air and Space Museum	museum (building façade & PS changes)	Pre-Process	Early DDOT Feedback	
BZA		816 Potomac Avenue, SE	Residential DU expansion in 2 phases	Scoping	Awaiting Scoping Form	
DMPED		Stevens School 2425 N Street NW	school for children with disabilities who require bussing	Pre-Process	Early DDOT Feedback	
BZA		5th & I NW Peebles Corporation	155 hotel rooms 60 DU (condos) 86 parking spaces (zoning requires 90~)	Scoping	Awaiting Scoping Form	
ZC		251 H St NW AIPA	Consolidated: X Office 0 parking spaces Stage 1: X Office 34 parking spaces	Scoping	Awaiting Scoping Form	
BZA		2100 South Dakota Ave	Self-Storage	Pre-Process	Early DDOT Feedback	
LTR		4001 South Capitol St	50,000 SF medical office 195 DU 5,500 SF retail 31,000 office 278 parking spaces (122 medical office, 45 general office, 96 residential below grade, 15 surface) 68 long-term bike parking	Scoping	Internal Scoping Review	
NEPA 106		Potomac Hill Diplomatic Center Master Plan & NEPA Study 2300 E Street, NW	Office - 2,500 - 3,000 employees 400 parking spaces	Analysis	Awaiting CTR	
LTR		818 Michigan Ave NE	Parking garage	Pre-Process	Early DDOT Feedback	
ZC		Sorsum Corda Bounded by M Street, L Place, N Cap, and 1st Street NW	1,300 dwelling units 24,000 SF retail 58,000 flex space 980 vehicle parking spaces	Analysis	Awaiting CTR	
ZC		Meridian International Center 1630 Crescent Place NW	140 DU 9,000 SF meeting space 105 resident vehicle parking spaces 35 Center visitor vehicle parking spaces	Analysis	Awaiting CTR	
ZC		301 Florida Ave NE Ditto Development	56 DU 4,500 square feet retail 0 vehicle parking spaces No on-site loading	Analysis	Awaiting CTR	

NEPA		MLK Library Expansion 901 G Street NW	30,628 SF addition for meeting/event space	Analysis	Awaiting CTR	
NEPA		Smithsonian South Campus Independence Ave b/w 7th St & 12th St	No substantial change in building program Alterations to site access	Pre-Process	Early DDOT Feedback	
ZC		National Rehabilitation Hospital 110 Irving Street NW	60,000 SF addition No change in staff or patient capacity	Analysis	Awaiting CTR	
ZC		300 Morse St	Mixed-Use	Pre-Process	Early DDOT Feedback	
BZA		3701 New Hampshire Ave NW	20-30 dwelling units 4,000 SF retail 0 parking	Analysis	Awaiting CTR	
ZC	13-14A	McMillan Sand Filtration Site Phase II Jair Lynch Parcels 2/3	236 dwelling units 18,600 SF retail 222 vehicle parking spaces 87 bicycle parking spaces	Pre-Process	Early DDOT Feedback	
ZC	13-14B	Parcel 4 Modification	Changes to parking and access for grocer	Pre-Process	Early DDOT Feedback	
ZC		965 Florida Ave NW MRP	Mixed-Use Grocery Residential	Pre-Process	Early DDOT Feedback	
ZC		500 Morse St NE	Mixed-Use	Pre-Process	Early DDOT Feedback	
ZC		Gallaudet/JBG Union Market	Mixed-Use	Pre-Process	Early DDOT Feedback	
ZC	15-12	1401 Pennsylvania Ave SE CAS Riegler	Mixed-Use	Pre-Process	Early DDOT Feedback	
NEPA		Armed Forces Retirement Home	2,280,477 SF of residential 1,191,391 SF of office 290,650 of medical office space 264,086 SF of retail space 214,000 SF assisted living facility 126,391 SF hotel and conference center 40,978 SF heating plant	Scoping	Internal Scoping Review	
ZC SO		411 New York Ave NE	Hotel	Pre-Process	Early DDOT Feedback	
BZA		Eckington Mews	30 DU/30 vehicle spaces/15 bicycle spaces potential stub alley closing	Pre-Process	Early DDOT Feedback	
BZA		Washington International School	450 students/ 110 staff	Pre-Process	Early DDOT Feedback	
BZA		1355-1357 U Street	30 DU/Parking Variance	Scoping	Awaiting	

		NW			CTR	
ZC		Canal Park Square 767	166 DU (118 market rate rentals, 48 affordable) 1,121 SF retail 108 parking spaces	Scoping	Awaiting Scoping Form	
ZC		800 K Street NW	Office building rehabilitation	Pre-Process	Early DDOT Feedback	
ZC		The Yards Parcel O	mixed use condo and rental buildings	Pre-Process	Early DDOT Feedback	
ZC		Georgetown Day School	mixed use school retail residential	Pre-Process	Early DDOT Feedback	
ZC		The Yards Parcel P2b	wine-pub 0 vehicular parking	Pre-Process	Early DDOT Feedback	

The City-Wide Safe Routes to Schools Construction Project

The City-Wide Safe Routes to Schools Construction Project is intended to improve the safety of the roadways and intersections along the routes to schools within the District. The work will involve installation of ADA ramps, missing sidewalks, curbs and gutters, repainting crosswalks and other civil work as needed. The locations for this contract will be decided through a process that prioritizes missing sidewalks near schools, parks, recreation centers and transit stops. The prioritized project list developed through this process will be given to the contractor after receiving the Notice to Proceed Letter at which time the contractor shall execute construction of these improvements. The District has committed \$1.8 million dollars to these improvement projects for the base year.

The Capital Bikeshare Improvement Program

The Capital Bikeshare Improvement Program involves upgrading bike sharing docking locations where they are currently located on an unimproved surface. Currently 13 of the over 200 capital bikeshare locations are located on unimproved pads of dirt, grass, gravel or mulch, and many potential future locations are limited because the existing sidewalk infrastructure does not provide ample space for station location. In addition to the thirteen locations that have been identified, it is anticipated that other stations will be included and improved when funding is available. The District has committed \$170,000 to these improvement projects for the base year.



XI. Recommendations for Budget and Funding


Funding work orders that address deficiencies making the District non-compliant overall may come from many different sources.

To illustrate the funding for ADA asset compliance, there will be a table in this section which will show the funds expended last year on construction projects in the right-of-way.

The previous charts in the Self-Evaluation section show the projects that are scheduled to be completed during FY 2016.

DDOT will continue to apply for federal funding to bring assets into ADA compliance. Local funds will be budgeted for local infrastructure repairs. A contingency fund will be established for assets that are high priorities because of safety concerns or as a result of a grievance of complaint that has been filed regarding non-ADA compliance.

The following questions will be considered when the ADA Coordinator attempts to identify potential funding sources:

1. Have accessibility improvements been incorporated into existing programmed work plans?
 2. Have accessibility improvements been incorporated into existing programmed maintenance plans?
 3. Have stand-alone accessibility improvement projects been processed through the Transportation Improvement Program?
 4. Are there instances in which an accessibility improvement was found to be “unduly burdensome”?
 5. Are the accessibility improvements technically not feasible or impractical?
- 

XII. Measures for Success

GRIEVANCES – The ADA Coordinator will track any grievances or complaints that were filed during the previous year with regards to accessibility in the public ROW. In addition to the original complaint, the ADA Coordinator will track decisions, work completed, costs, and response time. These activities will provide guidance in planning for future budgeting and serve as an indicator of progress towards making the city more accessible for individuals with disabilities.

COSTS – All work orders, especially when new construction is required, will be tracked to capture the ongoing investment in providing accessibility. This information will be used for applying for federal grants to help support DDOT's efforts to improve accessibility for persons with disabilities in using the public rights-of-way.

TRAINING – The ADA Coordinator will be responsible to coordinate all ADA staff training. The training will be provided to all levels of the organization to ensure an awareness of the ADA regulations and requirements. The ADA Coordinator will use DDOT University to track who has completed the training and will identify staff still needing the training. The training curricula will be reviewed and updated on an annual basis. Bi-annual training will be required.

CHANGES – The ADA Coordinator will stay abreast of all accessibility requirements, such as monitoring the Access Board's website. The Access Board is responsible for developing and updating the ADAAG. These guidelines are used by the U.S. Department of Justice and the U.S. Department of Transportation (DOT) in setting enforceable standards that must be followed. Any changes to the standards will be posted at the website: www.access-board.gov.

DATA COLLECTION – The ADA Coordinator will contract for the services of on-going data collection and database management. The priority for data collection will focus on transportation assets in proximately to land uses with high foot traffic, such as schools, hospitals, and shopping centers, as well as high volume pedestrian and bus passageways. In addition, the data collection coverage will be balanced among all the wards of the District. Although this database will be maintained and managed by a contractor, the data will be owned by DDOT. This database will have geographic attributes that allow new and corrected transportation asset that are ADA compliant to be mapped in a GIS format. DDOT is currently reviewing the possibility of integrating the database with their Cityworks program.

INSPECTIONS/AUDITS – The ADA Coordinator, or designated DDOT staff or contractor, will conduct weekly audits in the field to inspect new construction meant to address deficiencies, and transportation facilities or assets identified as a high priority for correction, which resulted in a work order issuance.

PUBLIC OUTREACH EFFORTS – The ADA Coordinator will conduct annual public meetings to report efforts made to improve ADA accessibility throughout the District. These public meetings will provide a fully transparent look at the progress, or lack thereof, and provide full disclosure of obstacles, challenges, successes and costs. In addition, the ADA Transition Team Advisory Group will be convened on an annual basis, at a minimum. If needed, members of the group may request more meetings. The ADA Coordinator will also be responsible for tracking public comments submitted to the Transition Team website: <http://adaplanddotdc.com>.

ANNUAL UPDATE TO THE ADA TRANSITION PLAN – The ADA Transition Plan will be updated annually and submitted to the FHWA for review and acceptance. The deadline for the annual submission will be at the end of the month in which the first ADA Transition Plan was originally accepted.



XIII. Transition Plan Update Process

The ADA Transition Plan is a “living” document and will require annual updates. The following list refers to the original table of contents and indicates suggestions for possible updates to the plan.


Annual Update to the ADA Transition Plan		
Section:	Report:	Changes:
DDOT Commitment to Non-Discrimination and Equal Access Under the Americans with Disabilities Act	N/A	N/A
I. Executive Summary	N/A	Annual Update
II. Purpose of the Report and Compliance Requirements	N/A	N/A
III. Methodology, Approach, and Next Steps to Implementation	N/A	Annual Update
IV. Policies and Procedures	List any Policy and Procedure change as it relates to the ADA Transition Plan.	Indicate how this will impact the ADA Transition Plan.
V. Interdepartmental Coordination and Training	List all courses available and report all training conducted from previous year.	Establish goals for training staff. Publish a calendar for next year.
VI. Grievance Program	Report all grievances/ complaints from the previous year, including resolutions & responses.	Indicate any changes in procedures for collecting grievances/ complaints.
VII. Standards and Regulations	Review PROWAG and ADAAAG for updates.	Update field assessments as necessary.
VIII. Public Outreach and Advisory Group	List all public meetings held and include all public commentary.	Publish calendar of public outreach for the next year, including Advisory Group meetings.

Annual Update to the ADA Transition Plan		
Section:	Report:	Changes:
IX. Self-Evaluation Data Process	Generate reports on Asset Inventory, including projected costs.	Review the Capitalworks Program to pursue projects to cover asset improvement.
X. Scheduling for Asset Compliance	Asset Inventory Report will indicate potential projects and costs.	Projecting which projects may be scheduled for the following year.
XI. Recommendations for Budget and Funding	Review expenditures from previous years and identify funding sources.	Project the work to be done for the following year, including what is planned in the Capital Works Program.
XII. Measures of Success	N/A	Additional reports as needed.
XIII. Transition Plan Update Process	The ADA Transition Plan will be update on an annual basis.	Any variations to the asset inventory, projects accomplished, costs will be reported.


APPENDIX 1

List of Acronyms

504:	Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services.
ADA:	Americans with Disabilities Act
ADAAG:	Americans with Disabilities Act Accessibility Guidelines
APS:	Accessible Pedestrian Signal
ANSI:	American National Standards Institute
AASHTO:	American Association of State Highway and Transportation Officials
Caltrans:	California Department of Transportation
DC:	District of Columbia
DDOT:	District Department of Transportation
DEM:	Design and Engineering Manual
DOJ:	Department of Justice
DPW:	Department of Public Works
FHWA:	Federal Highway Administration
GIS:	Geographic Information System
GPS:	Global Positioning System
MEF:	Maximum Extent Feasible
MUTCD:	Manual of Uniform Traffic Control Devices for Streets and Highways



PAR:	Pedestrian Access Route
PPSA:	Policy, Planning and Sustainability Administration
PSRA:	Public Space Regulatory Administration
QA:	Quality Assurance
QC:	Quality Control
QA/QC:	Quality Assurance/Quality Control
PROWAG:	Public Rights-of-Way Accessibility Guidelines
ROW:	Right-of-Way
SHA:	State Highway Administration
TOA:	Transportation Operations Administration
TCP:	Traffic Control Plan
UFA:	Urban Forestry Administration
UFAS:	Uniform Federal Accessibility Standards
WMATA:	Washington Metropolitan Area Transit Authority



APPENDIX 2

Glossary of Disability-Related Terms

The following definitions were taken from the Americans with Disabilities Act (ADA) and other reference materials. They are commonly used terms and may have various definitions depending on context.

A

Access Aisle

An accessible pedestrian space located between elements, such as parking spaces, seating, and desks that provides clearances appropriate for use of the elements.

Administrative Authority

A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

Access Barriers

Any obstruction that prevents people with disabilities from using standard facilities, pedestrian access routes, equipment or resources.

Access Board

An independent federal agency devoted to accessibility for people with disabilities. The Access Board developed the accessibility guidelines for the ADA and provides technical assistance and training on these guidelines. The agency also is referred

to as the Architectural and Transportation Barriers Compliance Board.

Accessible

Refers to a site, facility, work environment, pedestrian access route, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.

Accessible Element

An element that is provided to accommodate people with disabilities (for example, telephone, controls, and the like).

Accessible Pedestrian Signals (APS)

These signals provide information in non-visual format, which includes audible tones or verbal messages, and/or vibrotactile information.

Accessible Route

A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors,

floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

Accessible Space

Space that allows for the accommodation of people with disabilities around an object.

Accessibility

As required by the Americans with Disabilities Act, removal of barriers that would hinder a person with a disability from entering, functioning, and working within a facility. Required restructuring of the facility cannot cause undue hardship for the employer.

Affirmative Action

A set of positive steps that employers use to promote equal employment opportunity and to eliminate discrimination. It includes expanded outreach, recruitment, mentoring, training, management development and other programs designed to help employers hire, retain and advance qualified workers from diverse backgrounds, including persons with disabilities. Affirmative action means inclusion, not exclusion. Affirmative action does not mean quotas and is not mandated by the ADA.

Alteration

Modification made to an existing building or facility that goes beyond normal maintenance activities and effects or could affect usability.

Alternate Pedestrian Access Route

A temporary accessible route used when the existing pedestrian access route is blocked by construction, alteration, maintenance, or other temporary condition(s).

Americans with Disabilities Act (ADA)

A comprehensive, federal civil rights law that prohibits discrimination on the basis of disabilities in employment, state and local government programs and activities, public accommodations, transportation, and telecommunications.

An individual must meet one of the following three tests: (a) have a physical or mental impairment that substantially limits one or more of the major life activities of such individual; (b) have a record of such impairment; or (c) be regarded as having an impairment. (Same as Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Amendments of 1988.)

Americans with Disabilities Act Amendments Act (ADAAA)

Enacted on September 25, 2008, and becoming effective on January 1, 2009, making a number of significant changes to the definition of "disability" and directing the U.S. Equal Employment Opportunity Commission (EEOC) to

amend its ADA regulations to reflect the changes made by the ADAAA. The [final regulations were published in the Federal Register](#) on March 25, 2011.

Americans with Disabilities Act Accessibility Guidelines (ADAAG)

Scoping and technical requirements to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulations issued by federal agencies, including the Department of Justice and the Department of Transportation.

Assistive Devices

Tools that enable individuals with disabilities to perform essential job functions, e.g., telephone headsets, adapted computer keyboards, enhanced computer monitors.

Assistive Technology

Technology used to assist a person with a disability, e.g., wheelchair, hand splints, computer-based equipment.

Auxiliary Aids and Services

Under titles II and III of the ADA, includes a wide range of services and devices that promote effective communication or allows access to goods and services. Examples of auxiliary aids and services for individuals who are deaf or hard of hearing include qualified interpreters, note takers, computer-aided transcription services, written materials,

telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, and exchange of written notes. Examples for individuals with vision impairments include qualified readers, taped texts, audio recordings, Braille materials, large print materials, and assistance in locating items. Examples for individuals with speech impairments include TDDs, computer terminals, speech synthesizers, and communication boards.

B

Backslope

A sideslope that goes up as the distance increases from the roadway (cut slopes).

Barriers

Obstacles that prevent people with disabilities from fully participating in society.

Barrier Removal

Removal, rearrangement, or modification of objects positioned or structured in a manner that impedes access.

Braille

System of embossed characters formed by using a Braille cell, a combination of six dots consisting of two vertical

columns of three dots each. Each simple Braille character is formed by one or more of these dots and occupies a full cell or space. Some Braille may use eight dots.

C

Circulation Path

An exterior or interior way of passage from one place to another for pedestrians, including, but not limited to, walks, hallways, courtyards, stairways, and stair landings.

Civil Rights Act of 1991

Federal law that capped compensatory and punitive damages under title I of the ADA for intentional job discrimination. The law also amended the ADA's definition of an employee, adding "with respect to employment in a foreign country, such term includes an individual who is a citizen of the United States."

Clear Floor Space

The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.

Clear Width

The unobstructed width within a pedestrian circulation path. The clear width within a pedestrian circulation path must meet the accessibility criteria for a pedestrian access route.

Covered Entity

Under the ADA, "covered entity" is an entity that must comply with the law. Under title I, covered entities include employers, employment agencies, labor organizations, or joint labor-management committees. Under title II, covered entities include state and local government instrumentalities, the National Railroad Passenger Corporation, and other commuter authorities, and public transportation systems. Under title III, covered entities include public accommodations such as restaurants, hotels, grocery stores, retail stores, etc., as well as privately owned transportation systems.

Counter Slope

The slope of the gutter or roadway at the foot of a curb ramp or landing where it connects to the roadway, measured along the axis of the running slope extended.

Cross Slope

The slope that is perpendicular to the direction of travel (see running slope).

Crosswalk

A marked or unmarked pedestrian crossing, typically at an intersection, that connects the pedestrian access routes on opposite sides of a roadway. A crosswalk must meet accessibility criteria.

Curb Extension

A curb and sidewalk bulge or extension into the parking lane used to decrease the length of a pedestrian crossing and increase visibility for the pedestrian and driver.

Curb Ramp

A short ramp cutting through a curb or built up to it.

D

Detectable Warning

A standardized tactile surface feature built in or applied to walking surfaces or other elements to warn visually impaired people of hazards on a circulation path.

Direct Threat

A significant risk to the health or safety of a person with a disability or to others that cannot be eliminated by reasonable accommodation.

Disability

The limitation of normal physical, mental, social activity of an individual. There are varying types (functional, occupational, [learning](#)), degrees (partial, total), and durations (temporary, permanent) of disability with respect to an individual: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Discrimination

Act of making a difference in treatment or favor on a basis other than individual merit.

E

Egress, Means of

A continuous and unobstructed way of exit travel from any point in a building or facility to a public way. A means of egress comprises vertical and horizontal travel and may include intervening room spaces, doorways, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, horizontal exits, courts and yards. An accessible means of egress is one that complies with these guidelines and does not include stairs, steps, or escalators. Areas of rescue assistance or evacuation elevators may be included as part of accessible means of egress.

Element

An architectural or mechanical component of a building, facility, space, or site, or public right-of-way, e.g., telephone, curb ramp, door, drinking fountain, seating, or water closet.

Entrance

Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibules if provided, the entry door(s) or gate(s),

and the hardware of the entry door(s) or gate(s).

Escort Services

(Also called transportation services.) Provides transportation for older adults to services and appointments. May use bus, taxi, volunteer drivers, or van services that can accommodate wheelchairs and persons with other special needs.

Essential Job Functions

The fundamental job duties of the employment position that the individual with a disability holds or desires. The term essential functions, does not include marginal functions of the position.

Equal Employment Opportunity

An opportunity to attain the same level of performance or to enjoy equal benefits and privileges of employment as are available to an average similarly-situated employee without a disability.

Existing Facility

Refers to buildings that were constructed before the ADA went into effect. A public accommodation's building constructed before the effective date of title III does not have to be fully accessible unless the removal of barriers, including structural ones, is readily achievable.

F

Facility

All or any portion of buildings, structures, site improvements, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property located on a site.

FM Sound Amplification System

Electronic amplification system consisting of three components: a microphone or transmitter, monaural FM receiver and a combination charger and carrying case. It provides wireless FM broadcast from a speaker to a listener who has a hearing impairment.

Functionally Disabled

A person with a physical or mental impairment that limits the individual's capacity for independent living.

Furnishing Zone

A linear portion of the sidewalk corridor, adjacent to the curb, that contains elements such as trees, signal poles, utility poles, street lights, street signs, controller boxes, hydrants, parking meters, driveway aprons, planting strips, or street furniture.

Frontage Zone

A linear portion of the sidewalk corridor, adjacent to the edge of the right-of-way.

G

Grade

The slope parallel to the direction of travel that is calculated by dividing the

vertical change in elevation by the horizontal distance covered.

Grade Break

The intersection of two adjacent surface planes with different grade elevations.

Gutter

A trough or dip used for drainage purposes that runs along the edge of the trail or street and curb or curb ramp.

H**Health**

The state of complete physical, mental, and social well-being and not merely the absence of disease or infirmity. It is recognized, however, that health has many dimensions (anatomical, physiological, and mental) and is largely culturally defined. The relative importance of various disabilities will differ depending upon the cultural milieu and the role of the affected individual in that culture. Most attempts at measurement have been assessed in terms of morbidity and mortality.

Hearing Impairments

Complete or partial loss of ability to hear caused by a variety of injuries or diseases including congenital defects.

I**Impairment**

Term used in the ADA definition of disability. Includes any physiological

disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine; or any mental or psychological disorder, such as an intellectual disability (formerly termed "mental retardation"), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Interpreter

Professional person who assists a deaf person in communicating with hearing people.

Intersection

An area where two or more pathways or roadways join together.

Island

A pedestrian refuge within the right-of-way and traffic lanes of a highway or street; also used as a loading stop for light rail or buses.

J**Job Analysis**

A formal process in which information about a specific job or occupation is collected and analyzed.

Job Description

A detailed summary, usually written, of the major components of a job. A typical job description consists of six major components: essential job functions, knowledge and critical skills, physical demands, environmental factors, the roles of the ADA and other federal laws such as the Occupational Safety Health Act (OSH Act), and any explanatory information that may be necessary to clarify job duties or responsibilities.

Job Related and Consistent with Business Necessity

Standard used to determine whether a qualification standard or employment policy concerns an essential aspect of the job and is required to meet the needs of the business.

K

None at this time.

L

Landing

A level paved area, within or at the top and bottom of a stair or ramp, designed to provide turning and maneuvering space for wheelchair users and as a resting place for pedestrians.

Learning Disability

A disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in an imperfect ability to listen,

think, speak, read, write, spell, or to do mathematical calculation. The term includes such conditions as perceptual handicaps, brain injury, and minimal brain dysfunction.

M

Major Life Activity

Term used in the ADA definition of disability. It refers to activities that an average person can perform with little or no difficulty. Major life activities include, but are not limited to: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working; and the operation of a major bodily function, including functions of the immune system, special sense organs and skin; normal cell growth; and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Marginal Job Functions

Functions that are not considered essential to a job. Employers must consider removing marginal job functions as an accommodation under

the ADA, but do not have to remove essential functions as an accommodation.

Marked Crossing

A crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.

Maximum Extent Feasible

Applies to the occasional case where the nature of an existing facility makes it virtually impossible to comply with applicable accessibility standards through a planned alteration.

Median

An island in the center of a road that provides pedestrians with a place of refuge and reduces the crossing distance between safety points.

Mental Health

The capacity in an individual to function effectively in society. Mental health is a concept influenced by biological, environmental, emotional, and cultural factors and is highly variable in definition, depending on time and place. It is often defined in practice as the absence of any identifiable or significant mental disorder and sometimes improperly used as a synonym for mental illness.

Mental Illness/Impairment

A deficiency in the ability to think, perceive, reason, or remember resulting

in loss of the ability to take care of one's daily living needs.

Midblock Pedestrian Crossing

A marked pedestrian crossing located between intersections.

Minimum Clearance Width

The narrowest point on the sidewalk or trail. A minimum clear width is created when significant obstacles, such as utility poles or tree roots, protrude into the sidewalk and reduce the design width.

Mitigating Measures

Medical treatment or devices that lessen the effects of an impairment. When determining whether a person is substantially limited in a major life activity, we ignore the beneficial effects of mitigating measures except ordinary eyeglasses or contact lens. Mitigating measures include things such as: medication, medical supplies, equipment, or appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics including limbs and devices, hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, and oxygen therapy equipment and supplies; use of assistive technology; reasonable accommodations or "auxiliary aids or services," learned behavioral or adaptive neurological modifications; or

psychotherapy, behavioral therapy, or physical therapy.

Mobility Impairment

Disability that affects movement ranging from gross motor skills such as walking to fine motor movement involving manipulation of objects by hand.

N

None at this time.

O

None at this time.

P

Passenger Loading Zone

An area provided for pedestrian to board/disembark a vehicle.

Path of Travel

An accessible pathway for people with disabilities to move through or access spaces.

Pedestrian

A person walking or traveling by means of a wheelchair, electric scooter, crutches or other walking devices or mobility aids. Use the term pedestrian is meant to include all people with disabilities regardless of which equipment they may use to assist their self-directed locomotion.

Pedestrian Access Route (PAR)

A pedestrian access route is a continuous, unobstructed walkway within a pedestrian circulation path that provides accessibility. The route is a corridor of accessible travel through public right-of-ways that has a specified minimum width and cross slope.

Pedestrian Circulation Path

An exterior or interior way of passage provided for pedestrian travel. Pedestrian circulation paths are required to contain a continuous pedestrian access route that connects to all adjacent pedestrian facilities, elements and spaces that are required to be accessible.

Pedestrian Facilities

Walkways such as sidewalks, crosswalks, walking and hiking trails, shared use paths, pedestrian separations and other improvements for pedestrian travel.

People with Disabilities

A term to describe a group of individuals with conditions that prevents them from performing a task or function because of a physical or mental impairment without an accommodation. When describing a group with a certain disability always refer to the people with the particular disability like, people with hearing disabilities.

Person with a Disability

A term to describe an individual who meets one of the following criteria

designating what is a disability. If they have a physical or mental impairment that substantially limits one or more major life activities, have a record of such impairment, or are regarded as having such impairment. When describing an individual with a certain disability always refer to them as a person with the particular disability like, person with a hearing disability.

Physical or Mental Impairment

Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities (Americans with Disabilities Act of 1990).

Private Facility

A place of public accommodation or a commercial facility subject to title III of the ADA and 28 C.F.R. part 36 or a transportation facility subject to title III of the ADA and 49 C.F.R. 37.45.

Protruding Objects

These are objects that may project into circulation paths in a manner that is hazardous to people with vision impairments. Unlike requirements for

pedestrian access routes, these criteria would apply to the full circulation space of sidewalks and other pedestrian paths. Objects mounted on walls or post with leading edges above the standard sweep of canes above 27 inches and below the standard head room clearance would be limited to a 4 inch protrusion.

Public Accommodations

Entities that must comply with Title III. The term includes facilities whose operations affect commerce and fall within at least one of the following 12 categories: places of lodging (e.g., inns, hotels, motels) (except for owner-occupied establishments renting fewer than six rooms); establishments serving food or drink (e.g., restaurants and bars); places of exhibition or entertainment (e.g., motion picture houses, theaters, concert halls, stadiums); places of public gathering (e.g., auditoriums, convention centers, lecture halls); sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers); service establishments (e.g., laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals); public transportation terminals, depots, or stations (not including facilities relating

to air transportation); places of public display or collection (e.g., museums, libraries, galleries); places of recreation (e.g., parks, zoos, amusement parks); places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools); social service center establishments (e.g., day care centers, senior citizen centers, homeless shelters, food banks, adoption agencies); and places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

Public Entity

Entities that must comply with Title II. The term is defined as: any state or local government; any department, agency, special purpose district, or other instrumentality of a state or local government; or certain commuter authorities as well as AMTRAK. It does not include the federal government.

Public Facility

A facility or portion of a facility constructed by, on behalf of, or for the use of a public entity subject to title II of the ADA and 28 C.F.R. part 35 or to title II of the ADA and 49 C.F.R. 37.41 or 37.43.

Public Use

Describes interior or exterior rooms or spaces that are made available to the general public. Public use may be provided at a building or facility that is privately or publicly owned.

Q

Qualified Individual with a Disability

An individual with a disability who, with or without reasonable modification to rules, policies, or practices, 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 the participation in programs or activities provided by a public entity (Americans with Disabilities Act of 1990).

R

Ramp

A walking surface which has a running slope greater than 1:20.

Ramp Connection

A pavement at the end of a ramp, connecting to a main lane of a roadway.

Rehabilitation Act of 1973

The Rehabilitation Act that prohibits discrimination on the basis of a disability by the federal government, federal contractors, by recipients of federal financial assistance, and in federally conducted programs and activities. Section 504 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 either receives Federal financial assistance or is conducted by

any Executive agency or the US Postal Services. This applies to programs in cities that receive federal funds.

Readily Achievable

Easily accomplishable and able to be carried out without much difficulty or expense. In determining whether an action is readily achievable, factors to be considered include nature and cost of the action, overall financial resources and the effect on expenses and resources, legitimate safety requirements, impact on the operation of a site, and, if applicable, overall financial resources, size, and type of operation of any parent corporation or entity. Under Title III, public accommodations must remove barriers in existing facilities if it is readily achievable to do so.

Reasonable Accommodation

Under Title I, a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity. Reasonable accommodation is a key nondiscrimination requirement of the ADA.

Rest Area

A level portion of a trail that is wide enough to provide wheelchair users and others a place to rest and gain relief from the prevailing grade and cross-slope demands of the path.

Right-of-Way

The rights, title, and interest in real property necessary for the construction and maintenance of the project. Private property rights may be acquired by donation or acquisition and be feeing-simple, easement, or other form of use agreement acceptable to the parties. The property rights must be of sufficient duration to match the design life of the project, and in a form that can be recorded on the land records.

Running Slope

The slope that is parallel to the direction of travel (see cross slope).

S

Section 508 of the Rehabilitation Act

Legislation that requires federal agencies to develop, procure, and use accessible electronic and information technology.

Sensory Impairment

A disability that affects touch, sight, or hearing, or both.

Self-Evaluation

Required by Title II, this is used to identify, review and analyze public programs, activities and services provided by city government and public entities to document the status of each to determine if any are discriminatory.

Shared-Use Path

A facility separated from motorized vehicular traffic that may be used by bicyclists, pedestrians and others such as equestrians in certain conditions.

Sidewalk

A walkway along a highway, road, or street intended for use by pedestrians.

Signage

Displayed verbal, symbolic, tactile, and pictorial information.

Sign Language

Manual communication commonly used by people with hearing disabilities. The gestures or symbols in sign language are organized in a linguistic way. Each individual gesture is called a sign. Each sign has three distinct parts; the handshape, the position of the hands, and the movement of the hands. American Sign Language (ASL) is the most commonly used sign language in the United States. People with hearing disabilities from different countries speak different sign languages.

Site

A parcel of land bounded by a property line or a designated portion of a public right-of-way.

Site Improvement

Landscaping, paving for pedestrian and vehicular ways, outdoor lighting, recreational facilities, and the like, added to a site.

Slip Resistant Surface

Slip resistance is based on the frictional force necessary to permit a person to ambulate slipping. A slip resistant surface does not allow a shoe heel, wheelchair tires, or a crutch tip to slip when ambulating on the surface.

Space

A definable area, e.g., room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.

Specific Learning Disability

Disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in difficulties listening, thinking, speaking, reading, writing, spelling, or doing mathematical calculations. Frequent limitations include hyperactivity, distractibility, emotional instability, visual and/or auditory perception difficulties and/or motor limitations, depending on the type(s) of learning disability.

Speech Impairment

Problems in communication and related areas such as oral motor function, ranging from simple sound substitutions to the inability to understand or use language or use the oral-motor mechanism for functional speech.

Stable Surface

Stability is the degree to which a surface remains unchanged by contaminants or

applied force, so that when the contaminant of force is removed the surface returns to its original condition. A stable surface is not significantly altered by a person walking or maneuvering a wheelchair.

Street Furniture

Sidewalk equipment or furnishings, including garbage cans, benches, parking meters and telephone booths.

Substantially Limits

A comparative term used in the ADA definition of disability. An impairment is a disability if it substantially limits the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict, the individual from performing a major life activity in order to be considered substantially limiting.

Surface

The material on which person walks or wheels in the pedestrian environment.

T

Traffic Calming

Design techniques that have been shown to reduce traffic speeds and may include lane narrowing, curb extensions, surface variations and visual clues in the vertical plane.

Transit Facility

A capital facility intended to improve the efficiency of public transportation or encourage the use of public transportation.

Transition Plan

A requirement that all state and local governments employing 50 or more people have a plan detailing the structural changes necessary to achieve program accessibility.

Transitional Segments

Segments of a pedestrian circulation path that blend between existing undisturbed pedestrian facilities.

Transportation Services

(Also called escort services.) Provides transportation for older adults to services and appointments. May use bus, taxi, volunteer drivers, or van services that can accommodate wheelchairs and persons with other special needs.

Truncated Domes

Small domes with truncated tops that are detectable warnings used at transit platforms, curb ramps, and hazardous vehicular ways.

U

Undue Burden

With respect to complying with Title II or Title III of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain

factors. These factors include: the nature and cost of the action; the overall financial resources of the site or sites involved; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements necessary for safe operation, including crime prevention measures; or any other impact of the action on the operation of the site; the geographic separateness, and the administrative or fiscal relationship of the site or sites in question to any parent corporation or entity; if applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities; and if applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity.

Undue Hardship

With respect to the provision of an accommodation under Title I of the ADA, significant difficulty or expense incurred by a covered entity, when considered in light of certain factors. These factors include the nature and cost of the accommodation in relationship to the size, resources, nature, and structure of the employer's operation. Where the facility making the accommodation is part of a larger entity,

the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility to the larger organization. Employers do not have to provide accommodations that cause an undue hardship.

Uniform Federal Accessibility Standards (UFAS)

One of two standards that state and local governments can use to comply with title II's accessibility requirement for new construction and alterations. The other standard is the ADA Accessibility Guidelines.

Universal Access

Access for all people regardless of ability or stature.

U.S. Department of Justice

Federal agency that is responsible for enforcing titles II and III of the ADA.

U.S. Department of Transportation

Federal agency that enforces nondiscrimination in public and private transportation. Nondiscrimination includes access to public bus, train and paratransit, as well as privately operated bus and shuttle transportation. The ADA does not cover air transportation, which is subject to the Air Carrier Access Act.

V

Vehicular Way

A route intended for vehicular traffic, such as a street, driveway, or parking lot.

Vertical Clearance

The minimum unobstructed vertical passage space required along a sidewalk or trail.

Visual Impairments

Complete or partial loss of ability to see, caused by a variety of injuries or diseases including congenital defects. Legal blindness is defined as visual acuity of 20/200 or less in the better eye with correcting lenses, or widest diameter of visual field subtending an angular distance no greater than 20 degrees.

W

Walkway

An exterior pathway with a prepared surface intended for pedestrian use, including general pedestrian areas such as plazas and courts and a continuous portion of the pedestrian access route that is connected to street crossings by curb ramps.

Wheelchair

Wheeled mobility device used by people with limited or no ability to walk. Wheelchairs can be manually propelled or battery powered.

Work Zone

An area of construction, maintenance or utility work activities.

X

None at this time.

Y

None at this time.

Z

None at this time.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

REVIEW OF NATIONWIDE SELF-EVALUATION AND TRANSITION PLANS - TASK A

Prepared For:



DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 2.0
DATE: December 2014

Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.
Disability Access Consultants (DAC)
Sharp & Company
Precision Systems, Inc.

This page left intentionally blank.

EXECUTIVE SUMMARY

The scope of work for the District Department of Transportation (DDOT) project for the development of a comprehensive Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (504) self-evaluation and transition plan includes a review of the current best practices nationwide in the area of public right-of-way (PROW) self-evaluations and transition plans. The identification and selection of successful components of nationwide plans will assist DDOT to incorporate select activities into the DDOT plan. The analysis and potential incorporation of best and exemplary practices will assist DDOT to develop not only a state-of-the-art plan for DDOT, but will serve as a nationwide model.

To start, an initial sample of plans nationwide was reviewed. The sample included public entity plans that included ADA/504 plans developed by states, recipients and sub-recipients. Related documents that supported the implementation of the transition plans were also reviewed and included informational documents, training guides and supplements.

It was found that the items and areas included in the plans and the approaches differed substantially. For example, some plans focused on curb ramps only and others included buildings and areas in the public rights-of-way. Some plans had automated methods for data collection and others did not. Bus stops and accessible pedestrian signals were included in some plans and not others. The difference in plans necessitated an analytical approach to complete the analysis and review.

In order to accomplish the nationwide review with a consistent and reliable approach, a comprehensive evaluation matrix was developed that listed potential activities that would produce a comprehensive plan. Use of the evaluation matrix developed allowed the reviewers to have a standard tool to collect and compare information. The evaluation matrix served as a data collection and analysis tool using a consistent approach to compare and complete a statistical analysis.

Activities included:

- Development and use of an evaluation matrix to provide a uniform and consistent method to compare and measure best practices nationwide
- Identifying ADA/504 plans and practices nationwide that included recipients and sub-recipients
- Conducting a detailed review and analysis of nationwide practices and plans

- Compiling the findings from the nationwide review
- Analyzing the findings for frequency and measure of success
- Formulating recommendations for best practices for DDOT.

Key findings are as follows:

- Nationwide approaches for the development of transition plans were diverse and included different methodologies
- Some core areas were noted that provided an increased measure of success and included:
 - Interdepartmental coordination
 - Support by upper level management
 - Automated or semi-automated system for data collection in the field
 - Web based system to manage barriers identified with a full range of reporting features to track compliance, document work completed, project budgets and plan future barrier removal practices
 - Adequate funding over multiple years
 - Grievances and complaints handled in a timely manner
 - Ongoing public input regarding the implementation of the plan
 - Training regarding the requirements of the ADA and Section 504

The results of the review of nationwide practices for the development of ADA/504 self-evaluations and transition plans provided valuable information from which DDOT can design and implement an exemplary plan. It is anticipated that the results from the nationwide survey in addition to other findings and activities from this project will produce an exemplary, state of the art plan for DDOT and nationwide implementation.

It is recommended that DDOT develop, integrate and internalize the areas that were found to be measures of successful implementation of the DDOT. The ten (10) critical elements of a successful plan included, but are not limited to:

1. Commitment from top level management
2. Adequate funding for successful implementation over multiple years
3. Formulating and planning an overall comprehensive plan at the start of the development of ADA/504 plan development
4. Designation of an ADA/504 Coordinator who is empowered and authorized to implement the plan

5. Appropriate input by staff, committees and stakeholders that are incorporated into the plan
6. Interagency collaboration and planning
7. ADA/504 measures, policies, procedures and practices integrated into all levels of the organization
8. Consistent and comprehensive data collection and management tools to collect field data, provide centralized access and management of data, prioritization, tracking, monitoring, documenting progress, updating the plan and preparing reports
9. Established and adopted procedures to track stakeholders concerns and grievances in a timely manner with documentation of the resolution and implications to the organization
10. Comprehensive and ongoing training at multiple levels: Training should include technical and support staff, in addition to policies, procedures and programs administrators.

This page left intentionally blank.

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	I
1. BACKGROUND.....	1
2. ACTIVITIES.....	1
2.1 Evaluation Matrix Tool.....	4
2.2 Representative Sample and Analysis.....	8
2.3 Transition Plans and Related Documents Reviewed.....	8
2.4 Training Guides, Supplements and Informational Documents.....	10
3. FINDINGS.....	11
4. RECOMMENDATIONS.....	19

This page left intentionally blank.

1. BACKGROUND

The development of an ADA/504 Self-evaluation and Transition Plan is required in accordance with Title II of the ADA. There are many benefits of a comprehensive ADA/504 Self-evaluation and Transition Plan. Not only does the plan provide a coordinated and strategic program for the removal of barriers for persons with disabilities, but it assists the public entity with planning and budgeting. In addition, the plan documents the required compliance efforts of the public entity.

The review of nationwide plans is one activity to assist with the development of a framework of a comprehensive DDOT Americans with Disabilities Act (ADA) Self-evaluation and Transition Plan and Section 504 of the Rehabilitation Act of 1973. Other project activities will provide additional information and strategies for the development of a comprehensive, replicable plan that may be used not only by DDOT, but ideally provide a superior nationwide example.

The results of the nationwide review are intended to be a compilation and analysis of practices from which DDOT can review and select to develop a framework for a comprehensive ADA and Section 504 Self-Evaluation and Transition Plan.

The results from the analysis of practices used by other recipients or sub-recipients are expected to assist with the framework for a comprehensive ADA and Section 504 Self-evaluation and Transition Plan. It is anticipated that the framework developed and adopted by DDOT will meet and exceed the requirements of the Federal Highway Administration (FHWA). The DDOT plan will provide for a living, dynamic plan that is internalized and integrated in the operational functions of DDOT.

2. ACTIVITIES

The review included the analysis of nationwide plans and practices, phone calls to selected recipients and sub-recipients. In addition, representatives from DDOT and the project team met with representatives of the Maryland State Highway Administration (SHA) in Baltimore, Maryland on July 10, 2014 to discuss strategies for development of a comprehensive ADA/504 plan.

SHA representatives shared information regarding the development of their plan, what worked and what did not. Subsequently, SHA provided DDOT representatives and the project team with a webinar of the SHA eGIS Portal to review the software that was developed for the identification of barriers in their public right-of-way and their methods for tracking the plan.

Several key indicators for a successful ADA/504 self-evaluation and transition plan were provided by SHA staff that included the following:

1. Commitment:
 - a. An important key to success is a strong commitment from the top management to support the development and ongoing implementation of the ADA/504 plan.
2. Funding:
 - a. Dedicated and adequate funding was described as the second critical key to success. Although the SHA is smaller than DDOT, SHA currently spends \$11-13 million per year in dedicated ADA funding, in addition to funding that is a part of other projects that incorporate accessibility standards.
 - b. A dedicated funding source was recommended.
3. Staff:
 - a. Staff dedicated to ADA accessibility was also identified as a factor for success.
 - b. SHA staff stated they have a team of four dedicated to ADA compliance and that members spend 40% of their time in the field.
 - c. Activities of ADA staff included review and approval of design documents, a review during construction for accessibility compliance and a final sign-off.
4. Design Waiver Process:
 - a. A design waiver process is in place for defining why something cannot comply with requirements.
 - b. Only one person can sign approving all waivers after a complete review is performed.
5. Grievance Procedures:
 - a. Grievance procedures are in place with a clear process for tracking and resolution.
 - b. It was discussed that SHA has timelines of 30 business days to investigate the complaint or grievance and 90 days to respond with a resolution.

6. Training:

- a. Staff emphasized that training is critical for everyone to understand the requirements and the process. SHA staff provide training a multiple levels.
- b. One level of training is an on-line overview called core training that all employees are required to participate in to be educated about accessibility requirements.
- c. The next level is technical training that is broken down into design and construction. Design staff and consultants are trained by in house staff on accessibility requirements and methods for compliance when laying out projects.
- d. The second portion of the training focuses on construction and inspector training. Senior managers and inspectors are trained on the accessibility requirements and how to enforce requirements. Both classroom and field exercises are included and a passing grade is required.
- e. SHA also provides training for counties, cities and towns and others to educate public entities on the requirements.

7. Quality Control:

- a. The importance of quality control for completed work was discussed by SHA staff.
- b. SHA withholds payment from contractors for work that does not comply.
- c. Contractors are required to remediate and fix work at their cost to as an incentive to perform work correctly.

8. Public Participation and Input:

- a. The importance of public input, communication and buy-in was emphasized.
- b. It was mentioned that Advisory Groups did not work well but served to be a great way to meet and interface with stakeholders.
- c. The need for specific meeting requirements was emphasized.

9. Asset Management System:

- a. The importance of an asset management system was discussed.
- b. Noncompliant items noted in the field are located and photographs taken.
- c. A plan with geographical representation is provided locating noncompliant items and associated photographs.
- d. A color system of green for compliance and red for noncompliance is used.

Other general areas discussed with SHA staff included the need to emphasize that the Federal Highway Administration can withhold funds for noncompliance. Another area discussed was expensive lawsuits that can force a jurisdiction to comply. A comprehensive self-evaluation and transition plan can show a good faith effort to comply.

2.1 Evaluation Matrix Tool

An evaluation matrix was developed with criteria that were anticipated to be contained in a quality, comprehensive ADA/504 self-evaluation or transition plan to provide for consistent and reliable analysis, comparison and reporting. Criteria selected for inclusion was representative of the components of a comprehensive plan that would ensure a useful, easy to manage, living, dynamic plan that meets or exceeds accessibility requirements and standards of a self-evaluation and transition plan. The criteria listed on the evaluation matrix were determined to be areas that would produce a comprehensive ADA and Section 504 Self-evaluation and Transition Plan. The detailed criteria used and the evaluation matrix developed for the review is included in Appendix C.

The criteria to be used in the analysis and the format of the matrix were designed to be comprehensive and to provide for a tool for consistent analysis of each recipient's or sub-recipient's development of ADA and/or Section 504 self-evaluations and transition plans nationwide.

A ranking scale was developed to rate each item being evaluated. Some plans did not have all of the items listed on the evaluation matrix and therefore were not ranked. The key included the following responses: yes, no or not applicable. In addition, a qualitative rating scale of 1-5 was assigned for each item, with 5 being the highest rating in terms of quality and comprehensiveness and 1 being the lowest.

The categories to be used in the analysis were vetted through Brett Rouillier, ADA Project Manager and Cesar Barreto, DDOT ADA Coordinator, and members of the project work group. Janine Ashe, Civil Rights Manager of FHWA also provided valuable input from the group for the development of the evaluation matrix. Representative samples of plans were selected (Appendix D) and reviewed using the evaluation matrix criteria and rating scale. The sample included not only recipients, but sub-recipients. The sample was not limited to entities similar in size or geographic representation to DDOT, but also included samples of larger and smaller entities that appeared to have evidence of best practices.

The Evaluation Matrix was designed to include areas and categories that may be indicative of exemplary and best practices. The template of the actual evaluation matrix

used is included in Appendix C. Each area listed was rated as a yes, no or not applicable, followed by a rating for quality and comprehensiveness. Additional comments were added as appropriate.

General categories used for the analysis included:

1. Standards Utilized
 - 1.1. ADA Standards
 - 1.2. MUTCD
 - 1.3. PROWAG
 - 1.4. Section 504
 - 1.5. ANSI
 - 1.6. UFAS
 - 1.7. Other
2. Areas Surveyed
 - 2.1. Buildings
 - 2.2. Rest Areas
 - 2.3. PAR
 - 2.3.1. Sidewalks
 - 2.3.2. Curb ramps
 - 2.3.3. Intersections
 - 2.3.4. Pedestrian Activated Signals
 - 2.3.5. Crosswalks
 - 2.3.6. Traffic islands
 - 2.3.7. Bus shelters/Bus Stops
 - 2.3.8. Driveways
 - 2.3.9. Handrails
 - 2.3.10. Obstructions
 - 2.3.11. Other
3. Field collection method
 - 3.1. Windshield
 - 3.2. Manual
 - 3.3. Semi-automated
 - 3.4. Automated
 - 3.5. Other
4. Quality Control
 - 4.1. Consistency

- 4.2. Reliability
- 4.3. Comprehensive
- 4.4. Ease of use
- 4.5. Other
- 5. Database
 - 5.1. Platform
 - 5.2. Easily updated
 - 5.3. Priority Procedures
 - 5.4. Severity Rating
 - 5.5. Schedule for barrier removal
 - 5.6. Tracking features
 - 5.7. Reporting features
 - 5.8. Corrections feature (corrections documented)
 - 5.9. Noncompliant corrections documented
 - 5.10. GIS
 - 5.11. Mapping
 - 5.12. Photographs
 - 5.13. Can reprocess if codes change
 - 5.14. Estimated costs
 - 5.15. Actual costs
 - 5.16. Other
- 6. Public Input
- 7. Prioritization Methods
 - 7.1. Compliant or concern by agency
 - 7.2. Complaint or concern by public
 - 7.3. Project demand
 - 7.4. High use public facility
 - 7.5. High need area (hospital, school, etc.)
 - 7.6. Demographics (persons with disabilities)
 - 7.7. Public input
 - 7.8. Severity or degree of compliance
 - 7.9. Other
- 8. Demographics-Persons with Disabilities
- 9. Plan Implementation
 - 9.1. Scheduled
 - 9.2. Phases
 - 9.3. Other

10. Planning Integration
11. MEF Policy
12. Technical Infeasibility
13. Equivalent Facilitation
14. Undue Financial Burden
15. ADA Committee
 - 15.1. Advisory
 - 15.2. Oversight
16. ADA Coordinator
17. 504 Coordinator
18. Transition Plan Coordinator
19. Grievance Procedure
20. Public Notice
21. Policies and Procedures
22. Reasonable Accommodations Policy
23. Nondiscrimination Policy/Notice
 - 23.1. ADA
 - 23.2. Section 504
24. Programs
25. Communication
 - 25.1. Alternate formats
 - 25.2. Auxiliary Aids/Services
 - 25.3. Interpreters
 - 25.4. Equipment
26. Monitoring and Tracking
27. Oversight Assurances
28. Methods for Living Plan
29. Designated Persons for Plan Implementation
30. District Points of Contact
31. Commitment

32. Funding/Budget
33. Training for Staff
 - 33.1. Engineers
 - 33.2. Inspectors
 - 33.3. Managers
 - 33.4. Other
34. Litigation (Current or Previous, if known)
35. Approved by Federal Highway
36. Other approvals
37. Measures of success
38. Interagency Collaboration
39. Other

2.2 Representative Sample and Analysis

A nationwide sample of 33 ADA Self-evaluations and Transition Plans and 27 related documents were selected and reviewed using a predefined set of criteria on an evaluation matrix. The use of the evaluation matrix and criteria provided a detailed analysis of a sample of nationwide practices of recipients and sub-recipients. The analysis also provided valuable input of activities that worked, did not work or needed improvement. In addition, the analysis provided information regarding funding sources and other items needed for successful development and implementation of the plan.

2.3 Transition Plans and Related Documents Reviewed

- Alaska Department of Transportation Section 504/ADA Work Plan
- Arizona Department of Transportation June 2012 Draft and December 2012 Final ADA Transition Plan for Public Rights of Way
- Arizona Department of Transportation December 2011 Final ADA Transition Plan for Facilities
- Arkansas State Highway and Transportation Department Self Evaluation
- California Caltrans Americans with Disabilities Act Compliance Report
- Colorado Department of Transportation Comprehensive Accessibility Transition Plan
- Connecticut Department of Transportation ADA Transition Plan

- Delaware Department of Transportation ADA Transition Plan
- Florida Department of Transportation ADA/504 Transition Plan (1992-2011)
- Hawaii Department of Transportation ADA Transition Plan
- Idaho Department of Transportation September 2011 Final Transition Plan
- Indiana Department of Transportation 2011 and 2013 Self-Evaluation and Updated ADA Transition Plan
- Iowa Department of Transportation Final ADA Transition Plan
- Kansas ADA/504 portion of Title VI update
- Maryland State Highway Administration 2009 ADA Transition Plan for Public Right of Way
- Maryland State Highway Administration 2009 through 2013 Annual Reports to the Federal Highway Administration
- Massachusetts Department of Transportation ADA/Section 504 February 2012 Interim Transition Plan
- Michigan Department of Transportation ADA Transition Plan
- Minnesota Department of Transportation ADA Transition Plan
- Missouri Department of Transportation Transition Plan Update
- Montana Department of Transportation September 2012 Americans with Disabilities Act (ADA) Transition Plan
- Nebraska Department of Roads Americans with Disabilities Act Transition Plan
- Nevada Department of Transportation ADA/504 Draft Transition Plan
- New Jersey Transit Department ADA/504 Draft Transition Plan
- New York State Department of Transportation ADA Transition Plan
- Oregon Department of Transportation
- Pennsylvania Department of Transportation 2012 Transition Plan
- Rhode Island Department of Transportation ADA Transition Plan
- South Dakota Department of Transportation ADA Transition Plan
- Texas Department of Transportation Transition Plan
- Utah Public Right of Way Accessibility Transition Plan

- City and County of San Francisco Updates and Revisions in 2007-2008 to the Americans with Disabilities Act Transition Plan for Curb Ramps and Sidewalks
- City of Columbus Indiana

2.4 Training Guides, Supplements and Informational Documents

- 504/ADA Self-Evaluation and Assurance of Compliance
- Accessible Pedestrian Signals
- Accessible Pedestrian Signals: A Guide to Best Practices
- ADA Access Board- Accessible Pedestrian Facilities in the Public Right of Way
- ADA Access Board- Common Problems Arising in the Installation of Accessible Pedestrian Signals
- ADA Compliance at Transportation Agencies: A Review of Practices (Sept 2008)
- ADA Methodologies and Procedures Report
- ADA Transition Planning: Inventory Management and Evaluations
- ADA Transition Plans: A Guide to Best Management Practices (May 2009)
- ADA Transition Plans: A Guide to best Management Practices
- Alabama Planning Association Sidewalk-Designers-Beware-Perry
- An Overview ADA Transition Plans: A Guide to Best Management Practices
- Delaware Department of Transportation Road to ADA Compliance
- Federal Highway Administration Assistance Tool for ADA Transition Plans
- Florida ADA Design Structures 2011
- Human and Civil Rights Overview of “Hot Topics” in ADA: The Connection to Transition Plans and Best Practices
- How to Develop an ADA Self-Evaluation & Transition Plan
- Maryland ADA Policy on Sub-Recipients
- Maryland State Highway Administration Policy Regarding Installation of Accessible Pedestrian Signals (APS)
- Michiana Area Council of Government’s ADA Inventory and Analysis Tool for Pedestrian Facilities in the Public Right-of-Way License Agreement

- Minnesota Department of Transportation ADA Reference and Training Materials TRS1004
- New Jersey Division of the DOT Designing Pedestrian Facilities for Accessibility
- Public Rights of Way Accessibility Guidelines Presentation for New York
- Sacramento County California ADA and Pedestrian Master Plan
- San Francisco California Accessible Pedestrian Signal Agreement
- Self-Evaluation and Transition Plan Best Practices Webinar
- Washington State’s Complete Streets and Main Street Highways Case Study Resource

3. FINDINGS

Findings from each area were ranked according to the response. A percentage was then calculated for each response. Findings from the analysis of practices provided the following information:

1. Standards

- 92% stated they used ADA Standards
- 80% stated they used PROWAG
- 8% stated they planned to use PROWAG in the future
- 39% used local standards where appropriate or other standards such as the MUTCD

2. Areas Inspected for Accessibility

- 56% surveyed buildings and related areas such as rest areas under their jurisdiction in addition to public rights-of way. Some entities also surveyed park and ride lots and other owned sites in addition to leased sites. The majority of the buildings surveyed were cursory and lacked detail.
- 74% initially focused on curb ramps and later expanded their plan to include sidewalks and other pedestrian rights-of-way to include intersections, crosswalks, traffic islands, bus shelters, driveways and other areas
- 15% focused only on curb ramps

3. Data Collection Methods

- 86% of the data collection methods were manual

- 34% reported data collection was semi-automated with the use of handheld GPS devices
- Quality Control
- 88% of the data collection methods lacked consistency, reliability, and quality control measures
- 64% of the plans were not comprehensive and did not include all potential barriers that would be identified by the applicable standards

4. Database

- 20% had some form of database for data collection
- 29% used a database for management of field data
- 5% collected field measurements manually and then transferred the field measurement into a database
- 97% did not have a database that had features or the capability to easily update, prioritize, apply a schedule for barrier removal, track and report features or document corrections
- 66% collected GIS information
- 16% captured photographs
- 46% has some form of mapping features
- 6% documented corrections made for barrier removal, but none were able to do so automatically or across the board in their database
- 63% documented estimated costs
- No documents were available to reflect actual costs
- None had the capability to reprocess their field data if codes changed

5. Public Input

- 82% had some form or method for input from the public
- 12% demonstrated very limited public input
- 10% had only one method for public input
- 38% had comprehensive methods for public input

6. Prioritization Methods

- 84% used some form or criteria for prioritization

- 14% had clearly defined methods for prioritization that included complaints, project demand, high use facility, high need area, demographics, public input and the severity of noncompliance

7. Demographics

- 51% used demographics in their prioritization and planning and included areas of high use by individuals with disabilities and other areas that may have high use such as schools and hospitals

8. Plan Implementation

- 42% had a scheduled plan for implementation
- 36% planned implementation in phases

9. Plan Integration

- 23% integrated the funding and implementation of the plan with other agencies and planning organizations
- 16% demonstrated interdepartmental coordination and integration

10. MEF Policy-Maximum Extent Feasible

- 6% had MEF procedures

11. Technical Infeasibility

- 7% had technical infeasibility

12. Equivalent Facilitation

- 0% of the entities sampled had equivalent facilitation policies

13. Undue Financial Burden

- 0% - There was evidence of the use of item #11 regarding applying barrier removal efforts to the maximum extent feasible (MEF), but formal policies regarding MEF were not evident
- The use of item numbers 12, 13, and 14 were found to be used in only limited cases

14. ADA Committees

- 32% had ADA Committees. Some were designated as ADA Advisory and some were designated as ADA Work Groups.

15. ADA Coordinator

- 90% had a designated ADA Coordinator(s)
- 56% had a joint ADA/504 Coordinator

16. 504 Coordinator

- 37% designated 504 Coordinator
- 56% had a joint ADA/504 Coordinator

17. Transition Plan Coordinator

- Only two entities had a designated Transition Plan Coordinator that was different and apart from the ADA or 504 Coordinator
- The ADA/504 Coordinators generally served in the role as the Transition Plan Coordinator

18. Grievance Procedures

- 90% were found to have grievance procedures
- 35% of the grievance procedures were targeted to employees and not the public

19. Public Notice

- 44% had a public notice regarding the rights afforded to persons with disabilities

20. Policies and Procedures

- 40% had policies and procedures to enhance ADA compliance

21. Reasonable Accommodations Policy

- 30% had policies regarding reasonable accommodations policies as most referenced they either had a policy or were planning to develop a policy

22. Nondiscrimination Policy

- 33% had nondiscrimination policies. Some stated they had policies for nondiscrimination although it was unclear as to how the policy was noticed or posted.

23. Programs

- 16% mentioned an accessibility review regarding access to programs, services and activities. A few entities reviewed employment policies and programs.

24. Communications

- 34% had policies for alternate formats and auxiliary aids. Some entities conducted a website review.

25. Training

- 59% offered training activities for staff. A few required mandatory attendance. On-line training was offered.

26. Monitoring and Tracking

- 13% had procedures for monitoring and tracking.

27. Oversight Assurances

- 7% had procedures for oversight assurances.

28. Methods for Living Plan

- 7% had components for a living plan that was ongoing and could be easily updated.

29. Designated persons for plan implementation

- 30% had a designated person for plan implementation. The role of this person was usually the ADA or 504 Coordinator.

30. District Points of Contact

- 86% designated the ADA, 504, or the ADA/504 Coordinator as the Point of Contact.

31. Commitment

- 68% of the agencies demonstrated a commitment by allocating resources and staff to develop or maintain an ADA/504 Plan.

32. Funding

- 72% of the agencies identified funds being budgeted for the removal of barriers identified in their plans.

33. Training for Staff

- 57% offered some form of training.
- 34% offered comprehensive training to a variety of staff, divisions and administrations.
- 10% found that providing “in-house” training provided a better and ongoing alternative than contracting an outside source for training.

34. Litigation

- 15% had some form of prior litigation or requirements by the Department of Justice or Federal Highways.
- 8% had reporting requirements due to settlement agreements.

35. Approvals by Federal Highway

- Although there is not a formal approval process, the FHWA has disseminated recommended components of a ADA/504 Transition Plan and has been monitoring performance of selected plans for recipients and sub-recipients.
- 5% self-reported that their plan had been approved by FHWA.
- FHWA is offering training to assist with the development of self-evaluations and transition plans and this training was identified in the plan.

36. Other approvals

- None indicated other approvals.

37. Measures of Success

- 18% had evidence of indicators of success in terms of ongoing efforts to remove barriers and funding for the removal of barriers.

38. Interagency Collaboration

- 24% used interagency collaboration to assist with the development and implementation of the plan.

The importance of leadership and a strong commitment from top management was emphasized as a vital component for the successful development and implementation of an ADA/504 plan along with adequate funding and resources by many recipients and sub-recipients. During an on-site meeting with the Maryland State Highway Administration (SHA), for example, the importance of commitment from the top and funding were described as two key variables for success. Representatives from SHA stated that they dedicate and spend \$11-13 million a year for ADA compliance above

and beyond funds that are already incorporated into new projects. In addition, they have a staff of four dedicated to ADA initiatives.

It is important to note that the \$11-13 million allocated each year by Maryland State Highway Administration (SHA), is for a project that is much smaller than the potential funding needed for DDOT to remove barriers. DDOT's current project to survey additional Wards is initially limited to the identification of a smaller number of attributes and assets than required by the ADA or PROWAG and related regulations and standards.

The area of adequate funding and commitment throughout the levels of the organization were noted to be of paramount importance to develop, maintain and implement a comprehensive and quality plan. Developing a comprehensive plan will decrease the probability of litigation and preserve the funds to remove barriers and avoid legal costs. Many public entities, unfortunately have found that poor maintenance of sidewalks and other pedestrian areas can lead to expensive litigation. Following litigation, the City of Chicago, for example, agreed to spend \$10 million a year for five years on sidewalk accessibility, in addition to the \$18 million it spends annually on sidewalk maintenance.

The City of San Francisco approved \$21M from the FY 13/14 budget to fund their ADA Transition Plan in addition to the \$19M approved for FY 12/13. Another measure of commitment is the \$177 million dollars funded solely for disability access improvements over 10 years, mostly for architectural barriers and curb ramp remediation. It is also important to note that the City of San Francisco identified fewer categories of barriers than DDOT has identified. The City of San Francisco has budgeted an amount for barrier removal greater than DDOT even though they have identified only portions of the barrier removal than required and have surveyed fewer barriers than DDOT. The City of San Francisco allocated funding for ADA improvements and barrier removal due to their current litigation and focus only on curb ramps and sidewalks.

The California Department of Transportation (Caltrans) entered into a settlement agreement which included an annual commitment of \$25 million a year plus a \$29.9 million carry-over from previous fiscal years. Funding allocated for FY 2014/15 is \$42.4 million, \$42.4 million for FY 2015/16 and \$35.9 million for FY 2016/17. The annual commitment levels according to a 2010 lawsuit are required to be \$1.1 Billion with annual commitments of \$25 million per year for 2010-2014; \$35 million per year for 2015 to 2024; \$40 million per year for 2025 to 2034 and \$45 million per year for fiscal years 2035-2039.

Another area that appeared to be of significance was the development of a web based accessibility software intake and management system to accurately and easily capture

as-is field measurements, manage data, set priorities, estimate budgets, monitor and track progress, document barrier removal and update the plan if codes change without re-inspecting. GIS, mapping and photographs were found to be valuable for understanding and implementing the plan.

The importance of public input, planning, interagency collaboration, designated responsible persons to oversee and implement the plan and the review of policies, procedures and programs were evident in successful plan implementation.

Training was identified as another critical element for building the internal oversight and empowering stakeholders to construct and maintain public rights-of-ways that are accessible. Some found that training by staff from within the organization provided more internal capacity and consistency than contracting for training by outside sources. The training that was identified to be most successful was provided at multiple levels and included design staff and consultants, construction and field inspectors.

In summary, a comprehensive ADA/504 plan has critical elements for not only the successful development of the plan, but for the on-going, integrated implementation and management of the plan. The survey of nationwide practices has identified the more significant components for the development and implementation of a meaningful, cost-effective plan. Best practices and methods for the successful implementation were identified.

The most significant best practices identified for a successful transition plan that could be utilized by DDOT include:

- Leadership and support from upper level management
- An ADA Coordinator that is empowered to monitor and implement the plan
- Projection of budgets and allocation of adequate funding
- Training for staff throughout the organization
- Interdepartmental coordination
- Data collection and management software
 - Development and use of a data collection method for electronic intake
 - Comprehensive surveys of all PROW and buildings
 - Use of web based software to manage the plan
 - Use of database tools to update and manage the plan
 - A web based software platform that provides a variety of reporting features available to generate reports as needed
 - A web based database that is easily updated

- A web based tool that provides priority settings, severity ratings, integration of a schedule for barrier removal and tracking features, including documenting corrections that are made to remove barriers
- Inclusion of GIS, mapping, photographs, estimated and actual costs in the web based software to manage the barrier removal plan

4. RECOMMENDATIONS

Information derived during the review of nationwide practices can be utilized to develop a comprehensive model and framework for DDOT's development of a state-of-the-art ADA/504 Self-evaluation and Transition Plan. Valuable information was collected. Some data collected, however, was more significant and had greater implications for the development of an effective, manageable, updatable plan that can be implemented over time.

The ten (10) critical elements of a successful plan included, but were not limited to:

1. Commitment from top level management: Many entities emphasized that successful plans are not possible without support and commitment from top level management. It was noted that direction from the top that permeates throughout the organization is a key measure for success.
2. Adequate funding over multiple years: It was emphasized that sufficient funding is needed to make an impact towards barrier removal and building accessible features. The ongoing commitment over multiple years was noted as a key measure for success.
3. Formulating and planning an overall comprehensive ADA/504: Building and developing a comprehensive plan that includes all of the required components is important in lieu of putting together a plan in pieces of compliance.
4. Designation of an ADA/504 Coordinator who is empowered and authorized to implement the plan: It was noted that the ADA/504 Coordinator be placed in the organizational structure in a location to facilitate the oversight and implementation of the plan. It was also noted that the ADA/504 coordinator needs sufficient staff for the implementation of the plan.
5. Appropriate input by staff, committees and stakeholders that are incorporated into the plan: The plan needs to be embraced by staff, members of the public and other stakeholders in order for accessibility objective and activities to be incorporated into planning and ongoing activities.

6. Interagency collaboration and planning: The coordination and planning with other local jurisdictions and agencies was found to promote sharing of ideas and enhance planning.
7. ADA/504 measures, policies, procedures and practices integrated into all levels of the organization: The integration of policies and procedures provides for a more seamless barrier removal plan and highlights any differences between policies, procedures and related construction practices.
8. Consistent and comprehensive data collection and management to collect field data, provide a centralized access and management of data, prioritization, tracking, monitoring, and documenting progress, updating the plan and preparing reports: Data collection and management was defined as a key component for a successful plan. The importance of an electronic method for data collection and reporting was noted to be of paramount importance. Of even more significance was the development of web based software to plan and document implementation of the plan. The importance of the capability of the web based program to produce a wide variety of reports and the items required for an effective transition plan.
9. Established and adopted procedures to track stakeholders concerns and grievances in a timely manner with documentation of the resolution and implications to the organization: As the ADA and Section 504 require that concerns and complaints be tracked to insure timely resolution, it is important that a system be developed to record concerns and complaints and document the resolution of such complaints.
10. Comprehensive and ongoing training at multiple levels to include technical and support staff: Training was emphasized to build the internal capacity of the organization and increase compliant construction methods. It was also noted that training should incorporate policies, procedures and programs.

This page left intentionally blank.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

TASK B REVIEW OF DDOT POLICIES AND PROCEDURES

Prepared For:



Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.
Disability Access Consultants (DAC)
Sharp & Company
Precision Systems, Inc.

DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 1.0
DATE: December 2014.

This page left intentionally blank

EXECUTIVE SUMMARY

A Comprehensive American with Disabilities Act (ADA)/Section 504 Self-Evaluation and Transition Plan is being developed for the District Department of Transportation (DDOT). DDOT recognizes that the Development of a Comprehensive ADA/Section 504 Transition Plan is an ongoing, active process that requires maintenance, updating and documentation of the plan. It is understood that the integration and collaboration of DDOT employees, divisions, departments and members of the public will provide for a realistic, usable and cost effective plan. As ADA Barrier Removal initiatives are coordinated, clearly communicated, understood and integrated throughout DDOT, the internal capacity to achieve and maintain compliance will be enhanced.

The purpose of this task is to review the overall policies and procedures of DDOT as they pertain to individuals with disabilities and the removal of barriers. Barriers for these individuals may include not only structural but programmatic barriers related to the provision of programs, services and activities in the pedestrian access route (PAR). Policies and procedures might impact the built environment and the operations of programs, services and activities.

Thus, DDOT's approach to examining policies and procedures supports DDOT's commitment for accessible Public Right-of-Way and also meets the legal mandates of the ADA and related accessibility regulations and standards.

The approach methodology to review policies and procedures included:

- Methods for data collection included information gathered from the DDOT website
- DDOT documents provided
- Interviews of DDOT staff
- Information collected during public input process

General findings related to policies include:

- DDOT demonstrates a commitment for compliance with the ADA and related accessibility standards such as Section 504, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and Manual of Uniform Traffic Control Devices for Streets and Highways (MUTCD) and local regulations.
- DDOT has varying degrees of methods and practices for ADA compliance.
- There are many documented activities and efforts regarding compliance initiatives to provide accessibility. Written procedures and policies regarding ADA and accessibility compliance are not frequently seen throughout Administrations. However, there is evidence of practice and mission statements for ADA compliance.

- It is unclear which Administration is developing and monitoring compliance.
- There are some excellent training materials that in essence describe what constitutes ADA compliance. In a few cases, differences regarding ADA compliance exist in training manuals. Reference to sections of the training materials regarding overall support and direction required by policy is limited.
- Policies regarding specific requests for ADA funding were not evident. This may be due to the fact that funding is integrated into the work activities.
- The prioritization of grievance related mitigation action has not been formalized. Administrations do not have clear policy or procedures to respond to such requests in a timely manner.

Overall recommendations related to policies include:

1. Additional staff should be put in place to support the ADA Coordinator in developing, implementing and monitoring ADA/Section 504 policies throughout DDOT.
2. A mechanism should be developed and utilized to have policies readily available for staff with a designated contact for questions or assistance.
3. A policy should be developed for the location and dissemination of policies.
4. Policies and procedures developed should include not only construction and planning environment, but policies related to access to program, services and activities of DDOT.
5. The method for integration for ADA policies and procedures must be clear.
6. Policies and procedures should monitor accessibility activities by DDOT, their effectiveness, compliance with the ADA and a method for escalation to another level, if ineffective.
7. The grievance procedures for tracking and monitoring the resolution of complaints need to be developed and centralized throughout the organization. The resolution of complaints needs to be timely and should be related to funding requests in advance. For example, requests regarding non-compliance that need to be resolved immediately due to safety issues need to have a funding source that is readily available to avoid delays.
8. Integrate an ADA grievances and procedure feature to Cityworks Software. This will serve to enhance timely resolution of complaints and communication between Administrations. The system can also be reviewed by General Counsel for potential legal issues and emerging legal trends.
9. A policy should be developed regarding participation by staff, contractors and consultants regarding participation in ADA training. It would provide a mechanism to track the type of training, date of training, duration and

participants. It is also recommended that training efforts be brought on-site to offices that are not located at headquarters.

10. A policy should be developed for procedures to request ADA funding that may reside outside of regular requests by Administrations.
11. A policy and procedure should be developed and implemented for an accommodations statement to appear on publications sent out and developed outside of the Communications Office. For example, a policy will provide the consistency for the time for requests and will avoid one Administration requesting seven days' notice and other requesting three days' notice.
12. A policy requiring ADA compliance standards be located on the Resource Website will increase accessibility by users and provide one centralized location for the review of the items by upper management for consistency.
13. Policies should be updated as legal trends and court decisions emerge.
14. Recommend developing a District ADA Policy and Guidelines that addresses accessibility and other ADA issues that individuals with disabilities may experience City-wide. It will be beneficial for engineers, developers, inspectors and contractors in the DC area, since it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance.
15. Create a policy on tracking and reporting the progress DDOT is achieving in ADA compliance.

This page left intentionally blank

Table of Contents

EXECUTIVE SUMMARY.....I

1. BACKGROUND.....7

1.1 General Background.....7

1.2 Americans with Disabilities Act.....7

1.3 Section 504 of the Rehabilitation Act of 1973.....9

2. ACTIVITIES.....9

2.1 Purpose of Task.....9

2.2 DDOT Organization Summary.....9

2.3 Process Used for Review Policies and Procedures.....10

2.4 Discussion by Administrations.....11

3. FINDINGS.....14

4. RECOMMENDATIONS.....15

This page left intentionally blank

1. BACKGROUND

1.1 General Background

The Americans with Disabilities Act of 1990 is a comprehensive civil rights act that prohibits discrimination and ensures equal opportunity for people with disabilities. The ADA was established with the purpose of providing independent access to public areas for individuals that have physical, visual or hearing disabilities. Although there has been several attempts to establish ADA Accessibility Guidelines (ADAAG) for agencies to use in its implementation, with the most recent being the 2010 ADA Standards for Accessible Design, ADDAG does not present any guidelines for the Public Right-of-Way.

The Department of Justice has found that ADAAG does apply to the Public Rights-of-Way, even if it was originally written for buildings and facilities. The U.S. Access Board developed guidelines in applying the ADA standards to the public right-of-way. The most recent use is the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way issued on July 26, 2011.

The proposed guidelines are developed specifically for pedestrian facilities in the Public Right-of-Way and address conditions and constraints that exist. The requirements make allowances for typical roadway geometry and permit flexibility in alterations to existing facilities where existing physical constraints make it impractical to fully comply with new construction requirements. The guidelines also include requirements for elements and facilities that exist only in the Public Right-of-Way such as pedestrian signals and roundabouts.

1.2 Americans with Disabilities Act

The Americans with Disabilities Act (ADA) of July 26, 1990 prohibits discrimination and ensures equal opportunity for people with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. The ADA is a companion civil rights legislation to the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. The Title II of ADA specifically refers to state and local government programs, services and activities.

The ADA is divided into five parts, covering the following areas:

- Employment
- Public Entities
- Public Accommodations
- Telecommunications, and
- Miscellaneous

1.2.1 Title I: Employment

Under this title, employers, including government agencies, such as DDOT, must ensure that their practices do not discriminate against persons with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment.

1.2.2 Title II: Public Entities

Title II of the ADA prohibits State and local governments from discriminating against individuals with disabilities or from excluding participation in denying benefits or programs, services, or activities to individuals with disabilities. It is divided into two subtitles: Subtitle A and Subtitle B.

a) Subtitle A

Subtitle A is intended to protect qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination of disability established by Section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance.

b) Subtitle B

Subtitle B is intended to clarify the requirements of Section 504 for public transportation entities that receive Federal financial assistance. It extends coverage to all public entities that provide public transportation, whether or not they receive Federal financial assistance. The Department of Transportation is responsible for the implementation of the second subtitle of Title II.

1.2.3 Title III: Public Accommodations

Title III requires newly constructed or altered places of public accommodations to comply with the ADA Standards and prohibits discrimination on the basis of disability in the activities of places of public accommodations.

1.2.4 Title IV: Telecommunications

This title covers regulations regarding private telephone companies, and requires common carriers offering telephone services to the public to increase the availability of interstate and intrastate telecommunication relay services to individuals with hearing and speech impairments.

1.2.5 Title V: Miscellaneous

Title V includes several miscellaneous provisions, including construction standards and practices, provisions for attorney fees, and technical assistance provisions. Title V sets the following:

- Requires the U.S. Access Board to issue accessibility standards
- Allows for attorney's fees to be awarded as part of the settlement of a successful lawsuit under the ADA
- Requires federal agencies to provide technical assistance
- States specifically that illegal use of drugs is not a covered disability
- Provides that state and local laws that mandate equal or greater protection to individuals with disabilities are not superseded or limited by the ADA

1.3 Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified individuals from discrimination based on their disability. The non-discrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 prevents organizations and employers from denying individuals with disabilities an equal opportunity to receive program benefits and services.

2. ACTIVITIES

2.1 Purpose of Task

The purpose of this task is to review DDOT overall policies and procedures as they pertain to individuals with disabilities and the removal of barriers that may deny access for people with disabilities. Barriers for these individuals may include not only structural but programmatic barriers related to the provision of programs, services and activities in the pedestrian access route (PAR). Policies and procedures might impact the built environment and the operations of programs, services and activities.

2.2 DDOT Organization Summary

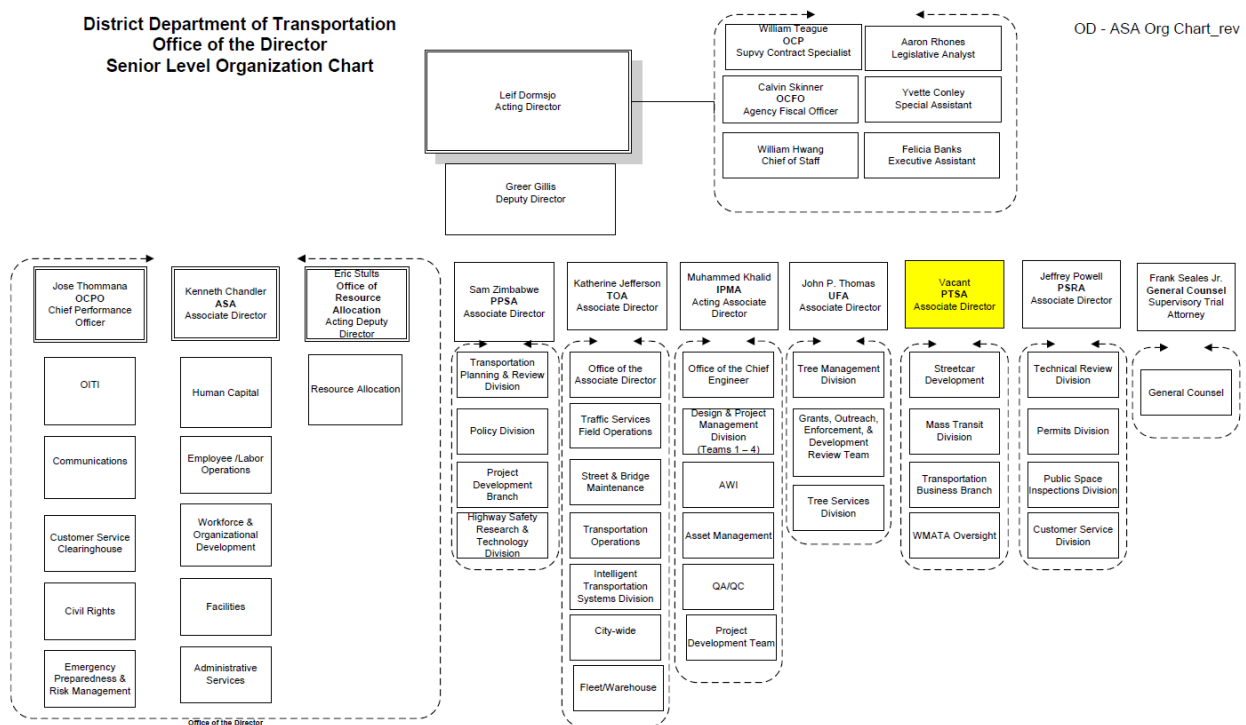
The District Department of Transportation is responsible for the management and maintenance of the transportation infrastructure for DC. Their mission is to develop and maintain a cohesive sustainable transportation system that delivers safe, affordable and convenient ways to move people and goods while protecting and enhancing the natural, environment and cultural resources of the District.

During this part of the project the following Administration were reviewed:

- Office of Director

- Office of Civil Rights
- Office of Communications
- Office of Information Technology
- Office of Risk Management
- Training Office
- Policy Planning and Sustainability Administration
- Transportation Operations Administration
- Infrastructure Project Management Administration
- Urban Forestry Administration
- Progressive Transportation Services Administration
- Public Space Regulatory Administration

The following is the DDOT Office of the Director Senior Level Organization Chart.



Process Used for Review Policies and Procedures

The methodology to review policies and procedures included:

- Collecting data from various sources in DDOT for the policies review (gathered from the DDOT website and documents provided by DDOT)
- Participating in interviews of key personnel staff to ascertain knowledge of each administration policy, if any
- Gathering information collected during public input process

2.3 Discussion by Administrations

As common with many public entities, there are not always specific policies or procedures regarding ADA requirements and related accessibility for each Administration. During the completion of this task, it was noted that there were some areas that did not have policies or procedures directly related to ADA requirements.

Also, in some documents, incorrect language was used regarding individuals with disabilities. The appropriate language should be adapted in updated documents.

There were no specific policies related to the ADA in most areas of Administration. Some areas are discussed below.

- Office of Civil Rights
 - The Office of Civil Rights has comprehensive information about ADA and accessibility regulations such as Title VI and Title VII. Related forms were provided regarding the complaint process. Information was available on the website and in publications. There was not a centralized system noting tracking concerns, complaints and grievance.

- Office of Risk Management
 - The Office reviews transportation security initiatives, develops emergency action plans, and ensures the Department is prepared for all levels of emergencies. It also has a procedure for building evacuations and transport that includes individuals with disabilities.

- Training Office
 - The Training Office ensures ADA training, mainly focused on DDOT Staff having familiarity with ADA Standards and requirements. Policies should be developed regarding tracking ADA training that includes the date of the training, individuals that attended and the measure of success from the training.

- Public Space Regulatory Administration (PSRA)
 - There are manuals that list criteria of ADA compliance. The DC Temporary Traffic Control Manual and Standards has a policy statement that says it provides guidance for assessment of work zones and safety issues for pedestrians including individuals with disabilities. A formal mechanism to state which guidelines and standards would be beneficial and would assist with enforcement.

PSRA staff provided evidence of many modifications and accommodations that were made for individual with disabilities to assist them in the permitting process, access to the kiosks, services and activities.

Following an on-site visit, it was noted that the kiosks do not meet ADA accessibility requirements. In the interim before reconfiguration of the kiosks, DDOT staff is aware that members of the public may request assistance. While there is no procedure set in place, interviews of DDOT staff while on-site demonstrated a commitment to provide an accommodation or modification for kiosk use.

DDOT needed to improve responsiveness, accuracy and work efficiencies to ensure that all business industry construction/renovation facility plan submissions provide adequate design information for ADA facilities. As a result, a Memorandum (Appendix C) specified that all new plans submitted to DDOT must clearly show compliance with requirements stated in Plan Submission Requirements and Supporting Documentation Requirements (effective on March 1st, 2013). DDOT's current state of practice allows applicants to submit plans for approval that does not include full designs for ADA features and this Memorandum reverses this practice.

Policies, in addition to permits, are needed to address access to special events. According to PSRA staff, a committee with representation of appropriate areas assists with the event.

- Infrastructure Project Management Administration (IPMA)
 - This Administration demonstrates progressive activities for ADA compliance. IPMA has reviewed and enhanced design and construction documents for ADA compliance.

While there have been Memorandums issued, there is no formal ADA policy set in place for monitoring work to ensure compliance. A policy and procedure should be put in place to track and monitor compliance.

Additionally, a DDOT grievance procedure was developed to outline what is needed to file a grievance. Besides this, a policy to track the grievances received by IPMA and other administrations already exists, Cityworks. Although very comprehensive and interactive it does not have an ADA feature that works within the grievances timeline set in Cityworks. DDOT's ADA grievances and procedures should be implemented within the software to enhance timely resolution of complaints and communication between Administrations.

- Transportation Operations Administration (TOA)
 - TOA seeks to maintain the integrity of public assets and based on interviews to the staff, they are continuously reviewing and incorporating ADA standards into their areas of responsibility. As an example, the Parking Management Team uses DDOT Inspection Checklist for Parking Meters that are implemented as policy (Appendix C).
 - The District offers programs intended to ensure parking accessibility to residents and visitors with disabilities. The permitting process for residential parking, although not formal policy, provides a written background for ADA permits for residential parking based on medical documentation (Appendix C).
- Policy, Planning and Sustainability Administration (PPSA)
 - This Administration establishes broad strategic goals to guide multi-modal program development, the policies necessary to implement these goals, and ensure compliance with policies through plan review and permitting.
 - A DDOT Sidewalk Installation Policy (Appendix C) was revised by the Department and established to require the installation of new sidewalks, where needed, to ensure a safe and accessible environment for pedestrians and persons with disabilities. This policy provides a consistent process for prioritizing the installation of new sidewalks, providing public notice of pending construction, evaluating public comments, and exempting some streets segments from the sidewalk installation requirements.
 - A policy and procedure form for ranking ADA issues would be useful and beneficial based on previous interviews with the staff. They expressed the need for policies or procedure regarding what type of causes or issues related to ADA compliance and another for costing of ADA items.

- Other items and areas to consider
 - Department's relationship to voting by members of the public. DDOT staff has stated that currently no DDOT sites are used for voting, but that DDOT sends notices to polling sites. DDOT should consider doing an inventory of polling sites for accessibility.
 - It is recommended that a policy be developed regarding the accessibility of current DDOT buildings and future acquisitions and leases and their inclusion into a Transition Plan.
 - DDOT should consider the use of the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of Way (PROWAG) and inclusion of its standards in policies and procedures. Although PROWAG is not yet formally adopted, many transportation agencies have adopted and are using these standards due to its expected finalization in the near future.

3. FINDINGS

DDOT has efforts to enhance ADA compliance within the Department. It is understood that many accessibility activities are being accomplished by practices and not by formal policy or procedures.

General findings related to policies include:

- DDOT demonstrates a commitment for compliance with the ADA and related accessibility standards such as Section 504, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and Manual of Uniform Traffic Control Devices for Streets and Highways (MUTCD) and local regulations.
- DDOT has varying degrees of methods and practices for ADA compliance.
- There are many documented activities and efforts regarding compliance initiatives to provide accessibility. Written procedures and policies regarding ADA and accessibility compliance are not frequently seen throughout Administrations. However, there is evidence of practice and mission statements for ADA compliance.
- It is unclear which Administration is developing and monitoring compliance.
- There are some excellent training materials that in essence describe what constitutes ADA compliance. In a few cases, differences regarding ADA

compliance exist in training manuals. Reference to sections of the training materials regarding overall support and direction required by policy is limited.

- Policies regarding specific requests for ADA funding were not evident. This may be due to the fact that funding is integrated into the work activities.
- The prioritization of grievance related mitigation action has not been formalized. Administrations do not have clear policy or procedures to respond to such requests in a timely manner.

4. RECOMMENDATIONS

Overall recommendations related to policies include:

1. Additional staff should be put in place to support the ADA Coordinator in developing, implementing and monitoring ADA/Section 504 policies throughout DDOT.
2. A mechanism should be developed and utilized to have policies readily available for staff with a designated contact for questions or assistance.
3. A policy should be developed for the location and dissemination of policies.
4. Policies and procedures developed should include not only construction and planning environment, but policies related to access to program, services and activities of DDOT.
5. The method for integration for ADA policies and procedures must be clear.
6. Policies and procedures should monitor accessibility activities by DDOT, their effectiveness, compliance with the ADA and a method for escalation to another level, if ineffective.
7. The grievance procedures for tracking and monitoring the resolution of complaints need to be developed and centralized throughout the organization. The resolution of complaints needs to be timely and should be related to funding requests in advance. For example, requests regarding non-compliance that need to be resolved immediately due to safety issues need to have a funding source that is readily available to avoid delays.
8. Integrate an ADA grievances and procedure feature to Cityworks Software. This will serve to enhance timely resolution of complaints and communication between Administrations. The system can also be reviewed by General Counsel for potential legal issues and emerging legal trends.

9. A policy should be developed regarding participation by staff, contractors and consultants regarding participation in ADA training. It would provide a mechanism to track the type of training, date of training, duration and participants. It is also recommended that training efforts be brought on-site to offices that are not located at headquarters.
10. A policy should be developed for procedures to request ADA funding that may reside outside of regular requests by Administrations.
11. A policy and procedure should be developed and implemented for an accommodations statement to appear on publications sent out and developed outside of the Communications Office. For example, a policy will provide the consistency for the time for requests and will avoid one Administration requesting seven days' notice and other requesting three days' notice.
12. A policy requiring ADA compliance standards be located on the Resource Website will increase accessibility by users and provide one centralized location for the review of the items by upper management for consistency.
13. Policies should be updated as legal trends and court decisions emerge.
14. Recommend developing a District ADA Policy and Guidelines that addresses accessibility and other ADA issues that individuals with disabilities may experience City-wide. It will be beneficial for engineers, developers, inspectors and contractors in the DC area, since it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance.
15. Create a policy on tracking and reporting the progress DDOT is achieving in ADA compliance.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

REVIEW OF DDOT'S PUBLIC ROW STREETScape AND SIMILAR DESIGN DOCUMENTS - TASK C

Prepared For:



Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.

Disability Access Consultants (DAC)

Sharp & Company

Precision Systems, Inc.

DC Contract No.: DCKA-2013-T-0115 Task Order No. 4

REV: 1.0

DATE: December, 2014

This page left intentionally blank.

EXECUTIVE SUMMARY

A Comprehensive American with Disabilities Act (ADA)/Section 504 Self-evaluation and Transition Plan is being developed for the District Department of Transportation (DDOT). DDOT recognizes that the Development of a Comprehensive ADA/Section 504 Transition Plan is an ongoing, active process that requires maintenance, updating and constant documentation of the plan. It is understood that the integration and collaboration of DDOT employees, divisions, departments and members of the public will provide for a realistic, usable and cost effective plan. As ADA Barrier Removal initiatives are coordinated, clearly communicated, understood and integrated throughout DDOT, the internal capacity to achieve and maintain compliance will be enhanced.

This report discusses the findings of Task C which includes performing DDOT documents review as they pertain to people with disabilities and removal of barriers. The Team identified and used several Federal documents to determine the current ADA compliance criteria for pedestrian facilities found within the Public Right-of-Way. These standards included the 2010 ADA Standards for Accessible Design and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, July 26, 2011.

Ten documents were reviewed for this task taking into consideration information and/or standards regarding items such as curb ramps details, crosswalks, and protruding objects. This review found that the majority of the documents are not ADA compliant based on the most current standards. This report shows what and/or why they are not fully in compliance and also includes recommendations for DDOT’s improvement. It is anticipated that the project basis established by DDOT will meet the requirements of the Federal Highway Administration (FHWA).

The general findings of this effort are summarized as follows:

- Portions of the majority of the documents reviewed are not ADA compliant.
- Documents do not specify and/or offer training requirements to managers, planners, designers and inspectors responsible for improvements to the Public Right-of-Way projects.
- Most of the documents use incorrect language regarding individuals with disabilities.
- Some documents reference outdated standards and guidelines.

- Documents don't really have an established procedure for ADA design exceptions.
- The role of the ADA Coordinator does not appear to be mentioned in these documents.
- Documents do not focus on people with disabilities as part of the public input.

Our general recommendations for the update and revision of these documents are as follows:

- The majority of the documents need to be revised to ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Documents should recommend that ADA training be mandated to all DDOT staff responsible for improvements to the Public Right-of-Way projects, to ensure district-wide implementation of ADA requirements from planning, design, and construction to maintenance phases.
- Make a requirement for an ADA training exam or evaluation after each course be taken to ensure staff and/or consultants understanding of the ADA requirements for planning, designing, and construction.
- Some documents should reference the WMATA Guidelines for Design and Placement of Transit Stops, which provide details of bus shelter requirements and alighting areas.
- The appropriate language should be adapted in the updated versions.
- Establish a procedure and/or form for design exceptions pertaining to ADA issues.
- ADA Coordinator should have a more prominent role at the moment of planning and designing.
- Documents should focus on people with disabilities as an important part of the public input. Also, meetings must be held in accessible locations and reasonable accommodations must be provided. Including people with diversity in meetings will increase opportunities for the open exchange of ideas, mutual learning, and informed and representative decision making processes.

TABLE OF CONTENTS

EXECUTIVE SUMMARY I

1. BACKGROUND.....5

1.1. General Background.....5

1.2. Americans with Disabilities Act5

1.3. Section 504 of the Rehabilitation Act of 19737

2. ACTIVITIES.....7

2.1. Procedure Used for Review of DDOT’s Public ROW Documents.....7

2.2. List of Federal Regulations and Guidelines Used for Evaluation8

2.3. List of DDOT Documents Reviewed for Compliance9

2.4. Format Used for Document Review Comments9

2.5. Detailed Review of PROW Documents12

3. DISCUSSION OF FINDINGS OF DOCUMENT REVIEWED.....12

3.1. DDOT Right-of-Way Policies and Procedures Manual (June 9, 2011)13

3.2. Public Realm Design Manual (July 2011)15

3.3. DC Pedestrian Master Plan (April 2009).....18

3.4. DDOT DC Streetcar Design Criteria Manual (2012)23

3.5. Pedestrian Safety and Work Zone Standards Covered and Open Walkways ...27

3.6. DPW Downtown Streetscape Regulations (August 2000)28

3.7. Bicycle Facility Design Guide (2005)31

3.8. DC Bicycle Master Plan (April 2005)31

3.9. DDOT Design-Build Manual (May 2014)32

3.10. Green Infrastructure Standards (2014).....32

4. RECOMMENDED MODIFICATIONS/CHANGES TO PROW DOCUMENTS ...33

4.1. Summary of Findings & Recommendations.....33

4.2. Findings34

4.3. Recommendations.....34

5. SUMMARY35

This page left intentionally blank.

1. BACKGROUND

1.1. General Background

The Americans with Disabilities Act of 1990 is a comprehensive civil rights act that prohibits discrimination and ensures equal opportunity for people with disabilities. The ADA was established with the purpose of providing independent access to public areas for individuals that have physical, visual and hearing disabilities. Although there have been several attempts to establish ADA Accessibility Guidelines (ADAAG) for agencies to use with the most recent being the 2010 ADA Standards for Accessible Design, ADDAG does not present any guidelines for the public right-of-way.

The Department of Justice has determined that the ADAAG do apply to the public rights-of-way, despite the original application to only buildings and facilities. The U.S. Access Board developed guidelines in applying the ADA Standards to the public right-of-way. The most recent use is the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way issued on July 26, 2011.

The proposed guidelines are developed specifically for pedestrian facilities in the public right-of-way and address conditions and constraints that exist. The requirements make allowances for typical roadway geometry and permit flexibility in alterations to existing facilities where existing physical constraints make it impractical to fully comply with new construction requirements. The guidelines also include requirements for elements and facilities that exist only in the public right-of-way such as pedestrian signals and roundabouts.

1.2. Americans with Disabilities Act

The Americans with Disabilities Act (ADA) of July 26, 1990 prohibits discrimination and ensures equal opportunity for people with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. The ADA is a companion civil rights legislation to the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. The Title II of ADA specifically refers to state and local government programs, services and activities.

The ADA is divided into five parts, covering the following areas:

- Employment
- Public Entities
- Public Accommodations

- Telecommunications, and
- Miscellaneous

Title I: Employment

Under this title, employers, including government agencies, such as DDOT, must ensure that their practices do not discriminate against people with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment.

Title II: Public Entities

Title II of the ADA prohibits State and local governments from discriminating against individuals with disabilities or from excluding participation in denying benefits, programs, services, or activities to people with disabilities (e.g. public education, employment, transportation, recreation, health care, social services, courts, voting, and town meetings). It is divided into two subtitles:

- Subtitle A – Subtitle A is intended to protect qualified people with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination based on disability established by Section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance.
- Subtitle B – Subtitle B is intended to clarify the requirements of Section 504 for public transportation entities that receive Federal financial assistance. It extends coverage to all public entities that provide public transportation, whether or not they receive Federal financial assistance.

Title III: Public Accommodations

Title III requires newly constructed or altered places that accommodate the public to comply with the ADA Standards and prohibits discrimination on the basis of disability in the activities of these public accommodations.

Title IV: Telecommunications

This title covers regulations regarding private telephone companies, and requires common carriers offering telephone services to the public to increase the availability of interstate and intrastate telecommunication relay services to people with hearing and speech impairments.

Title V: Miscellaneous

Title V includes several items not covered elsewhere, including construction standards and practices, provisions for attorney fees, and technical assistance provisions. Title V sets the following:

- Requires the U.S. Access Board to issue accessibility standards
- Allows for attorney’s fees to be awarded as part of the settlement of a successful lawsuit under the ADA
- Requires federal agencies to provide technical assistance
- States specifically that illegal use of drugs is not a covered disability
- Provides that State and local laws that mandate equal or greater protection to individuals with disabilities are not superseded or limited by the ADA

1.3. Section 504 of the Rehabilitation Act of 1973

The Rehabilitation Act of 1973 is a federal law that protects people from discrimination based on their disability. The non-discrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 prevents organizations and employers from denying individuals with disabilities an equal opportunity to receive program benefits and services.

2. ACTIVITIES

2.1. Procedure Used for Review of DDOT’s Public ROW Documents

The primary goal of Task C is to ensure that all of DDOT’s Public Right-of-Way (PROW), Streetscape and similar design documents are in compliance with the current Federal ADA regulations and guidelines pertaining to the removal of accessibility barriers for people with disabilities. Towards this end, we have identified and used the latest Federal regulations and guidelines that pertain to ADA for evaluating DDOT

documents. Using this information, we created an evaluation form to help with the identification of areas within the document that needs improvement. Each document was evaluated using the form, out of which our outcomes and conclusions were generated; they will be shown further below with the summary of each document. Even though we are reviewing DDOT Standards and Design & Engineering Manuals as part of Task D, we are evaluating these PROW documents for compliance with DDOT Standards also, especially when DDOT Standards are more stringent than Federal Standards. We have reviewed all of DDOT’s PROW, streetscape and similar design documents, made available to us to date. In our review, emphasis is given to regulations pertaining to PROW ADA requirements. The detailed review is done in a format approved by DDOT (see Appendix C).

2.2. List of Federal Regulations and Guidelines Used for Evaluation

We used the following federal regulations, guidelines and documents in our review:

- Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), July 26, 2011
- 2010 ADA Standards for Accessible Design
- American with Disabilities Act of 1990
- Americans with Disabilities Act and Architectural Barriers Act Accessibility Guidelines (ADAAG), July 23, 2004
- Manual of Uniform Traffic Control Devices for Streets and Highways, 2009
- 29 USC 794 Section 504 of Rehabilitation Act of 1973
- 42 USC 126 Equal Opportunity for Individuals with Disabilities
- ADA Title II DOJ Guidance
- US DOT FHWA Access for Individuals with Disabilities Under Section 504 of the Rehabilitation Act and Title II of the ADA
- DOJ 28 CFR Parts 35, 36, 37 Non-discrimination on the Basis of Disability in State and Local Government Services; Public Accommodations and Commercial Facilities; Accessibility Standards
- Uniform Federal Accessibility Standards (UFAS)
- 49 U.S.C. Section 5310 Formula grants for the enhanced mobility of seniors and individuals with disabilities

- Project Civic Access
- FHWA DOT Designing Sidewalks and Trails for Access: Best Practices Design Guide, September 2001
- NCHRP Accessible Pedestrian Signals: A Guide to Best Practices

2.3. List of DDOT Documents Reviewed for Compliance

We used the following DDOT PROW, streetscape and similar design documents in our review for Task C:

- DDOT Right-of-Way Policies and Procedures Manual, June 9, 2011
- Public Realm Design Manual, July 2011
- District of Columbia Pedestrian Master Plan, April 2009
- DC Streetcar Design Criteria Manual, January 2012
- Pedestrian Safety and Work Zone Standards Covered and Open Walkways, September 2010
- Department of Public Works (DPW) Downtown Streetscape Regulations, August 2000
- Bicycle Facility Design Guide, 2005
- DC Bicycle Master Plan, April 2005
- DDOT Design Build Manual, May 2014
- Green Infrastructure Standards, 2014

All of the mentioned documents were found at DDOT’s website, ddot.dc.gov, under Standards and Guidelines, in the Projects and Planning tab. These documents are available for the public and for the use of the engineers and contractors.

2.4. Format Used for Document Review Comments

The PB Team used the following tabular format for documenting the review comments. Under the section Standards/Guidelines Referenced, it is shown the most commonly used ADA standards and guidelines, not necessarily the most current:

Review of DDOT’s Public ROW, Streetscape & Similar Design Documents							
DOCUMENT REVIEWED:				DOCUMENT DATE:			
REVIEWER(S):						REVIEW DATES:	
Standards/ Guidelines Referenced	PROWAG 2011						
	2010 ADA Standards						
	MUTCD 2009						
	ADAAG 2004						
	Other						
Item	Item Description	COMMENTS		Compliant			RECOMMENDATIONS
				Y	N	N/A*	
0.0	General						
1.0	Curb Ramps						
2.0	Sidewalks						
3.0	Crosswalk						
4.0	Bus Stops						
5.0	Driveways						

6.0	Pedestrian Signal Devices					
7.0	Parking Meters					
8.0	Medians					
9.0	On Street Parking					
10.0	Tree Beds					
11.0	Passenger Loading Zone					
12.0	Signs					
13.0	Sidewalk Cafés					
14.0	Surfaces					
15.0	Protruding Objects					
16.0	Stairs					
17.0	Procedures					

18.0	ADA Waiver					
19.0	Public Input					
20.0	Training					
21.0	Inspections					
ADDITIONAL COMMENTS/SHORT SUMMARY						
<i>*When an item is marked as N/A, it signifies that it is not relevant to the document under review.</i>						
<i>OTHER: WMATA Guidelines, Design and Engineering Manual 2009, Standard Specifications for Highways and Structures 2013 (Gold Book), AASHTO</i>						

2.5. Detailed Review of PROW Documents

Please see the attached Appendix C for the detailed review comments.

3. DISCUSSION OF FINDINGS OF DOCUMENT REVIEWED

The following is a discussion of the issues found in each document reviewed after being put through the evaluation process and also included are the recommendations for making each document compliant with the current ADA Standards and Guidelines.

A detailed view of the documents findings in the evaluation form can be found at the end of this report. Please see Appendix C.

3.1. DDOT Right-of-Way Policies and Procedures Manual (June 9, 2011)

The DDOT Right-of-Way Policies and Procedures Manual was developed to establish an efficient process for completing rights-of-way acquisitions and transfers, consistent with federal and local regulations. It involves travel lanes, on-street parking, sidewalk area, and other public spaces situated in the property lines on either side of a street as part of the rights-of-way.

When writing or speaking about people with disabilities, it is important to use the first person. Terms that are no longer proper or reflect a negative implication must be replaced; they do not reflect the individuality, equality or dignity of people with disabilities. In the DDOT Right-of-Way Policies and Procedures Manual (June 9, 2011), the word “handicapped” is used constantly throughout the document. While previously an acceptable term, using the word “handicapped” should be replaced with the acceptable and appropriate terminology “for person or people with disabilities”, which is a descriptive without negative implication.

Additionally, public input must involve all classes of people. The document must ensure and specify the importance of effective communication which is fundamental to involving all parties in the implementation of these standards. As part of an effective communication plan, the ADA requires that Title II entities communicate effectively with people who have communication disabilities. DDOT’s goal should be to ensure that communication with people with disabilities is equally effective as communication with people without disabilities. All people must be integrated in meetings to discuss projects and to solicit input into the project’s plans. This will guarantee the complete inclusion of any individual, regardless of their physical or mental capabilities, participating in a public meeting or advisory group, as an example.

The following is a more comprehensive look at the issues found in the different sections of this manual:

General

- Page 2-13, 2.10 Preliminary Design Plans (65%)
 - As part of the Preliminary Design Plans, a list of items that a ROW specialist should consider in consultation with the project engineer as part of the review is provided. Under Miscellaneous Items document it lists 3 questions. One more question should be asked related to ADA.

- Question: Is enough Right-of-Way being acquired to accommodate people with disabilities or to comply with the minimum requirements under ADA?
- Page 6-22, 6.11.3 Parking
 - “The total number of parking spaces and the number of handicapped spaces.”
 - Improper terminology used. Language should be changed. The term “person or people with disabilities” should be used instead of “handicapped”.
- Page 10-10, 10.3. Relocation Planning at Project Conceptual Stage
 - "Presence of residents with special needs, such as non-English speaking families or handicapped residents dependent on special services available nearby."
 - Improper terminology used. The term “person or people with disabilities” is more appropriate than “handicapped”.
- Page 10-81, 10.14.2 Planning for Housing of Last Resort (HLR)
 - "When a project appears to include persons who cannot readily be moved using the replacement housing program entitlements and procedures, i.e., when there is a unique housing need or when the cost of available comparable housing would result in payments in excess of the statutory payment limits (\$22,500 or \$5,250), DDOT will consider using HLR. Of particular concern are large families, low-income persons (especially families), the elderly or **handicapped**, other persons with physical, social or emotional problems, tight or volatile housing markets, large older dwellings, a large number of substandard dwellings within the project area, and similar situations."
 - Improper terminology used. The term “person or people with disabilities” is more appropriate than “handicapped”.
- Page 10-83, 10.14.3 Methods for Providing Housing of Last Resort
 - "Purchase an existing house and add a bedroom or make any repairs necessary to bring the house up to Decent, Safe and Sanitary Housing (DSS) standards. DDOT may also remove barriers to the handicapped

and construct special physical structures such as wheelchair ramps. DDOT may then rent or sell the house to the displaced person."

- Improper terminology used. Language should be changed. The term "person or persons with disabilities" should be used instead of "handicapped".
- Page 10-105, II. Estimate of existing conditions and Relocation costs
 - "Handicapped persons."
 - Improper terminology used. Language should be changed. The term "person or persons with disabilities" is more appropriate than "handicapped".

Public Input

- Page 2-10, 2.9 Public Information Meeting
 - "During the Preliminary Design Plan, numerous information meeting will be held to keep the public informed about the project and to solicit input into the project's plans. These meetings follow the intent of the Uniform Act as amended and other application regulations in ensuring landowners and the public are notified of project activities. They are included in the National Environmental Policy Act of 1968 process on major projects and other opportunities are provided after the preliminary design plans are available."
 - This description does not specify who will be involved in these public meetings. People with disabilities must be accommodated in all meetings. DDOT must take into consideration holding these meetings in accessible locations and also providing them with reasonable accommodations or have equal access to meetings. This will ensure the inclusion of all persons, regardless of their physical or mental capabilities.

3.2. Public Realm Design Manual (July 2011)

This Manual is the guide to the District of Columbia’s Public Space Regulations. It is a resource for learning about the importance of the public space and the regulations that guide its use and form, and the basis behind them.

The Public Realm Design Manual (July 2011) references must be updated to address the requirements of ADA. In actuality, the document needs to state that public realm design must conform to the most current ADA Standards and Public Right-of-Way Guidelines. Many design specifications such as: sidewalks, driveways and tree beds, reference the DDOT Design and Engineering Manual (April 2009) which is in process of being updated as part of Task D (Review of DDOT's Engineering Design and Construction Standards). All documents that refer to the DEM of 2009 will have to be updated pending the results of the evaluation on Task D. For sidewalks, the document specifies cross and running slopes but does not show the other ADA requirements in the section for Designing Standards. The document should specify that the surface material for sidewalks must be non-slip, stable and firm to achieve accessibility and safety for all pedestrians. It should indicate that the following surface requirements apply to sidewalks:

- Clear spaces at operable parts (such as pedestrian signals and pushbuttons)
- Boarding and alighting areas and boarding platforms at transit stops
- Accessible parking spaces and loading zones

On the other hand, when describing ADA standards for some assets, this manual does not get into many details or specifications. For example, when describing vaults it should mention that vertical surface discontinuities are for occasional expansion joints and objects such as covers, vault frames, and gratings that cannot be located in another portion of the sidewalk outside the pedestrian access route. Also, horizontal openings in gratings and joints will not permit passage of ½ inches in diameter. Extended openings in gratings should be placed so that the long dimension is perpendicular to the dominant direction of travel. If DDOT does not want to go into details of each asset found in the accessible route, it is recommended that the Manual reference the DEM or the Standard Drawings (also being reviewed in Task D) for a more in depth look at the construction/design requirements. The following is a more comprehensive look at the issues found in the different sections of this manual:

Sidewalks

- Page 3-4 Table. Sidewalk Area and Pedestrian Clear Zone for Different Street Types
 - Table references DC Municipal Regulations and Design and Engineering Manual (DEM).

- Document should address conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 3-4 Sidewalk Design Standards
 - Cross and Running slopes are specified but reference DEM.
 - Document should address conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 3-6. Sidewalk Design Standards
 - Non slip surface requirement is not mentioned.
 - Add statement: “Surfaces shall be stable, firm and slip-resistant.”

Driveways

- Page 3-8 Driveways
 - Document references DDOT’s Design and Engineering Manual for driveways specifications.
 - Document should address conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

Medians

- Page 2-10 Medians
 - “No landscaping will be allowed within medians that are narrower than 4 feet. If a median is between 4 ft. and 10 ft. it shall be at the District’s discretion whether the median is hardscape or irrigated and landscaped.”
 - A minimum clear width for Pedestrian Access Route (PAR) is not specified in this section. This section should be revised to indicate the clear width of PAR within medians and pedestrian refuge islands, which is 5 feet minimum.

Tree Beds

- Page 3-4 Table. Tree Area Box for Different Street Types
 - Table references DC Municipal Regulations and DEM.

- Document should address conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

Surfaces

- Page 5-6 Subsurface Projections
 - Standards for vaults do not state that the vault must be flush with the sidewalk.
 - Vault must be flush with the grade of the sidewalk and present no change(s) in level that exceed $\frac{1}{4}$ inches if non-beveled or if between $\frac{1}{4}$ - $\frac{1}{2}$ inches if beveled 1:50. Changes in level that exceed $\frac{1}{2}$ inches are not permitted. Surfaces must not create gaps in the surface that exceed $\frac{1}{2}$ inches.

Protruding Objects

- Page 3-23 Bike Racks
 - Requirements for bike racks do not specify if they protrude into PAR.
 - Avoid placement of racks that protrude more than 4 inches off the wall if located between 27-80 inches off the ground or floor surface. Or, if mounted on a post or pylon, objects do not protrude more than 12 inches off of post/pylon if located between 27-80 inches off the ground or floor surfaces. The design must ensure that direction (located below 27 inches off the ground or floor surface) is provided below the protruding object.

3.3. DC Pedestrian Master Plan (April 2009)

The DC Pedestrian Master Plan focuses on improving walking conditions within the City. It represents the first comprehensive citywide effort to address pedestrian issues.

This Master Plan focuses on increasing accessibility to people with disabilities, by making walking a manageable mode of travel throughout all parts of the District. It should also emphasize the inclusion of people with disabilities as an important part of the public involvement for the planning and implementation process for the document.

In updating this Master Plan, certain ADA standards need to be incorporated into the Master Plan and it must update references used. For example, discussing sidewalks, there are minimum clear path widths that are being discussed based on DDOT’s

standards, ADA Standards and the most recent Public Right-of-Way Guidelines. The District of Columbia must apply the most stringent standards first (in this case, DDOT Standards), and if it is not feasible to comply with these requirements, follow with the minimum ADA Standard or Public Right-of-Way Guidelines.

The document suggests adopting the Arlington County Bus Stop Design Standards, however, DDOT presently uses WMATA Guidelines for the Design and Placement of Transit Stops (December 2009). These Guidelines provide specifications for appropriate bus stop placement relative to intersection, bus stop spacing and different types of street-side designs such as on-street stops, curb bulbs, and bus bays; which ensure improvements to the bus passenger experience on the street side.

Additionally, this document does not specify driveway requirements pertaining to the Pedestrian Access Route (PAR). The portion of the driveway that intersects the PAR should meet the standards of a sidewalk. This portion must include an adequate minimum width with a 2% maximum as cross slope. All driveways must be flush with the grade of the sidewalk.

The following is a more comprehensive look at the issues found in the different sections of this master plan:

General

- The document references MUTCD 2003 Edition.
- Document should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines. This document currently references the 2003 Edition, not the 2009 Edition of the MUTCD.
- Page 3, Chapter 1 Vision and Goals
 - “There are two primary goals for the Pedestrian Master Plan:
 - To reduce the number of pedestrians killed and injured in crashes with motor vehicles; and
 - To increase pedestrian activity by making walking comfortable and accessible mode of travel throughout all parts of the District.”
- Suggest modifying the second goal with a more inclusive language such as “to increase pedestrian activity, including that of people with disabilities, by making walking comfortable and accessible mode of travel throughout all parts of the District.”
- Page 22, Chapter 3 Recommendation 2.1

- "Updates to the Design and Engineering Manual will enable DDOT to incorporate new provisions in the MUTCD and ADAAG into the Manual."
- The document should indicate that it must incorporate also the most current ADA Standards and Public Right-of-Way Guidelines into the Manual.

Curb Ramps

- Page 30, Appendix C Curb Ramps
 - This section does not mention the requirement to use non-slip surfaces. The section should be revised to designate the requirements for brick and decorative pavers to be non-slip surface. Surfaces shall be stable, firm and slip-resistant.

Sidewalk

- Page 20, Chapter 3 Recommendation 1.3
 - "All sidewalks will be constructed in conformance with the ADAAG".
 - The section should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines. The ADAAG is not the most current guideline.
- Page 6, Appendix C Sidewalks
 - "The minimum clear path around utility structures, street furniture and other encroachments shall be greater or equal to the sidewalk width. The minimum width is 36 inches."
 - Although the minimum clear path width is correct under ADA standards, it is recommended that the manual suggest that they achieve the minimum requirement of 48 inches and if they cannot comply with that, then apply for ADA Design Waiver, which needs to be approved by the ADA Coordinator, to be able to use the 36 inch minimum.

- Page 6, Appendix C Sidewalks
 - This section refers to ADAAG, AASHTO, ADA Standards, and Traffic Safety Divisions.
 - The section should indicate the need to conform to the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 6, Appendix C Sidewalks
 - "The maximum sidewalk cross slope is 2 percent. The maximum grade is 12:1 (8.3%)."
 - Maximum grade is incorrect. The maximum grade should be 1:12 instead of 12:1.

Crosswalk

- Page 14 Appendix C Crosswalk Marking Design
 - "The side flare of a handicap ramp must align as close as possible to the back edge line of the crosswalk. Each crosswalk must have two handicap ramps, one on each side of the street."
 - Incorrect language used. Language should be changed. Instead of handicap ramp, it should say curb ramp.
- Page 14 Appendix C Crosswalk Marking Design
 - "The ramp of the handicap ramp must have 12:1 slope, scored with non-slip surface, and built to D.C. Standards".
 - Language for curb ramp is incorrect. Slope is incorrect. Language should be changed. Instead of handicap ramp, it should say curb ramp. Slope must be 1:12.
- Page 14 Appendix C Crosswalk Marking Design
 - "No longer allowed, ADA meeting (Feb. 2004) must have handicap ramp for each crosswalk direction."
 - Incorrect language used. Language should be changed. Instead of handicap ramp, it should say curb ramp.

- Page 14 Appendix C Crosswalk Marking Design
 - Incorrect reference in document (Design and Engineering Manual 31.2.4 Crosswalk).
 - It should say 31.6.4 Crosswalk. Even though this issue does not pertain to any ADA concerns, it was thought best to bring it to the attention of the group who will be updating this document.

Bus Stops

- Page 62 Appendix C Bus Stop Siting
 - "Adopt the Arlington County Bus Stop Design Standards. This is a comprehensive guide that addresses the numerous considerations required for bus stop siting in the District, and it has already been approved by the Washington Metropolitan Transit Authority (WMATA). It is recommended that the bus stop siting policy generally favor far side bus stops."
 - Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines. Also, WMATA currently has its own Guidelines for Bus Stop Design. This section can be updated to state that DDOT should adopt WMATA design requirements.

Driveways

- Page 5 Appendix C: Access Management and Driveway Width
 - "Develop design criteria for sidewalk offsets to tickets gates and garage doors to reduce the likelihood that a vehicle parked/idling in a driveway will block a sidewalk. This can be accomplished by requiring driveways be designed in 20- foot increments from the back edge of sidewalk to the garage door or end of driveway."
 - No specifications for driveway regarding PAR. A portion of the driveway should meet the standards of sidewalks, a 4-foot minimum width with 2% cross slope should be included.

Public Input

- Page 10, Chapter 1 and Appendix B
 - Document does not address any input by people with disabilities into the plan itself.
 - DC Pedestrian Master Plan should focus on people with disabilities as an important part of the public involvement of the planning and implementation process for the document. DDOT must take into consideration holding meetings in accessible locations and also providing meetings with reasonable accommodations to afford accessibility.

Training

- Page 23, Chapter 3 Recommendation 2.3
 - "Education will be needed to ensure that project consultants, DDOT planners, inspectors, engineers and staff that oversee transportation studies and construction projects that impact the public right-of-way are aware of new pedestrian design policies, and have the necessary information to carry them out. A one-day pedestrian design seminar was conducted as part of this Plan, in combination with a bicycle facility design seminar (also one day) – additional educational opportunities will be needed on a yearly basis to ensure that roadway designers are kept up to speed on the District's pedestrian design practices."
 - It does not specify ADA training. Document should specify training related to ADA. This training will be instrumental for the implementation of the ADA Transition Plan in the District.

3.4. DDOT DC Streetcar Design Criteria Manual (2012)

This Manual intention provides general guidelines and specific criteria for the planning, design and construction of the proposed streetcar system. The use of it will enable DDOT, agencies, consultants, planners, engineers and other professionals to more efficiently translate DC requirements into acceptable design solutions.

The DC Streetcar Design Criteria Manual latest version is from 2012, which means that references used within it should be recent but they are not. Also, it uses incorrect language when referring to people with disabilities that must be corrected. The

document does not mention details regarding curb ramps, medians, signs and parking meters in their respective sections contained in the Manual.

As an example, for parking meters it does not specify if any ADA requirement will be taken into consideration when it says that they will be removing and storing parking meters in sidewalk locations. It just mentions that DDOT will complete this in accordance with specifications approved by them during the completion of streetcar construction. Parking meters and parking pay stations for accessible on-street parking must comply with technical requirements for operable parts. Displays and information must be visible from a point located 3.3 ft. maximum above the center of the clear space in front of the parking meter or parking pay station. At accessible parallel parking spaces, parking meters must be located at the head or foot of the space.

The following is a more comprehensive look at the issues found in the different sections of this manual:

General

- Document references ADAAG 2004.
 - Document should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines. The ADAAG is not the most current.
- Page 1-1, 1.2 Climate/Environmental Conditions
 - “In situations where deviations to the criteria are encountered, the designer is to submit a written waiver request to the DDOT approval of such deviations.”
 - ADA considerations must also be included in this waiver. In the event that the design conflicts with an ADA requirement, the ADA Coordinator must approve any changes proposed in the design plans.

- Page 1-3, 1.5 Codes and Standards
 - "The designer is fully and solely responsible for determining all applicable codes and standards for the proposed work. The Designer, at a minimum, shall comply with the requirements of the following codes. Additional codes and standards, laws and ordinances and requirements shall be determined by the Designer. In case of conflicts between the criteria, standards, codes, regulations, ordinances, etc. the more stringent requirement shall govern unless otherwise directed, in writing, by the District Department of Transportation."
 - ADA Accessibility Guidelines for Buildings and Facilities is under this list. Document should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 1-5, 1.5 Codes and Standards
 - A list of preliminary guide of applicable codes/standards and requirements that must be complied with, shows DC Accessibility Code and the American with Disabilities Act.
 - Document should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 11-1, 11.2 Handicapped Accessibility
 - The title used is: "Handicapped Accessibility".
 - Language should be changed. Instead of "Handicapped Accessibility", it should say "Accessibility for People with Disabilities".

Curb Ramps

- Page 5-6, 5.4.3 Curbs, Wheelchair Ramps and Curb Cuts
 - No cross slope and running slope are mentioned.
 - More details about the wheelchair ramps should be included. Running slope shall not exceed a 1:12 (8.33%) and must not exceed a 1:50 (2%) cross slope. Also, minimum width for curb ramp should be 48 inches. Perhaps it would be helpful to reference a typical ramp from the Standard Drawings.

Bus Stops

- Page 2-3, 2.3.3 Passenger Stops
 - "Bridge plates shall be provided onboard the streetcar vehicles for use by the elderly and handicapped and shall be available for use by all other passengers."
 - Incorrect language when describing individual with disabilities. Language should be changed, instead of handicapped; it should say people with disabilities.

Parking Meters

- Page 7-7, 7.7 Parking Meters and Pay & Display Kiosk
 - "DDOT will remove and store the existing meter heads; new parking meters shall be installed in sidewalk locations as indicated and in accordance with specifications approved by DDOT during the completion of streetcar construction."
 - It does not specify if ADA requirement will be taken into consideration. ADA requirements should be taken into consideration as part of the "punch list" before completion.

Medians

- Page 4-4, 4.2.1.3 Medians
 - "Median platforms may be either near or far side stops depending on particular site conditions."
 - It does not specify if ADA requirements will be taken into consideration. ADA requirements should be taken into consideration before completion.

Signs

- Page 8-2, 8.4 Sign Design
 - "Traffic signs related to streetcar operations shall be installed in accordance with DDOT requirements and the MUTCD. In situations where sign requirements are not addressed by the existing standards,

special signing shall be developed by the design consultant in coordination with DDOT.”

- It does not specify if ADA requirements will be taken into consideration. ADA requirements should be taken into consideration before completion.

3.5. Pedestrian Safety and Work Zone Standards Covered and Open Walkways (9/2010)

These Standards are to be incorporated into a required traffic control plan to provide guidance on the preferred methods for routing pedestrians safely through work zones occupying public space in the District of Columbia.

The document does not enclose ADA specifications or any requirement. However, it does emphasize the protection for pedestrians while work zones adjacent to sidewalks are being fixed or improved. An updated version should be provided by DDOT to achieve compliance in a covered/open walkway based on the most current ADA Standards and Public Right-of-Way Guidelines.

The following is a more comprehensive look at the issues found in the different sections of these standards:

General

- To ensure that work zones adjacent to sidewalk minimize disruption to the normal pedestrian pathways while providing adequate protection for pedestrians, DDOT shall review all traffic control plans to include a covered walkway on the sidewalk or the roadway or that includes an open walkway on the sidewalk or in the roadway.
- Document should ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines to achieve compliance in a covered/open walkway.

Pedestrian Signal Devices

- Page 11, Complete Closure of the Sidewalk
 - DDOT encourages the contracting and development communities to use audible signals at the approach sides of a sidewalk closure.

- It is recommended that contractors be mandated to provide audible signals during sidewalk closures.

3.6. DPW Downtown Streetscape Regulations (August 2000)

Standard Specifications for Highways and Structures 1996 was used for the DPW Downtown Streetscape Regulations. These should be revised to include the 2013 version which DDOT is currently using. On the other hand, technical requirements in regards to curb ramps, sidewalks, on-street parking, among others, should be updated. For curb ramps, crossing and running slopes are not incorporated into the drawings shown within the document. For a better understanding in designing purposes when drawing a curb ramp, details such as clear width, type of ramp, crossing and running slopes, clear space provided at the top and bottom of it, have to be shown. Or at the very least reference them from the DEM of the Standard Drawings.

Also, an ADA Coordinator's role involves a lot of responsibilities. Requiring the involvement of an ADA Coordinator will efficiently assist people with disabilities with their questions and investigating complaints. A diagonal curb ramp is shown in the document; this drawing must include a note stating that an approval from the ADA Coordinator is required for construction.

The following is a more comprehensive look at the issues found in the different sections of these regulations:

General

- The document references the Standard Specifications for Highways and Structures, 1996. DDOT is currently using 2013 Edition.
- Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

Curb Ramps

- Page 4- 1102.2.
 - "Handicap ramp locations and details."
 - Incorrect language when describing curb ramps. Language should be changed, instead of handicap ramp, it should say curb ramp.
 - Page 14- 1105.15, 1105.15 (b)

- "Ramps for use by the handicapped shall meet the following requirements: (b) Handicap ramps shall be located within the parallel lines and aligned with the back edge of the crosswalk."
- Incorrect language when describing individuals with disabilities and curb ramps. Language should be changed. Instead of handicapped and handicap ramp, it should say people with disabilities and curb ramp respectively.
- Page 14- 1105.15 (c)
 - States 5-foot clearance at top of ramp.
 - The requirements should also specify the cross slope of 2% for this area.
- Page 14- 1105.15
 - Document does not mention: cross slope, clearance at top of ramp, running and cross slope.
 - Curb ramps details should be incorporated as part of the drawing.
- Page 15- Figure 4 (Wheelchair Ramp Details)
 - For a diagonal ramp, an approval by ADA Coordinator is not mentioned.
 - Detail for a Corner Wheelchair must include a note stating that approval of the ADA Coordinator is required for construction.
- Page 15- Figure 4 (Wheelchair Ramp Details)
 - No cross slope and clearance at top of curb ramps are shown; running and cross slope for curb ramp are not included.
 - Cross slope and clearance at top of ramp must be included as part of the drawing as well as the running slope and cross slope of the curb ramp.
- Page 16- Figure 4A
 - No cross slope and clearance at top are mentioned for top of curb ramp.
 - Cross slope and clearance at top of ramp must be included as part of the drawings as well as the running and cross slope of the curb ramp.

Sidewalk

- Page 9- Figure 2 (Pressed Concrete Block Paver)
 - Cross and running slope are not specified in the section; minimum clear width is absent as well.
 - Cross and running slope for sidewalk must be included in the drawing; minimum PAR width must be included also. Running slope shall not exceed a 1:12 (8.33%) running slope and must not exceed a 1:50 (2%) cross slope. Minimum clear width requirement is 4 feet.
- Page 12- 1105.5
 - Non-slip surface requirement is not mentioned.
 - Requirements for brick and decorative pavers must include that they be non-slip surface. Surfaces shall be stable, firm and slip-resistant.

On Street Parking

- Figure 1 Application Form
 - Section of Parking/Loading Facilities does not mention the number of spaces for people with disabilities.
 - Section of Parking/Loading Facilities should include the number of spaces for people with disabilities.

Tree Beds

- Page 19- 1106.6
 - Requirements for PAR width are not specified.
 - PAR width must be included for tree planting requirements.

Surfaces

- Page 27- 1109
 - Standards for underground vaults do not state that the vault must be flush with the adjoining sidewalk.
 - Vault must be flush with the grade of the sidewalk and present to change(s) in level that exceed $\frac{1}{4}$ inches if non-beveled or if between $\frac{1}{4}$ to $\frac{1}{2}$ inches if beveled 1:50. Changes in level that exceed $\frac{1}{2}$ inches

are not permitted. Surfaces must not create gaps in the surface that exceed ½ inches.

3.7. Bicycle Facility Design Guide (2005)

DDOT has developed this Bicycle Facility Design Guide to assist with the planning, design, and implementation of bicycle facilities. Specifications within this Guide are based on the Manual on Uniform Traffic Control Devices, AASHTO Guide for the Development of Bicycle Facilities and input provided by DDOT staff. Any ADA Standards and Guidelines are referenced within document. However, a drawing shows a minimum height for vertical clearance for tree branches which should be changed or clarified. The drawing should be corrected incorporating the minimum requirement from the most recent Public Right-of-Way Standards.

The following is a more comprehensive look at the issues found in the different sections of this guide:

Protruding Objects

- Drawing 32, Trail Cross Section
 - Drawing shows minimum height of 5 feet as a vertical clearance for tree branches.
 - The most recent Public Right-of-Way Guidelines indicates 6.7-foot minimum for vertical clearances. Drawing should be corrected incorporating the minimum requirement from the most recent Public Right-of-Way Guidelines.

3.8. DC Bicycle Master Plan (April 2005)

The DC Bicycle Master Plan was developed as a guide to establishing high quality bicycle facilities and programs. The purpose of this Plan is to ensure safe and convenient bicycle transportation in the nation's capital.

This document does not specify anything about ADA. The document should specify that bicycle parking should not be located within the pedestrian access route (PAR) as DDOT provides bicycle parking in public spaces throughout the District.

The following is a more comprehensive look at the issues found in the different sections of this master plan:

General

- Page 25, Recommendation 1.5 Provide Bicycle Parking in Public Space
 - “DDOT will continue bicycle parking in public spaces throughout the District.”
 - Document should indicate that bicycle parking should not be located within or should not obstruct the PAR.

3.9. DDOT Design-Build Manual (May 2014)

The DDOT Design-Build Manual describes the Department’s procedures for evaluating and selecting a project delivery method. It also defines policies, procedures and requirements to effectively procure and administer DDOT projects using the Design-Build project delivery process. In the Design-Building process, ADA requirements should be taken into consideration.

The following is a more comprehensive look at the issues found in the different sections of this manual:

General

- Page 1, 1.0 Overview
 - “The objectives of this manual are to: ensure selection of an appropriate project procurement method; comply with applicable procurement regulations; maximize the potential advantage of alternative procurement methods; provide guidance on interpretation of other DDOT manuals with respect to Design-Build projects.”
 - In the Design-Build process, ADA requirements should be taken into consideration. As part of the objectives, this document must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

3.10. Green Infrastructure Standards (2014)

The Green Infrastructure Standards presents the standard drawings and specifications for all the constructions activities and material control within the Public Space of DC.

It is suggested adding language that ensures that while complying with Green Infrastructure requirements, accessibility requirements for people with disabilities are

preserved and not violated. Moreover, as part of the Design Process for Maximum Extent Practicable (MEP), ADA requirements should be part of the planning space steps.

The following is a more comprehensive look at the issues found in the different sections of these standards:

- General D-2, 2.3.10.3 Design Process for Maximum Extent Practicable (MEP)
 - “Planning phase- Steps that may be appropriate in the planning phase are: identifying available space, safe access issues, pedestrian circulation requirements, impervious surface removal, location of existing utilities, existing trees, soil characteristics, candidate Best Management Practice (BMP) and Land Conversion Areas, and street profile analysis.”
 - Steps must add comply with ADA requirements. Planning space steps should include that it must comply with ADA requirements.

4. RECOMMENDED MODIFICATIONS/CHANGES TO PROW DOCUMENTS

4.1. Summary of Findings & Recommendations

Task C consisted of reviewing various DDOT Public Right-of-Way and other related documents for accessibility compliance under current federal ADA regulations. Since the emphasis is on Public Right-of-Way documents, we have used PROWAG as the primary regulation, even though it is currently only a guideline, but is assumed to become the law ultimately. The proposed guidelines are developed specifically for pedestrian facilities in the public right-of-way and address conditions and constraints that exist in the public right-of-way.

The goal of the District is to make all pedestrian access routes in the public right-of-way accessible to people with disabilities. This Task is one of the tasks in creating a Transition Plan for the District to become compliant.

4.2. Findings

The findings of this effort are summarized as follows:

- Portions of the majority of the documents reviewed are not ADA compliant.
- Documents do not specify and/or offer training requirements to managers, planners, designers and inspectors responsible for improvements to the Public Right-of-Way projects.
- Most of the documents use incorrect language regarding people with disabilities.
- Some documents reference outdated standards and guidelines.
- Documents don't really have an established procedure for ADA design exceptions.
- The role of the ADA Coordinator does not appear to be mentioned in these documents.
- Documents do not focus on people with disabilities as part of the public input.

4.3. Recommendations

Our recommendations for the update and revision of these documents are as follows:

- The majority of the documents need to be revised to ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Documents should recommend that ADA training be mandated to all DDOT staff responsible for improvements to the Public Right-of-Way projects, to ensure district-wide implementation of ADA requirements from planning, design, and construction to maintenance phases.
- Make a requirement for an ADA training exam or evaluation after each course be taken to ensure staff and/or consultants understanding of the ADA requirements for planning, designing, and construction.
- Some documents should reference the WMATA Guidelines for Design and Placement of Transit Stops, which provide details of bus shelter requirements and alighting areas.
- The appropriate language should be adapted in the updated versions.

- Establish a procedure and/or form for design exceptions pertaining to ADA issues.
- ADA Coordinator should have a more prominent role at the moment of planning and designing.
- Documents should focus on people with disabilities as an important part of the public input. Also, meetings must be held in accessible locations and reasonable accommodations must be provided. Including people with diversity in meetings will increase opportunities for the open exchange of ideas, mutual learning, and informed and representative decision making processes.

5. SUMMARY

This Findings Report for Task C is just a small part of all the tasks required in the development of a Comprehensive ADA/Section 504 Transition Plan. It is expected that PROWAG will become a Standard soon. Depending on the modifications and contents of the final regulations, the Transition Plan will also have to be revised. Similarly, when other regulations are implemented and if DDOT management structure changes, the Transition Plan will also need to be updated.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

REVIEW OF DDOT'S ENGINEERING DESIGN AND CONSTRUCTION STANDARDS - TASK D

Prepared For:



DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 1.0
DATE: December, 2014

Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.

Disability Access Consultants (DAC)

Sharp & Company

Precision Systems, Inc.

This page left intentionally blank

EXECUTIVE SUMMARY

A Comprehensive American with Disabilities Act (ADA)/Section 504 Self-evaluation and Transition Plan is being developed for the District Department of Transportation (DDOT). DDOT recognizes that the Development of a Comprehensive ADA/Section 504 Transition Plan is an ongoing, active process that requires maintenance, updating and documentation of the plan. It is understood that the integration and collaboration of DDOT employees, divisions, departments and members of the public will provide for a realistic, usable and cost effective plan. As ADA Barrier Removal initiatives are coordinated, clearly communicated, understood and integrated throughout DDOT, the internal capacity to achieve and maintain compliance will be enhanced.

This report will present the findings of Task D, which discusses the review of DDOT's Engineering, Design and Construction Standards. The Team identified and used several Federal documents to determine the current ADA compliance criteria for pedestrian facilities found within the Public Right-of-Way. These standards included the 2010 ADA Standards for Accessible Design and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, July 26, 2011.

Six documents were reviewed for this task. This review found that DDOT's documents relating to Engineering, Design and Construction Standards, even though they are good technical documents, need modifications to make them fully ADA compliant based on the current federal standards. This report shows what and/or why some provisions in the reviewed DDOT documents are not fully in compliance and also includes recommendations for making them compliant.

It is DDOT's objective to provide complete accessibility to pedestrians and ensure that no person with a disability will be discriminated against on the basis of his or her disability. As a recommendation, DDOT should consider developing a District ADA Policy and Guidelines that addresses accessibility and other ADA issues that people with disabilities may experience citywide. The creation of a document will be beneficial for engineers, developers, inspectors and contractors in the DC area, since it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance.

We have also noted that many provisions of DDOT standards are stricter than the ADA Standards and the Public Right-of-Way Guidelines. This, and the fact that DDOT is engaged in the preparation of a Transition Plan, shows that DDOT can and will meet the requirements of Federal Highway Administration (FHWA) and will become a "Best Practice" for the rest of the nation's Cities and States to adopt.

The findings of this effort are summarized as follows:

- Portions of the documents reviewed are not ADA compliant.
- The references used in these manuals are outdated.
- Documents do not specify and/or offer ADA training to managers, planners, designers and inspectors responsible for planning, designing, and monitoring construction of improvements to Public Right-of-Way projects
- The involvement of the ADA Coordinator in the planning, design and development process is non-existent.
- Many of the documents use incorrect language regarding people with disabilities.
- Documents are used for all construction activities; however, most of them are not aware of ADA concerns within this process
- Detailed drawings for several items were not present in the Standard Drawings 2009 (i.e. short poles and porous flexible paving).
- Description of the different types of ramps used in the District is not present in the Design and Engineering Manual (DEM) or the Standard Drawings.
- There is no established procedure and/or form that addresses ADA design exceptions.
- There is no established hierarchy of which ADA standard or guideline one must comply with first.

Our recommendations for the update and revision of these documents are as follows:

- All of the documents should make note that they must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Documents should recommend that ADA training be mandated to all DDOT staff responsible for improvements to the Public Right-of-Way projects, to ensure district-wide implementation of ADA requirements from planning, design, and construction to maintenance phases.
- Make availability of ADA trained and certified staff, and/or consultants, a mandatory requirement for all design, engineering, and construction projects.

- Make a requirement an ADA training exam or evaluation after each course taken to ensure staff and/or consultants understanding of the ADA requirements for planning, designing, and construction.
- Make the requirement of ADA Coordinator's approval, a requirement for all contracts before they are issued for bidding, and also for close-out.
- The appropriate language when referring to people with disabilities should be adapted in the updated versions.
- ADA requirements must be taken into consideration for all construction activities.
- Detail Drawing should be made available for the different types of curb ramps as depicted by PROWAG for planning and design.
- There should be a different payment quantity for each type of curb ramp. Some types of curb ramps have more incidental costs than others that should be specified to help with the planning and design process.
- Detailed drawings for several items that were not present in the Standard Drawings 2009 should be made available for the planning and design process.
- Suggest using easily identifiable materials and patterns to physically separate the different zones such as Furniture Zone, Pedestrian Zone, and Frontage Zone. Importance should be given to the Pedestrian Zone, so that a clearly identifiable Pedestrian Access Route (PAR) is introduced right at the planning and design phase, so that the PAR will be maintained at a slope of 2% or less without any obstructions.
- Consider developing a District ADA Policy and Guidelines that addresses accessibility and other ADA issues that people with disabilities may experience citywide. It will be beneficial for engineers, developers, inspectors and contractors in the DC area, since it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance.

This page left intentionally blank

TABLE OF CONTENTS

EXECUTIVE SUMMARYi

1. BACKGROUND1

1.1. General Background.....1

1.2. Americans with Disabilities Act1

1.3. Section 504 of the Rehabilitation Act of 19733

2. ACTIVITIES4

2.1. Procedure used for Review of DDOT's Engineering, Design and Construction Standards Documents4

2.2. List of Federal Regulations and Guidelines used for Evaluation.....4

2.3. List of DDOT's Engineering, Design and Construction Standards Reviewed5

2.4. Format used for Document Review Comments5

2.5. Detailed Review of DDOT's Engineering, Design and Construction Standards Manual8

3. DISCUSSION OF FINDINGS OF DOCUMENTS REVIEWED8

3.1. DC DDOT Design and Engineering Manual, April 20099

3.2. DC DDOT Standard Specifications for Highways and Structures, 2013.....23

3.3. DC DDOT Standard Drawings, April 2009.....28

3.4. DC DDOT Construction Management Manual, May 201037

3.5. DC Temporary Traffic Control Manual Guidelines and Standards (July 2006) ..38

3.6. DDOT Utility Work Zone Traffic Control Plan Typical, May 200739

4. RECOMMENDED MODIFICATIONS/CHANGES TO PROW DOCUMENTS ...42

4.1. Summary of Findings & Recommendations.....42

4.2. Findings42

4.3. Recommendations.....43

5. SUMMARY44

This page left intentionally blank

1. BACKGROUND

1.1. General Background

The Americans with Disabilities Act of 1990 is a comprehensive civil rights act that prohibits discrimination and ensures equal opportunity for people with disabilities. The ADA was established with the purpose of providing independent access to public areas for people that have physical, visual or hearing disabilities. Although there has been several attempts to establish ADA Accessibility Guidelines (ADAAG) for agencies to use in its implementation, with the most recent being the 2010 ADA Standards for Accessible Design, ADDAG does not present any guidelines for the Public Right-of-Way.

The Department of Justice has found that ADAAG does apply to the Public Right-of-Way, even if it was originally written for buildings and facilities. The U.S. Access Board developed guidelines in applying the ADA Standards to the public right-of-way. The most recent use is the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way issued on July 26, 2011.

The proposed guidelines are developed specifically for pedestrian facilities in the Public Right-of-Way and address conditions and constraints that exist. The requirements make allowances for typical roadway geometry and permit flexibility in alterations to existing facilities where existing physical constraints make it impractical to fully comply with new construction requirements. The guidelines also include requirements for elements and facilities that exist only in the Public Right-of-Way such as pedestrian signals and roundabouts.

1.2. Americans with Disabilities Act

The Americans with Disabilities Act (ADA) of July 26, 1990 prohibits discrimination and ensures equal opportunity for people with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. The ADA is a companion civil rights legislation to the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973. The Title II of ADA specifically refers to state and local government programs, services and activities. The ADA is divided into five parts, covering the following areas:

- Employment
- Public Entities
- Public Accommodations
- Telecommunications, and
- Miscellaneous

Title I: Employment

Under this title, employers, including government agencies, such as DDOT, must ensure that their practices do not discriminate against persons with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment.

Title II: Public Entities

Title II of the ADA prohibits State and local governments from discriminating against individuals with disabilities or from excluding participation in denying benefits or programs, services, or activities to people with disabilities. It is divided into two subtitles: Subtitle A and Subtitle B.

Subtitle A

Subtitle A is intended to protect qualified people with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It additionally extends the prohibition of discrimination of disability established by Section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments, including those that do not receive Federal financial assistance.

Subtitle B

Subtitle B is intended to clarify the requirements of Section 504 for public transportation entities that receive Federal financial assistance. It extends coverage to all public entities that provide public transportation, whether or not they receive Federal financial assistance. The Department of Transportation is responsible for the implementation of the second subtitle of Title II.

Title III: Public Accommodations

Title III requires newly constructed or altered places of public accommodations to comply with the ADA Standards and prohibits discrimination on the basis of disability in the activities of places of public accommodations.

Title IV: Telecommunications

This title covers regulations regarding private telephone companies, and requires common carriers offering telephone services to the public to increase the availability of interstate and intrastate telecommunication relay services to people with hearing and speech impairments.

Title V: Miscellaneous

Title V includes several miscellaneous provisions, including construction standards and practices, provisions for attorney fees, and technical assistance provisions. Title V sets the following:

- Requires the U.S. Access Board to issue accessibility standards.
- Allows for attorney's fees to be awarded as part of the settlement of a successful lawsuit under the ADA.
- Requires federal agencies to provide technical assistance.
- States specifically that illegal use of drugs is not a covered disability.
- Provides that state and local laws that mandate equal or greater protection to people with disabilities are not superseded or limited by the ADA.

1.3. Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified people from discrimination based on their disability. The non-discrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Section 504 prevents organizations and employers from denying people with disabilities an equal opportunity to receive program benefits and services.

2. ACTIVITIES

2.1. Procedure used for Review of DDOT's Engineering, Design and Construction Standards Documents

The primary goal of Task D is to ensure that all of DDOT's Engineering, Design and Construction Standards are in compliance with the current Federal ADA regulations and guidelines pertaining to the removal of accessibility barriers for people with disabilities. Towards this end, we have identified and used the latest Federal regulations and guidelines that pertain to ADA for evaluating DDOT manuals. Using this information, we created an evaluation form to help with the identification of areas within the document that needs improvement. This evaluation form was submitted for review and approved by DDOT, the approved format can be found in Appendix C and D. Each document was evaluated using the form, out of which our findings and recommendations were generated; they will be shown further below with the summary of each document. We have reviewed all of DDOT's Engineering Design and Construction Standards manuals, made available to us to date.

2.2. List of Federal Regulations and Guidelines used for Evaluation

We used the following federal regulations, guidelines and documents in our review:

- Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), July 26, 2011
- 2010 ADA Standards for Accessible Design
- American with Disabilities Act of 1990
- Americans with Disabilities Act and Architectural Barriers Act Accessibility Guidelines (ADAAG), July 23, 2004
- Manual of Uniform Traffic Control Devices for Streets and Highways, 2009
- 29 USC 794 Section 504 of Rehabilitation Act of 1973
- 42 USC 126 Equal Opportunity for Individuals with Disabilities
- ADA Title II DOJ Guidance
- US DOT FHWA Access for Individuals with Disabilities Under Section 504 of the Rehabilitation Act and Title II of the ADA

- DOJ 28 CFR Parts 35, 36, 37 Non-discrimination on the Basis of Disability in State and Local Government Services; Public Accommodations and Commercial Facilities; Accessibility Standards
- Uniform Federal Accessibility Standards (UFAS)
- 49 U.S.C. Section 5310 Formula grants for the enhanced mobility of seniors and individuals with disabilities
- Project Civic Access
- FHWA DOT Designing Sidewalks and Trails for Access: Best Practices Design Guide, September 2001
- NCHRP Accessible Pedestrian Signals: A Guide to Best Practices

2.3. List of DDOT's Engineering, Design and Construction Standards Reviewed

We used the following DDOT's Engineering and Construction Standards documents in our review for Task D:

- DC DDOT Design and Engineering Manual, April 2009
- DC DDOT Standard Specifications for Highways and Structures, 2013
- DC DDOT Standard Drawings, April 2009
- DC DDOT Construction Management Manual, May 2010
- DC Temporary Traffic Control Manual Guidelines and Standards, July 2006
- DDOT Utility Work Zone Traffic Control Typical (TCP), May 2007

All of the mentioned documents were found at DDOT's website, ddot.dc.gov, under Standards and Guidelines, in the Projects and Planning tab. These documents are available for the public and for the use of the engineers and contractors.

2.4. Format used for Document Review Comments

The PB Team used the following tabular format for documenting the review comments. Under the section Standards/Guidelines Referenced, it is shown the most commonly used ADA standards and guidelines, not necessarily the most current:

Review of DDOT's Engineering, Design and Construction Standards Manuals							
DOCUMENT REVIEWED:				DOCUMENT DATE:			
REVIEWER(S):						REVIEW DATES:	
Standards/ Guidelines Referenced	PROWAG 2011						
	2010 ADA Standards						
	MUTCD 2009						
	ADAAG 2004						
	Other						
Item	Item Description	COMMENTS	Compliant			RECOMMENDATIONS	
			Y	N	N/A*		
0.0	General						
1.0	Curb Ramps						
2.0	Sidewalks						
3.0	Crosswalk						
4.0	Bus Stops						
5.0	Driveways						

6.0	Pedestrian Signal Devices					
7.0	Parking Meters					
8.0	Medians					
9.0	On Street Parking					
10.0	Tree Beds					
11.0	Passenger Loading Zone					
12.0	Signs					
13.0	Sidewalk Cafés					
14.0	Surfaces					
15.0	Protruding Objects					
16.0	Stairs					
17.0	Procedures					

18.0	ADA Waiver					
19.0	Public Input					
20.0	Training					
21.0	Inspections					
ADDITIONAL COMMENTS/SHORT SUMMARY						
<i>*When an item is marked as N/A, it signifies that it is not relevant to the document under review.</i>						
<i>OTHER: WMATA Guidelines, Design and Engineering Manual 2009, Standard Specifications for Highways and Structures 2013 (Gold Book), AASHTO</i>						

2.5. Detailed Review of DDOT's Engineering, Design and Construction Standards Manual

Please see the attached:

- Appendix C – Detailed Review of DDOT's Engineering, Design and Construction Standards
- Appendix D – Marked-Up Copies of Non-compliance Issues within Documents

3. DISCUSSION OF FINDINGS OF DOCUMENTS REVIEWED

The following is a discussion of the issues found in each document reviewed and recommendations for making each document compliant with the current ADA Standards and Guidelines.

For the details of the review comments by documents, please see Appendix C.

3.1. DC DDOT Design and Engineering Manual, April 2009

This Manual describes the Department's procedures and standards for preparing project construction documents. The purpose of the Design and Engineering Manual (DEM) is to enable the District's engineers, consultants, and private developers to effectively develop projects that meet the District's policies and standards. For this reason, it is important to make sure this document refers and ensures conformance with current ADA Standards and Public Right-of-Way Guidelines.

As a general recommendation for this Manual, ADA Coordinator and ADA approvals in Designing, Planning and the general project development, must be part of each of these sections. Chapter 29 of this document focuses on the Pedestrian and American with Disabilities Act Facilities. It sets the minimum criteria to be used in the design of all sidewalks, curb ramps, and other pedestrian facilities within the right-of-way. Following this, it means that recent ADA references must be shown in the references list to meet the previous accomplishments. However, it says that all pedestrian facilities shall be designed in accordance with the most recent ADA regulations and the requirements of these Standards, whichever provides the safest and better access for pedestrians.

Under curb ramps, details must be clarified for a better understanding regarding designing purposes. For example, when referring about the top of the curb ramp, there should be at least 4 feet minimum clearance but it must specify that 5 feet should be required when an obstruction is present (wall, fence). Moreover, material surface should be included and the document should emphasize it must be non-slip, firm and stable to prevent future accidents and water accumulation.

Regarding sidewalks, the information is contradictory in some sections. It is not clear if the minimum sidewalk width is the same as the clear sidewalk width. If minimum for sidewalk is 6 feet, a 4-foot minimum clear path cannot be achieved when considering furniture zone. Besides, it does emphasize to compliment the design with the requirements of the most recent ADA standards, for that reason references need to be updated.

For bus stops, specifically boarding and alighting areas must have a firm and stable surface. Although it shows a standard for boarding and alighting areas, it does not mention the maximum crossing and running slopes of 2%. The District's standards are more stringent than ADA Standards and the most recent Public Right-of-Way Guidelines. Another important point for this section is the importance of the bus stop

boarding and alighting area connection, which means that it has to be connected to streets, sidewalks, or pedestrian paths by an accessible route for full compliance.

The DEM must also indicate clear width and clear height projections for PAR when locating poles, signs and any above ground streetscape. A clear path of travel includes an unobstructed way of pedestrian passage by means of which the altered area may be entered and connects the altered area with an exterior approach such as sidewalk, streets, parking areas, among others. The following is a more comprehensive look at the issues found in the different sections of this manual:

General

- Document refers to the ADAAG 1991 and 2005 version of the Accessible Public Right-of- Way.
- Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 1-2, 1.5 Governing Standards
 - Major references for governing standards do not include ADA. Major references for the manual should include at minimum the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 2-2, 2.1.1 Step 1- Planning
 - Project Scoping and Resource Allocation do not mention meeting with the ADA Coordinator. Document must mention meeting with the ADA Coordinator as part of the Project Scoping and Resource Allocation.
- Page 2-3, 2.1.1 Step 1- Planning
 - Project Approvals do not mention getting approval from the ADA Coordinator. Getting approval from the ADA Coordinator in accessibility related issues must be included as part of the Project Approvals.
- Page 2-7, Project Status Checklist
 - Under Task Milestones, ADA Design Approval is not included. ADA Design Approval should be included as part of Project Approvals.
- Page 2-16, 2.3.11.1 Preliminary Plan Submittal 30% Review
 - *“Whenever possible, curb ramps should be perpendicular to the curb and aligned with the crosswalk line farthest from the intersection.”*

- As part of the plan submittal task, design should comply with all relevant ADA Standards and Public Right-of-Way Guidelines, and be reviewed by the ADA Coordinator and/or ADA staff.
- Page 2-37, 2.4.3.17 Pavement Marking Plans
 - *“**Handicapped** ramps, which are required for each pedestrian travel direction. Verify that the ramps are within crosswalks.”*
 - Incorrect language used. Language should be changed. Handicapped ramp should be replaced with curb ramp.
- Page 3-11, 3.2.16 Bike/Pedestrian Improvements
 - *“The Program Manager/Project Manager must confer with the TPPA and IPMA Traffic Engineers on bike and pedestrian related issues.”*
 - ADA Coordinator is not mentioned when conferring about pedestrian related issues. ADA Coordinator and/or ADA staff must be included when it comes to discussing any accessibility issues.
- Page 5-4, 5.7 Bike/Pedestrian Improvements
 - Recommendations from ADA Coordinator are not mentioned for design improvements. List of guidelines referenced does not include ADA Standards and Public Right-of-Way Guidelines. Program Manager must confer with the ADA Coordinator as well as the DDOT Bicycle Program Office. Most current ADA Standards and Public Right-of-Way Guidelines should be referenced.
- Page 6-2, 6.5 Pedestrian Overpass/Underpass
 - *“The design of pedestrian over/underpasses should accommodate accessibility for the physically **handicapped** and bicycle traffic, where warranted.”*
 - Incorrect language used. Language should be changed. Instead of physically handicapped, it should refer to people with disabilities.
- Page 28-1, 28.2 References
 - The most current Public Right-of-Way Guidelines are not listed as reference. The document should reference and comply with the most current Public Right-of-Way Guidelines.

- Page 29-1, 29.2 References
 - *"Americans with Disabilities Act Accessibility Guidelines (ADAAG)" 1991 and "Accessible Public Rights-of-Way" 2005 are under the references list.*
 - ADA references are outdated. References must be updated to the most current ADA Standards and Public Right-of-Way Guidelines.

- Page 29-6, 29.8 Hearing Impairments
 - *"Special ADA warning beacons and/or Traffic Signals may be applied or are under testing by DDOT. Their installation shall be approved by DDOT Traffic Engineer in case-by-case manner."*
 - Approval by the ADA Coordinator is not mentioned. ADA Coordinator as well the Traffic Engineer must approve the installation to ensure full compliance.

- Page 30-1, 30.3 ADA Requirements
 - *"All designs for roadways shall conform to ADA requirements."*
 - ADA requirements should be more specific, to avoid confusion and plan delays. All designs for roadways must conform to the most current ADA Standards and Public Right-of-Way Guidelines.

- Page 31-2, 31.2.2 Alleys
 - *"Exemptions are commercial driveways with **handicap** ramps that have truck and bus traffic."*
 - Incorrect language used. Language should be changed to curb ramps instead of handicap ramps.

- Page 31-10, 31.6 Historical District Sidewalks, Curbs, Gutters, Crosswalks, Bicycle and Handicapped Ramps, Roadway Surfaces, Alleys and Other Special Districts
 - *"The concrete for the **handicapped** ramps does not need to be tinted to match the brick."*

- Incorrect language used. Language should be changed. Use curb ramps instead of handicapped ramps. (Including the 31.6 Title)
- Page 38-1, 38.1 Traffic Control Plan (TCP)
 - *“The construction traffic control plan (TCP) must be designed to move traffic (motorist, pedestrian, bikes) safely through a work zone.”*
 - The TCP must also follow the ADA Standards and Public Right-of-Way Guidelines. It should also include people with disabilities.
- Page 44-2, 44.2.4 Geometric Review
 - As part of a list of items that should be considered in a geometric review of construction project, ADA compliance is not listed to be considered. ADA compliance should be listed under a geometric review of construction project items.
- Page 44-5, 44.2.12 Pedestrian Volumes
 - *“Typical classifications are: children less than 12 years old, adults, school children, non-school children, **handicapped**, to and or elderly people.”*
 - Incorrect language used. Language should be changed to people with disabilities instead of handicapped.
- Page 48-4, Chapter 84 Appendices
 - Checklist table for General project development procedures does not specify any ADA compliance. ADA compliance should be listed under General project development procedures checklist. Having this as part of the checklist will ensure that the developer or contractor achieve compliance with ADA requirements in a timely and cost effective manner.
- Page 48-7, Chapter 84 Appendices
 - Checklist table for Traffic project development procedures does not specify any ADA compliance. ADA compliance should be listed under Traffic project development procedures checklist. Having this as part of the checklist will ensure that the developer or contractor achieve compliance with ADA requirements in a timely and cost effective manner.

- Page 48-8, Chapter 84 Appendices
 - Checklist table for Structures project development procedures does not specify any ADA compliance. ADA compliance should be listed under Structures project development procedures checklist. Having this as part of the checklist will ensure that the developer or contractor achieve compliance with ADA requirements in a timely and cost effective manner.
- Page 48-10, Chapter 84 Appendices
 - Checklist Table for Trees Planting and Landscaping project development procedures does not specify any ADA compliance. ADA compliance should be listed under Trees Planting and Landscaping project development procedures checklist. Having this as part of the checklist will ensure that the developer or contractor achieve compliance with ADA requirements in a timely and cost effective manner.
- Page 48-11, Chapter 84 Appendices
 - Checklist table for Right-of-Way and Dry Utilities project development procedures does not specify any ADA compliance. ADA compliance should be listed under Right-of-Way and Dry Utilities project development procedures checklist. Having this as part of the checklist will ensure that the developer or contractor achieve compliance with ADA requirements in a timely and cost effective manner.
- Page 48-30, Appendix E Definitions
 - Pedestrian Access Route (PAR) is not defined. Must include PAR definition under this section.
- Page 48-36, Appendix E Definitions
 - Curb ramp is not defined. A curb ramp definition should be included under this section.

- Page 48-40, Appendix I List of References
 - List of References includes ADAAG. References must be updated to include the most current ADA Standards and Public Right-of-Way Guidelines.

Curb Ramps

- Page 29-4, 29.5 Curb Ramps
 - *"A landing is required at the top of a ramp that shall connect to the travel route. At the top of the ramp there shall be a 4-foot minimum clearance. The transition from the ramp to the gutter shall be flush. All ramps shall be concrete or stamped concrete, which resembles brick. Detectable warning surfaces shall extend 24 inches minimum in the direction of travel and the full width of the curb ramp (exclusive of flares), the landing, or the blended transition."*
 - Although this section is correct under 2010 ADA Standards, it is suggested that DDOT use PROWAG requirements, as it give the person in a wheelchair more leeway to maneuver in a tight space. A minimum clearance of 5 feet is required when an obstruction is present (wall, fence). Also, the material surface is not specified. Curb ramp surface should be non-slip, firm and stable.
- Page 29-5, 29.5 Curb Ramps
 - The following are the DDOT requirements for curb ramps that include the ADA Regulations for curb ramps: "All ramps shall be 90 degree toward the curb."
 - This statement requires more clarification. All curb ramps shall be square with the direction of travel if possible. If not possible, make 90 degrees.
- Page 29-5, 29.5 Curb Ramps
 - The following are the DDOT requirements for curb ramps that include the ADA Regulations for curb ramps: Except for these *"The ramp width is 4 feet minimum. The length of the ramp depends on curb height, considering a maximum slope of 1/12. The side flare width is 2*

feet while the flare slope is $1/10$. Provide landing at the top of the ramp at 4 feet minimum, to allow the wheelchair to turn."

- It is recommended that a minimum clearance of 5 feet be required when an obstruction is present (wall, fence). The side flare width can only be determined by measuring the height of the curb. The height of the curb must be measured to determine the side flare width necessary to achieve 1:10 slope.
- Page 31-14, 31.6.5 Bicycle/Wheelchair Ramps
 - *"**Handicap** ramps cannot be installed in front of individual private or public buildings. **Handicap** ramps can only be installed in pairs of two, one on each side of the street and must be located within crosswalk, unless otherwise approved."*
 - Incorrect language used. Language should be changed to curb ramps instead of handicap ramps.
- Page 39-3, 39.2.4 Pedestrian Safety
 - *"All **handicap** ramps shall be located within the crosswalk. At least one of the ramp's side flares must align, as close as possible to the back edge line of the crosswalks. **Handicap** ramps must be installed for each travel direction at a corner. **Handicap** ramps located at the center of the corner radii be pre-approved by the Chief Engineer."*
 - Incorrect language used. Language should be changed to curb ramps instead of handicap ramps. Approval of both ADA Coordinator and the Chief Engineer is needed.
- Page 43-2, 43.3.1 Size and Dimension of Pavement Markings
 - *"All curb ramps must be located within the marked crosswalk, not including side flares of the ramps. All curb ramps shall be installed in perpendicular (90%) to the gutter pan angle with the back side of flare aligned as closely as possible to the back edge line of the crosswalk."*
 - There are different types of curb ramps constructed in DC. They cannot just be perpendicular ramps. Include the different types of curb ramps under this requirement.

Sidewalks

- Page 19-3, 19.5.3 Sidewalks

- *"Minimum width for sidewalks on bridges is 6 feet clear."*
- Needs to be clarified. It does not specify if 6 feet is from the back or face of the curb. It must include details regarding the minimum width for the sidewalks on bridges.
- Page 29-1, 29.4.1 General Layout and Design Criteria
 - *"All public sidewalks shall comply with the requirements of the most recent ADA standards, which include requirements for sidewalk widths, grades, locations, markings, surface treatments, and curb ramps".*
 - 2010 ADA Standards are not strict enough for clear sidewalk width. The stricter DDOT standard of 6 feet minimum is recommended. If not possible, then use Public Right-Of-Way Accessibility Guidelines 2011 minimum clear sidewalk width which is 4 feet.
- Page 29-2, 29.4.1.1 Sidewalk Widths
 - Information is contradictory, it is not clear if the minimum sidewalk width is the same as the clear sidewalk width. If minimum for sidewalk really is 6 feet, 4 feet minimum clear path cannot be achieved when considering grass buffer and furniture zone. The minimum clear sidewalk width should be clarified.
- Page 29-3, 29.4.1.3 Slope
 - *"Cross Slope – Maintain 2% (maximum) or ¼ inch per foot sidewalk cross slope towards the roadway. Cross slopes exceeding 2% do not meet ADA requirements and require approval of the Director."*
 - *"Longitudinal Slope - Longitudinal slope shall not exceed the grade of the adjacent roadway. Where longitudinal grades exceed 5%, it is desirable to provide level landings at regular intervals."*
 - Cross slopes exceeding 2% require approval of the ADA Coordinator in addition to the Director.
- Page 29-7, 29.12 Pedestrian Minimum Clear Path
 - *"The minimum clear path around utility structures, street furniture and other encroachments shall be 3 feet."*
 - This is correct under the 2010 ADA Standards. However it is recommended that the minimum clear path width be 4 feet for ease of access of people with disabilities. A width of 3 feet is not enough space to maneuver a wheelchair or crutches.

- Page 31-1, 31.2.1 Sidewalk
 - *"Where utility poles, sign supports, fire hydrants, tree boxes, etc., are provided in the sidewalk, the minimum usable width of sidewalk shall be 3 feet to allow for wheelchair passage."*
 - The minimum clear width for sidewalk should be changed to 4 feet to allow wheelchair passage.
- Page 31-13, 31.6.1 New/Existing Sidewalks
 - *"**Handicap** ramps must lead to the crosswalk and be installed on both sides of the street."*
 - Incorrect language used. Language should be changed to curb ramps instead of handicap ramps.
- Page 32-3, 32.3.14 Sidewalks
 - *"Existing Street- Sidewalk to be reconstructed, if required, with a minimum cross slope of 1 percent and a maximum cross slope of 2 percent and meet requirements of Americans with Disabilities Act Accessibility Guidelines (ADAAG)".*
 - Reference should be replaced. Document should include the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 41-3, 41.2.1.3 Sidewalks without Continuous Tree Space
 - *"Install streetlighting with a minimum of 3 feet clearance from the face of the curb to the centerline of the support pole and provide at least 3 feet clear space for pedestrian walkway."*
 - This is correct under the 2010 ADA Standards. However it is recommended that the *minimum* clear path width be 4 feet for ease of access of people with disabilities. A width of 3 feet is not enough space to maneuver a wheelchair or crutches.

Crosswalks

- Page 43-5, 43.7 Crosswalk
 - *"Handicap ramps must be included within a crosswalk at all times. **Handicap** ramps must be installed in pairs of two, one for each pedestrian travel direction. Any corner and/or mid-block crosswalk having handicap ramps."*

- Incorrect language used. Language should be changed to curb ramps instead of handicap ramps.
- Raised Crosswalk Widths
 - Document does not mention raised crosswalk standards requirements. Raised crosswalk should be included and must comply with current ADA Standards and Public Right-of-Way Guidelines.

Bus Stops

- Page 29-7, 29.13 Bus Shelters
 - *"A minimum 8-foot-wide sidewalk parallel to the curb of the street and adjacent to the front doors of the bus is required. This area must be free of any obstacles and it must have a minimum 6-foot sidewalk depth to allow the bus **handicap** kneeler to operate for receiving wheelchair users."*
 - According to PROWAG 2011, boarding and alighting areas shall provide a clear length of 8 feet minimum, measured perpendicular to the curb or street or highway edge, and a clear width of 5 feet minimum, measured parallel to the street or highway. It is unclear if boarding area dimensions mentioned in this manual are a typo or just a stricter standard. It is also confusing that the dimensions given are in different directions (i.e. DDOT has 8 feet parallel to the curb while PROWAG has 8 feet perpendicular to the curb). This needs to be clarified. It is recommended that the statement be changed to "A minimum 8-foot-wide perpendicular to the curb of the street and a clear width parallel to the curb of 6 feet minimum. This area must be free of obstacles and adjacent to the front doors of the bus. A slope of 2% in both *directions* is also required".
 - Also, incorrect language used for people with disabilities. Language must be changed to the *appropriate* term.
- Page 29-8, 29.13.3 Minimum Size and Capacity
 - *"The minimum pedestrian path width of 6 feet shall be maintained at bus shelters."*
 - Unclear if they mean behind the bus shelter. They must specify if this clear width pertains to the back or front of the bus shelter.
- Page 29-8, 29.13.3 Minimum Size and Capacity

- *"All bus stops shall have a minimum sidewalk width of 8 feet for the front doors of the bus and a minimum of 6 feet provided for the rear doors."*
- It is recommended that the statement be changed to " A minimum 8 ft wide perpendicular to the curb of the street and a clear width parallel to the curb of 6 feet minimum. This area must be free of obstacles and adjacent to the front doors of the bus. A slope of 2% in both directions is also required".

Driveways

- Page 31-4, 31.2.3.2 DDOT Requirements: Commercial Driveway
 - Minimum PAR width is not mentioned. Minimum clear path width should be included under this section.

Pedestrian Signals Devices

- Page 40-23, 40.7.8 Accessible Pedestrian Signal
 - *"APS should be installed wherever pedestrian signals are installed in new construction or reconstruction projects, in accord with the Draft Public Rights-of-Way Accessibility Guidelines. Currently, the most recent draft of these guidelines is from November 23, 2005 and is called "Revised Draft Guidelines for Accessible Public Rights-of-Way" (available at www.access-board.gov/prowac/)."*
 - ADA references are outdated. References must be updated to the most current ADA Standards and Public Right-of-Way Guidelines.

Medians

- Page 31-8, 31.4.1 General Requirements
 - Detectable Warning Surfaces are not specified under Medians. Must include Detectable Warning Surfaces details.

On Street Parking

- Page 29-9, 29.15 Universal Parking Space Design for Accessible Spaces within a Parking Lot

- *"All accessible parking spaces should have a painted **handicap** wheelchair symbol provided and signs mounted at the front of their spaces with the wheelchair symbol. These signs have a blue background with white symbols."*
 - Incorrect language used. Language should be changed to read as follows: "All accessible parking spaces should have painted International Symbol of Accessibility provided on the ground and signage should be mounted at the head of each accessible parking space illustrating the symbol. The symbol shall contrast with its background with either a light symbol on a dark background or a dark symbol on a light background". Handicap word should be replaced.
- Page 29-10, 29.15 Universal Parking Space Design for Accessible Spaces within a Parking Lot
 - *"Accessible Parking spaces must be designed so that a **handicap** person does not travel within the maneuvering lane for vehicle traffic to reach the safe travel path to a building or other site location."*
 - Incorrect language used. Language should be changed to people with disability instead of handicap person.
- Page 29-10, 29.15 Universal Parking Space Design for Accessible Spaces within a Parking Lot
 - *"There are no special **handicap** parking spaces provided. However, DDOT recommends when parking in angle back-in public street parking spaces, that the end spaces adjacent to the corner crosswalks be made available to the handicap access vehicles. Handicap ramps are not permitted at the curb of the street, unless they are located on both sides of the street and they must be located within a striped crosswalk. When a visually impaired or blind person feels a **handicap** ramp adjacent to the curb of the street, it indicates to him that he can cross the street within a crosswalk and vehicles will yield to them."*
 - Incorrect language used. Language should be changed to people with disabilities instead of handicap.
- Page 46-3, 46.2.1 Off-Street Handicap Parking Spaces for people with Disabilities

- *"There must be an additional 5-foot diagonal striped area between a regular parking space and an adjacent **handicap** space."*
- Incorrect language used. Language should be changed from handicap to refer to individuals with disabilities. Does not mention ADA compliant curb ramp. It must include that curb ramps closest to people with disabilities parking spaces should be ADA compliant.

Tree Beds

- Page 47-3, 47.3.7 Tree Box
 - Under requirements to be followed in the design of trees and their location in order to reduced utility conflicts items, an ADA concern is not mentioned. ADA should be part of this section.

Signs

- Page 14-3, 14.3 Other Utilities
 - Does not specify clear width for PAR. Clear width for PAR should be taken under consideration when locating poles, signs and any above ground streetscape. Clear height projections within the PAR (e.g. signs, tree branches) should also be mentioned in these considerations.
- Page 42-1, 42.1.2 Ground Mounted Signs
 - Document does not mention that signposts must not create an accessibility problem. The document should indicate that signpost location could cause an accessibility issue and must comply with current ADA Standards and Public Right-of-Way Guidelines.
- Page 43-7, 43.13.1 General
 - *"Type and Location of Signs-The Ward Traffic Engineer shall make the determination regarding the type and location of signage controls within the ROW. The controls shall include traffic control signs, street names signs, delineators, and permanent barricades."*
 - This statement must be updated. Statement should include that signposts must not obstruct the pedestrian access route.

Sidewalk Cafés

- Page 29-4, 29.4.2 Sidewalk Cafés Located Within Public Space
 - *"Accessibility for wheelchairs users implies, adequate dimensioning of café aisles (4 feet between tables), and spaces for routes leading to ramps and doorways, if stairs are blocking the way."*
 - It is recommended that the minimum turning space required be 5 feet to give a person in a wheelchair more leeway to maneuver in this space. Requirements for dimensioning of café aisles must include minimum turning space requirements.

Surface

- Page 29-6, 29.9 Tactile Warning Strips (Detectable Warnings)
 - *"Truncated domes are a detectable warning device used on walkway surface and curb ramps to warn visually impaired persons of abrupt grade changes and hazardous vehicular areas."*
 - Incorrect language used. Language should be changed to people with visual impairments instead of visually impaired persons. Details should be incorporated to include that Detectable Warnings must have color contrast and must be 2 feet wide from the bottom of the ramp.

Protruding Objects

- Page 28-6, 28.6.3 Placement of Bike Racks in Public Space
 - Does not specify clear width for PAR. Clear width for PAR must be considered when placing bike racks in Public Space. Use the most recent Public Right-of-Way Guidelines as reference.
- Page 31-9, 31.4.7 Objects
 - Document does not specify ADA requirements for protruding objects. It must include requirements from the most current ADA Standards and Public Right-of-Way Guidelines.

3.1. DC DDOT Standard Specifications for Highways and Structures, 2013

The DC DDOT Standard Specifications for Highways and Structures are standards for all DDOT contracts awarded by the DC Mayor and Council, and the Contracting Officer. It is used for all the construction activities and material control within the Public Space. Therefore, all the materials, equipment and installations intended to conform to Codes and Standards, ADA Standards must be part of it.

Under each Measure and Payment Method section, information of each curb ramp and blended transitions must be included. In addition, areas of new construction should include updated information, including the amount payable by the detectable warning pavers, which are not included in the current estimate under this section. In general, the document must submit necessary requirements under each curb ramp including: description, materials, composition, consistency, construction requirements, and measure and payment.

Construction requirements do not mention ADA requirements for sidewalks. It must be updated and include additional information regarding ADA compliance. Sidewalks specifications should be included such as slopes, landing areas, minimum width requirement, among others. It does not include information for granite sidewalk as well, which is very common used material in the DC area. Also, ADA requirements must be included for crosswalks, driveways, and medians.

ADA training is a fundamental responsibility for people involved in every construction project. However, it does not specify that the ADA training programs should be offered. Under employee training requirements, although it is mentioned that the contractor must provide job training aimed at developing full journey workers in the type of trade or job classification involved, ADA training is essential to complete each job within and outside the field.

General

- Page 5, 101.02 Abbreviations
 - List of abbreviations used in the specifications or on the plans do not include ADA abbreviation. Update the list to include ADA.

- Page 16, 102.10 Employment of the Handicapped
 - *"Pursuant to the Rehabilitation Act of 1973 (for Federal and federally-assisted projects), DC Human Rights Act of 1977 for District of Columbia- funded projects, and the Americans with Disabilities Act, the Contractor and all Subcontractor agree not to discriminate against any*

handicapped person who is qualified to perform the job. The Contractor also agrees to take Affirmative Action to hire, advance, and treat *handicapped* people without discrimination."

- Incorrect language used. Language should be changed to "people with disabilities" instead of "handicapped"...
- Page 17, 103 Standard Contract Provisions
 - Under this section, any ADA compliance is not included. A general provision *requiring* ADA compliance must be taken into consideration.
- Page 329, 631.02 Codes and Standards
 - Material, equipment and installations shall conform to Codes and Standards, ADA Standards are not mentioned. This section must be updated to include ADA Standards as part of the Codes and Standards.

Curb Ramps

- Page 280, 606.04 PCC Wheelchair/Bicycle Ramps
 - Measure and Payment Method section must include more information about curb ramp. It must correct the following method as specified in the Contract Documents: "The unit of measure will be each. The number will be actual number of complete ramps constructed in new and existing construction, respectively." It should say: "The unit of measure will be each or square yard. A typical curb ramp will be considered a perpendicular curb ramp of 48 square feet."
- Page 280, 606.04 PCC Wheelchair/Bicycle Ramps
 - Under Measure and Payment section, new construction areas must include additional information. Detectable Warning Pavers must be part of the payment for the PCC Wheelchair/Bicycle Ramps.
- Types of Curb Ramps and Blended Transition
 - Document does not include information for all types of curb ramps: blended transition, parallel, built-up, combination, directional, and granite ramps. General requirements for each type of ramp must

include: description, materials, composition, consistency, construction requirements, and measure and payment.

Sidewalks

- Page 264, 605 Sidewalks and Driveway
 - Construction requirements do not mention ADA requirements. This section must be updated. Document should include additional information regarding ADA compliance. Sidewalk specifications should be included (slopes, landing areas, minimum width requirement).
- Page 267, 605.02 Portland Cement Concrete Sidewalk Repair and Miscellaneous Construction
 - Construction requirements do not mention ADA requirements. This section must be updated to include additional information regarding ADA compliance. Sidewalk specifications should be included (slopes, landing areas, minimum width requirement).
- Page 268, 605.03 Asphaltic Concrete Walk
 - Construction requirements do not mention ADA requirements. This section must be updated to include additional information regarding ADA compliance. Sidewalk specifications should be included (slopes, landing areas, minimum width requirement).
- Granite Sidewalk
 - Document does not include information for granite sidewalks. General requirements for granite sidewalk must include: description, materials, composition, consistency, construction requirements, and measure and payment.

Crosswalks

- Raised Crosswalks
 - Document does not include information for raised crosswalk. General requirements for raised crosswalk must include: description, materials, composition, consistency, construction requirements, and measure and payment.

Driveways

- Page 230, 504 PCC Driveway and Alley Entrances
 - Construction requirements do not mention ADA compliance. Construction Requirements section must be updated to include that driveways and alley entrances must be ADA compliant.
- Page 231, 505 Repair PCC Pavement Base. Alley, Driveway and Alley Entrances
 - Construction requirements do not mention ADA compliance. Construction requirements section must be updated to include that driveway and alley entrances must be ADA compliant.

Medians

- Page 233, B. Preparing Pavement or Base Course for Median Strips, or Directional and Pedestrian Islands
 - Under the section, ADA issues are not mentioned for median islands. Additional information must be added. Section should include that median islands must be ADA compliant 6 feet wide. Detectable warning pavers should be longer than 6 feet from back of curb to back of curb.

Protruding Objects

- Page 271, 605.05 Inverted-U bike
 - Bike rack installation does not mention if bike rack obstructs the PAR. "Bike Rack must not block the PAR" must be included.

Training

- Page 46, G Training and Promotion
 - *"2. Consistent with the Contractor's work force requirements and as permissible under Federal and State regulations, the Contractor shall make full use of training programs."*
 - This section does not specify that ADA training programs should be offered. The section should be revised to specify that ADA training programs should be offered.
- Page 48- 103.04 Employee Training Requirements
 - *"The Contractor shall provide on-the-job training aimed at developing full journey workers in the type of trade or job classification involved."*
 - It does not specify ADA training. Document should specify that ADA training programs should be offered.

3.2. DC DDOT Standard Drawings, April 2009

This document defines standards for engineering drawings for highways and structures in DC. These Standard Drawings should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines. Cases such as slopes in these drawings, specifically in curb ramps, should not be overlooked and must be corrected. In addition, there are different types of curb ramps in DC that are not listed and should be included with their descriptions such as: directional, combination, blended transition, granite, and built-up ramps.

There is also a material used in the District that is not mentioned within document called Porous Flexible Paving (Flexi-Pave) used in sidewalks, which should be included with details for the reference and use of the engineers and contractors. It should also include a drawing with all the pertinent dimension and slope requirements as well as reference the most current ADA regulation.

Pedestrian Pad and Bus Shelters are not included in the drawings. A detail drawing of both must be included. Also, another good reference would be the most recent WMATA Bust Stop and Bus Shelter Guidelines. These design guidelines are also used as a basis when working with local jurisdictions in planning access improvements to transit facilities. Accessibility factor is part of these Guidelines which makes it a good guide to these standards.

General

- Document references ADAAG but it does not specify the edition year.
- Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

Curb Ramps

- 609.05 Wheelchair Bicycle Ramps Locations
 - Notes and drawings indicate that the maximum running slope for ramp is 12:1, it should be 1:12. A drawing indicates that the maximum side flare slope is 10:1, it should be 1:10. Drawing references ADAAG for dimensions, PROWAG 2011 is the most current information. ADA waiver/ADA Coordinator approval is not specified when exceptions are needed. Drawings and notes should be corrected to 1:12 for maximum running slope and 1:10 for maximum side flare slope. Drawing should reference the most current ADA Standards and Public Right-of-Way Guidelines as its source of information. Notes should include that ADA waiver/ADA Coordinator approval is required for design exceptions.
- 609.06 Wheelchair Bicycle Ramps within Corner Radius
 - Drawing indicates that the maximum running slope for ramp and for side flares is 12:1, it should be 1:12. ADA waiver/ADA Coordinator approval is not specified for this kind of construction. Drawing references ADAAG for dimensions, PROWAG 2011 is the most current information. Drawings and notes should be corrected to 1:12 for maximum running slope for ramp and side flares. Notes should include that ADA waiver/ADA Coordinator approval is required for this type of construction. Drawing should reference the most current ADA Standards and Public Right-of Way Guidelines as its source of information.
- 609.07 Wheelchair Bicycle Ramps Details
 - Drawing indicates that the maximum running slope for ramp and for flares is 12:1, it should be 1:12. Notes do not indicate that any ADA guidelines should be referenced. Drawings and notes should be corrected to 1:12 for maximum running slope for ramp and side flares.

Drawing should reference the most current ADA Standards and Public Right-of Way Guidelines as its source of information.

- 609.08 Wheelchair Bicycle Ramps Slope Nomographs
 - Drawings and notes indicate that the maximum running slope for ramp is 12:1, it should be 1:12. Drawing indicates that the maximum side flare slope is 10:1, it should be 1:10. Notes do not indicate that any ADA guidelines should be referenced. Drawings and notes should be corrected to 1:12 for maximum running slope and 1:10 for maximum side flare slope. Drawing should reference the most current ADA Standards and Public Right-of Way Guidelines as its source of information.
- 609.09 Parallel Wheelchair Ramps
 - Drawing is inaccurate, does not present a correct parallel ramp. Notes do not indicate that any ADA guidelines should be referenced. ADA waiver/ADA Coordinator approval is not specified for this kind of construction. Drawing should be corrected to represent an accurate portrayal of a parallel ramp. Drawing should reference the most current ADA Standards and Public Right-of Way Guidelines as its source of information. Notes should include that ADA waiver/ADA Coordinator approval is required for this type of construction.
- Directional Ramp
 - Detailed drawing for these ramps is not present in the Standard Drawings 2009. A detailed drawing of this type of ramp must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines.
- Combination Ramp
 - Detailed drawing for these ramps is not present in the Standard Drawings 2009. A detailed drawing of this type of ramp must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines.

- Blended Transition
 - Detailed drawing for these ramps is not present in the Standard Drawings 2009. A detailed drawing of this type of ramp must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines.
- Granite Ramp
 - Detailed drawing for these ramps is not present in the Standard Drawings 2009. A detailed drawing of this type of ramp must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines. A typical cross section must be shown, as the placing of granite slabs differs from placing concrete. This will serve as a guide for how to install a granite ramp.
- Built-up Ramp
 - Detailed drawing for these ramps is not present in the Standard Drawings 2009. A detailed drawing of this type of ramp must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines.

Sidewalks

- 608.01 Typical Sidewalk Section
 - Running slope is not specified. Tree box dimensions are not up to date. The section does not indicate that the surface of the sidewalk must be non-slip, firm and stable. Drawing shows minimum clear width is 3 feet, should be 4 feet minimum. Include running slope in the detail drawings. Update the tree box dimensions in accordance with Urban Forestry Administration (UFA). Add a note that says that the sidewalk surface must be non-slip, firm and stable. Sidewalk clear width must be corrected to 4 feet to meet ADA standard.

- 608.02 Pressed Concrete Block Paver Sidewalk
 - Cross slope, running slope and minimum sidewalk width are not specified in the drawing. Drawing details must include cross slope, running slope and minimum sidewalk width in accordance with the most current ADA Standards and the Public Right-of-Way Guidelines.

- 608.04 Brick on 4" PCC Base
 - ADA Compliance reference not specified. Drawing shows cross slope is 2% minimum, it should be 2% maximum. Drawing should include reference to the most current ADA Standards and the Public Right-of-Way Guidelines. Cross slope must be corrected to 2% maximum.

- Granite Sidewalk
 - No detail drawing or typical section is present in the Standard Drawings 2009. A detail of this type of sidewalk must be included for reference in the Standard Drawings for the reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standard and Public Right-of-Way Guidelines. A typical cross section must be shown, as the placing of granite slabs differs from placing concrete. This will serve as a guide for how to install a granite sidewalk.

- Porous Flexible Paving (Flexi-Pave)
 - No detail of this type of paving is present in the Standard Drawings 2009. A detail of this type of paving must be included in the Standard Drawings for reference and use by engineers and contractors. The drawing should include all pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines.

Crosswalk

- 616.29 Traffic Calming Raised Crosswalk and Typical Circle Standard Drawings
 - Drawing does not include crosswalk layout. Crosswalk layout must be included.
- Raised Crosswalk
 - No detail of this type of crosswalk is present in the Standard Drawings 2009. A detailed drawing of a raised crosswalk must be included in the Standard Drawings for reference and use by engineers and contractors. A typical cross section must be shown.

Bus Stops

- Pedestrian Pad
 - There is no detailed drawing present in the Standard Drawings 2009. A detailed drawing of a Pedestrian Pad must be included in the Standard Drawing for reference and use by engineers and contractors. All pertinent dimension and slope requirements as well as reference to the most current ADA Standards and Public Right-of-Way Guidelines should be included. Another good reference is the WMATA Bus Stop and Bus Shelter Guidelines.
- Bus Shelter
 - There is no detailed drawing present in the Standard Drawings 2009. A detailed drawing of a Bus Shelter must be included in the Standard Drawing for reference and use by engineers and contractors. All pertinent dimension and slope requirements as well as reference the most current ADA Standards and Public Right-of-Way Guidelines should be included. Another good reference would be the WMATA Bus Stop and Bus Shelter Guidelines.

Driveways

- 504.01 Alley-Driveway Entrance with Curb Return Type "A"
 - *"To ensure conformance with ADA Guidelines where alley and driveway entrances abut sidewalk, the entrances, including any intervening curb return, shall be flush with the adjacent sidewalk a minimum of 4 feet forward from the back of sidewalk."*

- Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- 504.02 Driveway Entrance Type "B"
 - *"To ensure conformance with ADA Guidelines where alley and driveway entrances abut sidewalk, the entrances, including any intervening curb return, shall be flush with the adjacent sidewalk a minimum of 4 feet forward from the back of sidewalk."*
 - Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- 504.03 Driveway Entrance Type "C"
 - *"To ensure conformance with ADA Guidelines where alley and driveway entrances abut sidewalk, the entrances, including any intervening curb return, shall be flush with the adjacent sidewalk a minimum of 4 feet forward from the back of sidewalk."*
 - Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- 504.04 Driveway Entrance Type "D"
 - *"To ensure conformance with ADA Guidelines where alley and driveway entrances abut sidewalk, the entrances, including any intervening curb return, shall be flush with the adjacent sidewalk a minimum of 4 feet forward from the back of sidewalk."*
 - Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.

Pedestrian Signal Devices

- Short Poles
 - No detailed drawing is present in the Standard Drawings 2009. A detailed drawing of a Short Pole must be included in Standard Drawings for the reference and use by engineers and contractors. All pertinent dimension and slope requirements as well as reference the

most current ADA Standards and Public Right-of-Way Guidelines should be included.

Medians

- 601.01 Directional Islands
 - *"Where island extend across crosswalks, curb cuts for **handicapped** shall be constructed as part of the islands."*
 - Incorrect language when describing person with disabilities. Curb cut width not specified. Language should be changed to people with disabilities instead of handicapped. Drawing should include PROWAG recommendation for a 6-foot-wide curb cut.

- 601.02 Directional Islands
 - *"Where island extend across crosswalks, curb cuts for **handicapped** shall be constructed as part of the islands."*
 - Incorrect language when describing person with disabilities. Curb cut width not specified. Language should be changed to person with disabilities instead of handicapped. Drawing should include PROWAG recommendation for a 6-foot-wide curb cut.

- 601.03 Median Pedestrian Refuge Island Detail
 - Median and island opening shows 4-foot minimum width. Median and island opening should be 6 feet minimum in accordance with PROWAG.

Tree Beds

- 611.02 Typical Median Plan for Type "A" and "B" Tree Wells
 - No clear sidewalk width is specified. Clear sidewalk width must be specified. It must reference the most current ADA Standards and Public Right-of-Way Guidelines.

- 611.04 Type "A" Tree Well Typical Section
 - No clear sidewalk width is specified. Clear sidewalk width must be specified. It must reference the most current ADA Standards and Public Right-of-Way Guidelines.
- 611.05 Type "B" Tree Well Typical Section
 - No clear sidewalk width is specified. Clear sidewalk width must be specified. It must reference the most current ADA Standards and Public Right-of-Way Guidelines.

Surfaces

- 617.23 Traffic Signal District Manhole Frame and Cover Installation- PEPCO
 - Drawing does not indicate that the manhole frame and cover must be flush with the sidewalk. Note must include that the manhole frame and cover be flush with the sidewalk and present no gaps in the surface greater than ½ inch.

Protruding Objects

- 602.06 Coping
 - *"Face of coping shall be 2 feet minimum from face of curb, unless shown otherwise on the contract plans, or as directed by the engineer."*
 - Minimum acceptable width for sidewalk is 4 feet. Change the minimum width to 4 feet in accordance with PROWAG.

Stairs

- 602.04 Step Details
 - Projection into the PAR is not specified. Notes must include most current ADA Standards and Public Right-of-Way Guidelines for PAR projection.
- 709.01 Steps Handrails
 - Drawing does not show that the handrail extends beyond bottom step. To be ADA compliant, a 12 inch minimum extension must be shown.

3.3. DC DDOT Construction Management Manual, May 2010

This Manual was developed to establish standard operating procedures for DDOT's engineers, construction managers, consultants, and contractors in order to promote efficiency.

None of the communication in the announcements of projects and bidding process incorporates ADA. Communication with the public must meet ADA requirements, whether they are in electronic, telecommunication or physical format. DDOT must take steps to incorporate this requirement into its procedures and guidelines.

Our recommendation is to have the following mandatory requirements incorporated into the document:

- ADA trained and certified staff (at least one) is available for all consultants, contractors, and DDOT personnel involved in all construction projects involving public right-of-way.
- A project cannot be closed-out till the ADA Coordinator certifies that the project is compliant with all ADA requirements.
- If an ADA requirement cannot be fulfilled due to physical or other reasons, an "Exception" is retained on file with the approval of the Program Manager, ADA Coordinator, and the Chief Engineer.

General

- Page 1 Introduction, 3. Construction Project Staff and Responsibilities
 - *"However, all construction management staff should recognize that every project will be different to some degree and will require flexibility in the procedures and responsibilities in adapting them to a particular project."*
 - Additional information must be included. The following comment must be incorporated: "Hence, all project supervisory staff must be familiar with the Americans with Disabilities Act of 1990, the 2010 ADA Standards and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way."

3.4. DC Temporary Traffic Control Manual Guidelines and Standards (July 2006)

This Manual is the District of Columbia's version of Part 6 of the MUTCD 2003 edition. Temporary traffic control installations should be reviewed daily to ensure the functionality of the temporary traffic control devices and compliance with the Manual.

The DC Temporary Traffic Control Manual Guidelines and Standards must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines, the references used within document are outdated. Moreover, language used related to curb ramps is not appropriate and must be changed.

General

- This document refers to the ADA Regulations of 1994.
- Document must ensure conformance with the most current ADA Standard and Public Right-of-Way Guidelines.
- Page 3-1, Fundamental Principles
 - *"Guidance: The needs of pedestrians who have disabilities should be considered in accordance with the Americans with Disabilities Act of 1990 (ADA), Title II, and Paragraph 35.130. For further information, see the new accessibility guidelines for buildings and facilities, transportation facilities, and transportation vehicles, September 1994."*
 - Reference must be updated. Document should make note that it must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Page 5-5, 5.1 Pedestrian Considerations
 - *Standard I: Requirements of the American with Disabilities Act (ADA) of 1990.*
 - It must be updated. Document should include the most current ADA Standards and Public Right-of-Way Guidelines.

Curb Ramps

- Page B-8, General Traffic Control Plan (TCP) Submittal Guidelines
 - *"Provide temporary **handicap** ramps, crosswalks, and signs to meet Americans with Disabilities Act (ADA) for all pedestrians within*

*construction work zone area. (NOTE: The entire **handicap** ramp including side flares must be located within a crosswalk. The minimum crosswalk has a 15-foot width. The top and bottom of a ramp must have a 5-foot clearance. Stop lines are located a minimum six feet before a crosswalk. Stop lines are 12 inches wide. If using a striped crosswalk, the stripes are two feet wide with 2-foot spacing and make stripes parallel to curb line of street. Edge lines are required on all crosswalks.)"*

- Incorrect language used. Language should be changed to say curb ramp instead of handicap ramp. Slope standards for curb ramp and landing area must be included.
- Page B-13, Third Party Certified Traffic Control Plan (TCP) Submittal Requirements
 - *"Provide temporary **handicap** ramps, crosswalks, and signs to meet Americans with Disabilities Act (ADA) for all pedestrians within construction work zone area. (NOTE: The entire **handicap** ramp including side flares must be located within a crosswalk. The minimum crosswalk has a 15-foot width. The top and bottom of a ramp must have a 5-foot clearance. Stop lines are located a minimum six feet before a crosswalk. Stop lines are twelve inches wide. If using a striped crosswalk, the stripes are 2-feet wide, with 2-foot spacing and make stripes parallel to curb line of street. Edge lines are required on all crosswalks.)"*
 - Incorrect language used. Language should be changed to say curb ramp instead of handicap ramp. Slope standards for curb ramp and landing area must be included.

3.5. DDOT Utility Work Zone Traffic Control Plan Typical, May 2007

The DDOT Utility Work Zone Traffic Control Plan Typical are used for utility excavation, and other work within the public right-of-way. As an observation, the document does not specify that sidewalks, curb ramps and crosswalks must meet the needs of pedestrian with disabilities. Temporary sidewalks, curb ramps and crosswalks should meet the needs of pedestrians with disabilities in accordance with the ADA Standards and Guidelines. Document has to be focused on pedestrians and in every detail make sure work zones comply with all ADA requirements.

General

- TCP 2 Typical TCP for Travel Lane, Parking Lane, and Sidewalk Closure
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 3 Typical TCP for Parking Lane/Sidewalk Closure
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 11 Right Lane Closures with No Parking Permitted
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 12 Approaching Left Lane Closure with Parking Permitted
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 13 Multiple Lane Closure at Intersection

- Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 14 Right Lane Closure Far Side of Intersection
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 15 Left Lane Closure on Far Side of Intersection
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 21 Typical TCP for Two Lane Closure on Two Way Street to Excavate Across Roadway; Phase 1
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.
- TCP 22 Typical TCP for Two Lane Closure on Two Way Street to Excavate. Excavate Across Roadway; Phase 2
 - Standard notes in the Typical TCP do not specify that temporary sidewalks, wheelchair ramps and crosswalks must meet the needs of pedestrians with disabilities. In the Standard Notes it should be included that temporary sidewalks, wheelchair ramps and crosswalks

shall meet the needs of pedestrians with disabilities in accordance with the most current ADA Standards and Public Right-of-Way Guidelines.

4. RECOMMENDED MODIFICATIONS/CHANGES TO PROW DOCUMENTS

4.1. Summary of Findings & Recommendations

Task-D consisted of reviewing various DDOT's Engineering, Design and Construction Manuals for accessibility compliance under current federal ADA regulations. We have used PROWAG as the primary regulation, even though it is currently only a guideline; it is anticipated to become the law ultimately. The proposed guidelines are developed specifically for pedestrian facilities in the public right-of-way and address conditions and constraints that exist in the public right-of-way.

The goal of the District is to make all pedestrian access routes in the public right-of-way accessible to people with disabilities. This Task is one of the efforts in creating a Transition Plan for the District to become ADA compliant.

We are aware that DDOT is currently in the process of revising the Standard Drawings to incorporate ADA requirements. Since most of the ADA compliance barriers occur in the planning and design stage itself, it is important that the Engineering and Design Standards be updated to current Federal ADA Standards. Many of the DDOT Standards have more stringent requirements than the Federal Standards, and have even stricter requirements heavily in pedestrians.

4.2. Findings

The findings of this effort are summarized as follows:

- Portions of the documents reviewed are not ADA-compliant.
- The references used in these manuals are outdated.
- Documents do not specify and/or offer ADA training to managers, planners, designers and inspectors responsible for planning, designing, and monitoring construction of improvements to Public Right-of-Way projects
- The involvement of the ADA Coordinator in the planning, design and development process is non-existent.

- Many of the documents use incorrect language regarding people with disabilities.
- Documents are used for all construction activities; however, most of them are not aware of ADA concerns within this process
- Detailed drawings for several items were not present in the Standard Drawings 2009 (i.e. short poles and porous flexible paving).
- Description of the different types of ramps used in the District is not present in the DEM or the Standard Drawings.
- There is no established procedure and/or form that addresses ADA design exceptions.
- There is no established hierarchy of which ADA standard or guideline one must comply with first.

4.3. Recommendations

Our recommendations for the update and revision of these documents are as follows:

- All of the documents should make note that they must ensure conformance with the most current ADA Standards and Public Right-of-Way Guidelines.
- Documents should recommend that ADA training be mandated to all DDOT staff responsible for improvements to the Public Right-of-Way projects, to ensure District-wide implementation of ADA requirements from planning, design, and construction to maintenance phases.
- Make availability of ADA trained and certified staff, and/or consultants, a mandatory requirement for all design, engineering, and construction projects.
- Make a requirement an ADA training exam or evaluation after each course taken to ensure staff and/or consultants understanding of the ADA requirements for planning, designing, and construction.
- Make the requirement of ADA Coordinator's approval, a requirement for all contracts before they are issued for bidding, and also for close-out.
- The appropriate language when referring to people with disabilities should be adapted in the updated versions.
- ADA requirements must be taken into consideration for all construction activities.
- Detail Drawing should be made available for the different types of curb ramps as depicted by PROWAG for planning and design.

- There should be a different payment quantity for each type of curb ramp. Some types of curb ramps have more incidental costs than others that should be specified to help with the planning and design process.
- Detailed drawings for several items that were not present in the Standard Drawings 2009 should be made available for the planning and design process.
- Suggest using easily identifiable materials and patterns to physically separate the different zones such as Furniture Zone, Pedestrian Zone, and Frontage Zone. Importance should be given to the Pedestrian Zone, so that a clearly identifiable Pedestrian Access Route (PAR) is introduced right at the planning and design phase, to ensure that the PAR will be maintained at a slope of 2% or less without any obstructions.
- Consider developing a District ADA Policy and Guidelines that addresses accessibility and other ADA issues that individuals with disabilities may experience citywide. It will be beneficial for engineers, developers, inspectors and contractors in the DC area, since it could give an easier, clearer understanding of DDOT's requirements when it comes to ADA compliance.

5. SUMMARY

This Findings Report for Task D is just a small part of all the tasks required in the development of a Comprehensive ADA/Section 504 Transition Plan. It is expected that PROWAG will become a Standard soon. Depending on the modifications and contents of the final regulations, the Transition Plan will also have to be revised. Similarly, when other regulations are implemented and if DDOT management structure changes, the Transition Plan will also need to be updated.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

GRIEVANCE POLICIES TASK E

Review of Grievance Policy,
Procedures, Forms and Tracking

Prepared For:



Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.
Disability Access Consultants (DAC)
Sharp & Company
Precision Systems, Inc.

DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 2.0
DATE: April 2015

This page left intentionally blank

Executive Summary

PURPOSE OF THE PROJECT

The purpose of the project is to develop a comprehensive ADA/Section 504 Transition Plan to help the District Department of Transportation (DDOT) remove pedestrian accessibility barriers along the public rights-of-way throughout the District.

The purpose of Task E is to assess the grievance policies of DDOT and the procedures for filing, monitoring, tracking, and timely resolution of concerns and complaints regarding accessibility for persons with disabilities. This report provides a summary of the review of the District Department of Transportation (DDOT) grievance policies, procedures, and forms.

Public entities, such as DDOT, are required by the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (504) to respond to concerns and complaints in a timely manner and to track and monitor the resolution of such concerns and complaints. In addition, the Federal Highway Administration (FHWA) has internal and external complaint processing procedures. As DDOT is a primary recipient of FHWA funding, DDOT adheres and reports complaint procedures and resolution of complaints to FHWA. The process does not preclude DDOT of informally resolving complaints regarding potential discrimination.

Discrimination is defined by FHWA as any act or inaction, whether intentional or unintentional in any program or activity of a Federal-aid recipient, sub-recipient, or contractor, which results in disparate (unfavorable) treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, sex, national origin, age, disability or in the case of disability, failing to make a reasonable accommodation.

Complaints and grievances include nonstructural and structural accommodations. The ADA or 504 Coordinator usually has the responsibility of responding to and resolving complaints in a timely manner. Reasonable accommodations may be subject to privacy laws, especially in cases involving medical issues. Therefore, portions of the tracking of concerns and complaints regarding reasonable accommodations may be subject to privacy laws and may require enhanced security.

METHODOLOGY

A review was conducted of the District of Columbia Department of Transportation's (DDOT) grievance policies, procedures and practices to determine compliance with

requirements under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Federal Highway Administration (FHWA) requirements were also reviewed due to DDOT's relationship to FHWA. Civil rights and related supporting documents were also reviewed as was the current system used by DDOT to record complaints from citizens. This review addressed compliance with grievance policies and procedures, and the tracking, monitoring and the timeliness of complaint resolutions.

The scope of work activities include:

- Determining what DDOT grievance policies, procedures and practices are currently in place;
- Reviewing DDOT grievance policies, procedures and practices for compliance with the ADA;
- Determining if a grievance tracking system or process exists to follow and ensure timely resolution of grievances and for reporting purposes;
- Identifying any deficiencies in the policies, forms or tracking system;
- Make recommendations for changes, additions or deletions needed in the current policies and tracking process;
- Reviewing and recommending potential training for the ADA Coordinator related to grievance policies and procedures;
- Noting any exemplary practices implemented by DDOT.

FINDINGS

Key findings are as follows:

- DDOT currently has grievance policies and procedures that overall meets the requirements of the ADA;
- The former grievance tracking process used prior to January 2014 incorporated all the required elements to track the grievance process, but did not include the resolution of the complaint or concern or did not resolve the complaint or concern in a timely manner;
- The documentation of tracking, timelines and resolution of complaints has improved since 2014 and is receiving ongoing enhancement by adapting the current Cityworks system. The Cityworks system does however have deficiencies with the entering of complaints and items that need to be addressed, assigning the items to the appropriate person, and tracking the progress of addressing the items and completion.

RECOMMENDATIONS

Based on recent interviews with the ADA Coordinator, DDOT is providing training for the Customer Service Request (CSR) system, also known as 311, for data entry of ADA related complaints and is adapting the current Cityworks program to meet the tracking and monitoring portion of the requirement. It was discussed with the ADA Coordinator that the system should be able to record and track the following:

- Date of initial request
- Type of request/nature of concern
- Informal complaint or formal grievance
- Person or persons who made the request
- Contact information of person(s)
- Communication by DDOT regarding the request
- Action taken to meet and resolve the request with date(s)
- If resolved, date resolved and the method or methods used to resolve the issue and/or provide the accommodation
- If not resolved, entries should be tracked regarding the action taken, the results and a statement provided as to why assistance or resolution was not provided or was not successful
- Note of any unresolved complaints
- Inclusion of a strategy and timeline for the projected resolution of the unresolved complaint
- Expected expenditure of funds
- Actual expenditure of funds
- Follow-up activities such as permits or planned barrier removal

A tracking system is recommended to be used to track accommodation requests for persons with disabilities regarding the type of request for accommodation and whether the accommodation was provided. The tracking system for accommodations will also provide information regarding the number and type of accommodation requests made over time and provide security and privacy for requests of a medical or sensitive nature to protect sensitive information. The tracking of accommodations will provide information that will be valuable for planning and budgeting.

Although DDOT is in the process of adapting the current Cityworks program to serve as a grievance process, the current program is not adequate at this time to meet the requirements serving as a DDOT grievance and tracking program.

Table of Contents

EXECUTIVE SUMMARY 3

1. BACKGROUND..... 8

1.1 The Americans with Disabilities Act/Section 504 Regulations..... 8

1.2 Project Purpose..... 8

1.3 Task Purpose 9

2. SUMMARY OF GRIEVANCE REQUIREMENTS 9

3. REVIEW METHODOLOGY..... 10

4. FINDINGS..... 11

The following is a summary of the findings from document and procedure review and the interview with the DDOT ADA Coordinator. 11

4.1 Required ADA Notice 11

4.2 Role of the Designated Responsible Person..... 11

4.3 DDOT Grievance Procedures 12

4.4 DDOT Complaint Processing and Tracking..... 13

4.5 Other Statutes and Related Agencies 14

Title VI and Title VII 14

DC Office of Human Rights 14

5. RECOMMENDATIONS..... 15

1. BACKGROUND

1.1 The Americans with Disabilities Act/Section 504 Regulations

The Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. §§ 12101 et seq) and its implementing regulations prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, transportation and telecommunications. The ADA defines an individual with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or as a person who is perceived by others as having such an impairment. While the ADA does not specifically name all of the impairments that are covered, it does indicate that definition of disability be construed in to the broadest extent permitted under the Act.

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 either receives federal financial assistance or is conducted by any Executive agency or the United States Postal Service. Each federal agency has its own set of Section 504 regulations that apply to its own programs. As a recipient of U.S. Department of Transportation Funding, The District Department of Transportation is required to adhere to the ADA and the established Section 504 regulations.

1.2 Project Purpose

The purpose of the project is to define the services and responsibilities required for the development of a comprehensive ADA/Section 504 Transition Plan to help the DDOT remove barriers to pedestrian accessibility in the public rights-of- way throughout the District.

The project consists of the development of a comprehensive ADA /Section 504 Transition Plan. The Parsons Brinckerhoff team will work closely with the DDOT ADA Coordinator to identify and obtain for review the required deficiencies, found under a separate contract, and the associated DDOT Manuals and Policies. This review is essential to determine the deficiencies and recommended solutions to include in the Transition Plan.

The Transition Plan should be sufficient to provide adequate protection against potential legal actions by identifying reasonable, objective compliance criteria. The Transition Plan will show DDOT's commitment to continuous progress toward the identified goals and objectives for removing barriers to pedestrian accessibility. The Transition Plan will

establish a prioritization process for correcting all ADA/Section 504 non-compliant assets. The Transition Plan will be a “living” and transparent plan. It will accommodate a dynamic input process whereby, as issues are identified, they will be incorporated into the prioritization schedule in accordance with the assessment factors.

1.3 Task Purpose

The purpose of Task E is to assess the grievance policies of DDOT and the procedures for filing, monitoring and tracking and timely resolution of concerns and complaints regarding accessibility for persons with disabilities. To provide information for this task, the DDOT ADA coordinator was interviewed to obtain an understanding of the current policies and activities related to responsibilities and procedures. The DDOT policies, procedures, and website were reviewed, and complaints were tracked through the automated system.

2. Summary of Grievance Requirements

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act requires that a grievance procedures be established and readily available and accessible for anyone to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by DDOT.

Procedures are required to be adopted and published for resolving grievances related to the ADA and Section 504. These grievance procedures are to set out a system for resolving complaints of disability discrimination in a prompt and fair manner. The grievance procedure should include:

- a description of how and where a complaint under Title II may be filed with DDOT;
- if a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- a description of the time frames and processes to be followed by the complainant and the government entity;
- information on how to appeal an adverse decision; and
- a statement of how long complaint files will be retained.

The procedure should also be made available in alternative formats so that it is accessible to all people with disabilities. The procedure should be periodically reviewed and updated and include the contact information of the ADA coordinator as necessary.

The process for and the need to make complaints in writing or by an accessible alternate format based upon the individual’s needs should be spelled out in the

procedures. Alternative means for filing complaints, such as personal interviews or a tape recording of the complaint should be available for individuals with disabilities upon request. A form created for ease of filing grievances should contain information about the alleged discrimination such as name, address, phone number of complainant and location, date and description of the problem. The procedures should indicate that complaints should be submitted by the grievant and/or his/her designee as soon as possible but no later than 30 days after the alleged violation. Some complaints or grievances may be related to employment issues and medical accommodations, which should be handled with an additional level or measure of security. The rules contemplate informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a grievance. In most cases, the designated decision maker should issue a written determination as to the validity of the grievance and a description of the resolution, if any, and a copy forwarded to the grievant within 60 days after its filing. The determination should include information on how to appeal an adverse decision. Ideally, the agency's ADA coordinator should be the recipient of all inquiries regarding ADA compliance and accommodations. The ADA coordinate should conduct an investigation, if appropriate, and maintain all files and records relating to all grievances filed for the time spelled out in the procedures.

3. Review Methodology

A review was conducted of District of Columbia Department of Transportation (DDOT) grievance policies, procedures, and practices to determine compliance with requirements under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Federal Highway Administration (FHWA) requirements were also reviewed due to DDOT's relationship to FHWA. Civil rights, related, and supporting documents were also reviewed. This review addressed compliance with grievance policies and procedures, and the tracking, monitoring and the timeliness of complaint resolutions.

Related documents reviewed included, but were not limited to:

- The ADA notice and grievance procedure requirements
- Federal Highway Administration External and Internal Complaint Processing Procedures
- Related nondiscrimination statutes
- DDOT methods and documents for tracking complaints and grievances
- DDOT's job description for the ADA Coordinator (CS-301-13)

- Information from the DDOT website regarding the ADA, Section 504, Title VI and Title VII

An assessment of the on-line grievance process was conducted through a review of actual complains entered into the District of Columbia’s 311 system. In addition, the current on-line compliant form was also reviewed and tested for functionality. The 311 Call Center is operated by the D.C. Office of Unified Communications and serves as a one-stop service for residents, constituents, and visitors that was designed to make interaction with city government easier.

Finally, to obtain staff perspectives on DDOT’s grievance policies and procedures, the DDOT ADA Coordinator was interviewed.

4. FINDINGS

The following is a summary of the findings from document and procedure review and the interview with the DDOT ADA Coordinator.

4.1 Required ADA Notice

As required, DDOT has posted a notice on its website providing regarding the Americans with Disabilities Act. The posting provides information regarding employment, effective communication, accessibility and references to reference materials and documents. The information also provides notice and contact information of the ADA Coordinator. In addition, the information posted also meets the requirements of the procedure for an auxiliary aid or service, effective communication or a modification in a policy or procedure to participate in a Department program, service, or activity. This notice is provided in Attachment F.

The website refers users to Attachment A-PROW Compliance Inquiry Process. The attachment was not found on the webpage or through a search of the website.

4.2 Role of the Designated Responsible Person

DDOT has a comprehensive job description for the position of the Americans with Disabilities Act Coordinator and a responsible person has been designated by DDOT carry out the functions specified in the job description. The complete job description is included in Appendix E. DDOT job description CS-301-13 states the following:

“The position has the primary responsibility for ensuring that all programs, services, activities and facilities of the agency are accessible and usable by all individuals, as

required by the Americans with Disabilities Act (ADA), Title II and Section 504 of the 1973 Rehabilitation Act; and equal employment opportunity (EEO) program requirements.”

The job position for the ADA Coordinator is very comprehensive and clearly outlines the roles and responsibilities of the ADA Coordinator. The Coordinator is ultimately responsible for coordinating all DDOT efforts in complying with the ADA and for overseeing investigations and responses to complaints of discrimination. These responsibilities are confirmed in the job description for the ADA Coordinator.

As noted, the job description provides responsibility to not only the ADA, but also Section 504 of the Rehabilitation Act (504). The job description and subsequent major duties are appropriate for a person serving in the role of the ADA/504 Coordinator. The job description does not limit job responsibilities to only the public right-of-way. Inclusion of 504 activities provides for a seamless performance of activities.

4.3 DDOT Grievance Procedures

DDOT currently has a grievance and complaint procedure available on the DDOT website. As reported by Mr. Cesar Barreto, DDOT ADA Coordinator, a new grievance procedure was submitted to and approved by FHWA in 2014. The form and procedure mirror the Department of Justice (DOJ) recommended notice and procedures and therefore meets the requirements under the ADA and Section 504. The form was placed on the website in 2014. The title of the form to be completed by the Grievant is Accessibility Complaint Form. A copy of the Grievance Procedure and form to be filled out for a complaint is included in Appendix C.

A prior ADA Grievance Procedure was reviewed by the General Counsel and the Assistant Attorney General on September 1, 2011, but was not disseminated. The previous DDOT policy directed persons with complaints to the District of Columbia Office of Human Rights instead of directly to DDOT. The new grievance policy directs concerns with DDOT directly to DDOT and represents an improvement.

In addition, DDOT has an Accessibility Complaint Form available on the DDOT website. The form can be used to file an informal complaint or a formal grievance. Although not stated, it appears that the complaint can be mailed to the address listed as the contact person on the website. The complaint form was found to be posted on the website, but was not functional at the time of this review.

The development of an approved grievance policy and form represents an improvement over previous grievance policies and procedures prior to the 2014 approval of the grievance policy.

4.4 DDOT Complaint Processing and Tracking

Grievance concerns and complaints are to be documented, tracked and status updated by the ADA Coordinator. These files and records are to be maintained by the agency for a minimum of three years.

A review of current and prior ADA complaint tracking log records indicated that the documentation procedure was being followed, although not always accurately or complete. For instance, some of the items either do not indicate the resolution status or if any follow-up action was taken. Some concerns seemed to take a considerable amount of time to resolve and it appeared that no action was taken in a few cases.

At the time of this report, the ADA Coordinator stated that that the tracking and reporting feature of the complaint and grievance log were being enhanced and further developments underway. As a part of the verification of the functionality of the Cityworks 311 system as a process for accessibility grievances, several actual concerns were submitted to Cityworks to be entered into the 311 system to be entered into Cityworks. The results of the submittal of the grievances provided mixed results. It was found that some of the 311 calls entered could be located in the system, however not all could be found. In addition, it was also found that documentation entered by the 311 staff from some of the calls did not contain complete information... One call entered was marked as “closed” after it was entered, although no action had been taken to resolve the issue. The current CSR 311 system needs significant adjustments and enhancements if it is to be used as a grievance processing system.

During an interview of Mr. Cesar Barreto, the DDOT ADA Coordinator, he indicated that the tracking of the concerns and complaints has been improving. Mr. Barreto stated that the Cityworks system has recently been enhanced to collect and track concerns, complaints and grievances, but that additional modifications are still needed. Mr. Barreto also stated that training has been provided to 311 staff to facilitate better inclusion of ADA concerns and complaints into Cityworks.

To address requests for reasonable accommodations, Mr. Barreto stated that he has developed an internal system tracking system with alerts to track and monitor requests that are not conducive to Cityworks as they may be for reasonable accommodations and have privacy requirements. In prior years, DDOT used a paper tracking method as an ADA grievance and complaint procedure that was more specifically designed for ADA issues. The previous tracking log from 2005 to 2014 was reviewed and was found to provide inadequate monitoring and tracking of complaints and concerns. According to

Mr. Barreto, a new procedure and system was recently developed and will provide for a more timely resolution of complaints and tracking.

Although it was found that DDOT's current grievance process for accepting and processing complaints and grievances needs improvement, DDOT does meet the requirements for the notice and posting of external and internal grievance procedures.

4.5 Other Statutes and Related Agencies

Title VI and Title VII

DDOT has a Discrimination Complaint form for Title VI of the Civil Rights Act of 1964 regarding discrimination based on race, color, and national origin in any program or activity receiving Federal assistance. This form is included as Appendix K. It is interesting to note that page 2 has a check box for "disability" in the category indicated for the basis of the complaint. As Title VI and Title VII include race, color, religion, sex, or national origin, it is unclear if the inclusion of "disability" was added to provide for a more inclusionary, seamless method for complaints and grievances. The Title VII Policy is included as Appendix J.

DC Office of Human Rights

The DC Office of Human Rights enforces the DC Human Rights Act of 1977 and other laws and policies on nondiscrimination. Its mission is to eradicate discrimination, increase equal opportunity, and protect human rights in the city. It provides additional means to ensure the persons with disabilities are afforded access to programs, services, and activities of all city agencies including DDOT. The Office is also the advocate for the practice of good human relations and mutual understanding among the various racial ethnic and religious groups in the District of Columbia.

Activities of the DC Office of Human Rights include:

- Investigate and process complaints of unlawful discrimination in employment, housing, public accommodations, and educational institutions. Places of public accommodation include restaurants, hospitals, financial institutions, and insurance companies.
- Protect the equal employment opportunity rights of District government employees.
- Review, approve, and monitor the affirmative action plans of all District government departments and agencies. This includes review of special departmental emphasis programs for individuals with disabilities.

- Investigate complaints and conditions causing community tension and conflict, which could lead to breaches of the peace and public disorder.
- Conduct hearings on major issues affecting the protection and promotion of human rights.
- Assess local and federal laws and policies with respect to discrimination.
- Provide information on human rights laws and policies to the community at large.
- Make recommendations to the Mayor and the City Council of the District of Columbia based on reports, studies, and hearings conducted by the office.

5. RECOMMENDATIONS

In accordance with the ADA and Section 504, DDOT has developed and disseminated comprehensive grievance procedures and complaint forms. In addition, DDOT has provided a compliant and comprehensive notice of the Americans with Disabilities Act to inform recipients of their rights. As required by the ADA, DDOT has provided notice of the rights afforded to individuals with disabilities and the contact person. The identity of the ADA Coordinator is properly noticed as required.

The current method for tracking and resolving complaints is not adequate at this time, but it was reported by DDOT staff that the process of using Cityworks is being enhanced and improved to track and provide for prompt resolution of complaints.

The ADA notice, complaint form, and procedures are in compliance with the requirements of ADA, however there are a few improvements that could be made to clarify and improve the process, including:

1. The ADA Coordinator job description extends beyond ADA to areas such as equal employment opportunity (EEO). DDOT may want to review the current organizational location (Infrastructure Project Management Administration) of the ADA Coordinator in relationship to the duties outlined in the job description. Additional training in related civil rights areas and reasonable accommodations may be needed for the ADA Coordinator due to the duties described in the current job description. The ADA Coordinator currently provides comprehensive training in his area of expertise within IPMA and is developing comprehensive training materials.

2. As not all concerns or complaints need to or should become formal grievances, a methodology should be established to encourage stakeholders to submit a concern or suggestion without needing to advance to the level of a formal grievance. The ADA Coordinator currently accepts concerns by phone or by email. A method should be identified for informal requests for accessibility without the need for a formal grievance.
3. DDOT should establish a feedback system or loop to integrate concerns or complaints into the ADA/504 self-evaluation or transition plan. The integration would assist to analyze comments or suggestions as they may relate or be relevant to priorities for barrier removal in the overall plan.
4. DDOT should continue to enhance the modifications to Cityworks and the 311 Customer Service Request to establish a centralized web based tracking system for concerns, complaints, suggestions and grievances that is integrated with other divisions, such as the DDOT Office of Civil Rights in order to provide a seamless and timely method for not only resolution of complaints.
5. The multiple points of entry for complaints by stakeholders should continue to be coordinated to enhance communication, timely response of complaints and a cost effective approach. The coordination between other divisions within DDOT in the handling of complaints should be reviewed. For example, the Title VI Discrimination complaint form is inclusive of all complaints of discrimination, including disability. The coordination of complaints between divisions should needs to be seamless.
6. As the DDOT ADA Coordinator is charged with the responsibility of resolving and maintaining all complaints received and retaining them for a period of three years, steps should be taken to ensure that all concerns and complaints be received directly or ultimately by the ADA Coordinator for timely resolution and maintenance. DDOT may want to consider maintaining the records for a longer period to assist with planning and provide justification of budgeting for barrier removal in addition to documenting compliance.
7. It should be clarified if the “Accessibility Complaint Form” attached in Appendix I is designed to file formal grievances only, or if it may also be used to submit comments and complaints. In addition, DDOT should consider removing the email address as a requirement for form submission, as there may be cases where the person filing the complaint does not have an email address.

8. Information referencing the requirements of the ADA should be reworded to reference Title I, Title II, and Title IV of the ADA to say only the “ADA” without references to particular titles to be more encompassing. Although DDOT is a Title II entity, DDOT also needs to comply with other titles of the ADA as appropriate.
9. The forms reference to a “seven day advance notice being the minimum” should be deleted and a shorter timeframe be inserted, such as referenced in the DDOT “Notice under the Americans with Disabilities Act” that references 48 hours. Requiring a seven-day notice may be considered discriminatory as requiring a longer notice requires a person with a disability to have better and more advanced planning skills. In addition, the two notices should be congruent.
10. The amount of time it takes from the filing of the concern or complaint until the time the complaint is resolved or an action is taken to resolve or defer the issue should be tracked and monitored. Issues that are not resolved or take excessive time should be readdressed and evaluated for the appropriate action. The complaint or grievance tracking system should include, at a minimum:
 - a. Initial request-date request made
 - b. Type of request/nature of concern
 - c. Informal complaint or formal grievance
 - d. Person or persons who made the request
 - e. Contact information of person
 - f. Communication by DDOT regarding the request
 - g. Action taken to meet and resolve the request with date(s)
 - h. If entered into Cityworks, indicate date and person entering information
 - i. If resolved, date resolved and the method or methods used to resolve the issue and/or provide the accommodation
 - j. If not resolved, entries will be made regarding the action taken, the results and a statement provided as to why assistance or resolution was not provided or was not successful
 - k. Note of any unresolved complaints
 - l. Any unresolved complaints should have a strategy and timeline for the projected resolution of the complaint
 - m. Expected expenditure of funds
 - n. Actual expenditure of funds
 - o. Follow-up activities such as permits or planned barrier removal
11. The separate, secure tracking system that was recently developed by the ADA Coordinator can also be used to document and track the provision(s) of reasonable

accommodations and modifications for eligible individuals with disabilities while protecting privacy of medical issues.

12. If DDOT plans to continue to use the 311 system for a point of entry for complaints and grievances, the functionality and capability of the system should be improved. For example, during the review of the 311 system for use as a grievance process, it was noted that on-line requests were difficult to enter due to limited categories to choose from in the drop down menu. This same limitation appears to be a factor for 311 staff that are entering information from phone calls into the system. Additional training is recommended for 311 staff entering information into Cityworks. As the current system does not track the operators who entered information into the system for targeted training by person, it is recommended that training for 311 staff be conducted regarding entering complete information.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

REVIEW OF DDOT'S PROCESS AND RESULTS OF THE ADA ASSETS EVALUATION - TASK F

Prepared For:



DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 2.0
DATE: December 2014

Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.

Disability Access Consultants (DAC)

Sharp & Company

Precision Systems, Inc.

This page left intentionally blank.

EXECUTIVE SUMMARY

The scope of work for the District Department of Transportation (DDOT) project for the development of a comprehensive ADA/Section 504 self-evaluation and transition plan includes a review of the results of the ADA assets compliance evaluation performed by others. Activities include:

- Conducting an initial sample of the results, findings and recommendations of the ADA assets compliance evaluation
- Providing a report of the findings and recommendations of the initial sample
- Providing a report of any deficiencies noted in the sample
- Providing a report with recommendations for improvement
- Providing a QA/QC report of current foot-on-ground (FOG) surveys

DDOT developed an initial data collection and reporting system during the 2012 Pilot Study of the Golden Triangle and DDOT should be commended for their efforts. This software has been referred to as the ADA Asset Inventory Software, the DDOT Asset Inventory System and the ADA Assets Compliance System. For clarity and analysis of the software for this task, the pilot study will be referred to as “pilot study” software. The most recent version 2.1 of the software that is being utilized for the current foot-on-ground field inspections is referred to as the “current’ software.

The development of tools for consistent and accurate field intake, reporting and management of the ADA/504 plan was shown to be an important measure of success during the nationwide review of practices that was conducted as a part of the current project. An intake and management system is valuable and beneficial for the development of a DDOT ADA/Section 504 Plan for documentation, planning, budgeting and other components of barrier removal for persons with disabilities.

Based on preliminary information conducted during the review of the DDOT software system, however, it appears that enhancements to the database would be beneficial.

Findings are currently limited due to the lack of access to the data being collected during the current FOG surveys. Therefore, findings and recommendations noted in this report do not utilize the current software being used for the FOG surveys and are limited to the data collected during the previous pilot study in 2012. In addition, the findings regarding the reporting features are also limited to the pilot study. A review was unable to be conducted regarding the processing of the data and what interventions or methods the current software requires from data acquisition in the field to web based reporting

and management. It is, however, anticipated that the review will be completed when access to the data is provided in the near future.

It is important to note that Task F and Task G overlap as they both report on the DDOT web based GIS system that is also known as the ADA Asset Inventory. Thus, some findings will apply to both Task F and Task G.

Key findings for recommended enhancements include:

- The software design for both the intake program and website portion of the software are built from existing third party software programs with limited coding for customizations and reporting features. Using third party software programs may limit future development and customizations in addition to licensing fees for the third party software.
- Reporting features that would be pertinent for a transition plan are limited.
- Reporting features for documentation of work that was completed for the removal of barriers are not available. It is not known if corrected work can be recorded.
- Application errors were noted that may indicate the exception handling was not coded properly.
- Forms do not include a description of the location, forcing the user to navigate to another area to access GIS and location descriptions.
- Individual component priorities cannot be assigned to attributes.
- Attributes that have multiple areas and levels of compliance cannot be reported separately and therefore cause the entire attribute to default as noncompliant.
- Some findings lacked photographs.
- Some photographs were the same for different locations and findings.
- Some noncompliant findings were omitted.
- Options to export maps to a PDF format were not found.
- Inactive links are visible to the user.
- Some noncompliant findings are documented by a red font color which would not be clear in a black and white printed report.
- Options to run combinations of reports was not available.
- The software is not fully compatible with Internet Explorer 11.
- Some reports provided incorrect information based upon the selection.

- Some reports for noncompliant items did not report correctly.
- Excel reports generate in the older XLS format and not in the newer XSLX format.
- Excel documents are not pre-sorted with headers.
- It is not known if reports can be reprocessed if codes change.
- Summary cost reports can be generated, but individual costs are not displayed.
- Report filters are not user friendly.
- Navigation methods should be less cumbersome.
- Some findings are reported as “yes” or “no” and do not report actual measurements to assist the user to make informed decisions for barrier removal for severity and priority ratings. The use of “yes” or “no” findings provides the user with limited information in order to rate the severity of the findings or to take corrective action. For example, is the width noncompliant due to ½ inch or 10 inches, or a slope of 1% or 8%?
- The use “yes” and “no” responses does not allow for updating of the results if codes change.

This page left intentionally blank.

TABLE OF CONTENTS

EXECUTIVE SUMMARY I

TABLE OF CONTENTS..... V

1. BACKGROUND 6

1.1 Purpose of the Review 6

1.2 Review Methodology 7

1.3 Components Included in the Review 7

1.4 Limitations 8

1.5 Survey Teams 8

2. ACTIVITIES..... 9

3. FINDINGS 10

3.1 Pilot Study Compared to Current FOG Surveys 10

3.2 Survey of Field Inspectors 10

3.3 Quality Control..... 10

3.4 Data Exports..... 10

3.5 Processing of Data 11

3.6 Browser Utilized for Review..... 11

3.7 Page/Navigation Menus 11

3.8 Review of Development of the Software Program 12

3.9 Review of Forms..... 13

3.10 Quality Control Samples 22

3.11 Quality Control Limitations and Comments..... 25

3.12 Quality Control Sample Findings 25

3.13 Asset ADA Status Section 26

3.14 Asset ADA Priority Section 28

3.15 Network ADA Status/Network ADA Priority Sections..... 30

3.16 Asset Compliance/Noncompliance Report 32

3.17 ADA Asset Inventory Details..... 34

3.18 Asset Non-Compliance Summary..... 35

3.19 Report Filter..... 36

3.20 System Help 37

3.21 System Review..... 37

3.22 System Tools..... 38

3.23 System Settings..... 41

3.24 Inspection Form, Processing and Reporting Review 42

4. RECOMMENDATIONS 44

1. BACKGROUND

1.1 Purpose of the Review

The review was to be initiated to review the process and results of the ADA assets compliance evaluation and make any recommendations for correction of deficiencies or enhancements. It was originally anticipated that this review would be completed prior to the use of the DDOT Asset Inventory software to inspect additional wards of areas in the City for the DDOT project, as enhancements and potential changes to the software should occur prior to additional inspections.

This report is being prepared to review the process and results of the ADA assets compliance evaluation and make any recommendations for correction of deficiencies or enhancements. The review includes an analysis of the efficiency and accuracy of the intake, reporting and management software that is needed for the development and ongoing implementation of an DDOT ADA/504 Self-evaluation and Transition Plan. For clarity, the previous software used for the pilot study in 2012 and 2013 will be referred to as the “Pilot Study software” and the newest version being used for the current foot-on-ground surveys will be referred to as the “Current FOG software.”

The development of a comprehensive web based data collection and management tool is critical for a transition plan. A comprehensive plan starts with accurate data collection in the field followed by consistent processing of data exported from the field. Data collected is managed and is available in multiple reporting formats.

The minimum requirements for a self-evaluation and transition plan include, but are not limited to the following:

- a. A detailed description of the noncompliant item (asset or attribute)
- b. The proposed method or methods to remove the noncompliant barrier
- c. The person or persons responsible to oversee the implementation of the plan
- d. The proposed schedule for barrier removal

As the transition plan is intended to be a living, working plan that is updated on a regular basis, the associated data collection and management software used for this purpose must meet the minimum requirements.

Other components that have been found to be helpful for the ongoing implementation of a transition plan include photographs, GIS information, estimated costs and documentation of barriers that have been removed. It is also helpful that the software

has the capability to add new barriers if they are created, and to document the reasons why barriers were added.

Users need to be able to produce or print reports from a web based system. The software should also have the capability to be easily customized for new and additional events the user desires to capture.

1.2 Review Methodology

The review methodology included a review of the pilot study of the Golden Triangle area in the District of Columbia from 2012 and 2013. In addition, a review was conducted of the updated field intake survey forms developed for the current 2014 inspections of the selected areas of wards in the District of Columbia. Interviews of one team of inspectors and the contractor developing the software were conducted. This reviewer initially planned to review the actual data collection in the field by all teams to determine the methods used during the field surveys, review accuracy and consistency in the field and subsequently determine if data collected was accurately reported and processed into the software and reports.

1.3 Components Included in the Review

The scope of work for the District Department of Transportation (DDOT) project for the development of a comprehensive ADA/Section 504 self-evaluation and transition plan includes a review of the DDOT web-based GIS System to be used for the ongoing DDOT compliance efforts, including the compliance surveys of the additional wards.

The primary scope of work for Task F includes:

- Conducting an initial sample of the results, findings and recommendations of the ADA assets compliance evaluation
- Providing a report of the findings and recommendations of the initial sample
- Providing a report of any deficiencies noted in the sample
- Providing a report with recommendations for improvement
- Providing a QA/QC report of current foot-on-ground (FOG) surveys

For clarity, DDOT conducted a pilot study in 2012 to review compliance assets and attributes in the Golden Triangle. In 2014, DDOT entered into a contract to conduct additional foot-on-ground (FOG) surveys of a lesser number of attributes and assets than collected in the pilot study in selected wards in the City. Thus, the pilot study is referred to as the “pilot” study and the current FOG survey of the wards as the “current” study.

1.4 Limitations

It is important to note that the review was limited due to the lack of access to the current data for the current software and the reporting and processing of the current data. A sample of the pilot study software for the Golden Triangle project and the reporting features were utilized. A sample of the field data and forms for the current software were reviewed, but reporting and management features of the current software were not available. Thus, the following comments should be considered preliminary. It is anticipated that additional access to the current software will be provided in the near future.

1.5 Survey Teams

Access was limited to the data and results of the current study. Since on-site visits were not made possible to observe the field inspectors and methods while conducting surveys, interviews were conducted with two of the FOG survey members from one company conducting the surveys. Three companies are subcontracted to provide field surveys under one prime contractor. It was originally anticipated that an on-site evaluation, in addition to interviews, would be made regarding the consistency and results from each team, one from each company. The consistency between teams would have assisted with the validation of the foot-on-ground process and the use of the intake tools and software. It was originally planned that a review of the quality control process and results would be evaluated.

Thus, at the time of this report, two field inspectors from one subcontractor were interviewed regarding the inspection process. It is anticipated that additional inspectors will be interviewed or observed in the field conducting a survey in the near future. Responses from the team interviewed were positive and indicated a general understanding of the survey process and the use of survey tools.

The following evaluation was not completed, but is expected to be completed when access is provided to additional FOG data for the wards in the near future:

- Analysis and form of the raw data
- Quality control process
- Data after the quality control process
- Processing of the data that is collected in the field
- Determination if the data collected requires manual intervention or if it is an automated process
- Accuracy and consistency of the data collected and reported

The following areas were not able to be evaluated at the current time, but will be evaluated when data is available in the near future. Areas of access limitations to data include:

- No access has been provided regarding how data is processed or managed
- No access to the actual processing of data exports, as the reviewer cannot export the data or see what happens to the exported data. The reviewer has been told that the data is exported to FTP server and then transferred to an Oracle database after QC reviews.

The following area areas were reviewed:

- Intake portion (ArcPad) and the reports (website with ArcGIS server)
- Intake forms

2. ACTIVITIES

Activities include the review of the data collection and management tool referred to as the “software,” including intake forms. Samples of the data collected were reviewed for potential errors and omissions.

It was anticipated that the activities in Task F would include:

- Review of the general design of the software
- Review of the intake forms
- Review of survey methodology in the field
- Review of the raw data
- Review of edited data
- Review of data resulting after processing
- Review of reporting and management features of the software

Activities completed included a review of basic design and components of the software, review of intake forms and an initial analysis of data collected from the current foot-on-ground surveys. As the reporting features of the current software were not available, the reporting and management features were not evaluated. It is anticipated that these features will be evaluated in the near future as they become available.

In addition, a team of two field inspectors were interviewed as the opportunity to observe them in the field was not presented.

3. FINDINGS

3.1 Pilot Study Compared to Current FOG Surveys

The pilot study collected significantly more attributes and assets than the current foot-on-ground (FOG) study being conducted in selected locations. The pilot study also used different methods that included Trimble equipment for GIS information, luminance meter and digital video logging.

The current FOG survey collects fewer asset attributes than the pilot study. The current survey collects information regarding crosswalks, bus stops, curb ramps, sidewalks, trip hazards, objects and pedestrian signals. As noted in a recent meeting with DDOT staff regarding the DDOT system, changes are being made on a regular basis. It is unclear how this is being captured in the current FOG surveys.

The review was limited primarily to the pilot study and only data collected from the current FOG software. Thus, many of the findings will be duplicates of the findings in Task G, which also primarily used the pilot study due to lack of access to the current data and findings.

3.2 Survey of Field Inspectors

According to interviews with a team of field inspectors, inspectors reported exporting data collected in the field every day or every two days. It is recommended that data collected in the field be exported daily to avoid loss of data because of damage to the tablet or a lost or stolen tablet.

3.3 Quality Control

The quality control process regarding the review of field data collected is not clear. According to interviews, it was reported that a field inspection team review was conducted and sometimes an internal review is conducted. It was also reported that this quality control review is sometimes reported before uploading to the FTP site and sometimes after uploading to the FTP site. It is recommended that the quality control process be more clearly defined and established procedures for quality control be developed.

3.4 Data Exports

It appears that all data is transmitted during every export, even data that was exported previously. As the re-exporting of previously transmitted data should be unnecessary, we would recommend that only the edited data be re-exported. The re-exporting and

subsequent quality control review of all data, even portions that have already had a quality control review, is time consuming and may not be a good use of resources and staff time.

3.5 Processing of Data

According to interviews with the developers, the processing of data involves the following steps:

- Data Collection Using ArcPad
- Uploading of Data to FTP
- QC Review
- Algorithm Program to Check for Findings
- Oracle Database
- Website Reports

It appears that some manual steps are needed to complete the processing of data and it is not automated. For example, it appears that after the data is exported it remains on the FTP server until someone reviews it. It is recommended that this process be automatic and streamlined so that when the data is received from a tablet an automated process is triggered, sending a signal to the algorithm program which can start processing the data and transfer it to the Oracle database.

During the interview with the database developer, it was also mentioned that they are catching missing photos and decimal points during the quality control review. It is recommended that these types of validations be done by the software. For example, if the inspector missed taking a photo, it would be easier to validate it and alert the inspector while saving the form in the field, instead of finding it out later during the QC review and sending the inspector back to the field to get a new photo. The same recommendation applies to decimal point validations as these need to be done at the field inspection level and not at the quality control review which may come after uploading to the FTP server.

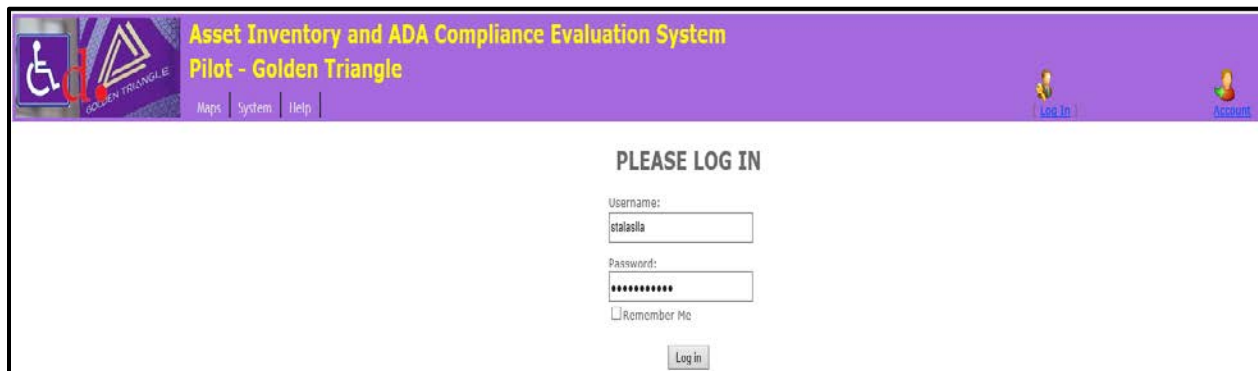
3.6 Browser Utilized for Review

The following review was documented using Internet Explorer 11 on a PC running the Windows 8 operating system, unless otherwise specified.

3.7 Page/Navigation Menus

The navigation menus of the website are all visible prior to login.

The menus for Maps, System and Account links are active on the Login page/logout page.



Asset Inventory and ADA Compliance Evaluation System
Pilot - Golden Triangle

Maps System Help

Log In Account

PLEASE LOG IN

Username:
stalsella

Password:

Remember Me

Log in

Links that are not active for the individual user should be hidden. For example, the account link should not be active or visible when the user is not logged into the system.

The same applies to System drop down menu. The reviewer does not have access to the section but the links are visible in a drop down menu. (Clicking on the links gives a message that the reviewer is not authorized to use this section)

3.8 Review of Development of the Software Program

Based upon available information, comments regarding the development of the software include:

1. Both the intake program and website portion of the software are built from of existing third party software programs with limited coding.
2. ArcPad was used for developing the tablet Intake program and ArcGIS was used for developing the website used for mapping and reporting.
3. Use of third party programs may limit future development and customization.
4. License renewals tend to be expensive and needs to be paid as long as DDOT is using these third party programs.
5. If a license expires, the continued use of the program may be impacted.
6. An in house software that was developed from scratch using various available technologies will avoid future issues (mentioned above) with customizations and future development and eliminate expensive licensing renewals.

3.9 Review of Forms

The current foot-on-ground (FOG) forms have been reduced from the pilot study to collect only certain assets and attributes.

The number of forms used in the current foot-on-ground software and survey collects significantly fewer assets and attributes than the software and intake used during the previous pilot study. The intake and related forms used in the current foot-on-ground survey include the following intake and related forms reviewed for version 2.1.

1. Bus stop
2. Crosswalk
3. Curb Ramp
4. Objects
5. Pedestrian Signal
6. Sidewalk
7. Trip Hazard

As a requirement of a comprehensive transition plan, items that are not compliant should be collected and reported in the transition plan.

Collecting all of the noncompliant items in one area may prove to be more cost effective than collecting some of the components and then return to collect additional components. In addition, collecting data at different times for the same area may not provide reliable results or a total picture for a cost effective approach. For example, collecting data on curb ramps and then later for the accessible pedestrian signal (APS) may not allow for the renovations or designs needed for a cost effective remediation of items that may be adjacent to or connected to the noncompliant area.

The following screen shots show each of the forms.

Bus_Stop (V2.1)

Bus_Stop | Note | Picture

Location: Intsct (near side) [HELP]

Shelter? [Y] Shelter Type: Clear/Skinny

Connected to Accessible Route? [Y]

Grass, No Sidewalk at BusStop? [N]

Bus Route Identification Sign? [Y]

Service on the Street? [Y] Street Slope (%) []

Boarding/Alighting Area: Front Door

Front Door Boarding/Alighting

Length [] inches Width [] inches

Slope Parallel to curb same as Roadway or better? [N]

Perpendicular to Curb - Running Slope [] %

Connected to Accessible Route? [Y]

Firm & Stable Surface? [Y]

ok [X] []

Crosswalk (V2.1)

Crosswalk | Note | Picture

Mid-block? [N] Ramp Missing? [Y] [Help]

Length [] feet Width [] feet

Running Slope [] % Cross Slope [] %

Distance from the stop bar [] feet

Surface Material: Asphalt

Edge Delineation Type: Paint Lines

Crossing Marking Type: Ladder

Type of Controlled Stop: Stop Sign

Running Slope same as Street Cross Slope? [Y]

Cross Slope same as Street Running Slope? [Y]

If crossing has Ped. Signal, Flash Don't Walk timing:

Ped. signal at left of approach traffic [] sec.

Ped. signal at right of approach traffic [] sec.

ok [X] []

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Built-up Ramp** [HELP]

Project into Veh or Parking Lanes? [Y]

Position: Inters. Corner | Grade Break in Ramp? [N]

Surface: Smooth | Slip Resistant? [N]

Change in Level in Ramp/Landing/Gutter? [N]

Appurtenances in Access Route? [N]

Landing Accumulates Water? [N]

Detectable Warning Surface? [Y]

Detectable Warning Surface Damaged? [N]

Detectable Warning at back of Curb? [Y]

Type of Detectalbe Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Blended Transition** [HELP]

Position: Inters. Corner | Grade Break in Ramp? [N]

Surface: Smooth | Slip Resistant? [N]

Change in Level in Ramp/Landing/Gutter? [N]

Appurtenances in Access Route? [N]

Landing Accumulates Water? [N]

Detectable Warning Surface? [Y]

Detectable Warning Surface Damaged? [N]

Detectable Warning at back of Curb? [Y]

Type of Detectalbe Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type:

Position: Grade Break in Ramp?:

Surface: Slip Resistant?:

Change in Level in Ramp/Landing/Gutter?:

Appurtenances in Access Route?:

Landing Accumulates Water?:

Detectable Warning Surface?:

Detectable Warning Surface Damaged?:

Detectable Warning at back of Curb?:

Type of Detectable Warning Surface:

Dome Pattern: Color Type:

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type:

Position: Grade Break in Ramp?:

Surface: Slip Resistant?:

Change in Level in Ramp/Landing/Gutter?:

Appurtenances in Access Route?:

For diagonal curb ramp segment of straight curb - Left side: inches

For diagonal curb ramp segment of straight curb - Right side: inches

Landing Accumulates Water?:

Detectable Warning Surface?:

Detectable Warning Surface Damaged?:

Detectable Warning at back of Curb?:

Type of Detectable Warning Surface:

Dome Pattern: Color Type:

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: Parallel [HELP]

Position: Inters. Corner | Grade Break in Ramp?: N

Surface: Smooth | Slip Resistant?: N

Change in Level in Ramp/Landing/Gutter?: N

Appurtenances in Access Route?: N

Parallel Ramps - Diverging Sidewalks?: N

Parallel Ramps - Barrier Protecting Drop-offs?: None

Landing Accumulates Water?: N

Detectable Warning Surface?: Y

Detectable Warning Surface Damaged?: N

Detectable Warning at back of Curb?: Y

Type of Detectable Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [F4]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: Perpendicular [HELP]

Position: Inters. Corner | Grade Break in Ramp?: N

Surface: Smooth | Slip Resistant?: N

Change in Level in Ramp/Landing/Gutter?: N

Appurtenances in Access Route?: N

Distance of bottom Grade Break from Back of Curb - Left Side: 1 inches

Distance of bottom Grade Break from Back of Curb - Right Side: 1 inches

Landing Accumulates Water?: N

Detectable Warning Surface?: Y

Detectable Warning Surface Damaged?: N

Detectable Warning at back of Curb?: Y

Type of Detectable Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [F4]

Objects (V2.1)

Objects | Note | Picture

Please select an Object Type: Help

Bicycle Rack Litter Can Tree Bench
 lighting Pole Mail Box Treebed Sidewalk Cafe
 Signal Pole Media Box Planter Awning/Canopy
 Stair to Bldg Call Box Bollard Fire Hydrant
 Ramp to Bldg Electrical Box Sign Parking Meter
 Other:

PAR Clear Width inches

ok cancel help

Ped_Signal (V2.1)

General | Pushbutton | Note | Picture

Push button Provided? Help

Push button Type

Clear Space at Push button? Y

Connects to Pedestrian Access Route? Length inches

Running Slope % Cross Slope % Width inches

Can be contacted from landing at top of ramp or clear ground space? Y

Height inches Push button Locator Tone? Y

Directional Information & Signs on Push button? Y

ok cancel help

Ped_Signal (V2.1)

General | Pushbutton | Note | Picture

Location Countdown Signal? Help

Distance from Extended Crossing Line inches

Distance from the Curb Line inches

Distance from other pedestrian signal devices at crossing inches

Message Display Type

Cross Street Name Recall

Vibrotactile indication of WALK?

Audible Signal of WALK?

ok X

Sidewalk (V2.1)

Sidewalk | Note | Picture

Note: Record at beginning and end of sidewalk segment and wherever any of these items change

Total Width inches Clear Width inches

Offset from Curb (to Clear Path) inches

Grade % Cross slope %

Sidewalk Material

Firm & Stable? Slip Resistant?

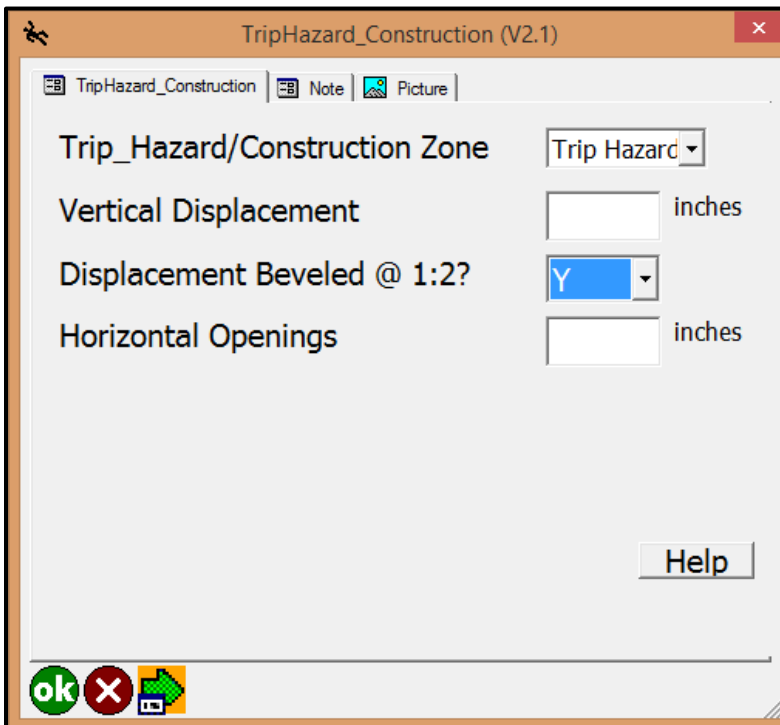
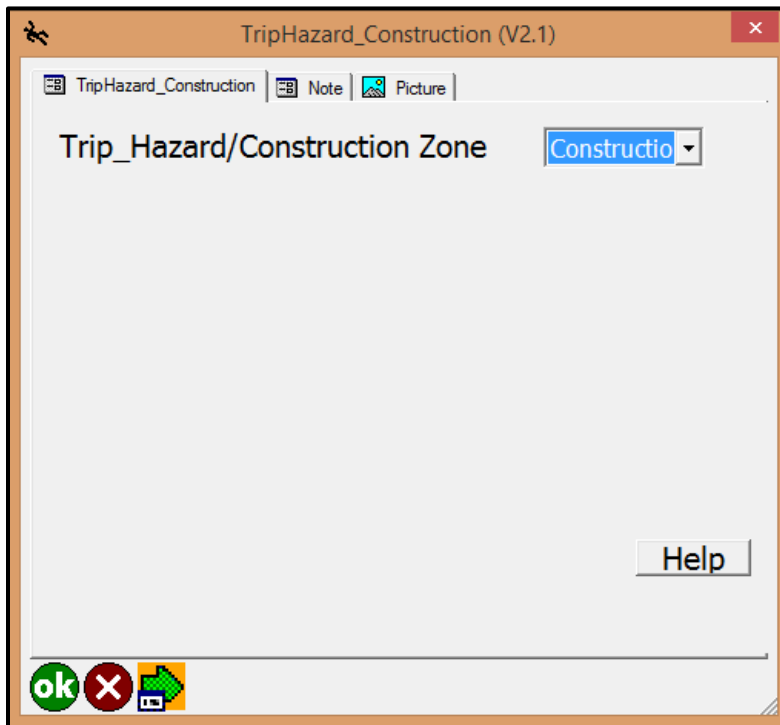
Sidewalk Rail Crossing - Type

Is Sidewalk Surface flush with top of Rail?

Rail Crossing - Flangeway Gap Width inches

Help

ok X

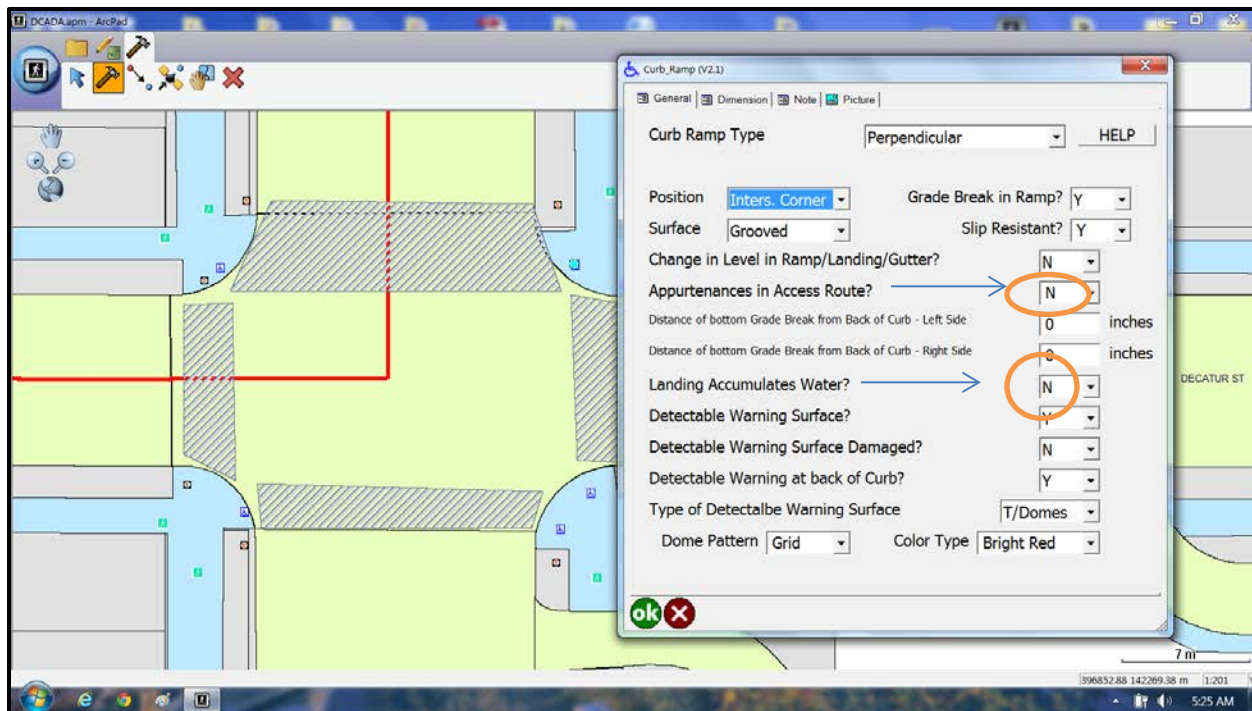


3.10 Quality Control Samples

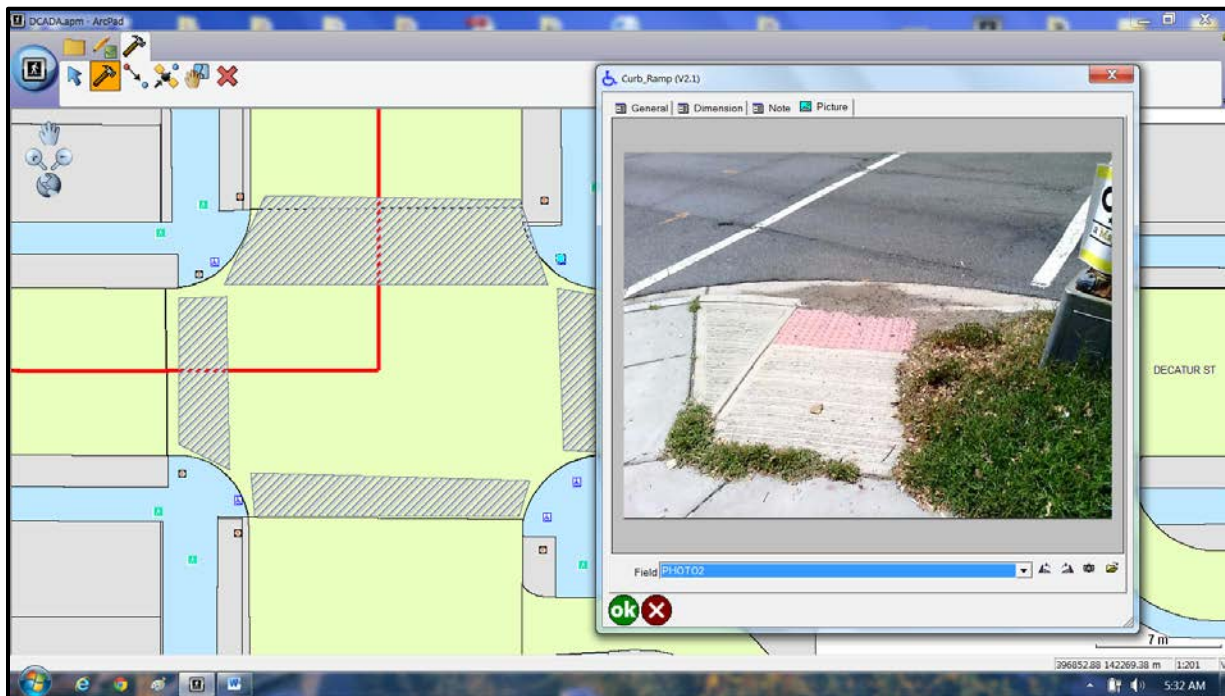
The quality control sample is limited to the previous pilot study and only the survey data collection of the current foot-on-ground (FOG) and current forms. The review does not include any reporting features of the current FOG software. Thus, the current software management and reporting features have not been evaluated.

Findings from the current foot-on-ground sample are similar to the sample from the previously conducted pilot study for the Golden Triangle. The software continues to contain errors and omissions. It is unclear if the errors or omissions are due to inspector error, the data collection tool, the processing of the data, data processing rules or the actual software itself. Examples are shown in the following screen shots.

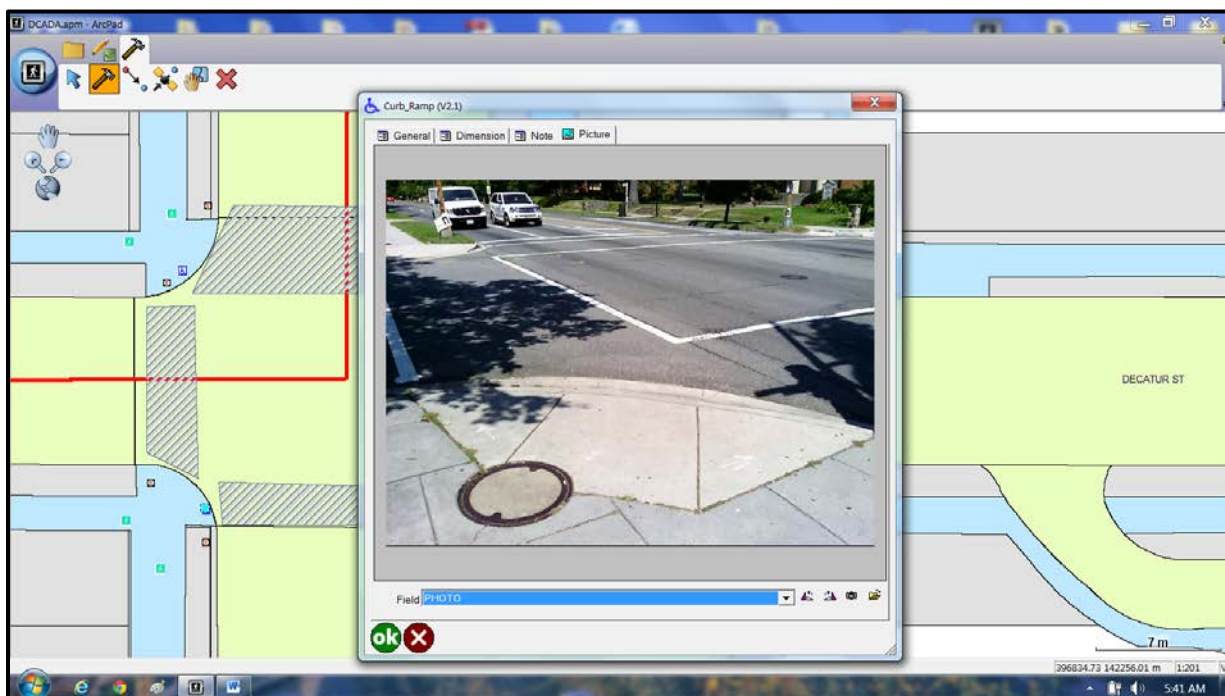
The first screen shot is of the intake form of a curb ramp at northeast corner of Decatur and 16th Street. The photo shows that the bottom landing of the curb ramp accumulates water and debris. The inspector, however, checked the box that the landing does not accumulate water as shown by the inspector indicating N for no accumulation on the intake form. In addition, the side and top landing is overgrown with grass and is a tripping hazard. The inspector did not report this as-is condition.

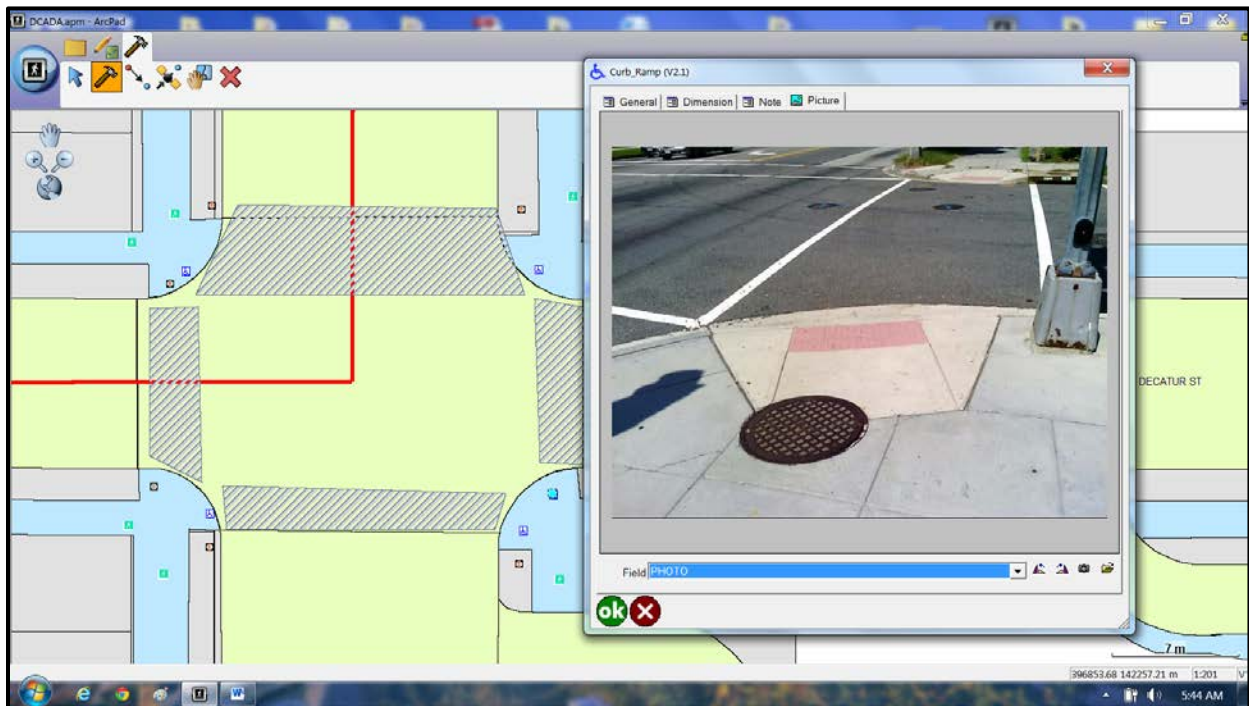


The photo of the curb ramp below shows the water and debris accumulation at the bottom landing and the overgrowth of grass on the top and side flare.

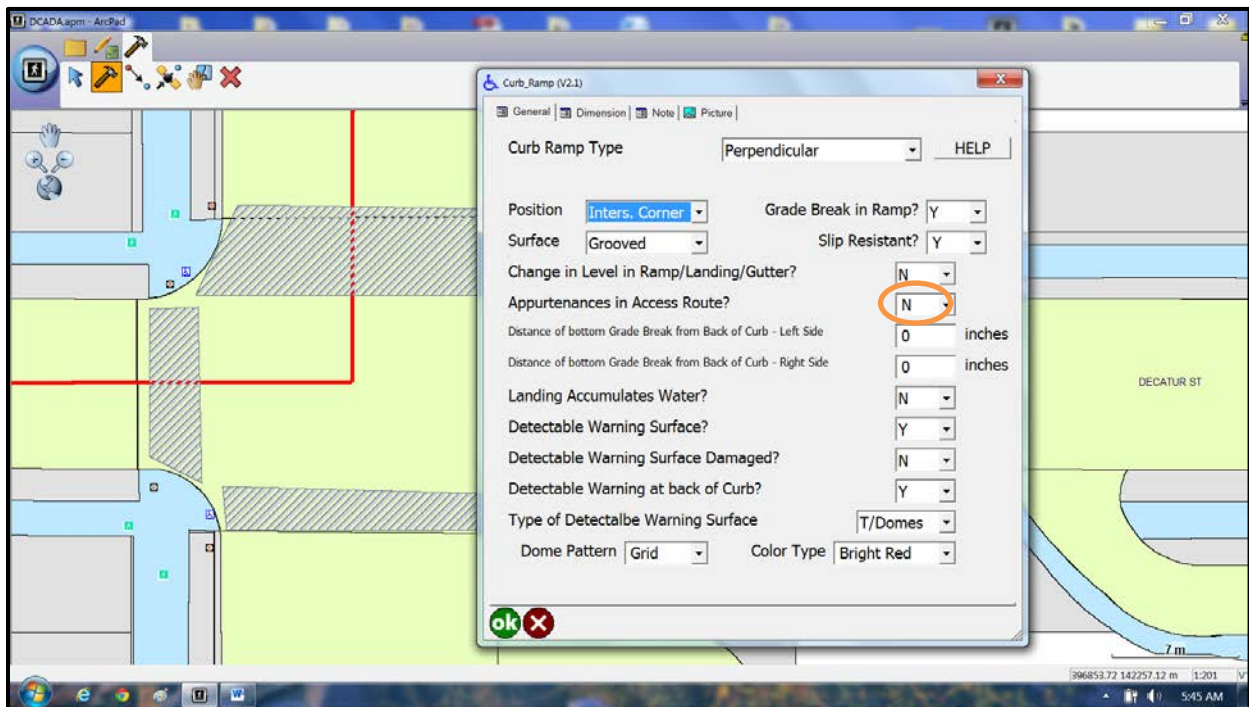


Several curb ramps have appurtenances that were not found on by the inspector as shown in the next two photos. The lack of identification of appurtenances was a common error that was noted.

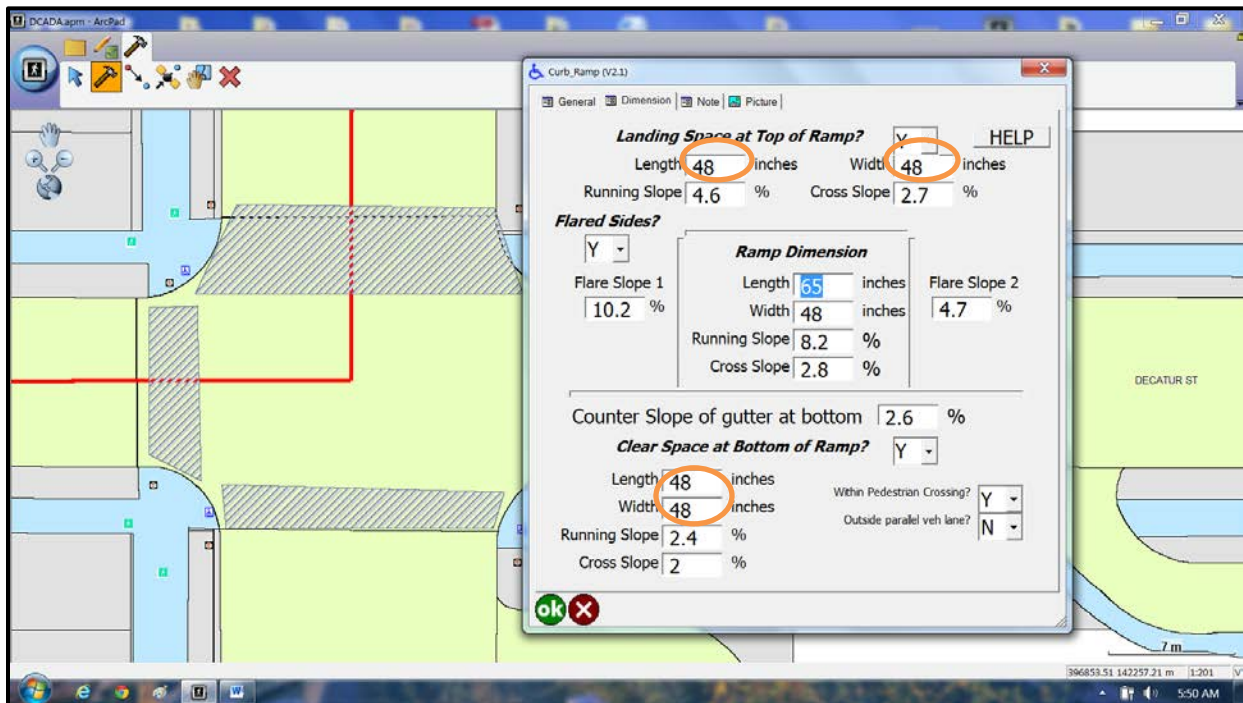




The next form screen shot shows the inspector’s indication as N or no in the check no check box for appurtenances in the access route.



It is also interesting to note that in the random sample every top and bottom landing measurement recorded for all curb ramps examined is exactly the same measurement of 48 inches by 48 inches. It is questionable that all the curb ramp landings are 48 inches by 48 inches for both the top and bottom landing.



3.11 Quality Control Limitations and Comments

As stated previously, it is important to note that the quality control procedures are limited at this time to the review of data collected in the field on current forms and **not the reporting format** that will be developed as a part of a related, but different project. The reporting and management features of the current software will be evaluated as soon as it is completed.

3.12 Quality Control Sample Findings

Screen shots from the QC sample and associated comments have been included to provide better clarity and more detail regarding the findings and recommendations.

1. The software continues to contain errors possibly due to design of the software and possibly inspector error, or both. Additional problems may be noted when the reporting and management features are developed. If the problems with the latest version of the software are not corrected, it is anticipated that the future versions for reporting and management will

- compound the errors and contain not only errors and omissions, but will not provide the user with a functioning version of the software.
2. An error message appears when accessing help files.
 3. Some areas or fields on the forms were not completed by the field inspector during the foot on ground surveys and were left blank.
 4. The forms close without being completed causing the potential for attributes and assets to not be captured.
 5. The design of some of the forms do not allow for collection of as-is conditions, or for the collection of the number of attributes or assets that are required to be counted in order to be properly reported, such as required percentages and numbers.
 6. When the intake form is not completed, associated photos cannot be viewed.
 7. Some items were visible in the photographs that were not included in the report, representing a possible omission of assets and attributes.
 8. In some cases, two or more attributes share one photo. There is not a photo for each finding.
 9. The symbol placement in some cases does not accurately reflect the asset location.
 10. There is no description in the form to designate the asset location, and the GPS does not always provide accurate results.
 11. The method for one inspector to know where another inspector started or stopped appears to be an issue. This may lead to duplication or omissions.
 12. There does not appear to be a clear procedure for place marking the start and stop of inspections to avoid overlap and omissions.
 13. The date of the inspection does not currently display in the report. The date not being apparent at this time may be because the date may be recorded when the reporting version of the software is complete.

3.13 Asset ADA Status Section

The main obstacle for using the map is that a description is not shown when hovering with a mouse or cursor over the icons. For every appropriate entry, it is assumed the

inspector noted a description or location (For example Bus Stop next to... or Parking next to..., etc.)

The entity types are identified with different icons (like trees, parking, etc.) and are distinguished as compliant or non-compliant by the color of the icon. However, displaying the entity description by a cursor hover or click would be very useful when reviewing the map.

The entity values can be seen by clicking on the “i” icon and clicking the entity icon. The reviewer cannot produce any useful report or data from this screen. For example, in this example screenshot of a tree, the ADA info/photos can be seen from this screen. However, it would be very useful to export the non-compliant findings directly from this screen instead of separately accessing the Reports section.

The screenshot shows a dialog box titled "Object_TreeTreeBed" with a close button (X) in the top right corner. The dialog contains several tabs: "Attributes", "Info/ADA", "Note", and "Photo". The "Info/ADA" tab is selected. The form fields are as follows:

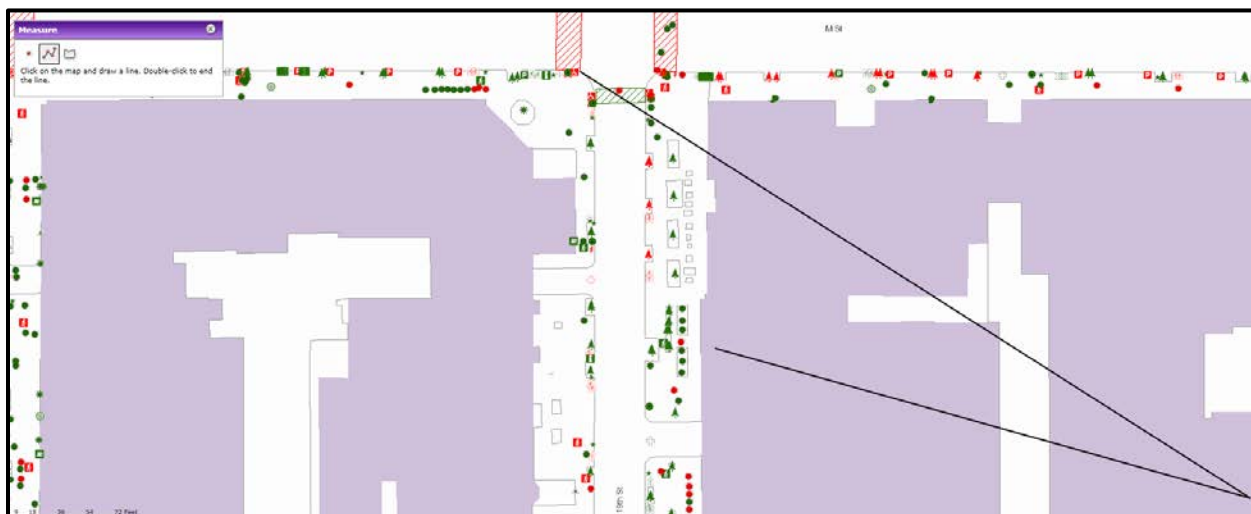
- Object Type: 07:Treebed (dropdown)
- Protrude into Pedestrian Access Route (PAR)? (N) (dropdown)
- Tree Overhang Width >= 4in? (dropdown)
- Treebed Protrude into (PAR)? (N) (dropdown)
- Treebed Edging: Fencing (dropdown)
- Edging Height: 1 ft 3 in (input fields)
- Treebed Surface: Grass (dropdown)

At the bottom of the dialog are three buttons: "Start Edit", "Apply Edit", and "Cancel Edit". All three buttons are disabled (grayed out).

Clicking on the entity icon should also produce a list of all related findings for that particular entity. For example clicking on a curb ramp icon should load all non-compliant findings of that curb ramp. This avoids running a separate report from the Reports menu.

In addition, the “Start Edit, Apply Edit and Cancel Edit” buttons are disabled, so the reviewer was not able to test their functionality.

The reviewer is not able to measure distance on the map using the Measure tool. The reviewer was not able to draw a straight line on the map. The reviewer followed the instructions from the Help instructions precisely, but was unsuccessful. The following screen shot illustrates the result when the reviewer attempted to draw a line.



Options to export the maps to PDF or any other style of report format were not evident. Buttons and features not noted in this review list function correctly.

3.14 Asset ADA Priority Section

The map in this section acts similar to the map in the Asset ADA Status section. It would be beneficial to see the entity description when hovering with a cursor over the entity, and the list of related non-compliant items in a prioritized order by clicking on the entity. Currently the user has to click on the “i” and click on the entity to view the entity details. Clicking on “Info/ADA” link displays the following screen shot:

Attributes	Info/ADA	Note	Photo
ADA Status:	ADA Compliant		
ADA Priority:			
ADA Actions:			
Asset Location:	20TH ST from M ST,NW to N ST,NW - East Side		
ADA Waived?			
Requested?			
Object ID:	381		
Last updated by:	CESAR		
Last updated at:	2013-04-15 12:41:54		
<input type="button" value="Start Edit"/> <input type="button" value="Apply Edit"/> <input type="button" value="Cancel Edit"/>			

Again the “Start Edit, Apply Edit and Cancel Edit” links are not active, so the reviewer is not able to test them. The Pole in this example screen shot does not have a priority assigned, but is still on the map, which confuses the user.

The Asset ADA Priority section does not let the user filter the map by a single or combination of priorities. The user can filter the map by Bus Stops or Curb Ramps, etc., but the user cannot filter the map for priority 1A or 1B, for example. The user also cannot run a combination of priorities, such as all entities with priorities 1A and 1B. The priorities are done by entities and not by non-compliant findings. Note the following screen shot:

This sidewalk is assigned priority 1B, so all non-compliant items related to this sidewalk fall under priority 1B. In most instances, separate priorities would need to be assigned to each of the non-compliant items. For example, some non-compliant items of the sidewalk may fall under 1B and others may fall under 1C, etc.

Assigning individual priorities to each item is not possible with the current system.

The reviewer did not see any options to export the maps to PDF or any other style of report format.

3.15 Network ADA Status/Network ADA Priority Sections

The legend indicates different colors for different levels of network compliance, but the reviewer cannot filter the map by individual or a combination of compliant/non-compliant/data missing etc. items.

Using the color “red” to indicate noncompliance will not allow reports to be produced or copied without a color printer or copier. Another method for indicating noncompliance should be used.

Clicking the “i” button and clicking on the map results in this coding error message.



```
Application Error

Page_Error
'dwlFeatures' has a SelectedIndex which is invalid because it does not exist in the list of items. Parameter name:
value

at System.Web.UI.WebControls.ListControl.set_SelectedIndex(Int32 value) at System.Web.UI.WebControls.DropDownList.set_SelectedIndex(Int32 value) at
IdentifyFeature.ServerAction(ToolEventArgs toolEventArgs) in C:\inetpub\wwwroot\DCGTADA2\App_Code\IdentifyFeature.vb:line 76 at
ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.handlePostBack(String clientAction, NameValueCollection parameters) at ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.GetCallbackResult
() at ESRI.ArcGIS.ADF.Web.UI.WebControls.WebControl.RaisePostBackEvent(String eventArgument) at ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.RaisePostBackEvent(String
eventArgument) at System.Web.UI.Page.RaisePostBackEvent(IPostBackEventHandler sourceControl, String eventArgument) at System.Web.UI.Page.RaisePostBackEvent
(NameValueCollection postData) at System.Web.UI.Page.ProcessRequestMain(Boolean includeStagesBeforeAsyncPoint, Boolean includeStagesAfterAsyncPoint)
```

This application error may indicate that the exception handling was not done correctly while coding. This website needs a generic error message that simply displays a short line of text such as “Error occurred, sorry for the inconvenience” instead of actually showing the coding error along with many lines of code lines that describe the error. The actual error and exception would best be captured into a log file instead of displaying it to the user.

This reviewer did not see any options to export these two network section maps to a PDF or any other style of report format.

This reviewer was not able to run the reports with any combination of reporting features.

No reports loaded when attempting to run either the Asset Compliance Report, the Asset Inventory Report, or the Asset Non-Compliance Report.

From the following screenshot, the reviewer tried all options for Intersection, Segment, Current View, and Select Area, plus different options under Location, Asset, Attribute, and ADA_Status. None of the options produced any reports.

Please select options for reports

Intersection Segment Current View Select Area

Location Asset Attribute ADA_Status

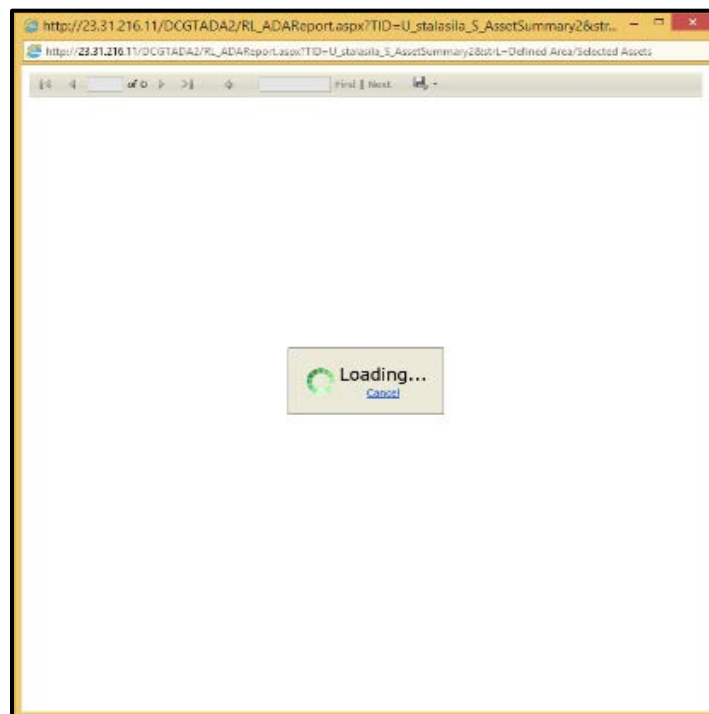
Choose Locations to be included in report:

Ward	Selected	ANC	Selected
1	1	1A	1A
2	2	1B	1B
3	3	1C	1C
4	4	1D	1D
5	5	2A	2A
6	6	2B	2B
7	7	2C	2C
8	8	2D	2D

*Press "Ctrl" to choose multiple items

Generate Asset Compliance Summary Report

The reviewer waited for significant periods of time anticipating that the report would load. In one instance the reviewer waited for more than 15 minutes. The green progress circle, however, continuously spun with no report generation.



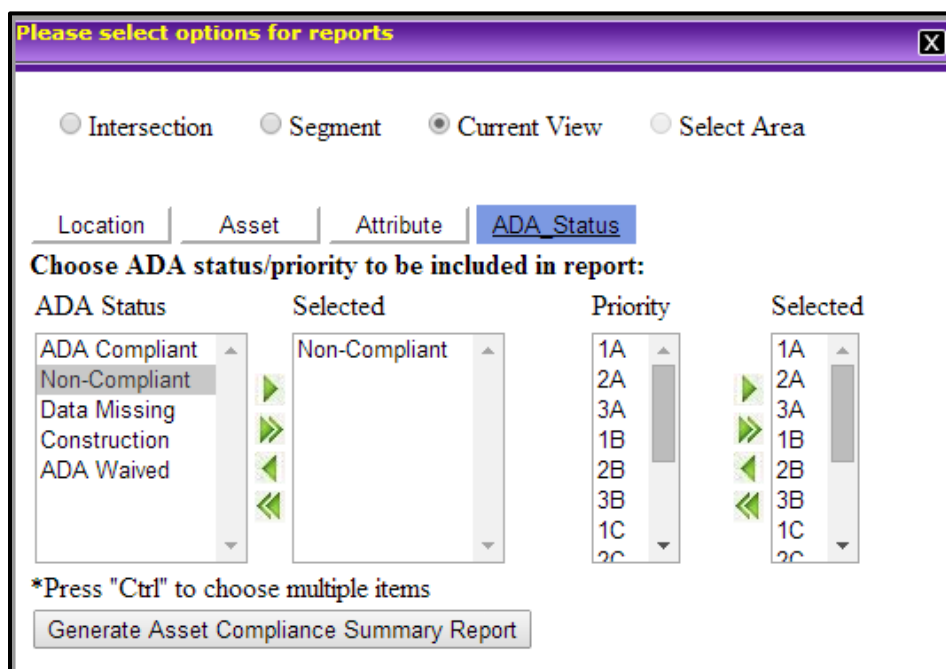
However when the reviewer tried to generate the identical reports with the Chrome internet browser, the reports loaded quickly, so it may be that this software is not fully compatible with Internet Explorer 11. The reviewer strongly suggests fixing the browser issue. Internet Explorer the most common browser for users in an office environment

and version 11 is expanding rapidly with new windows updates. It is recommended that use of all browsers be explored for compatibility.

The reviewer was not able to produce a report that displays only non-compliant items. For example, the reviewer attempted to get a report of all non-compliant findings of all curb ramps in the current view but was unable to. Regardless of which Asset was selected, the report contains both compliant and non-compliant items. The following three reports sections were tested using the latest version of Chrome as this area of the software is not compatible with Internet Explorer 11.

3.16 Asset Compliance/Noncompliance Report

The following were selected for generating a report:



The resulting report generated these findings:

DDOT - Asset Inventory and ADA Compliance Evaluation System, Pilot - Golden Triangle

Asset Compliance Report

Location: Defined Area/Selected Assets

Type of Asset	Total Num. of Asset	Num. of Compliant Asset	Num. of non-Compliant Asset	Num. of Asset with Missing Data	Num. of Asset under Construction	Num. of Asset with ADA Waived
CROSSWALK	1	0	1	0	0	0
CURBRAMP	3	0	3	0	0	0
INLET	1	0	1	0	0	0
MANHOLE	4	0	4	0	0	0
GRATE	3	0	3	0	0	0
OBJECT_FIREHYDRANT	1	0	1	0	0	0
OBJECT_LITTERCAN	3	0	3	0	0	0
PED_SIGNAL	4	0	4	0	0	0
SIGN	1	0	1	0	0	0
TRIP_HAZARD	1	0	1	0	0	0
TOTAL	22	0	22	0	0	0

Prepared By: staliasia Date Prepared: 5/23/2014

This report provides incorrect information based upon the selection. Even though the reviewer chose to run only noncompliant items, it includes all other type of items with values of 0. The report does not specify or summarize the selections to remind the user what the report contains, and clearly explain why all the other values are 0. The result is the same with all other selections, Options not selected appear in the report with 0 values.

The exported excel report generates in the older XLS format and not in the newer XSLX format. In addition, the excel document is not pre-sorted with headers which are extremely helpful to users sorting through large amounts of data.

It is unclear as to the different additional types of reports that are available.

It is unknown what codes and which code versions were used were used to determine if items are compliant, and and it is not known if reports can be reprocessed if codes change. In addition, it is not known if corrected work can be recorded.

3.17 ADA Asset Inventory Details

The following is a selection chosen to run for a sample asset report:

The reviewer chose only non-compliant items to be included in this report, but the output report contains many pages similar to the following example screen shot:

All the grates are included, even though no non-compliant items in red text are shown in the report. Again, the use of color coding noncompliant items in RED is not recommended.

Per the example below, the exported excel report uses a very cumbersome format, which is not user friendly.

DDOT - Asset Inventory and ADA Compliance Evaluation System, Pilot - Golden Triangle

Asset Inventory Detail

Selected Location: Defined Area/Selected Assets

Asse Type: CROSSWALK ADA_Status : Non-Compliant ADA_Priority: 3B

ObjectID: 69 Asset Location: 20TH ST AND M ST,NW - North Side

3.18 Asset Non-Compliance Summary

The following is a selection chosen to run for a sample Asset Non-Compliance Summary report.

Please select options for reports

Intersection
 Segment
 Current View
 Select Area

Choose Locations to be included in report:

Ward	Selected	ANC	Selected
1	1	1A	1A
2	2	1B	1B
3	3	1C	1C
4	4	1D	1D
5	5	2A	2A
6	6	2B	2B
7	7	2C	2C
8	8	2D	2D

*Press "Ctrl" to choose multiple items

Choose Attributes to be included in listing:

<input checked="" type="checkbox"/> Compliance Attributes	<input checked="" type="checkbox"/> Last Update User	<input checked="" type="checkbox"/> ADA Action
<input checked="" type="checkbox"/> GPS Location	<input checked="" type="checkbox"/> Last Update Time	<input checked="" type="checkbox"/> ADA Cost

The resulting report is shown in the following screenshot.

Type of Asset	Action	Total Num. of Asset	Cost Estimate
CROSSWALK	Mill&Resurface	1	
CROSSWALK	Summary	1	\$10,626
CURBRAMP	Replace Ramp	2	
CURBRAMP	Replace turning space	2	
CURBRAMP	Repair Bottom Landing (Gutter)	1	
CURBRAMP	Replace Bottom Landing (Mill & Resurface)	2	
CURBRAMP	Install/Replace DWS	1	
CURBRAMP	Summary	3	\$14,720
INLET	Replace Inlet	1	
INLET	Summary	1	\$100
MANHOLE	Reset Manhole Top	4	
MANHOLE	Summary	4	\$1,400
GRATE	Replace Grate	1	
GRATE	Adjust/Reset Top	2	
GRATE	Summary	3	\$1,150
OBJECT_FIREHYDRANT	Repair Sidewalk (6ftx6ft)	1	
OBJECT_FIREHYDRANT	Summary	1	\$200
OBJECT_LITTERCAN	Repair Sidewalk (6ftx6ft)	3	
OBJECT_LITTERCAN	Summary	3	\$600

It is not clear as to what the function is for this report, as the report calculates a summary cost but does not break down or display any individual costs.

3.19 Report Filter

The report filter is displayed on nearly all sections of the website.

Please select options for reports

Intersection
 Segment
 Current View
 Select Area

Location
 Asset
 Attribute
 ADA_Status

Choose Locations to be included in report:

Ward	Selected	ANC	Selected
1	1	1A	1A
2	2	1B	1B
3	3	1C	1C
4	4	1D	1D
5	5	2A	2A
6	6	2B	2B
7	7	2C	2C
8	8	2D	2D

*Press "Ctrl" to choose multiple items

Choose Attributes to be included in listing:

Compliance Attributes
 Last Update User
 ADA Action
 GPS Location
 Last Update Time
 ADA Cost

Generate Asset non-Compliance Summary Report

Using this method is confusing and burdensome as the user has to navigate between four different sections to check all the options needed for the desired report.

For example, if the user wants only non-compliant curb ramps to be included in the report, the user must first click on the Asset section, remove all existing Assets from the “Selected” section and re-add Curb ramp to the “Selected” section. The user must then click on the ADA_Status tab and remove all existing items from “Selected” and add Non-Compliant to the “Selected” list before running the report. The similar situation applies to all other options.

It would be much easier for the user if all these selection items and boxes are located in the same screen.

Also the selections are not carried between different reports. For example if curb ramps only are selected to run an Asset Compliance Report, an Asset Inventory Detail report with the same options should be able to be generated without needing to re-select the same options.

3.20 System Help

Although there is no PDF or Word document format of help available, the website does have a help section. The help section is the generic help section from ArcGIS Help. The reviewer recomms a “customized” help section with DDOT screenshots to assist users to better understand the system. The help section describes how to access the system along with some screenshots.

Not all sections under Help have screenshots of the described items. Having screenshots for each point makes an excellent illustration of the item description.

The help section does not describe different levels of access available for the website. It would be useful for the users to see different levels available and what modules are accessible at each access level.

3.21 System Review

This section of the report reviews the “System” section of the DDOT Asset Inventory Website. The System section has three different menu options.

1. User Management – the reviewer does not have access to this section, thus is not able to review this section.
2. System Tools - System tools has 2 different sub-sections
 - a. Update ADA Criteria

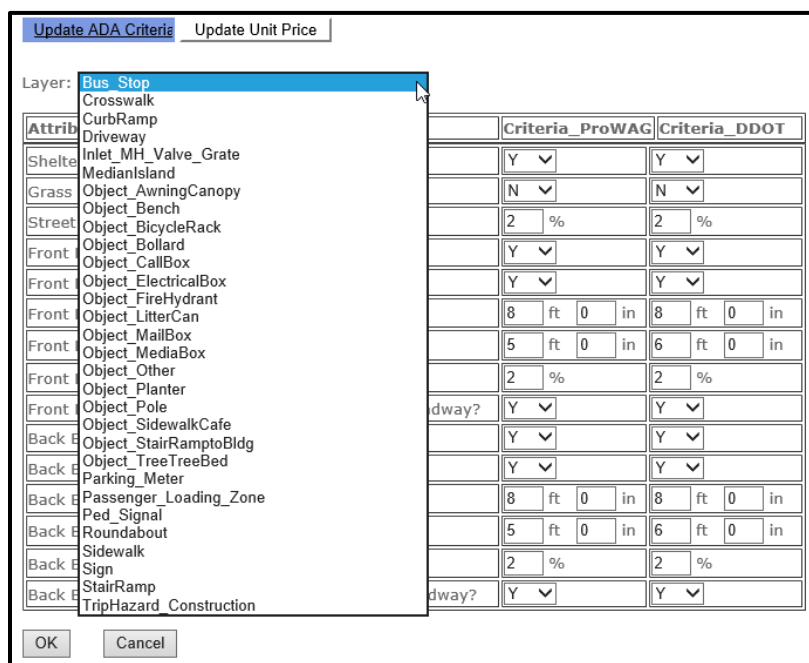
b. Update Unit Price

3. System Settings

3.22 System Tools

Update ADA Criteria

Using the Update ADA Criteria feature, the user can view and edit some of the criteria for creating reports using inspected data. The Update ADA Criteria feature offers two choices of standards to apply to the findings, PROWAG and DDOT. It is unclear if selecting on either PROWAG or DDOT changed any of the findings or criteria. The following screen shot shows the drop down menu list of the available layers in the Update ADA Criteria function.



As an example, Bus Stops were selected in the following sample screen shot.

Attribute	Criteria_ProWAG	Criteria_DDOT
Shelter - Connected to Accessible Route?	Y	Y
Grass Area, No Sidewalk at Bus Stop?	N	N
Street Slope (Max)	2 %	2 %
Front Boarding - Connected to Accessible Route?	Y	Y
Front Boarding - Firm, Stable Surface?	Y	Y
Front Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Front Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Front Boarding - Running Slope (Max)	2 %	2 %
Front Boarding - Slope parallel to curb same as roadway?	Y	Y
Back Boarding - Connected to Accessible Route?	Y	Y
Back Boarding - Firm, Stable Surface?	Y	Y
Back Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Back Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Back Boarding - Running Slope (Max)	2 %	2 %
Back Boarding - Slope parallel to curb same as roadway?	Y	Y

Although the reviewer’s user access enabled the reviewer to change the measurements in number entry text boxes such as Street Slope and Front Boarding Length, the reviewer was not able to change the established Yes or No values in drop down boxes. The existing “Y” or “N” value is the only option in the drop down menu, preventing a user from changing an existing value when needed for updates or correction.

Per the following example, Shelter-Connected to Accessible Route has “Y” chosen for both PROWAG and DDOT. When the drop down menu is clicked as if to change the choice to “N”, no alternative values are present in the dropdown.

Attribute	Criteria_ProWAG	Criteria_DDOT
Shelter - Connected to Accessible Route?	Y	Y
Grass Area, No Sidewalk at Bus Stop?	N	N
Street Slope (Max)	2 %	2 %
Front Boarding - Connected to Accessible Route?	Y	Y
Front Boarding - Firm, Stable Surface?	Y	Y
Front Boarding - Length (Min)	8 ft 0 in	8 ft 0 in

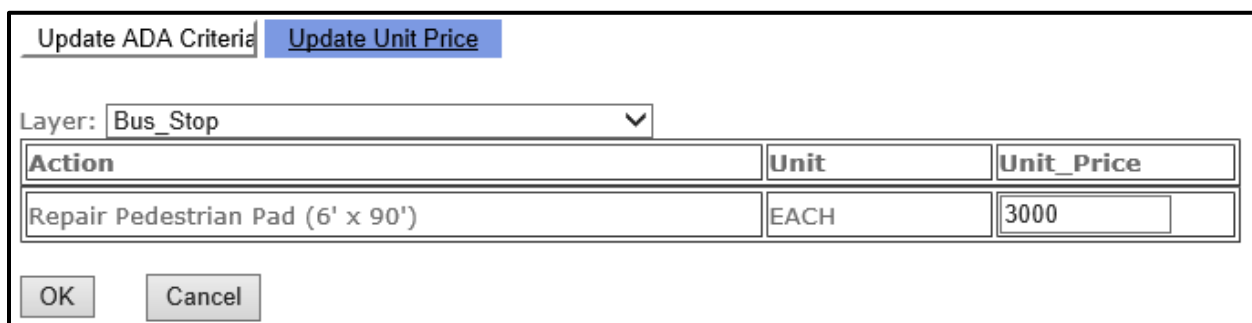
In additional drop down menu checks, we found that this applies to all drop down menus under any layer.

We found that both the “OK” and “Cancel” buttons seem to work properly. Clicking the OK button saves the modified values, and the Cancel button reverts the changes made during the session.

Update Unit Price

The Update Unit Price feature also has the same Layer dropdown with all entities listed. Selecting an entity from the drop down loads the respective costing entries.

We chose “Bus Stop” for our example screenshot.



The screenshot shows a software interface with two tabs: "Update ADA Criteria" and "Update Unit Price". The "Update Unit Price" tab is active. Below the tabs, there is a dropdown menu labeled "Layer:" with "Bus_Stop" selected. Below the dropdown is a table with three columns: "Action", "Unit", and "Unit Price". The table contains one row: "Repair Pedestrian Pad (6' x 90')", "EACH", and "3000". At the bottom of the dialog are two buttons: "OK" and "Cancel".

Action	Unit	Unit Price
Repair Pedestrian Pad (6' x 90')	EACH	3000

It is unclear how the costing is generated and applied to this entry, as there is only one Action under Bus Stop, which is Repair Pedestrian Pad. However, the Update ADA Criteria tab for the Bus Stop layer contains fifteen Attributes. There is no way for the system user to know how the Unit Price breaks out over the Attributes.

For example it is not clear whether the 3,000 Unit Price to Repair Pedestrian Pad is a combined total to update all Attributes for the Bus Stop or only a specific attribute. If it is only for a selected Attribute, there is no indication as to which one has been chosen.

We have included a second Update Unit Price screen shot for the layer of Crosswalk.

Action	Unit	Unit_Price
Adjust Width	LF	8.5
Mill&Resurface	SY	23
Expand Width	LF	8.5

Similar to the list of Actions for Bus Stop, there are only 3 costs, whereas the Update ADA Criteria tab for Crosswalk has 8 Attributes. The user cannot discern how the costs are applied to the failed Attributes.

3.23 System Settings

Included below is a screenshot for System Settings.

Please carefully update the system settings, invalid changes may result in system malfunction.

DCGTADA Web Settings

Contact_Name:

Contact_Email:

Web_Address:

Debug_Email:

Other Settings

ADA Criteria:

Other than the “ADA Criteria” drop down under Other Settings, these records are mostly for information purposes.

The “ADA Criteria” drop down has two options, PROWAG and DDOT with PROWAG selected as default. To avoid causing any issues with the data, the user has refrained from changing this value to DDOT for the assessment. Therefore, it has not been tested

whether changing the value to DDOT would automatically trigger the data to be re-processed using DDOT standards.

3.24 Inspection Form, Processing and Reporting Review

An additional phase of review is planned to review the actual intake forms, processing and reporting. The first portion will be to examine the intake forms used for field inspection. The forms will be reviewed to determine if they are comprehensive. Following the review of the intake forms, the accuracy of the intake will be compared to the actual reporting to review the processing of the data against specific rules or standards.

An initial sample of intake forms noted some areas needing further examination. The following list is not conclusive, but is meant as an example to demonstrate the type of review being discussed:

1. An initial review of the curb ramp intake form does not provide for a way to measure the width, length or contrast of the truncated dome’s detectable (spelling error noted) warning surface (see screen shot)
2. There is no way to indicate if the sidewalk slope measurement matches the adjacent street slope.
3. The intake form does not provide for input for decibel levels of tone locator or ambient traffic noise. In addition, there is no input for the size of the push button or arrow, or if Braille is provided.
4. No bench intake form is provided for a bus stop. There is no method to record the shelter dimensions, distance from the street or if there is ample lighting. Also, there is no option to record bus stop signage.
5. Some measurements are of a “yes” or “no” response with no indicator of the degree or severity of noncompliance.

Curb_Ramp (V2.0)

General | Dimension | Note | Picture

Curb Ramp Type: Perpendicular [HELP]

Position: Inters. Corner | Grade Break in Ramp?: Y

Surface: Smooth | Slip Resistant?: Y

Change in Level in Ramp/Landing/Gutter?: Y

Appurtenances in Access Route?: Y

Distance of bottom Grade Break from Back of Curb - Left Side: 12 inches

Distance of bottom Grade Break from Back of Curb - Right Side: 12 inches

Landing Accumulates Water?: Y

Detectable Warning Surface?: Y

Detectable Warning Surface Damaged?: Y

Detectable Warning at back of Curb?: Y

Type of Detectable Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: White

ok [cancel] [help]

Curb_Ramp (V2.0)

General | Dimension | Note | Picture

Landing Space at Top of Ramp? Y [HELP]

Length: 36 inches | Width: 40 inches

Running Slope: 5 % | Cross Slope: 6 %

Flared Sides? Y

Ramp Dimension

Flare Slope 1: 2 % | Length: 36 inches | Flare Slope 2: 3 %

Width: 34 inches

Running Slope: 5 % | Cross Slope: 6 %

Counter Slope of gutter at: 2 %

Clear Space at Bottom of Ramp? Y

Length: 36 inches | Width: 29 inches

Running Slope: 6 % | Cross Slope: 5 %

Within Pedestrian Crossing?: Y

Outside parallel veh lane?: Y

ok [cancel] [help]

4. RECOMMENDATIONS

Although the DDOT Asset Inventory System has components that are valuable for collecting survey information in the field and providing a method to access information, there are areas that need further enhancement for consistency, accuracy and usability. It is also imperative that the DDOT Asset inventory system be evaluated to determine its ability to accurately and consistently collect data in the field and that the data collected is process using an automated method for efficiency and accuracy. As access to the raw data collected in the field was not provided and access was not provided to determine method of processing of data. Quality control methods were also not made available and therefore were not evaluated.

Other factors that the system should be evaluated for include, but are not limited to:

- Functionality
- Scalability
- Interoperability and integration with current DDOT programs
- Usability
- Security
- Reliability
- Consistency
- Reporting features (as required for a Transition Plan and need of DDOT)
- Security
- Back-up and recovery
- Run-time rate

Additional recommendations include:

1. The design of the intake forms should be reviewed in areas where problems have been noted and corrections made in the intake forms and subsequent code to provide for accurate reporting and management features.
2. Intake forms should be reviewed to verify that they include all of the data that is required to be collected, and for the ease and usability of the form.
3. An intake page should not have the ability to be closed by the inspector without the completion of all required information. The consistency that results due to

the properly completed forms will provide a more thorough, consistent and reliable inspection and will allow for photographs to be viewed.

4. As discussed previously, the use of yes/no answers should be limited. Actual field measurements should be included to allow the client to make more informed decisions regarding the severity and priority of the barrier removal. For example, a yes/no question that says “Clear space at the bottom of the ramp” does not record the actual measurement and requires the field inspector to understand the standards addressed in the question. The majority of the curb ramps from the foot-on-ground inspections were recorded as “No” when it appears that there is clear space at the bottom of many ramps. A similar condition exists for the top landing.
5. The updated field inspection manual should be reviewed for content and clarity and relationship to the intake forms.
6. The capability and methodology should be developed to allow the field inspector to edit their own work in order to make corrections in the office or in the field.
7. A process or procedure should be developed to track unedited, edited and reports that are ready to be “published” for use by the client. The process for this function is unclear and/or it is vague if field inspectors are using an edit feature.
8. Differences in reporting teams should be noted and clarified if the differences were a function of the inspection tool, instructions in the Accessibility Asset Inventory Manual or due to the software. A part of a QC audit is to review the consistency and reliability of data collected between different inspectors. The data collected should be consistent, reliable and accurate between surveyors.
9. An additional audit sample is recommended when the reporting format is completed. A comparison audit to review the data collected in the field will show the accuracy and comprehensiveness of how the software reports the data.
10. Unedited and edited data collected in the field should be reviewed and compared.
11. The discrepancies between the findings and the reporting should be examined and the causative factor or factors determined and remediated.
12. Additional desk and field QC audits should be conducted following the completion of the reporting and management features of the software.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

REVIEW OF DDOT'S WEB-BASED GIS COMPUTERIZED SYSTEM - TASK G

Prepared For:



DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 1.0
DATE: November 2014

Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group, Inc.
Disability Access Consultants (DAC)
Sharp & Company
Precision Systems, Inc.

This page left intentionally blank.

EXECUTIVE SUMMARY

The scope of work for the District Department of Transportation (DDOT) project for the development of a comprehensive ADA/Section 504 self-evaluation and transition plan includes a review of the web-based GIS System (also known as the DDOT Asset Inventory Evaluation System and the ADA Assets Compliance System) to be used for the ongoing DDOT compliance efforts, including the compliance surveys of the additional wards. Activities include:

- Conducting an initial sample of the results, findings and recommendations of the ADA assets compliance system;
- Providing a report of the findings and recommendations of the current DDOT compliance system;
- Providing a report of the findings and recommendations regarding the current DDOT web based accessibility system
- Reviewing the reporting and prioritizing features of the web based system;
- Reviewing the updating capabilities of the web based system;
- Reviewing the DDOT web based system to perform the analysis and functions of a transition plan;
- Providing a report regarding the findings and efficiency of the DDOT web based system.

DDOT developed an initial data collection and reporting system during the 2012 Pilot Study of the Golden Triangle and DDOT should be commended for their efforts. This software has been referred to as the ADA Asset Inventory Software, the DDOT Asset Inventory System and the ADA Assets Compliance System. For clarity and analysis of the software for this task, the pilot study will be referred to as “pilot study” software. The most recent version 2.1 of the software that is being utilized for the current foot-on-ground field inspections is referred to as the “current” software.

The development of tools for consistent and accurate field intake, reporting and management of the ADA/504 plan was shown to be an important measure of success during the nationwide review of practices that was conducted as a part of the current project. An intake and management system is valuable and beneficial for the development of a DDOT ADA/Section 504 Plan for documentation, planning, budgeting and other components of barrier removal for persons with disabilities.

Based on preliminary information conducted during the review of the DDOT software system, however, it appears that enhancements to the database would be beneficial.

Findings are currently limited due to the lack of access to the data being collected during the current FOG surveys. Therefore, findings and recommendations noted in this report do not utilize the current software being used for the FOG surveys and are limited to the data collected during the previous pilot study in 2012. In addition, the findings regarding the reporting features are also limited to the pilot study. A review was unable to be conducted regarding the processing of the data and what interventions or methods the current software requires from data acquisition in the field to web based reporting and management. It is, however, anticipated that the review will be completed when access to the data is provided in the near future.

It is important to note that Task F and Task G overlap as they both report on the DDOT web based GIS system that is also known as the ADA Asset Inventory. Thus, some findings will apply to both Task F and Task G.

Key findings for recommended enhancements include:

- The software design for both the intake program and website portion of the software are built from existing third party software programs with limited coding for customizations and reporting features. Using third party software programs may limit future development and customizations in addition to licensing fees for the third party software.
- Reporting features that would be pertinent for a transition plan are limited.
- Reporting features for documentation of work that was completed for the removal of barriers are not available. It is not known if corrected work can be recorded.
- Application errors were noted that may indicate the exception handling was not coded properly.
- Forms do not include a description of the location, forcing the user to navigate to another area to access GIS and location descriptions.
- Individual component priorities cannot be assigned to attributes.
- Attributes that have multiple areas and levels of compliance cannot be reported separately and therefore cause the entire attribute to default as noncompliant.
- Some findings lacked photographs.
- Some photographs were the same for different locations and findings.
- Some noncompliant findings were omitted.
- Options to export maps to a PDF format were not found.
- Inactive links are visible to the user.

- Some noncompliant findings are documented by a red font color which would not be clear in a black and white printed report.
- Options to run combinations of reports was not available.
- The software is not fully compatible with Internet Explorer 11.
- Some reports provided incorrect information based upon the selection.
- Some reports for noncompliant items did not report correctly.
- Excel reports generate in the older XLS format and not in the newer XSLX format.
- Excel documents are not pre-sorted with headers.
- It is not known if reports can be reprocessed if codes change.
- Summary cost reports can be generated, but individual costs are not displayed.
- Report filters are not user friendly.
- Navigation methods should be less cumbersome.
- Some findings are reported as “yes” or “no” and do not report actual measurements to assist the user to make informed decisions for barrier removal for severity and priority ratings. The use of “yes” or “no” findings provides the user with limited information in order to rate the severity of the findings or to take corrective action. For example, is the width noncompliant due to ½ inch or 10 inches, or a slope of 1% or 8%?
- The use of “yes” and “no” responses does not allow for updating of the results if codes change.

This page left intentionally blank.

TABLE OF CONTENTS

EXECUTIVE SUMMARY I

TABLE OF CONTENTS V

1. BACKGROUND..... 1

1.1 Purpose of the Review 1

1.2 Review Methodology 2

1.3 Components Included in the Review 2

1.4 Limitations 3

1.5 Survey Teams 3

2. ACTIVITIES..... 4

3. FINDINGS 5

3.1 Pilot Study Compared to Current FOG Surveys 5

3.2 Survey of Field Inspectors 5

3.3 Quality Control..... 5

3.4 Data Exports 6

3.5 Processing of Data 6

3.6 Browser Utilized for Review 7

3.7 Page/Navigation Menus..... 7

3.8 Review of Development of the Software Program..... 7

3.9 Review of Forms 8

3.10 Quality Control Samples 17

3.11 Quality Control Limitations and Comments 20

3.12 Quality Control Sample Findings..... 20

3.13 Asset ADA Status Section..... 21

3.14 Asset ADA Priority Section..... 23

3.15 Network ADA Status/Network ADA Priority Sections..... 24

3.16 Asset Compliance/Noncompliance Report 26

3.17 ADA Asset Inventory Details 28

3.18 Asset Non-Compliance Summary 30

3.19 Report Filter 31

3.20 System Help 32

3.21 System Review..... 32

3.22 System Tools..... 32

3.23 System Settings 35

3.24 Inspection Form, Processing and Reporting Review 36

4. RECOMMENDATIONS..... 37

This page left intentionally blank.

1. BACKGROUND

1.1 Purpose of the Review

The purpose of Task G is to review the web based computerized system known as the ADA assets compliance evaluation and make any recommendations regarding the features, deficiencies and note any recommended corrections. It was originally anticipated that this review would be completed prior to the use of the DDOT Asset Inventory software to inspect additional wards of areas in the City for the DDOT project, as enhancements and potential changes to the software should occur prior to additional inspections.

The review includes an analysis of the efficiency and accuracy of the intake, reporting and management software that is needed for the development and ongoing implementation of an DDOT ADA/504 Self-evaluation and Transition Plan. For clarity, the previous software used for the pilot study in 2012 and 2013 will be referred to as the “Pilot Study software” and the newest version being used for the current foot-on-ground surveys will be referred to as the “Current FOG software.”

The development of a comprehensive web based data collection and management tool is critical for a transition plan. A comprehensive plan starts with accurate data collection in the field followed by consistent processing of data exported from the field. Data collected is managed and is available in multiple reporting formats.

The minimum requirements for a self-evaluation and transition plan include, but are not limited to the following:

- a. A detailed description of the noncompliant item (asset or attribute)
- b. The proposed method or methods to remove the noncompliant barrier
- c. The person or persons responsible to oversee the implementation of the plan
- d. The proposed schedule for barrier removal

As the transition plan is intended to be a living, working plan that is updated on a regular basis, the associated data collection and management software used for this purpose must meet the minimum requirements.

Other components that have been found to be helpful for the ongoing implementation of a transition plan include photographs, GIS information, estimated costs and documentation of barriers that have been removed. It is also helpful that the software has the capability to add new barriers if they are created, and to document the reasons why barriers were added.

Users need to be able to produce or print reports from a web based system. The software should also have the capability to be easily customized for new and additional events the user desires to capture.

1.2 Review Methodology

The review methodology included a review of the pilot study of the Golden Triangle area in the District of Columbia from 2012 and 2013. In addition, a review was conducted of the updated field intake survey forms developed for the current 2014 inspections of the selected areas of wards in the District of Columbia. Interviews of one team of inspectors and the contractor developing the software were conducted. This reviewer initially planned to review the actual data collection in the field by all teams to determine the methods used during the field surveys, review accuracy and consistency in the field and subsequently determine if data collected was accurately reported and processed into the software and reports.

1.3 Components Included in the Review

The scope of work for the District Department of Transportation (DDOT) project for the development of a comprehensive ADA/Section 504 self-evaluation and transition plan includes a review of the DDOT web-based GIS System to be used for the ongoing DDOT compliance efforts, including the compliance surveys of the additional wards.

The primary scope of work for Task F includes:

- Conducting an initial sample of the results, findings and recommendations of the ADA assets compliance evaluation
- Providing a report of the findings and recommendations of the initial sample;
- Providing a report of any deficiencies noted in the sample
- Providing a report with recommendations for improvement
- Providing a QA/QC report of current foot-on-ground (FOG) surveys

For clarity, DDOT conducted a pilot study in 2012 to review compliance assets and attributes in the Golden Triangle. In 2014, DDOT entered into a contract to conduct additional foot-on-ground (FOG) surveys of a lesser number of attributes and assets than collected in the pilot study in selected wards in the City. Thus, the pilot study is referred to as the “pilot” study and the current FOG survey of the wards as the “current” study.

1.4 Limitations

It is important to note that the review was limited due to the lack of access to the current data for the current software and the reporting and processing of the current data. A sample of the pilot study software for the Golden Triangle project and the reporting features were utilized. A sample of the field data and forms for the current software were reviewed, but reporting and management features of the current software were not available. Thus, the following comments should be considered preliminary. It is anticipated that additional access to the current software will be provided in the near future.

1.5 Survey Teams

Access was limited to the data and results of the current study. Since on-site visits were not made possible to observe the field inspectors and methods while conducting surveys, interviews were conducted with two of the FOG survey members from one company conducting the surveys. Three companies are subcontracted to provide field surveys under one prime contractor. It was originally anticipated that an on-site evaluation, in addition to interviews, would be made regarding the consistency and results from each team, one from each company. The consistency between teams would have assisted with the validation of the foot-on-ground process and the use of the intake tools and software. It was originally planned that a review of the quality control process and results would be evaluated.

Thus, at the time of this report, two field inspectors from one subcontractor were interviewed regarding the inspection process. It is anticipated that additional inspectors will be interviewed or observed in the field conducting a survey in the near future. Responses from the team interviewed were positive and indicated a general understanding of the survey process and the use of survey tools.

The following evaluation was not completed, but is expected to be completed when access is provided to additional FOG data for the wards in the near future:

- Analysis and form of the raw data
- Quality control process
- Data after the quality control process
- Processing of the data that is collected in the field
- Determination if the data collected requires manual intervention or if it is an automated process
- Accuracy and consistency of the data collected and reported

The following areas were not able to be evaluated at the current time, but will be evaluated when data is available in the near future. Areas of access limitations to data include:

- No access has been provided regarding how data is processed or managed
- No access to the actual processing of data exports, as the reviewer cannot export the data or see what happens to the exported data. The reviewer has been told that the data is exported to FTP server and then transferred to an Oracle database after QC reviews.

The following area areas were reviewed:

- Intake portion (ArcPad) and the reports (website with ArcGIS server)
- Intake forms

2. ACTIVITIES

Activities include the review of the data collection and management tool referred to as the “software,” including intake forms. Samples of the data collected were reviewed for potential errors and omissions.

It was anticipated that the activities in Task F would include:

- Review of the general design of the software
- Review of the pilot study software
- Review of the current foot-on-ground software
- Review of the intake forms
- Review of survey methodology in the field
- Review of the raw data
- Review of edited data
- Review of data resulting after processing
- Review of reporting and management features of the software

Activities completed included a review of basic design and components of the software, review of intake forms and an initial analysis of data collected from the current foot-on-ground surveys. As the reporting features of the current software were not available, the reporting and management features were not evaluated. It is anticipated that these features will be evaluated in the near future as they become available.

In addition, a team of two field inspectors were interviewed as the opportunity to observe them in the field was not presented.

3. FINDINGS

3.1 Pilot Study Compared to Current FOG Surveys

The pilot study collected significantly more attributes and assets than the current foot-on-ground (FOG) study being conducted in selected locations. The pilot study also used different methods that included Trimble equipment for GIS information, luminance meter and digital video logging.

The current FOG survey collects fewer asset attributes than the pilot study. The current survey collects information regarding crosswalks, bus stops, curb ramps, sidewalks, trip hazards, objects and pedestrian signals. As noted in a recent meeting with DDOT staff regarding the DDOT system, changes are being made on a regular basis. It is unclear how this is being captured in the current FOG surveys.

The review was limited primarily to the pilot study and only data collected from the current FOG software. Thus, many of the findings will be duplicates of the findings in Task G, which also primarily used the pilot study due to lack of access to the current data and findings.

3.2 Survey of Field Inspectors

According to interviews with a team of field inspectors, inspectors reported exporting data collected in the field every day or every two days. It is recommended that data collected in the field be exported daily to avoid loss of data because of damage to the tablet or a lost or stolen tablet.

3.3 Quality Control

The quality control process regarding the review of field data collected is not clear. According to interviews, it was reported that a field inspection team review was conducted and sometimes an internal review is conducted. It was also reported that this quality control review is sometimes reported before uploading to the FTP site and sometimes after uploading to the FTP site. It is recommended that the quality control process be more clearly defined and established procedures for quality control be developed.

3.4 Data Exports

It appears that all data is transmitted during every export, even data that was exported previously. As the re-exporting of previously transmitted data should be unnecessary, we would recommend that only the edited data be re-exported. The re-exporting and subsequent quality control review of all data, even portions that have already had a quality control review, is time consuming and may not be a good use of resources and staff time.

3.5 Processing of Data

According to interviews with the developers, the processing of data involves the following steps:

- Data collection using ArcPad
- Uploading of data to FTP
- QC Review
- Algorithm program to check for findings
- Oracle database
- Website Reports

It appears that some manual steps are needed to complete the processing of data and it is not automated. The more automation, if properly designed and coded, will lead to less chance for human error when processing the field data into the database and generating reports. For example, it appears that after the data is exported it remains on the FTP server until someone reviews it. It is recommended that this process be automatic and streamlined so that when the data is received from a tablet an automated process is triggered, sending a signal to the algorithm program which can start processing the data and transfer it to the Oracle database.

During the interview with the database developer, it was also mentioned that they are catching missing photos and decimal points during the quality control review. It is recommended that these types of validations be done by the software. For example, if the inspector missed taking a photo, it would be easier to validate it and alert the inspector while saving the form in the field, instead of finding it out later during the QC review and sending the inspector back to the field to get a new photo. The same recommendation applies to decimal point validations as these need to be done at the field inspection level and not at the quality control review which may come after uploading to the FTP server.

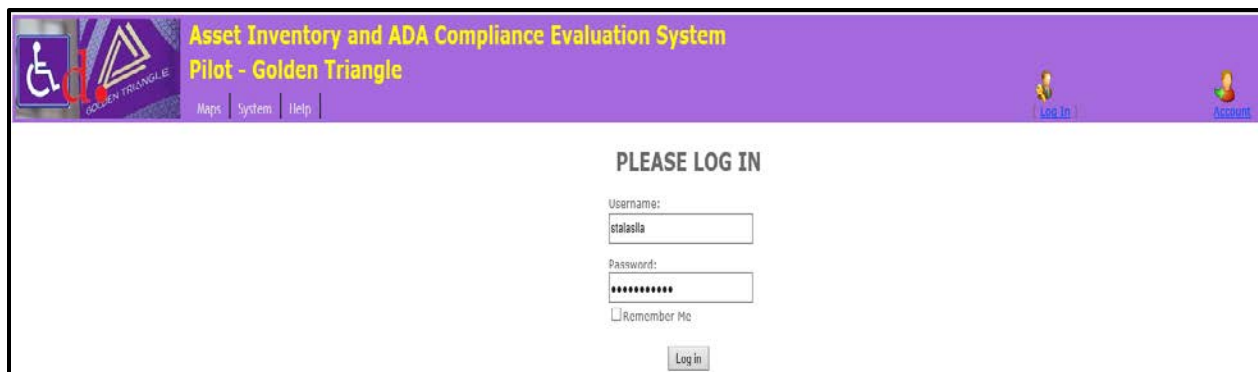
3.6 Browser Utilized for Review

The following review was documented using Internet Explorer 11 on a PC running the Windows 8 operating system, unless otherwise specified.

3.7 Page/Navigation Menus

The navigation menus of the website are all visible prior to login.

The menus for Maps, System and Account links are active on the Login page/logout page.



The screenshot shows the login page for the 'Asset Inventory and ADA Compliance Evaluation System Pilot - Golden Triangle'. The page has a purple header with a logo on the left and navigation links for 'Maps', 'System', and 'Help'. On the right side of the header, there are 'Log In' and 'Account' links. The main content area is white and contains a 'PLEASE LOG IN' section with a 'Username:' field containing 'stalaella', a 'Password:' field with masked characters, a 'Remember Me' checkbox, and a 'Log In' button.

Links that are not active for the individual user should be hidden. For example, the account link should not be active or visible when the user is not logged into the system.

The same applies to System drop down menu. The reviewer does not have access to the section but the links are visible in a drop down menu. (Clicking on the links gives a message that the reviewer is not authorized to use this section)

3.8 Review of Development of the Software Program

Based upon available information, comments regarding the development of the software include:

1. Both the intake program and website portion of the software are built from of existing third party software programs with limited coding.
2. ArcPad was used for developing the tablet Intake program and ArcGIS was used for developing the website used for mapping and reporting.
3. Use of third party programs may limit future development and customization.
4. License renewals tend to be expensive and needs to be paid as long as DDOT is using these third party programs.
5. If a license expires, the continued use of the program may be impacted.

6. An in house software that was developed from scratch using various available technologies will avoid future issues (mentioned above) with customizations and future development and eliminate expensive licensing renewals.

3.9 Review of Forms

The current foot-on-ground (FOG) forms have been reduced from the pilot study to collect only certain assets and attributes.

The number of forms used in the current foot-on-ground software and survey collects significantly fewer assets and attributes than the software and intake used during the previous pilot study. The intake and related forms used in the current foot-on-ground survey include the following intake and related forms reviewed for version 2.1.

1. Bus stop
2. Crosswalk
3. Curb Ramp
4. Objects
5. Pedestrian Signal
6. Sidewalk
7. Trip Hazard

As a requirement of a comprehensive transition plan, items that are not compliant should be collected and reported in the transition plan.

The following screen shots show each of the forms.

Bus_Stop (V2.1)

Bus_Stop | Note | Picture

Location: Intsct (near side) [HELP]

Shelter? [Y] Shelter Type: Clear/Skinny

Connected to Accessible Route? [Y]

Grass, No Sidewalk at BusStop? [N]

Bus Route Identification Sign? [Y]

Service on the Street? [Y] Street Slope (%) []

Boarding/Alighting Area: Front Door

Front Door Boarding/Alighting

Length [] inches Width [] inches

Slope Parallel to curb same as Roadway or better? [N]

Perpendicular to Curb - Running Slope [] %

Connected to Accessible Route? [Y]

Firm & Stable Surface? [Y]

ok [X] []

Crosswalk (V2.1)

Crosswalk | Note | Picture

Mid-block? [N] Ramp Missing? [Y] [Help]

Length [] feet Width [] feet

Running Slope [] % Cross Slope [] %

Distance from the stop bar [] feet

Surface Material: Asphalt

Edge Delineation Type: Paint Lines

Crossing Marking Type: Ladder

Type of Controlled Stop: Stop Sign

Running Slope same as Street Cross Slope? [Y]

Cross Slope same as Street Running Slope? [Y]

If crossing has Ped. Signal, Flash Don't Walk timing:

Ped. signal at left of approach traffic [] sec.

Ped. signal at right of approach traffic [] sec.

ok [X] []

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Built-up Ramp** [HELP]

Project into Veh or Parking Lanes? [Y]

Position: Inters. Corner | Grade Break in Ramp? [N]

Surface: Smooth | Slip Resistant? [N]

Change in Level in Ramp/Landing/Gutter? [N]

Appurtenances in Access Route? [N]

Landing Accumulates Water? [N]

Detectable Warning Surface? [Y]

Detectable Warning Surface Damaged? [N]

Detectable Warning at back of Curb? [Y]

Type of Detectalbe Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Blended Transition** [HELP]

Position: Inters. Corner | Grade Break in Ramp? [N]

Surface: Smooth | Slip Resistant? [N]

Change in Level in Ramp/Landing/Gutter? [N]

Appurtenances in Access Route? [N]

Landing Accumulates Water? [N]

Detectable Warning Surface? [Y]

Detectable Warning Surface Damaged? [N]

Detectable Warning at back of Curb? [Y]

Type of Detectalbe Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Combination** [HELP]

Position: **Inters. Corner** Grade Break in Ramp?: **N**

Surface: **Smooth** Slip Resistant?: **N**

Change in Level in Ramp/Landing/Gutter?: **N**

Appurtenances in Access Route?: **N**

Landing Accumulates Water?: **N**

Detectable Warning Surface?: **Y**

Detectable Warning Surface Damaged?: **N**

Detectable Warning at back of Curb?: **Y**

Type of Detectable Warning Surface: **T/Domes**

Dome Pattern: **Grid** Color Type: **Dark Gray**

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Diagonal** [HELP]

Position: **Inters. Corner** Grade Break in Ramp?: **N**

Surface: **Smooth** Slip Resistant?: **N**

Change in Level in Ramp/Landing/Gutter?: **N**

Appurtenances in Access Route?: **N**

For diagonal curb ramp segment of straight curb - Left side: **1** inches

For diagonal curb ramp segment of straight curb - Right side: **1** inches

Landing Accumulates Water?: **N**

Detectable Warning Surface?: **Y**

Detectable Warning Surface Damaged?: **N**

Detectable Warning at back of Curb?: **Y**

Type of Detectable Warning Surface: **T/Domes**

Dome Pattern: **Grid** Color Type: **Dark Gray**

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Landing Space at Top of Ramp? Y N

Length inches Width inches

Running Slope % Cross Slope %

Flared Sides? Y N

Ramp Dimension

Length inches Flare Slope 2 %

Width inches

Running Slope %

Cross Slope %

Flare Slope 1 %

Counter Slope of gutter at %

Clear Space at Bottom of Ramp? Y N

Length inches Within Pedestrian Crossing? Y N

Width inches Outside parallel veh lane? Y N

Running Slope %

Cross Slope %

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Parallel** [HELP]

Position: Inters. Corner | Grade Break in Ramp?: N

Surface: Smooth | Slip Resistant?: N

Change in Level in Ramp/Landing/Gutter?: N

Appurtenances in Access Route?: N

Parallel Ramps - Diverging Sidewalks?: N

Parallel Ramps - Barrier Protecting Drop-offs?: None

Landing Accumulates Water?: N

Detectable Warning Surface?: Y

Detectable Warning Surface Damaged?: N

Detectable Warning at back of Curb?: Y

Type of Detectable Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Curb_Ramp (V2.1)

General | Dimension | Note | Picture

Curb Ramp Type: **Perpendicular** [HELP]

Position: Inters. Corner | Grade Break in Ramp?: N

Surface: Smooth | Slip Resistant?: N

Change in Level in Ramp/Landing/Gutter?: N

Appurtenances in Access Route?: N

Distance of bottom Grade Break from Back of Curb - Left Side: 1 inches

Distance of bottom Grade Break from Back of Curb - Right Side: 1 inches

Landing Accumulates Water?: N

Detectable Warning Surface?: Y

Detectable Warning Surface Damaged?: N

Detectable Warning at back of Curb?: Y

Type of Detectable Warning Surface: T/Domes

Dome Pattern: Grid | Color Type: Dark Gray

ok [X] [Help]

Objects (V2.1)

Objects | Note | Picture

Please select an Object Type: Help

<input checked="" type="checkbox"/> Bicycle Rack	<input type="checkbox"/> Litter Can	<input type="checkbox"/> Tree	<input type="checkbox"/> Bench
<input type="checkbox"/> lighting Pole	<input type="checkbox"/> Mail Box	<input type="checkbox"/> Treebed	<input type="checkbox"/> Sidewalk Cafe
<input type="checkbox"/> Signal Pole	<input type="checkbox"/> Media Box	<input type="checkbox"/> Planter	<input type="checkbox"/> Awning/Canopy
<input type="checkbox"/> Stair to Bldg	<input type="checkbox"/> Call Box	<input type="checkbox"/> Bollard	<input type="checkbox"/> Fire Hydrant
<input type="checkbox"/> Ramp to Bldg	<input type="checkbox"/> Electrical Box	<input type="checkbox"/> Sign	<input type="checkbox"/> Parking Meter
<input type="checkbox"/> Other:			

PAR Clear Width inches

ok X Picture

Ped_Signal (V2.1)

General | Pushbutton | Note | Picture

Push button Provided? Help

Push button Type

Clear Space at Push button?

Connects to Pedestrian Access Route? Length inches

Running Slope % Cross Slope % Width inches

Can be contacted from landing at top of ramp or clear ground space?

Height inches Push button Locator Tone?

Directional Information & Signs on Push button?

ok X Picture

Ped_Signal (V2.1)

General | Pushbutton | Note | Picture

Location Countdown Signal? Help

Distance from Extended Crossing Line inches

Distance from the Curb Line inches

Distance from other pedestrian signal devices at crossing inches

Message Display Type

Cross Street Name Recall

Vibrotactile indication of WALK?

Audible Signal of WALK?

ok X

Sidewalk (V2.1)

Sidewalk | Note | Picture

Note: Record at beginning and end of sidewalk segment and wherever any of these items change

Total Width inches Clear Width inches

Offset from Curb (to Clear Path) inches

Grade % Cross slope %

Sidewalk Material

Firm & Stable? Slip Resistant?

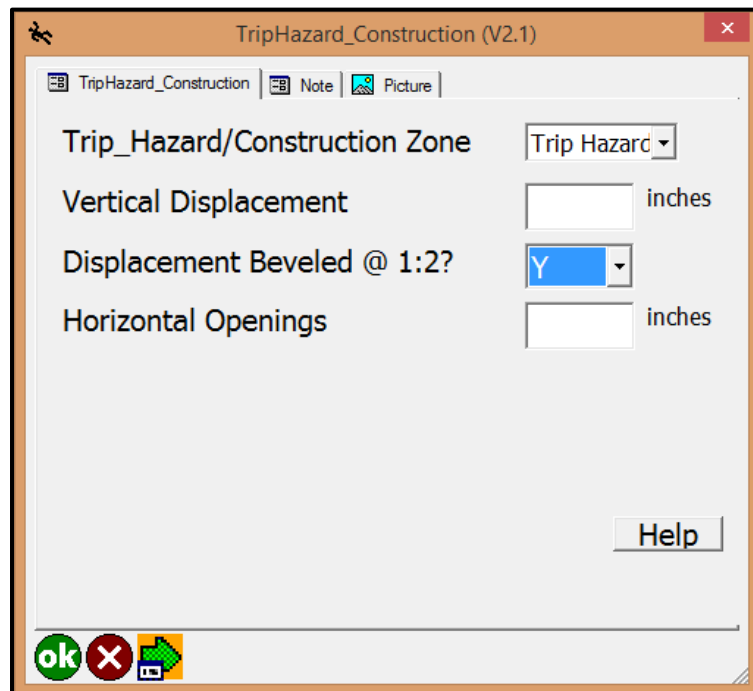
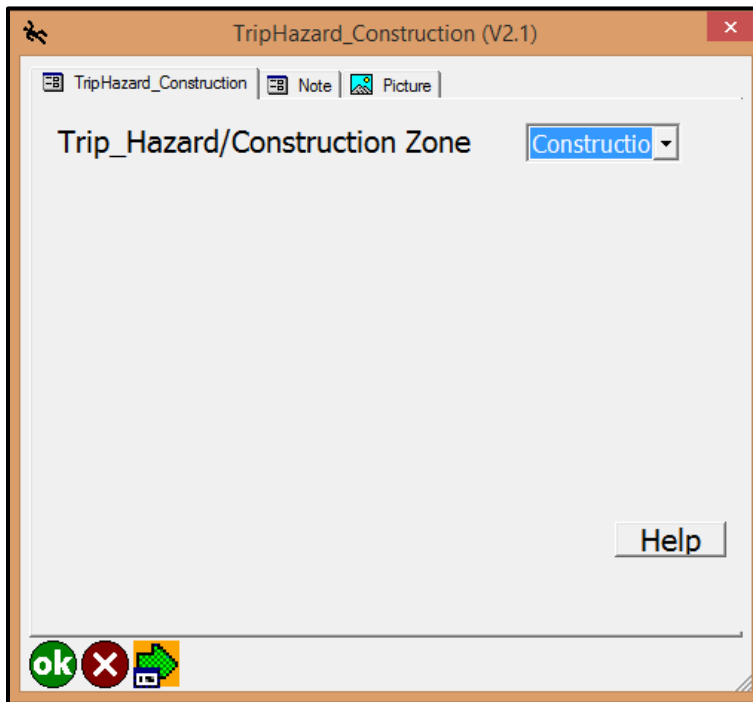
Sidewalk Rail Crossing - Type

Is Sidewalk Surface flush with top of Rail?

Rail Crossing - Flangeway Gap Width inches

Help

ok X

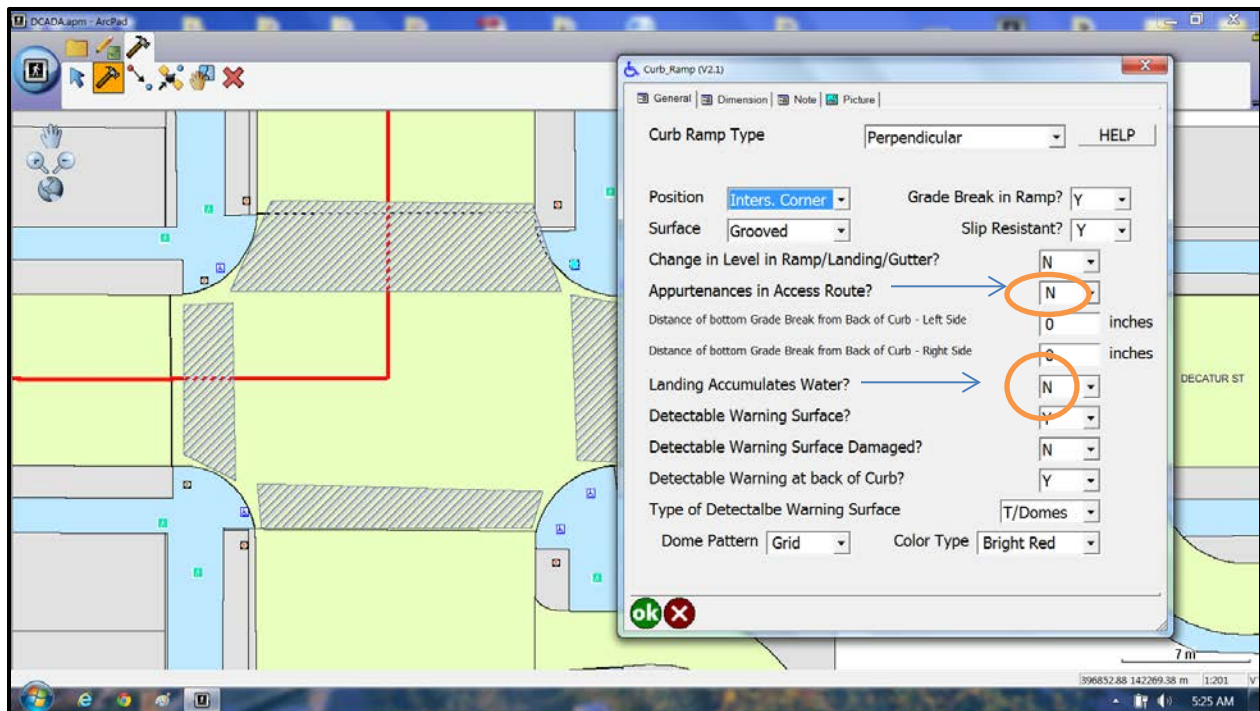


3.10 Quality Control Samples

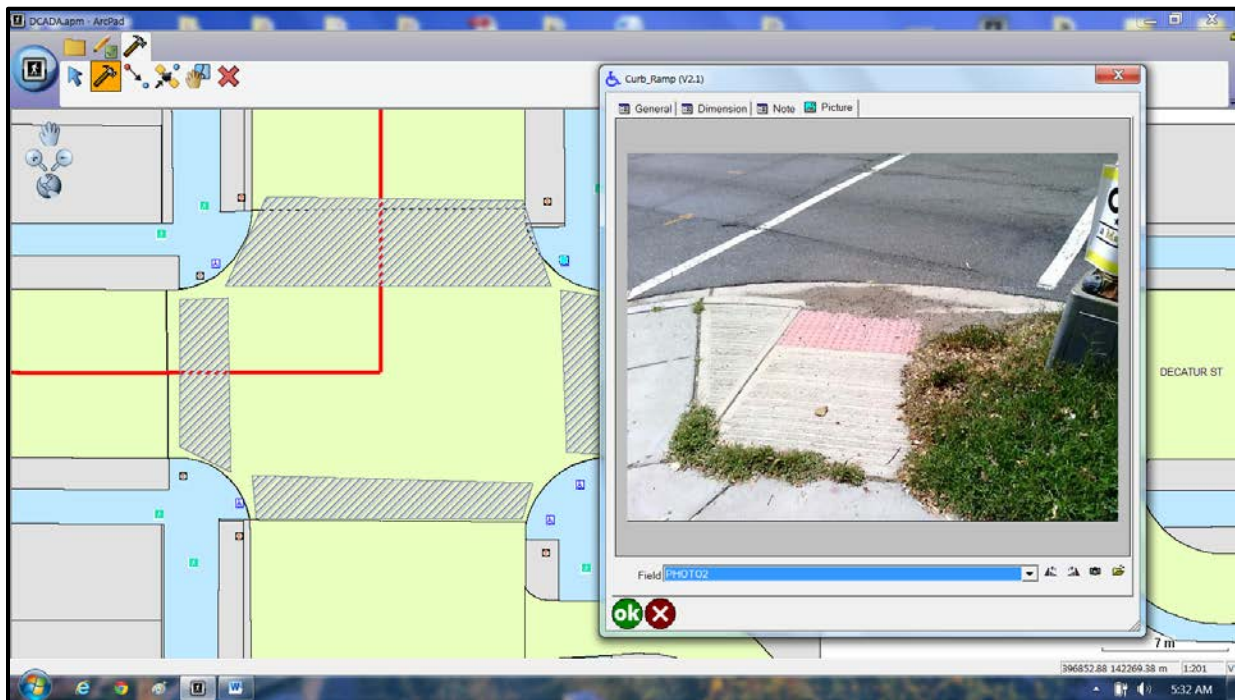
The quality control sample is limited to the previous pilot study and only the survey data collection of the current foot-on-ground (FOG) and current forms. The review does not include any reporting features of the current FOG software. Thus, the current software management and reporting features have not been evaluated.

Findings from the current foot-on-ground sample are similar to the sample from the previously conducted pilot study for the Golden Triangle. The software continues to contain errors and omissions. It is unclear if the errors or omissions are due to inspector error, the data collection tool, the processing of the data, data processing rules or the actual software itself. Examples are shown in the following screen shots.

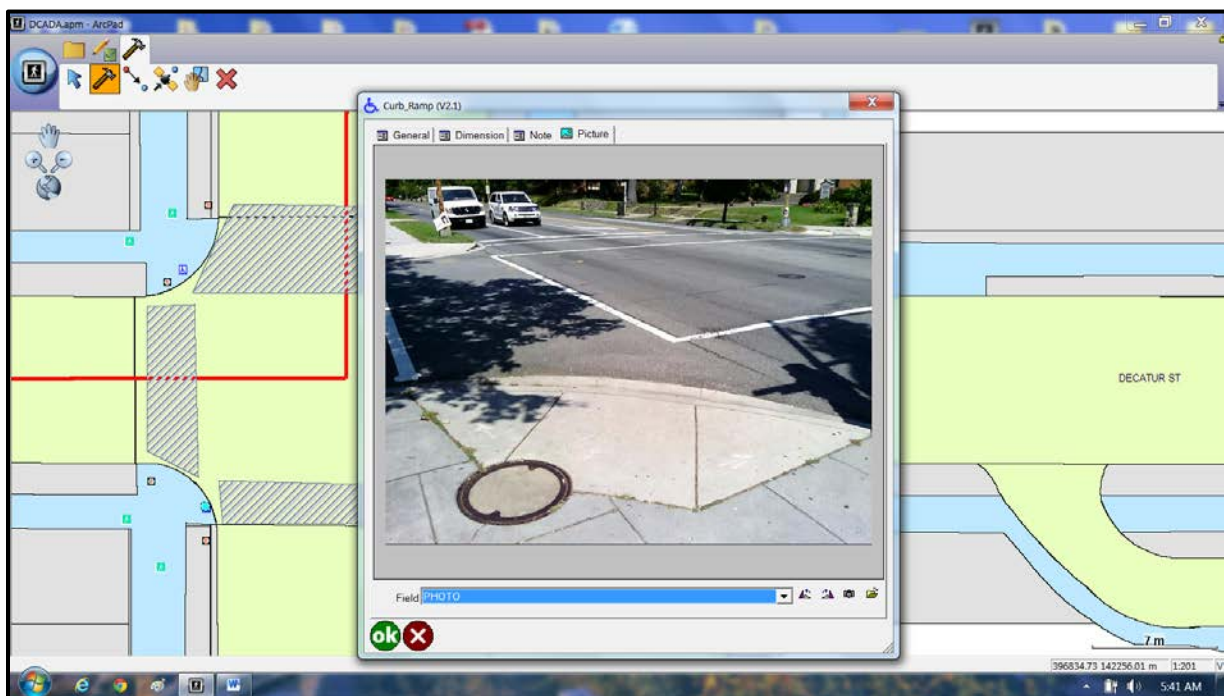
The first screen shot is of the intake form of a curb ramp at northeast corner of Decatur and 16th Street. The photo shows that the bottom landing of the curb ramp accumulates water and debris. The inspector, however, checked the box that the landing does not accumulate water as shown by the inspector indicating N for no accumulation on the intake form. In addition, the side and top landing is overgrown with grass and is a tripping hazard. The inspector did not report this as-is condition.

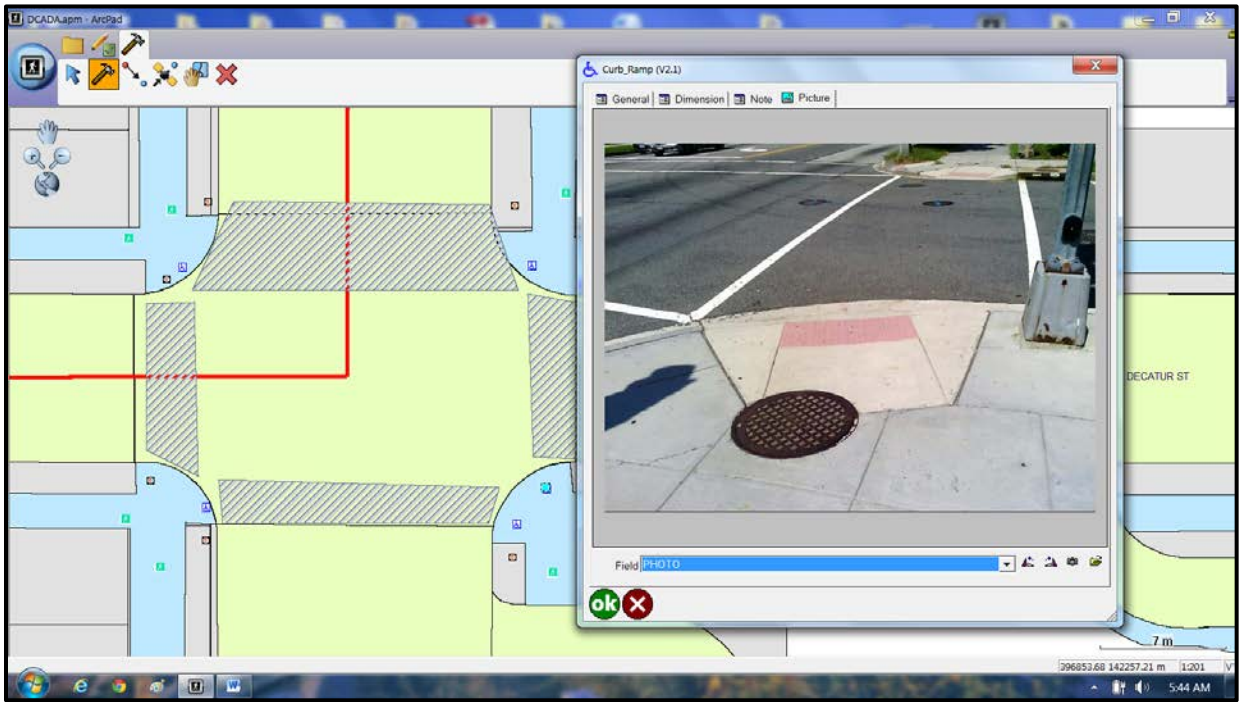


The photo of the curb ramp below shows the water and debris accumulation at the bottom landing and the overgrowth of grass on the top and side flare.

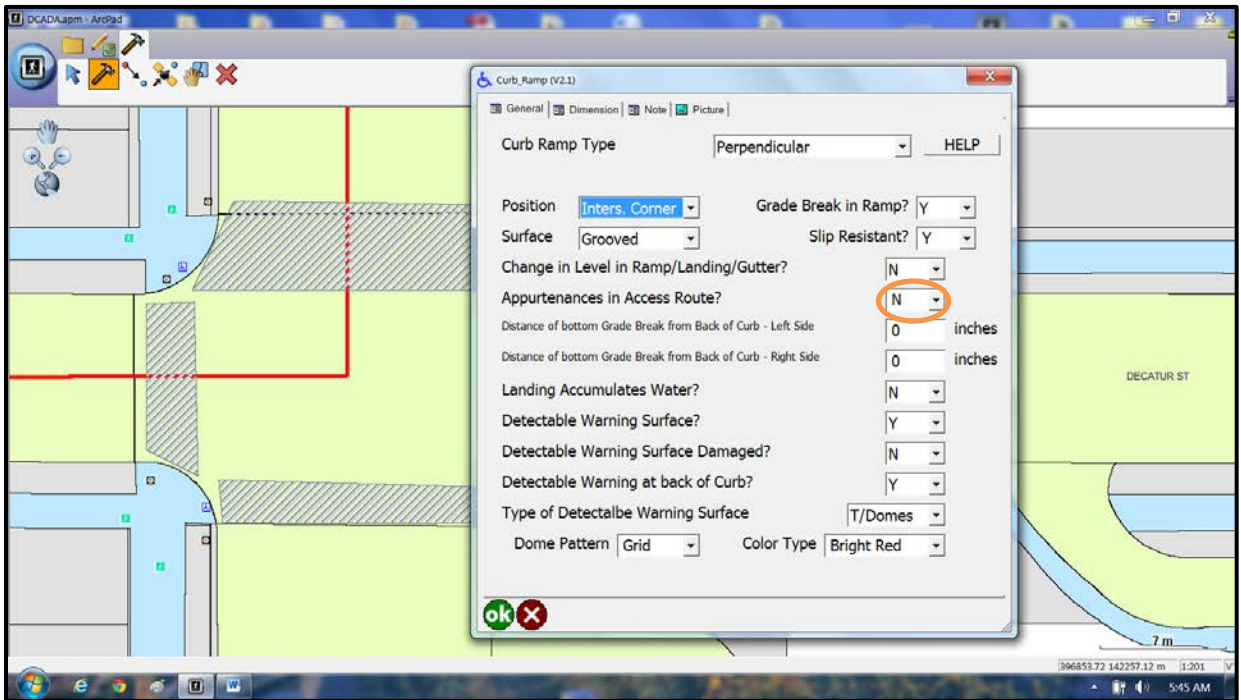


Several curb ramps have appurtenances that were not found on by the inspector as shown in the next two photos. The lack of identification of appurtenances was a common error that was noted.

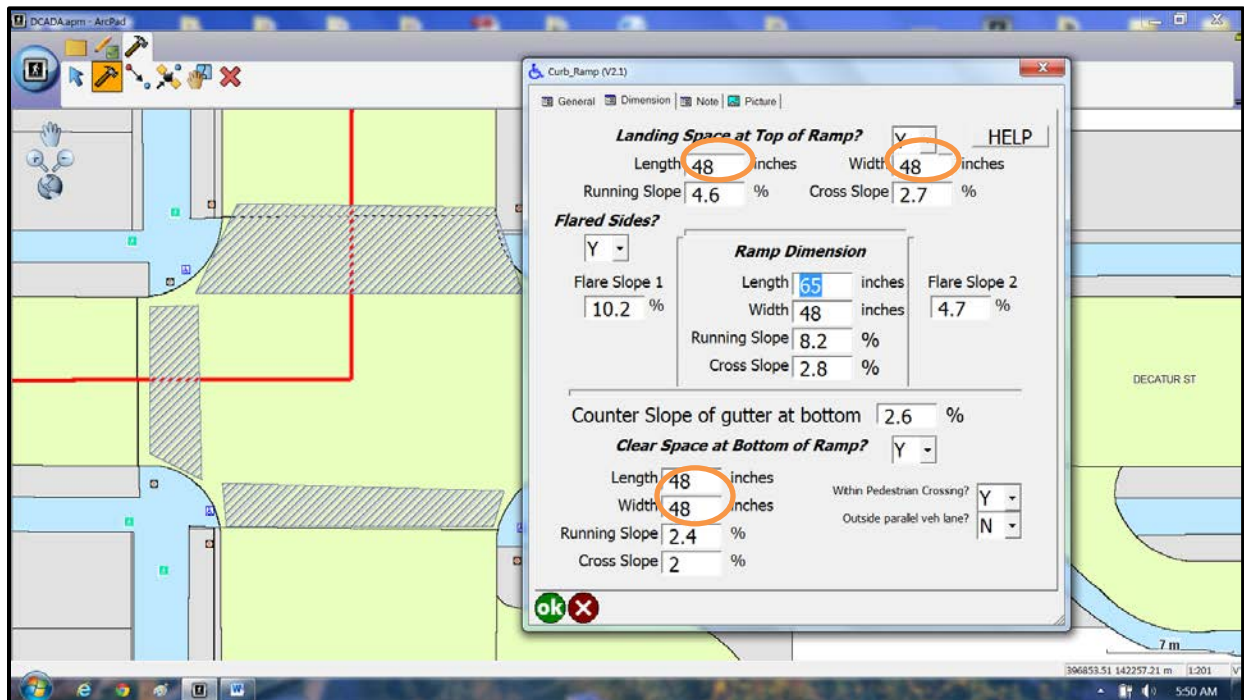




The next form screen shot shows the inspector’s indication as N or no in the check no check box for appurtenances in the access route.



It is also interesting to note that in the random sample every top and bottom landing measurement recorded for all curb ramps examined is exactly the same measurement of 48 inches by 48 inches. It is questionable that all the curb ramp landings are 48 inches by 48 inches for both the top and bottom landing.



3.11 Quality Control Limitations and Comments

As stated previously, it is important to note that the quality control procedures are limited at this time to the review of data collected in the field on current forms and **not the reporting format** that will be developed as a part of a related, but different project. The reporting and management features of the current software will be evaluated as soon as it is completed.

3.12 Quality Control Sample Findings

Screen shots from the QC sample and associated comments have been included to provide better clarity and more detail regarding the findings and recommendations.

1. The software continues to contain errors possibly due to design of the software and possibly inspector error, or both. Additional problems may be noted when the reporting and management features are developed. If the problems with the latest version of the software are not corrected, it is anticipated that the future versions for reporting and management will compound the errors and contain

not only errors and omissions, but will not provide the user with a functioning version of the software.

2. An error message appears when accessing help files.
3. Some areas or fields on the forms were not completed by the field inspector during the foot on ground surveys and were left blank.
4. The forms close without being completed causing the potential for attributes and assets to not be captured.
5. The design of some of the forms do not allow for collection of as-is conditions, or for the collection of the number of attributes or assets that are required to be counted in order to be properly reported, such as required percentages and numbers.
6. When the intake form is not completed, associated photos cannot be viewed.
7. Some items were visible in the photographs that were not included in the report, representing a possible omission of assets and attributes.
8. In some cases, two or more attributes share one photo. There is not a photo for each finding.
9. The symbol placement in some cases does not accurately reflect the asset location.
10. There is no description in the form to designate the asset location, and the GPS does not always provide accurate results.
11. The method for one inspector to know where another inspector started or stopped appears to be an issue. This may lead to duplication or omissions.
12. There does not appear to be a clear procedure for place marking the start and stop of inspections to avoid overlap and omissions.
13. The date of the inspection does not currently display in the report. The date not being apparent at this time may be because the date may be recorded when the reporting version of the software is complete.

3.13 Asset ADA Status Section

The main obstacle for using the map is that a description is not shown when hovering with a mouse or cursor over the icons. The entity types are identified with different icons (trees, parking, etc.) and are distinguished as compliant or noncompliant by the color of the icon. However, displaying the entity description by a cursor hover or click would be very useful when reviewing the map.

The entity values can be seen by clicking on the “i” icon and clicking the entity icon. The reviewer cannot produce any useful report or data from this screen. For example, in this example screenshot of a tree, the ADA info/photos can be seen from this screen. However, it would be very useful to export the noncompliant findings directly from this screen instead of separately accessing the Reports section.

Object_TreeTreeBed

Attributes Info/ADA Note Photo

Object Type: 07:Treebed

Protrude into Pedestrian Access Route (PAR)? N

Tree Overhang Width >=4in?

Treebed Protrude into (PAR)? N

Treebed Edging Fencing

Edging Height: 1 ft 3 in

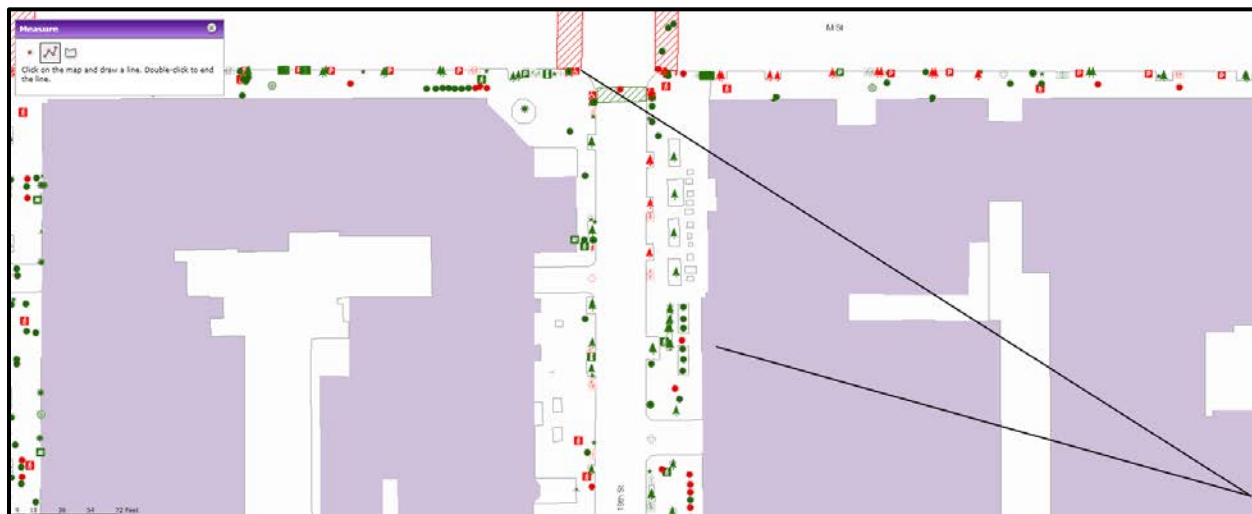
Treebed Surface Grass

Start Edit Apply Edit Cancel Edit

Clicking on the entity icon should also produce a list of all related findings for that particular entity. For example clicking on a curb ramp icon should load all non-compliant findings of that curb ramp. This avoids running a separate report from the Reports menu.

In addition, the “Start Edit, Apply Edit and Cancel Edit” buttons are disabled, so the reviewer was not able to test their functionality.

The reviewer is not able to measure distance on the map using the Measure tool. The reviewer was not able to draw a straight line on the map. The reviewer followed the instructions from the Help instructions precisely, but was unsuccessful. The following screen shot illustrates the result when the reviewer attempted to draw a line.



Options to export the maps to PDF or any other style of report format were not evident.

Buttons and features not noted in this review list function correctly.

3.14 Asset ADA Priority Section

The map in this section acts similar to the map in the Asset ADA Status section. It would be beneficial to see the entity description when hovering with a cursor over the entity, and the list of related non-compliant items in a prioritized order by clicking on the entity. Currently the user has to click on the “i” and click on the entity to view the entity details. Clicking on “Info/ADA” link displays the following screen shot:

The screenshot shows a web-based interface for viewing details of a specific asset. The window title is 'Object_Pole'. It features four tabs: 'Attributes', 'Info/ADA', 'Note', and 'Photo'. The 'Info/ADA' tab is selected. The form contains the following fields and controls:

- ADA Status:** A dropdown menu showing 'ADA Compliant'.
- ADA Priority:** An empty dropdown menu.
- ADA Actions:** An empty list box with up and down arrows.
- Asset Location:** A text area containing '20TH ST from M ST,NW to N ST,NW - East Side'.
- ADA Waived?:** A checkbox that is unchecked.
- Requested?:** A checkbox that is unchecked.
- Object ID:** A text input field containing '381'.
- Last updated by:** A text input field containing 'CESAR'.
- Last updated at:** A text input field containing '2013-04-15 12:41:54'.

At the bottom of the window, there are three buttons: 'Start Edit', 'Apply Edit', and 'Cancel Edit'. All three buttons appear to be disabled (greyed out).

Again the “Start Edit, Apply Edit and Cancel Edit” links are not active, so the reviewer is not able to test them. The Pole in this example screen shot does not have a priority assigned, but is still on the map, which confuses the user.

The Asset ADA Priority section does not let the user filter the map by a single or combination of priorities. The user can filter the map by Bus Stops or Curb Ramps, etc., but the user cannot filter the map for priority 1A or 1B, for example. The user also cannot run a combination of priorities, such as all entities with priorities 1A and 1B. The priorities are done by entities and not by non-compliant findings. Note the following screen shot:

The screenshot shows a web-based form titled "Sidewalk" with a purple header bar. The form is divided into four tabs: "Attributes", "Info/ADA" (which is the active tab), "Note", and "Photo". The "Info/ADA" tab contains the following fields and controls:

- ADA Status:** A dropdown menu with "Non-Compliant" selected.
- ADA Priority:** A dropdown menu with "1B" selected.
- ADA Actions:** A text input field containing "Adjust / Replace Sidewalk;" with a scrollable list icon on the right.
- Asset Location:** A text input field containing "M ST from 20TH ST,NW to 19TH ST,NW - North Side" with a scrollable list icon on the right.
- ADA Waived?:** A dropdown menu.
- Requested?:** A dropdown menu.
- Object ID:** A text input field containing "78".
- Last updated by:** A text input field containing "CESAR".
- Last updated at:** A text input field containing "2013-04-24 11:08:50".

At the bottom of the form, there are three buttons: "Start Edit", "Apply Edit", and "Cancel Edit".

This sidewalk is assigned priority 1B, so all non-compliant items related to this sidewalk fall under priority 1B. In most instances, separate priorities would need to be assigned to each of the non-compliant items. For example, some non-compliant items of the sidewalk may fall under 1B and others may fall under 1C, etc.

Assigning individual priorities to each item is not possible with the current system.

The reviewer did not see any options to export the maps to PDF or any other style of report format.

3.15 Network ADA Status/Network ADA Priority Sections

The legend indicates different colors for different levels of network compliance, but the reviewer cannot filter the map by individual or a combination of compliant/non-compliant/data missing etc. items.

Using the color "red" to indicate noncompliance will not allow reports to be produced or copied without a color printer or copier. Another method for indicating noncompliance should be used.

Clicking the "i" button and clicking on the map results in this coding error message.

Application Error

Page_Error
 'dwlFeatures' has a SelectedIndex which is invalid because it does not exist in the list of items. Parameter name: value

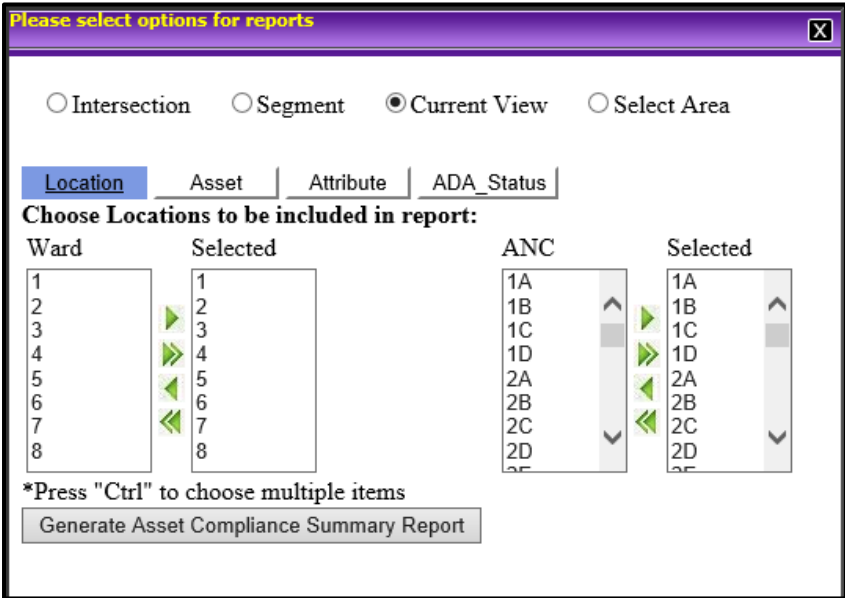
```

at System.Web.UI.WebControls.ListControl.set_SelectedIndex(Int32 value) at System.Web.UI.WebControls.DropDownList.set_SelectedIndex(Int32 value) at
IdentifyFeature.ServerAction(ToolEventArgs toolEventArgs) in C:\inetpub\wwwroot\DCGTADA2\App_Code\IdentifyFeature.vb:line 76 at
ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.handlePostBack(String clientAction, NameValueCollection parameters) at ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.GetCallbackResult
() at ESRI.ArcGIS.ADF.Web.UI.WebControls.WebControl.RaisePostBackEvent(String eventArgument) at ESRI.ArcGIS.ADF.Web.UI.WebControls.Map.RaisePostBackEvent(String
eventArgument) at System.Web.UI.Page.RaisePostBackEvent(IPostBackEventHandler sourceControl, String eventArgument) at System.Web.UI.Page.RaisePostBackEvent
(NameValueCollection postData) at System.Web.UI.Page.ProcessRequestMain(Boolean includeStagesBeforeAsyncPoint, Boolean includeStagesAfterAsyncPoint)
    
```

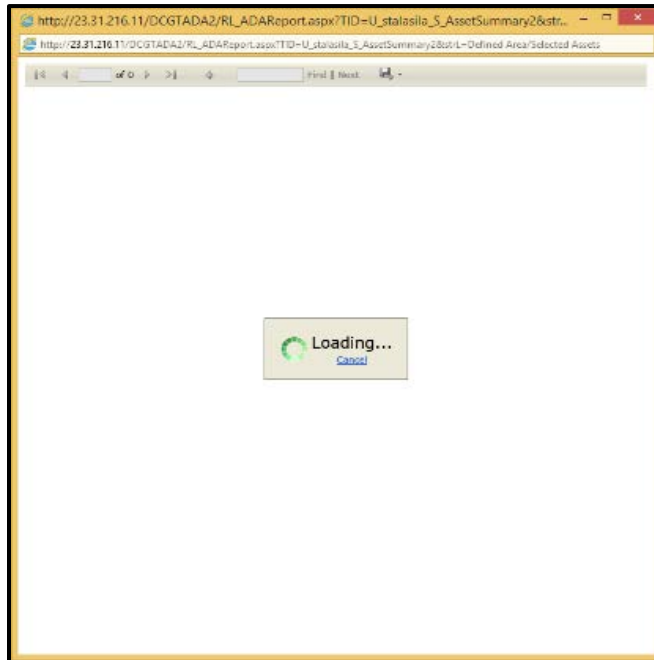
This application error may indicate that the exception handling was not done correctly while coding. This website needs a generic error message that simply displays a short line of text such as “Error occurred, sorry for the inconvenience” instead of actually showing the coding error along with many lines of code lines that describe the error. The actual error and exception would best be captured into a log file instead of displaying it to the user.

This reviewer did not see any options to export these two network section maps to a PDF or any other style of report format.

This reviewer was not able to run the reports with any combination of reporting features. No reports loaded when attempting to run either the Asset Compliance Report, the Asset Inventory Report, or the Asset Non-Compliance Report. From the following screenshot, the reviewer tried all options for Intersection, Segment, Current View, and Select Area, plus different options under Location, Asset, Attribute, and ADA_Status. None of the options produced any reports.



The reviewer waited for significant periods of time anticipating that the report would load. In one instance the reviewer waited for more than 15 minutes. The green progress circle, however, continuously spun with no report generation.

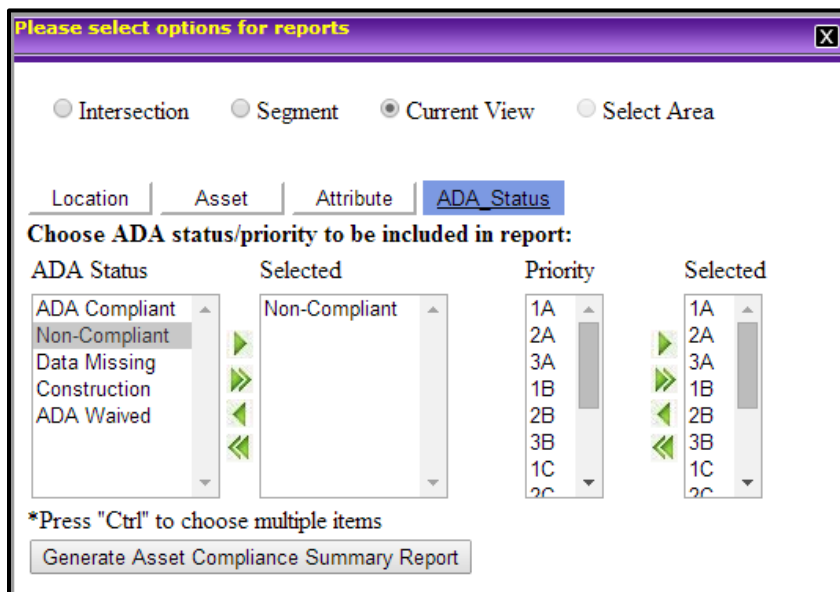


However when the reviewer tried to generate the identical reports with the Chrome internet browser, the reports loaded quickly, so it may be that this software is not fully compatible with Internet Explorer 11. The reviewer strongly suggests fixing the browser issue. Internet Explorer the most common browser for users in an office environment and version 11 is expanding rapidly with new windows updates. It is recommended that use of all browsers be explored for compatibility.

The reviewer was not able to produce a report that displays only noncompliant items. For example, the reviewer attempted to get a report of all non-compliant findings of all curb ramps in the current view but was unable to. Regardless of which Asset was selected, the report contains both compliant and noncompliant items. The following three reports sections were tested using the latest version of Chrome as this area of the software is not compatible with Internet Explorer 11.

3.16 Asset Compliance/Noncompliance Report

The following were selected for generating a report:



The resulting report generated these findings:

Type of Asset	Total Num. of Asset	Num. of Compliant Asset	Num. of non-Compliant Asset	Num. of Asset with Missing Data	Num. of Asset under Construction	Num. of Asset with ADA Waived
CROSSWALK	1	0	1	0	0	0
CURBRAMP	3	0	3	0	0	0
INLET	1	0	1	0	0	0
MANHOLE	4	0	4	0	0	0
GRATE	3	0	3	0	0	0
OBJECT_FIREHYDRANT	1	0	1	0	0	0
OBJECT_LITTERCAN	3	0	3	0	0	0
PED_SIGNAL	4	0	4	0	0	0
SIGN	1	0	1	0	0	0
TRIP_HAZARD	1	0	1	0	0	0
TOTAL	22	0	22	0	0	0

This report provides incorrect information based upon the selection. Even though the reviewer chose to run only noncompliant items, it includes all other type of items with values of 0. The report does not specify or summarize the selections to remind the user what the report contains, and clearly explain why all the other values are 0. The result is the same with all other selections, Options not selected appear in the report with 0 values.

The exported excel report generates in the older XLS format and not in the newer XSLX format. In addition, the excel document is not pre-sorted with headers which are extremely helpful to users sorting through large amounts of data.

It is unclear as to the different additional types of reports that are available.

It is unknown what codes and which code versions were used were used to determine if items are compliant, and and it is not known if reports can be reprocessed if codes change. In addition, it is not known if corrected work can be recorded.

3.17 ADA Asset Inventory Details

The following is a selection chosen to run for a sample asset report:

Please select options for reports

Intersection
 Segment
 Current View
 Select Area

Location Asset Attribute **ADA_Status**

Choose ADA status/priority to be included in report:

ADA Status	Selected	Priority	Selected
ADA Compliant		1A	1A
Non-Compliant	Non-Compliant	2A	2A
Data Missing		3A	3A
Construction		1B	1B
ADA Waived		2B	2B
		3B	3B
		1C	1C
		2C	2C

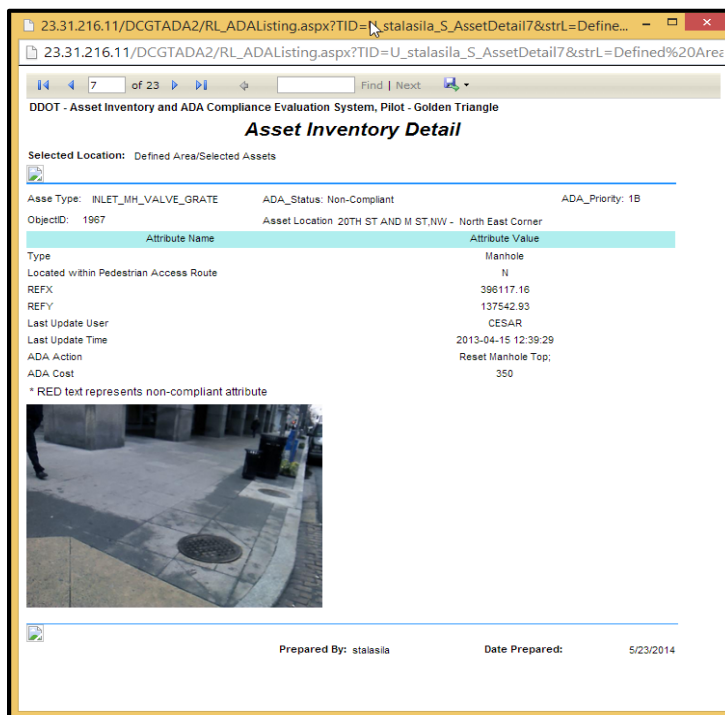
*Press "Ctrl" to choose multiple items

Choose Attributes to be included in listing:

Compliance Attributes
 Last Update User
 ADA Action
 GPS Location
 Last Update Time
 ADA Cost

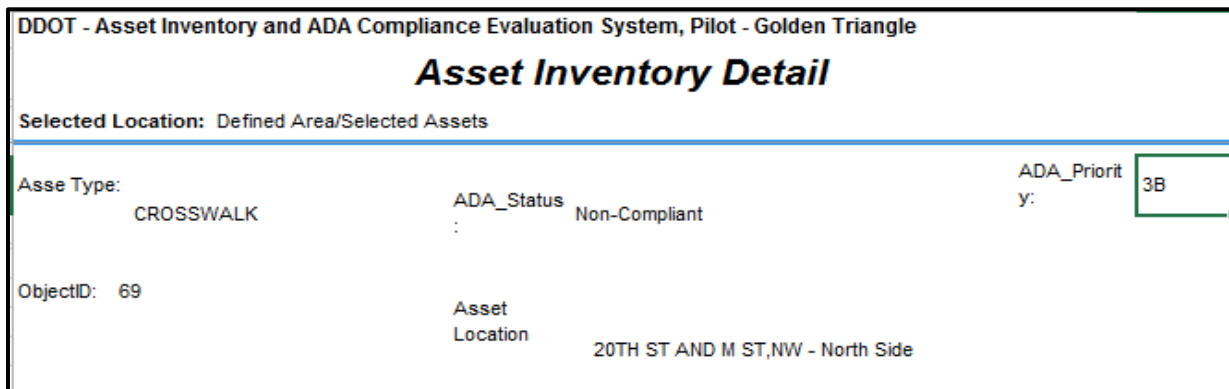
Generate Asset Inventory Detail Report

The reviewer chose only noncompliant items to be included in this report, but the output report contains many pages similar to the following example screen shot:



All the grates are included, even though no non-compliant items in red text are shown in the report. Again, the use of color coding noncompliant items in RED is not recommended.

Per the example below, the exported excel report uses a very cumbersome format, which is not user friendly.



3.18 Asset Non-Compliance Summary

The following is a selection chosen to run for a sample Asset Non-Compliance Summary report.

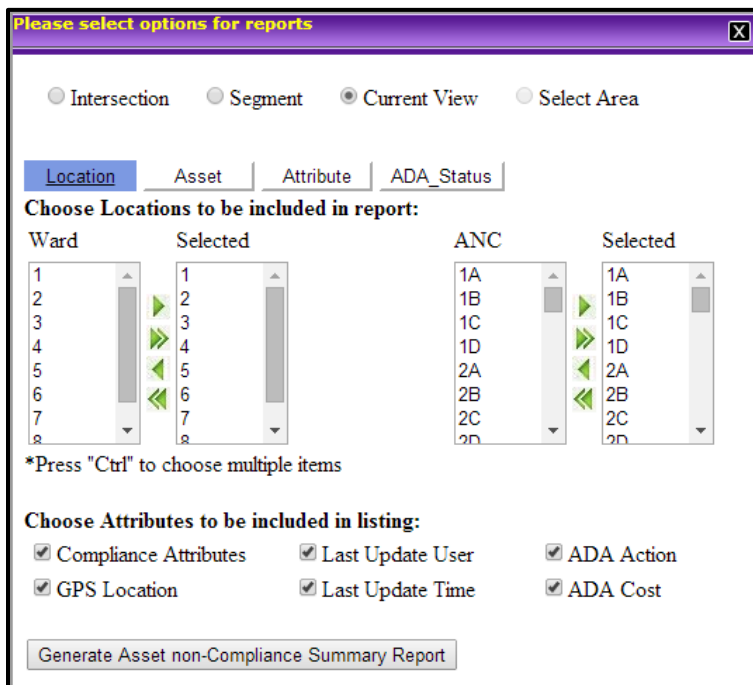
The resulting report is shown in the following screenshot.

Type of Asset	Action	Total Num. of Asset	Cost Estimate
CROSSWALK	Mill&Resurface	1	
CROSSWALK	Summary	1	\$10,626
CURBRAMP	Replace Ramp	2	
CURBRAMP	Replace turning space	2	
CURBRAMP	Repair Bottom Landing (Gutter)	1	
CURBRAMP	Replace Bottom Landing (Mill & Resurface)	2	
CURBRAMP	Install/Replace DWS	1	
CURBRAMP	Summary	3	\$14,720
INLET	Replace Inlet	1	
INLET	Summary	1	\$100
MANHOLE	Reset Manhole Top	4	
MANHOLE	Summary	4	\$1,400
GRATE	Replace Grate	1	
GRATE	Adjust/Reset Top	2	
GRATE	Summary	3	\$1,150
OBJECT_FIREHYDRANT	Repair Sidewalk (6ftx6ft)	1	
OBJECT_FIREHYDRANT	Summary	1	\$200
OBJECT_LITTERCAN	Repair Sidewalk (6ftx6ft)	3	
OBJECT_LITTERCAN	Summary	3	\$600

It is not clear as to what the function is for this report, as the report calculates a summary cost but does not break down or display any individual costs.

3.19 Report Filter

The report filter is displayed on nearly all sections of the website.



Using this method is confusing and burdensome as the user has to navigate between four different sections to check all the options needed for the desired report.

For example, if the user wants only non-compliant curb ramps to be included in the report, the user must first click on the Asset section, remove all existing Assets from the “Selected” section and re-add Curb ramp to the “Selected” section. The user must then click on the ADA_Status tab and remove all existing items from “Selected” and add Non-Compliant to the “Selected” list before running the report. The similar situation applies to all other options.

It would be much easier for the user if all these selection items and boxes are located in the same screen.

Also the selections are not carried between different reports. For example if curb ramps only are selected to run an Asset Compliance Report, an Asset Inventory Detail report with the same options should be able to be generated without needing to re-select the same options.

3.20 System Help

Although there is no PDF or Word document format of help available, the website does have a help section. The help section is the generic help section from ArcGIS Help. The reviewer recomms a “customized” help section with DDOT screenshots to assist users to better understand the system. The help section describes how to access the system along with some screenshots.

Not all sections under Help have screenshots of the described items. Having screenshots for each point makes an excellent illustration of the item description.

The help section does not describe different levels of access available for the website. It would be useful for the users to see different levels available and what modules are accessible at each access level.

3.21 System Review

This section of the report reviews the “System” section of the DDOT Asset Inventory Website. The System section has three different menu options.

1. User Management – the reviewer does not have access to this section, thus is not able to review this section.
2. System Tools - System tools has 2 different sub-sections
 - a. Update ADA Criteria
 - b. Update Unit Price
3. System Settings

3.22 System Tools

Using the Update ADA Criteria feature, the user can view and edit some of the criteria for creating reports using inspected data. The Update ADA Criteria feature offers two choices of standards to apply to the findings, PROWAG and DDOT. It is unclear if selecting on either PROWAG or DDOT changed any of the findings or criteria. The following screen shot shows the drop down menu list of the available layers in the Update ADA Criteria function.

Attribute	Criteria_ProWAG	Criteria_DDOT
Shelter - Connected to Accessible Route?	Y	Y
Grass Area, No Sidewalk at Bus Stop?	N	N
Street Slope (Max)	2 %	2 %
Front Boarding - Connected to Accessible Route?	Y	Y
Front Boarding - Firm, Stable Surface?	Y	Y
Front Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Front Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Front Boarding - Running Slope (Max)	2 %	2 %
Front Boarding - Slope parallel to curb same as roadway?	Y	Y
Back Boarding - Connected to Accessible Route?	Y	Y
Back Boarding - Firm, Stable Surface?	Y	Y
Back Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Back Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Back Boarding - Running Slope (Max)	2 %	2 %
Back Boarding - Slope parallel to curb same as roadway?	Y	Y

As an example, Bus Stops were selected in the following sample screen shot.

Attribute	Criteria_ProWAG	Criteria_DDOT
Shelter - Connected to Accessible Route?	Y	Y
Grass Area, No Sidewalk at Bus Stop?	N	N
Street Slope (Max)	2 %	2 %
Front Boarding - Connected to Accessible Route?	Y	Y
Front Boarding - Firm, Stable Surface?	Y	Y
Front Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Front Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Front Boarding - Running Slope (Max)	2 %	2 %
Front Boarding - Slope parallel to curb same as roadway?	Y	Y
Back Boarding - Connected to Accessible Route?	Y	Y
Back Boarding - Firm, Stable Surface?	Y	Y
Back Boarding - Length (Min)	8 ft 0 in	8 ft 0 in
Back Boarding - Width (Min)	5 ft 0 in	6 ft 0 in
Back Boarding - Running Slope (Max)	2 %	2 %
Back Boarding - Slope parallel to curb same as roadway?	Y	Y

Although the reviewer’s user access enabled the reviewer to change the measurements in number entry text boxes such as Street Slope and Front Boarding Length, the reviewer was not able to change the established Yes or No values in drop down boxes. The existing “Y” or “N” value is the only option in the drop down menu, preventing a user from changing an existing value when needed for updates or correction.

Per the following example, Shelter-Connected to Accessible Route has “Y” chosen for both PROWAG and DDOT. When the drop down menu is clicked as if to change the choice to “N”, no alternative values are present in the dropdown.

Attribute	Criteria_ProWAG	Criteria_DDOT
Shelter - Connected to Accessible Route?	Y	Y
Grass Area, No Sidewalk at Bus Stop?	N	N
Street Slope (Max)	2 %	2 %
Front Boarding - Connected to Accessible Route?	Y	Y
Front Boarding - Firm, Stable Surface?	Y	Y
Front Boarding - Length (Min)	8 ft 0 in	8 ft 0 in

In additional drop down menu checks, we found that this applies to all drop down menus under any layer.

We found that both the “OK” and “Cancel” buttons seem to work properly. Clicking the OK button saves the modified values, and the Cancel button reverts the changes made during the session.

Update Unit Price

The Update Unit Price feature also has the same Layer dropdown with all entities listed. Selecting an entity from the drop down loads the respective costing entries.

We chose “Bus Stop” for our example screenshot.

Action	Unit	Unit_Price
Repair Pedestrian Pad (6' x 90')	EACH	3000

OK Cancel

It is unclear how the costing is generated and applied to this entry, as there is only one Action under Bus Stop, which is Repair Pedestrian Pad. However, the Update ADA Criteria tab for the Bus Stop layer contains fifteen Attributes. There is no way for the system user to know how the Unit Price breaks out over the Attributes.

For example it is not clear whether the 3,000 Unit Price to Repair Pedestrian Pad is a combined total to update all Attributes for the Bus Stop or only a specific attribute. If it is only for a selected Attribute, there is no indication as to which one has been chosen.

We have included a second Update Unit Price screen shot for the layer of Crosswalk.

Action	Unit	Unit Price
Adjust Width	LF	8.5
Mill&Resurface	SY	23
Expand Width	LF	8.5

Similar to the list of Actions for Bus Stop, there are only 3 costs, whereas the Update ADA Criteria tab for Crosswalk has 8 Attributes. The user cannot discern how the costs are applied to the failed Attributes.

3.23 System Settings

Included below is a screenshot for System Settings.

Please carefully update the system settings, invalid changes may result in system malfunction.

DCGTADA Web Settings

Contact_Name:

Contact_Email:

Web_Address:

Debug_Email:

Other Settings

ADA Criteria:

Other than the “ADA Criteria” drop down under Other Settings, these records are mostly for information purposes.

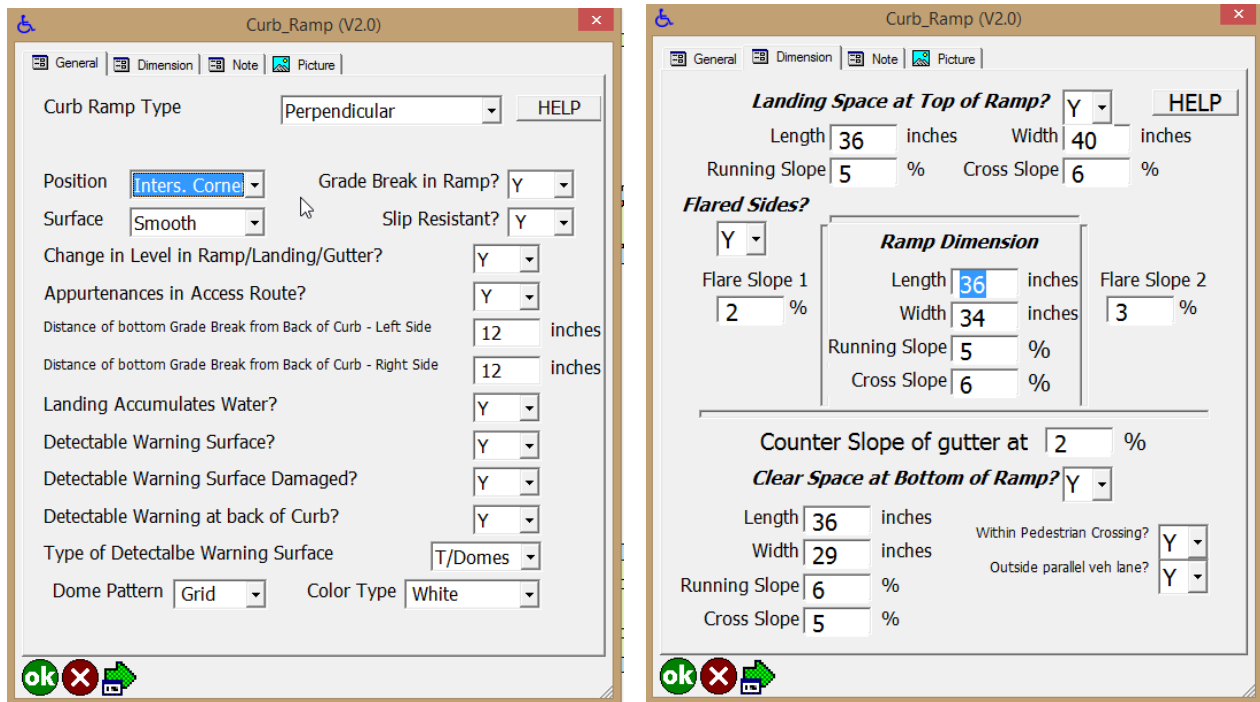
The “ADA Criteria” drop down has two options, PROWAG and DDOT with PROWAG selected as default. To avoid causing any issues with the data, the user has refrained from changing this value to DDOT for the assessment. Therefore, it has not been tested whether changing the value to DDOT would automatically trigger the data to be re-processed using DDOT standards.

3.24 Inspection Form, Processing and Reporting Review

An additional phase of review is planned to review the actual intake forms, processing and reporting. The first portion will be to examine the intake forms used for field inspection. The forms will be reviewed to determine if they are comprehensive. Following the review of the intake forms, the accuracy of the intake will be compared to the actual reporting to review the processing of the data against specific rules or standards.

An initial sample of intake forms noted some areas needing further examination. The following list is not conclusive, but is meant as an example to demonstrate the type of review being discussed:

1. An initial review of the curb ramp intake form does not provide for a way to measure the width, length or contrast of the truncated dome’s detectable (spelling error noted) warning surface (see screen shot)
2. There is no way to indicate if the sidewalk slope measurement matches the adjacent street slope.
3. The intake form does not provide for input for decibel levels of tone locator or ambient traffic noise. In addition, there is no input for the size of the push button or arrow, or if Braille is provided.
4. No bench intake form is provided for a bus stop. There is no method to record the shelter dimensions, distance from the street or if there is ample lighting. Also, there is no option to record bus stop signage.
5. Some measurements are of a “yes” or “no” response with no indicator of the degree or severity of noncompliance.



4. RECOMMENDATIONS

Although the DDOT Asset Inventory System has components that are valuable for collecting survey information in the field and providing a method to access information, there are areas that need further enhancement for consistency, accuracy and usability. It is also imperative that the DDOT Asset inventory system be evaluated to determine its ability to accurately and consistently collect data in the field and that the data collected is process using an automated method for efficiency and accuracy. As access to the raw data collected in the field was not provided and access was not provided to determine method of processing of data. Quality control methods were also not made available and therefore were not evaluated.

Other factors that the system should be evaluated for include, but are not limited to:

- Functionality
- Scalability
- Interoperability and integration with current DDOT programs
- Usability
- Security
- Reliability
- Consistency

- Reporting features (as required for a Transition Plan and need of DDOT)
- Security
- Back-up and recovery
- Run-time rate

Additional recommendations include:

1. The design of the intake forms should be reviewed in areas where problems have been noted and corrections made in the intake forms and subsequent code to provide for accurate reporting and management features.
2. Intake forms should be reviewed to verify that they include all of the data that is required to be collected, and for the ease and usability of the form.
3. An intake page should not have the ability to be closed by the inspector without the completion of all required information. The consistency that results due to the properly completed forms will provide a more thorough, consistent and reliable inspection and will allow for photographs to be viewed.
4. As discussed previously, the use of yes/no answers should be limited. Actual field measurements should be included to allow the client to make more informed decisions regarding the severity and priority of the barrier removal. For example, a yes/no question that says “Clear space at the bottom of the ramp” does not record the actual measurement and requires the field inspector to understand the standards addressed in the question. The majority of the curb ramps from the foot-on-ground inspections were recorded as “No” when it appears that there is clear space at the bottom of many ramps. A similar condition exists for the top landing.
5. The updated field inspection manual should be reviewed for content and clarity and relationship to the intake forms.
6. The capability and methodology should be developed to allow the field inspector to edit their own work in order to make corrections in the office or in the field.
7. A process or procedure should be developed to track unedited, edited and reports that are ready to be “published” for use by the client. The process for this function is unclear and/or it is vague if field inspectors are using an edit feature.
8. Differences in reporting teams should be noted and clarified if the differences were a function of the inspection tool, instructions in the Accessibility Asset Inventory Manual or due to the software. A part of a QC audit is to review the

consistency and reliability of data collected between different inspectors. The data collected should be consistent, reliable and accurate between surveyors.

9. An additional audit sample is recommended when the reporting format is completed. A comparison audit to review the data collected in the field will show the accuracy and comprehensiveness of how the software reports the data.
10. Unedited and edited data collected in the field should be reviewed and compared.
11. The discrepancies between the findings and the reporting should be examined and the causative factor or factors determined and remediated.
12. Additional desk and field QC audits should be conducted following the completion of the reporting and management features of the software.



Development of a Comprehensive ADA/Section 504 Transition Plan Project

TASK H – REVIEW OF THE RELEVANT OPERATIONAL
FUNCTIONS OF THE ADMINISTRATIONS WITHIN DDOT AS
THEY PERTAIN TO THE DISABLED AND REMOVAL OF
BARRIERS

Prepared For:



Prepared by:

**PARSONS
BRINCKERHOFF**

In Association With:

The Temple Group
Disability Access Consultants (DAC)
Sharp & Company
Precision Systems, Inc.

DC Contract No.: DCKA-2013-T-0115 Task Order No. 4
REV: 1.0
DATE: January 9, 2015

This page left intentionally blank

EXECUTIVE SUMMARY

PURPOSE OF THE PROJECT

The purpose of the project is to develop a comprehensive ADA/Section 504 Transition Plan to help the District Department of Transportation (DDOT) remove pedestrian accessibility barriers along the public rights-of-way throughout the District.

The purpose of Task H (*Review the relevant operational functions of the Administrations within DDOT as they pertain to the persons with disabilities and removal of barriers*) is to assess the operational function of the department to determine how the functions operate in relation to setting policy and planning, designing, constructing, and maintaining infrastructure related to accessibility. To provide the data for this task, DDOT staff were interviewed and asked questions relating to their current roles at DDOT, their involvement in the delivery and maintenance of infrastructure related to accessibility, and their goals for including accessibility needs in their future work efforts.

METHODOLOGY

To determine the operational functions of the DDOT Administrations, the Parsons Brinckerhoff team interviewed several key individuals and teams within the agency. The interview process would provide an opportunity for DDOT staff to share real-world experiences, challenges and accomplishments when implementing accessibility infrastructure in the city. The interview process would also reveal the collaboration across DDOT Administrations in implementing accessibility functions. Staff could reflect openly and honestly about any shortcomings and challenges that they may have and relate any exemplary practices of the District in relation to accessibility initiatives. The Parsons Brinckerhoff team could not develop a comprehensive and effective transition plan without the input and consideration of DDOT staff.

The Parsons Brinckerhoff team conducted interviews with DDOT staff from June 2014 to September 2014. The interviews were an open, interactive process within a secure environment. Interviews occurred with individuals on a one-on-one basis and with groups of individuals from the same Administration.

FINDINGS

The results of the interviews led to the following findings regarding DDOT's current implementation of ADA/Section 504 regulations:

- ▶ DDOT staff desire to fully comply with ADA regulations.
- ▶ There are no written procedures for DDOT staff to use in complying with ADA/Section 504, although they are somewhat knowledgeable about the regulations.

- ▶ DDOT staff complies with ADA based on individual interpretations of available guidance.
- ▶ There is no consistent level of familiarity with ADA/Section 504 regulations across the various DDOT Administrations.
- ▶ DDOT staff seeks assistance from the ADA Office for challenging issues that are not clearly resolvable – some for guidance and others for full-level technical, design and inspector support.
- ▶ There is interactivity between the various DDOT Administrations in their efforts to satisfy their ADA compliance responsibilities.
- ▶ There are no consistent procedures for monitoring compliance of ADA/Section 504. For example, System Inspection and Oversight Division (SIOD) inspectors are more effective than other staff in monitoring ADA/Section 504 compliance; however, they still need additional training and guidance.
- ▶ There is a need for an executive-level “champion” to advocate for ADA compliance throughout DDOT. Although the ADA Office is doing a fine job, there needs to be an executive-level member at DDOT to emphasize the importance of this function.
- ▶ There is a need for additional funding for ADA requirements beyond the capital program and asset management activities.
- ▶ There is a need to communicate to all staff regarding legal actions, complaints or lawsuits against DDOT which can, and should, impact the daily activities of DDOT staff.

DDOT is making progress in its compliance with ADA/Section 504 regulations. However, there is still more that DDOT can do to consistently implement accessibility guidelines throughout all of its functions. The following recommendations are for DDOT consideration.

RECOMMENDATIONS

Policies

- ▶ Written policies and procedures should be developed and distributed to all staff. The policies and procedures should be clearly defined and aligned with staff’s specific roles and responsibilities. The policies and procedures should include guidelines for compliance and methods for responding to customer concerns.
- ▶ Each DDOT Administration should have its own policies and procedures for implementing accessibility guidelines in its daily activities.

- ▶ The Office of Civil Rights and the ADA Office should take the lead in overseeing policy development and ensuring that each DDOT Administration has its own policy and procedures.
- ▶ The Training Office should be responsible for training staff on the policies and procedures.
- ▶ Policies should be made available in DDOT's *Design and Engineering Manual and Standards and Specifications* so that the Architecture/Engineer/Construction (A/E/C) community is fully aware of the policies.
- ▶ Federal and local funding should be made available for non-capital-related projects so that staff can have access to additional funding, if necessary, to ensure ADA compliance in their activities.
- ▶ The Director should designate a senior-level DDOT executive in the Office of the Director to be the "champion" for ensuring ADA compliance throughout the agency. This person would work directly with the Director and have oversight over the activities of the Office of Civil Rights and the ADA Office. This does not remove the current reporting responsibilities for the Office of Civil Rights or the ADA Office, but provides a level of support that is needed to emphasize the importance of compliance throughout DDOT.
- ▶ A quarterly legal brief should be developed and shared with staffs that discuss current legal actions regarding ADA non-compliance. Included with this legal brief would be a strategy for mitigation or specific action items as determined by ADA staff (Office of Civil Rights, ADA Office and General Counsel's Office).
- ▶ DDOT should convene an internal Technical Advisory Group with representatives from each DDOT Administration to garner input and feedback on agency policies and procedures.

Staffing

- ▶ The ADA Office should have a team – not just two individuals but a full team – that can perform audits of all DDOT Administrations. In the interim period, prior to hiring additional DDOT staff skilled in ADA compliance and its application for transportation infrastructure projects, DDOT can procure a program management contract with a reputable A/E firm to provide staff support for the ADA Office.
- ▶ DDOT should hire an attorney with expertise in handling ADA compliance issues that can work directly with the ADA Office and the Office of Civil Rights in drafting policies and action items for the agency.

Training

- ▶ Training should be provided to all DDOT staff, regardless of their roles or daily activities.
- ▶ Training should be offered on an annual basis, with refresher courses available regularly throughout the year.
- ▶ Training courses should include real-world examples and field trips so that staff can view applications that directly relate to their specific monitoring and inspection responsibilities.
- ▶ Training materials should be developed for staff use. Pocket manuals, checklists, guidelines for various applications and standard drawings should be made available for staff use after they receive training.
- ▶ Training should be focused on the following areas:
 - ADA Regulations, Policies and Procedures
 - Implementation of ADA Policies in Planning Activities
 - Implementation of ADA Policies in Design and Construction
 - ADA Compliance in Difficult Situations
 - Interagency Coordination for ADA Compliance
 - Inspecting for ADA Compliance in Work Zones and on Construction Sites
 - ADA Compliance for the A/E Design Community
 - ADA Compliance for Construction Contractors

Monitoring

- ▶ As part of the development of policies and action items, DDOT should develop monitoring guidelines for design, construction, inspection and operations activities. These guidelines need to be clearly aligned with DDOT staff responsibilities regarding monitoring and inspection for ADA compliance.
- ▶ The guidelines should not only include what items need to be monitored and inspected, but also should identify the regulations and define the criteria that staff must use in performing their monitoring and inspection responsibilities.
- ▶ The guidelines should encompass internal activities, such as accommodating employees with disabilities, DDOT website accessibility, and online permitting accessibility.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. BACKGROUND	7
1.1 The Americans with Disabilities Act/Section 504 Regulations.....	7
1.2 Project Purpose.....	7
1.3 Task Purpose	8
2. SUMMARY OF DDOT ORGANIZATION.....	8
2.1 Office of the Director (OD).....	9
2.2 Infrastructure Project Management Administration (IPMA)	11
2.3 Policy, Planning and Sustainability Administration (PPSA).....	13
2.4 Progressive Transportation Services Administration (PTSA)	14
2.5 Urban Forestry Administration (UFA).....	14
2.6 Transportation Operations Administration (TOA)	15
2.7 Public Space Regulations Administration (PSRA)	16
3. SUMMARY OF INTERVIEW PROCESS.....	17
3.1 Interview Process	17
3.2 Summary of Interviews	19
4. SUMMARY OF FINDINGS.....	44
5. RECOMMENDATIONS	48
5.1 Policies.....	48
5.2 Staffing	49
5.3 Training	49
5.4 Monitoring	50

This page left intentionally blank

1. BACKGROUND

1.1 The Americans with Disabilities Act/Section 504 Regulations

The Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. §§ 12101 et seq) and its implementing regulations prohibit discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications. To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment. (Note that the ADA does not specifically name all of the impairments that are covered).

Section 504 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 either receives federal financial assistance or is conducted by any Executive agency or the United States Postal Service. Each federal agency has its own set of section 504 regulations that apply to its own programs.

1.2 Project Purpose

The purpose of the project is to define the services and responsibilities required for the development of a comprehensive ADA/Section 504 Transition Plan to help the DDOT remove barriers to pedestrian accessibility in the public rights-of-way throughout the District.

The project consists of the development of a comprehensive ADA /Section 504 Transition Plan. The Parsons Brinckerhoff team will work closely with the DDOT ADA Coordinator to identify and obtain for review the required deficiencies, found under a separate contract, and the associated DDOT Manuals and Policies. This review is essential to determine the deficiencies and recommended solutions to include in the Transition Plan.

The Transition Plan should be sufficient to provide adequate protection against potential legal actions by identifying reasonable, objective compliance criteria. The Transition Plan will show DDOT's commitment to continuous progress toward the identified goals and objectives for removing barriers to pedestrian accessibility. The Transition Plan will establish a prioritization process for correcting all ADA/Section 504 non-compliant assets. The Transition Plan will be a "living" and transparent plan. It will accommodate a dynamic input process whereby, as issues are identified, they will be incorporated into the prioritization schedule in accordance with the assessment factors.

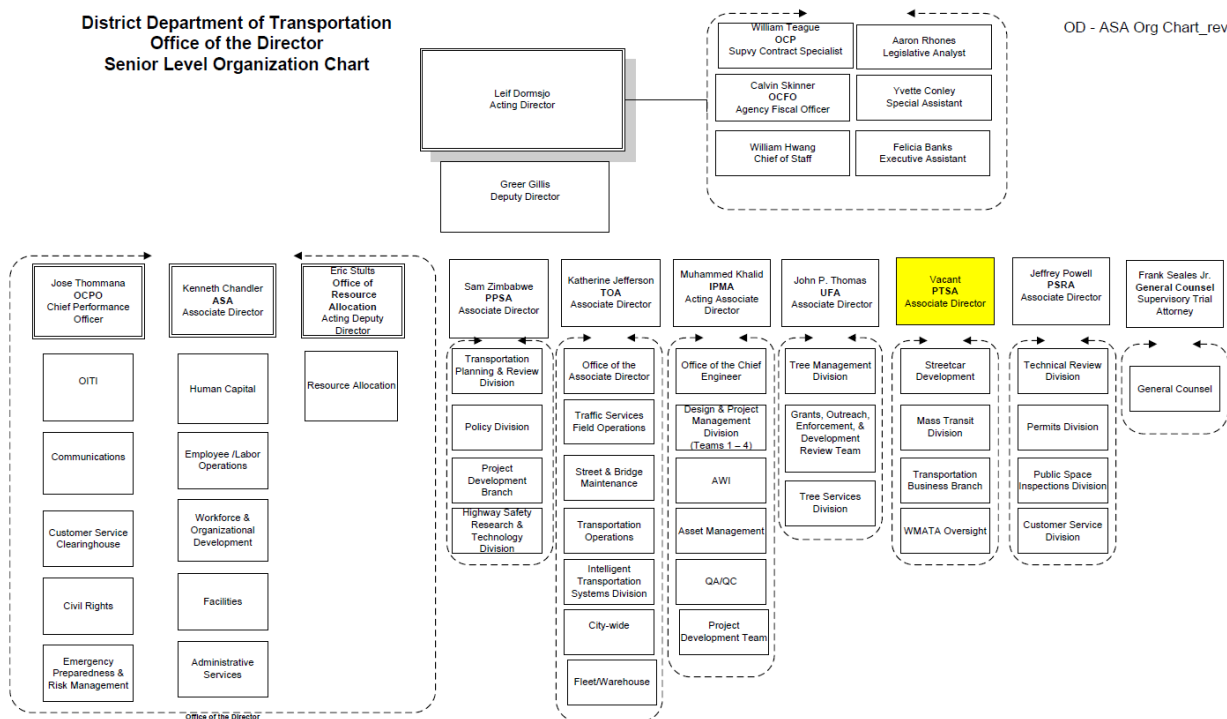
1.3 Task Purpose

The purpose of Task H (*Review the relevant operational functions of the Administrations within DDOT as they pertain to the persons with disabilities and removal of barriers*) is to assess the operational function of DDOT in relation to setting policy and planning, designing, constructing, and maintaining infrastructure related to accessibility. To provide the data for this task, DDOT staff were interviewed and asked questions relating to their current roles at DDOT, their involvement in the delivery and maintenance of infrastructure related to accessibility, and their goals for including accessibility needs in their future work efforts.

2. SUMMARY OF DDOT ORGANIZATION

DDOT manages and maintains the transportation infrastructure for the District. As part of its mission, DDOT works to develop and maintain a cohesive, sustainable transportation system for all of its users, including those with accessibility needs. Figure 1 shows the DDOT organization chart. The following sections describe each DDOT Administration, particularly those with responsibilities for developing and maintaining accessibility infrastructure.

Figure 1 | DDOT Organization Chart (Source: www.ddot.dc.gov)



6.1 Office of the Director (OD)

The Office of the Director is responsible for the oversight and management of the entire agency. The Office of the Director comprises the following functional areas:

- ▶ General Counsel
- ▶ Office of the Associate Chief Financial Officer (OCFO)
- ▶ Office of Information Technology and Innovation (OITI)
- ▶ Emergency Preparedness/Risk Management
- ▶ Customer Service Clearinghouse
- ▶ Communications Office
- ▶ Administrative Services Branch
- ▶ Resource Allocation
- ▶ Office of Contracting and Procurement
- ▶ Civil Rights

The functional areas have the following responsibilities relating to accessibility in the District:

General Counsel

The Office of the General Counsel provides legal services for DDOT. Their role is to protect DDOT from liability by dispensing legal advice and guidance to agency officials and employees. With respect to accessibility issues, the Office of the General Counsel takes the lead in defending DDOT against claims from persons with disabilities or advocacy organizations, but also works with senior DDOT management to be in compliance with ADA and disability guidelines resulting from legislation and recent legal decisions.

Office of the Associate Chief Financial Officer

The Office of the Associate Chief Financial Officer provides comprehensive and efficient financial management services to, and on behalf of, DDOT so that the financial integrity of the agency is maintained.

Office of Information Technology and Innovation (OITI)

OITI plans, develops, manages and provides information technology-related services for DDOT and ensures that those services are aligned with the strategies, plans and operations of the agency. OITI ensures that all information technology-related services follow accessibility guidelines, including external DDOT project-related websites and internal processes and equipment.

Emergency Preparedness/Risk Management

The Emergency Preparedness/Risk Management Office coordinates and implements DDOT's emergency transportation preparedness functions. This office reviews transportation security initiatives, develops emergency action plans, performs public outreach, and ensures DDOT is prepared for all levels of emergencies. This office also takes the lead in representing DDOT during District-declared emergencies when Emergency Support Function #1 – Transportation (ESF#1) is activated. Staff members serve on all regional and District emergency transportation planning boards. This office also ensures that DDOT employees with accessibility issues have the appropriate equipment that they need.

Customer Service Clearinghouse

The Customer Service Clearinghouse Office implements the Mayor's Customer Service standards so that constituents can access and receive DDOT services in a satisfactory, professional, responsible, and timely manner.

Office of Communications

The Office of Communications maintains and supports the mission and goals of DDOT through a comprehensive communications strategy utilizing media, social networking, public outreach, public notifications, etc. The office also acts as the central communications hub which strives to promote and improve the image of DDOT and the District to residents, elected officials, businesses and the general public. The Office of Communications ensures that all of its products meet accessibility guidelines, including internal and external DDOT websites.

Administrative Services Branch

- ▶ *Human Capital Division* provides human resources to the agency. This includes filling vacancies, maintaining data in People Soft and a myriad of HR and administrative initiatives. The division also administers the Performance Management Program (ePerformance) that ensures that all employees have a performance plan and are evaluated in accordance to DCHR policy and procedure.
- ▶ *Workforce Development* provides training services for DDOT employees. This includes providing employees with training and educational experiences that build technical competencies and certifications.
- ▶ *Labor Relations* provides DDOT with a central resource for fostering positive labor-management relationships by establishing Labor Management Partnerships in DDOT.
- ▶ *Facilities Division* manages and maintains DDOT-owned assets. The unit also provides operational support to all DDOT Administrations in the areas of document reproduction, interior space planning and design, land acquisition and development, and construction management. The facilities team accommodates the accessibility needs of DDOT employees and visitors, as needed.

Resource Allocation

The Resource Allocation Division prepares, monitors, analyzes and executes the Department's annual budget and federal aid highway program, including operating, capital, and intra-District funds, in a manner that facilitates fiscal integrity and maximizes services to taxpayers.

Office of Contracting and Procurement

The Office of Contracting and Procurement is to provide contract support to the Agency in its ongoing effort to provide for the efficient movement of people and goods throughout the City.

Civil Rights

The Office of Civil Rights assists the Director in developing and administering operational procedures to ensure that all individuals have the right to compete for work opportunities and be protected from discrimination without bias due to race, color, religion, gender, sexual orientation, national origin, age or disability. Although the ADA Office is no longer a part of the Office of Civil Rights, it is this office that is ultimately responsible for implementing ADA/Section 504 Guidelines for DDOT.

6.2 Infrastructure Project Management Administration (IPMA)

IPMA is responsible for the design, engineering and construction of roadways, bridges, traffic signals and alley projects in the District. IPMA also manages special construction projects and all roadway assets. IPMA is comprised of the following divisions:

- ▶ Design & Project Management Division
- ▶ Anacostia Waterfront Initiative/Special Projects Division
- ▶ Asset Management Analysis Division
- ▶ Quality Assurance/Quality Control Branch
- ▶ IPMA Project Development & Environment Division

Most of the divisions within IPMA are responsible for accessibility infrastructure. The ADA Coordinator and his team are under the Asset Management Analysis Division. The following is a description of each division under IPMA.

Design & Project Management Division

The Design & Project Management Division, led by the Deputy Chief Engineer for Design & Construction, is divided into ward-based teams that design and construct transportation infrastructure projects. Each team is responsible for two of the District Wards: Team 1 (Wards 1 & 2), Team 2 (Wards 3 & 4), Team 3 (Wards 5 & 6), and Team 4 (Wards 7 & 8). They manage the condition of the streets, sidewalks and alleys –DDOT's most visible work. Each team is responsible for designing, constructing and implementing accessibility infrastructure in their wards.

Anacostia Waterfront Initiative (AWI) /Special Projects Division

The Anacostia Waterfront Initiative (AWI)/Special Projects Division leads the effort to transform the Anacostia Riverfront by planning, designing, and constructing transportation infrastructure in the area. This division manages AWI and special projects such as infrastructure in the soccer stadium area and storm water management facilities. The AWI team must consider ADA and accessibility needs in their daily activities.

- ▶ *Storm Water Management Branch* is responsible for "greening" the District's transportation infrastructure to support new initiatives, environmental objectives, and regulations by ensuring that all DDOT projects minimize storm water runoff, while following ADA guidelines.

Asset Management Analysis Division

The Asset Management Analysis Division protects the quality of the District's streets, bridges, tunnels, alleys and sidewalks. The division maintains an inventory and condition assessment of all such assets. Moreover, the division tests and evaluates materials used for all DDOT construction projects.

- ▶ *Bridge and Tunnel Management Branch* collects, manages, and analyzes bridge, sign structures and tunnel data. Monitors bridge, tunnel, sign structures inspection projects. Manages preventive maintenance and the emergency contracts schedule.
- ▶ *Roadway Asset Management Branch* collects, manages and analyzes pavement, alley and sidewalk data. The unit monitors highway safety guardrail and impact attenuators contracts and is responsible for maintenance of ADA and accessibility infrastructure.
- ▶ *ADA Coordinator* oversees the Transition Plan for public rights-of-way and disability issues. This staff person is responsible for ensuring that all programs, services and activities of DDOT are accessible to, and usable by, individuals with disabilities and provides the public a contact person for any concerns or comments they may have concerning accessibility issues with DDOT within public rights-of-way.

Quality Assurance/Quality Control Branch

The mission of Quality Assurance and Quality Control is to evaluate construction materials; perform engineering investigation of materials related problems; geotechnical engineering; specification standardization; calibration of testing apparatus and procedures; utilization of new materials for construction projects and response to citizen complaints concerning vibration and drainage.

- ▶ *Field Operations Research Section* monitors construction projects, collect and verify samples to ensure all construction materials used meet DDOT standard and specification requirements.

- ▶ *Materials Laboratory* performs extensive laboratory tests on collected samples to ensure all construction materials used meet DDOT standard and specification requirements.
- ▶ *Materials Producers Control Section* inspects and approves material suppliers and sources, storage, plants, equipment and plant quality control programs to ensure that they meet DDOT standard and specification requirements.

IPMA Project Development & Environment Division

The Project Development & Environment Division provides guidance and assistance to DDOT staff with responsibilities for project delivery including project planning; preliminary engineering and design; construction; work zone reviews; utility coordination and utility risk assessment; constructability; and environmental reviews. This division also develops and maintains project development processes, preliminary engineering and design guidelines, and ensures the implementation of DDOT environmental policies and interstate access and approval procedures. This division ensures that planners and engineers include accessibility elements in their projects; that maintenance of traffic plans for all construction projects are being designed in compliance with DDOT standards; and that ADA and accessibility guidelines are being applied in work zone areas.

6.3 Policy, Planning and Sustainability Administration (PPSA)

The Policy, Planning and Sustainability Administration (PPSA) establishes broad strategic goals to guide multi-modal program development, establishes the policies necessary to implement these goals, and ensures compliance with these goals and policies through plan review and permitting. The following divisions within the PPSA are responsible for accessibility compliance during planning and sustainability activities.

Planning Division

- ▶ *State and Regional Planning Branch* coordinates with regional partners and manages the State Transportation Improvement Program (STIP) and Transportation Improvement Program (TIP) processes. The unit also manages freight and motor carrier programs and plans.
- ▶ *Strategic Transportation Planning Branch* develops transportation plans at all levels, from individual neighborhoods to citywide, and contributes to the development of policies and practices from a broad perspective.
- ▶ *Project Development Review Branch* reviews development and zoning plans for environmental and transportation policy compliance and impacts to the local and citywide transportation network.
- ▶ *Active Transportation Branch* works to implement bike and pedestrian programs and plans. The unit also manages Transportation Demand Management, Capital Bikeshare, and carsharing activities for DDOT.

Policy and Research Division

The Policy and Research Division works on policy development and implementation activities including public space management, parking, transportation system management, and rights-of-way management. The division also works to develop and disseminate rulemaking and administrative procedures.

6.4 Progressive Transportation Services Administration (PTSA)

The Progressive Transportation Services Administration (PTSA) of DDOT engages residents on current and future planned mass transit projects, studies, and service changes that affect District residents. PTSA provides the public with efficient, affordable and diverse means of travel within the District by providing funding, policy recommendations, and coordination services to the Washington Metropolitan Area Transit Authority (WMATA) and other stakeholders to ensure that transit services and amenities are appropriately considered within all private and public capital projects within the District. The following divisions have responsibilities in relation to accessibility needs for the District.

Streetcar Development Division

The Streetcar Division is responsible for developing and operating the District of Columbia's streetcar system. The streetcar system will afford the public the ability to travel within, and among, District neighborhoods in a fast, efficient and environmentally-friendly manner.

Transportation Business Division

The Transportation Business Division is responsible for operating and expanding DDOT's transportation services including bike sharing, car sharing, the bike station, vehicle electrification and other entrepreneurial operations developed by DDOT.

Mass Transit Division

Mass Transit Division is responsible for providing the public with efficient, affordable and diverse means of travel by providing transit services to the Washington Metropolitan Area Transit Authority (WMATA). This includes administering a transit subsidy to District of Columbia students.

6.5 Urban Forestry Administration (UFA)

The mission of the Urban Forestry Administration is to manage and increase the District's street trees to maintain healthy trees that provide improved air quality; increased ground water retention that minimizes runoff and flooding; temperature moderation; aesthetics; and other benefits to our community. The following divisions have responsibilities in relation to accessibility needs for the District.

Program Operations Division

This division provides educational information to District residents about the benefits of growing trees and encourages planting of appropriate tree species in our urban environment.

Field Operations Division

This division provides appropriate and expeditious services such as pruning, small tree removals, and clean-up of tree debris and stumps in order to provide safe sidewalk and street clearances for District residents and visitors.

6.6 Transportation Operations Administration (TOA)

TOA seeks to effectively maintain the integrity of public assets such as roadways, sidewalks, traffic calming devices, streetlights, parking meters, and ensures a safe and user-friendly transportation environment. The following divisions have responsibilities in relation to accessibility needs for the District.

Transportation Operations Division

This division manages daily traffic operations for the District:

- ▶ *Intelligent Transportation Systems (ITS) Systems Integration & Development Branch* reviews, assesses, integrates, and implements the latest and available technologies to enhance the District's transportation infrastructure.
- ▶ *ITS Systems Support Branch* designs, installs and maintains ITS infrastructure including traffic signals, CCTV, variable message signs, weather stations and highway advisory radios.

Citywide Program Support Division

The Citywide Program Support Division manages the operation and condition of the single and multi-space parking meters and the District's street, alley, bridge, tunnel and navigation lighting systems.

- ▶ *Parking Operations Branch* manages the operation and condition of all parking meters in the District, including ADA-accessible parking meters.
- ▶ *Streetlights Operations Branch* manages the operation and condition of the District's street, alley, bridge, tunnel and navigation lighting systems through a streetlight asset management contract.

Transportation System Maintenance Division

The Transportation System Maintenance Division maintains a functioning, safe and efficient transportation network in the District through field operations, inspection and oversight activities.

- ▶ *Traffic Services Field Maintenance Branch* installs and maintains traffic control devices such as signs, pavement markings, traffic signals and streetlights.

- ▶ *Street & Bridge Maintenance Field Operations Branch* performs immediate and preventive road, sidewalk, bridge and alley maintenance work to ensure safe passage while preserving the system. This unit also oversees the District's snow program and DDOT fleet of vehicles.
- ▶ *Snow Operations Branch* partners with agencies and residents in an effort to clear District streets and sidewalks efficiently and effectively to maintain safe passage throughout the transportation network.

Safety Standards Division

The Safety Standards Division collects, manages and analyzes transportation data such as vehicle crashes and traffic counts, as well as designs and reviews construction plans for safety improvements.

- ▶ *Transportation Safety Engineering Branch* collects, manages and analyzes transportation data such as vehicle crashes, pedestrian crashes and traffic counts and disseminates it to relevant parties within DDOT. This unit also reviews transportation project plans for safety controls.

6.7 Public Space Regulations Administration (PSRA)

The Public Space Regulations Administration enforces public space laws and regulations and inspects all work in public spaces completed under a public space permit to ensure the work is completed to DDOT standards. The following divisions have responsibilities in relation to accessibility needs for the District.

Systems Inspection and Oversight Division

The Systems Inspection and Oversight Division will enforce public space laws and regulations and will inspect all work in public spaces done under a public space permit. It will monitor all restoration of the right-of-way to ensure the work is done to DDOT standards and all conditions of the public space permit.

Public Space Permits Division

The Public Space Permit Division is responsible for processing all applications for public space permits, including temporary permits for mobile storage containers and moving trucks, occupancy permits for work zones, and permanent changes to public space such as new sidewalks and street trees.

Plan Review Division

The Plan Review Division provides technical reviews and comments for public space permit applications and assists the Systems Inspection and Oversight Division with in-field inspections, as needed. It assists applicants through meetings and reviews of specific plans, including through Preliminary Design Review Meetings and other processes intended to assist applicants with conforming to District public space laws and engineering standards.

Customer Service Division

The Customer Service Division is the main point of contact for all applicants and public inquiries regarding public space permits and inspections. It will assist applicants with the submission, tracking, and processing of public space permits; and it will assist with inspections and the tracking and refund of deposits. It supports the Transportation Online Permitting System (TOPS). It develops Standard Operating Procedures and employee manuals for all divisions and produces materials to educate applicants, stakeholders, and the public regarding the occupancy of public space, the public space permit process, and the management of work in public space.

3. SUMMARY OF INTERVIEW PROCESS

To determine the operational functions of the DDOT Administrations, the Parsons Brinckerhoff team set out to interview several key individuals and teams within the agency. The purpose was to obtain staff perspectives on DDOT's operational functions and accessibility requirements, and then document those functions in relation to the ADA compliance needs. The interview process provided an opportunity for DDOT staff to share real-world experiences, challenges and accomplishments when implementing accessibility infrastructure in the District. The interview process also revealed the collaboration across DDOT Administrations in implementing accessibility functions. Staff reflected openly and honestly about any shortcomings and challenges that they may have. Staff related exemplary practices of the District in relation to accessibility initiatives. The Parsons Brinckerhoff team could not have developed a comprehensive and effective transition plan without the input and consideration of DDOT staff.

3.1 Interview Process

The Parsons Brinckerhoff team conducted staff interviews from June 2014 to September 2014. The interviews held within an open, interactive process and in a secure environment. The request was made to meet with individuals on a one-on-one basis but the team could accommodate meetings with groups if it was the most feasible option. Interviews occurred in both formats.

The individuals chosen for the interviews were selected because of their roles and their responsibilities for implementing an ADA compliance structure into their Administrations. Also, they could provide information into the DDOT history of ADA compliance and each Administration's proposed goals to implement ADA processes within their organization. The list of DDOT key staff selected for the interviews and the interview schedule is shown in Appendix C.

DDOT's ADA Coordinator, Cesar Barreto, and ADA Project Manager, Brett Rouillier, contacted each DDOT Administration, directly, to request their attendance at the interview. To minimize the burden upon the staff of the ADA Coordinator, the Parsons Brinckerhoff team scheduled all of the interviews by contacting the individuals directly. The Parsons Brinckerhoff team requested support from the ADA Coordinator and ADA

Project Manager in helping to coordinate schedules in case some individuals were non-responsive. Interviews were no more than 60 minutes in length.

The Parsons Brinckerhoff team requested support from the DDOT Chief Engineer to encourage the DDOT staff to make themselves available for the interviews. The DDOT ADA Team also requested that the DDOT Director send a memo to the DDOT staff informing them of the interview process and asking for their direct participation in the interviews. A copy of each letter is shown in Appendix D.

A standard questionnaire that featured 18 broad questions regarding ADA/Section 504 was created to serve as a guide for both the participants and the interviewers. The participants were provided with the questions, in advance, and the interviewers used these questions as the basis for their discussion. Staff also had the option of bringing copies of any items relative to ADA compliance that they wanted to share with the interviewers. The questions were vetted by DDOT's ADA Coordinator, Cesar Barreto, and ADA Project Manager, Brett Rouillier. A copy of the interview questions is shown in Appendix E.

4. SUMMARY OF INTERVIEWS

The following is a summary of the interviews of DDOT's key staff. Full summaries for each interview are provided in Attachment 4.

4.1 Office of the Director (OD)

The following divisions within the Office of the Director were engaged for interviews. A summary of highlights and areas of improvement are described below.

Programs, Services and Activities Responsibilities

- ▶ The *Office of Information Technology and Innovation* (OITI) ensures that employees with disabilities are appropriately accommodated with IT equipment to support their essential job functions. Their accomplishments include a revamped permit website/interface and an overhauled DDOT main website to be Section 504 compliant. The website is easier to read and requires fewer clicks for navigation. This effort was completed as a citywide initiative by the Office of the Chief Technology Officer (OCTO).
- ▶ The *Office of Risk Management* (ORM) must develop individual safety plans for persons with disabilities including identifying places of refuge in case of an emergency (stairwell, conference rooms). Persons with disabilities are assigned a fellow employee as a "buddy" and receive a detailed, personal safety plan with emergency procedures and the name of their buddy. The safety plans must have fire department approval.
- ▶ The *Office of Communications* expressed the importance of communication with public outreach with regards to all DDOT activities. The office is working with the DDOT project managers to reinforce the provisions of Title VI (regarding ADA compliance) and Title IV. For example, if there were a request from a person who is hearing impaired, the DDOT project manager would be responsible for coordinating with the person and preparing appropriate accommodations.
- ▶ The *Office of Civil Rights* (OCR) participates in ADA/accessibility activities even though the ADA function moved from OCR to IPMA. They maintain a close working relationship with the ADA Coordinator. They also handle Title VII and Title I complaints related to ADA.
- ▶ The *Chief Learning Officer* is responsible for the training of DDOT staff regardless of Administration. To increase the knowledge of ADA requirements, the Training Office provides ADA training once per year. They mainly focus on familiarizing DDOT staff with ADA standards and requirements.

How ADA / Section 504 of the Rehabilitation Act Impacts the Office

- ▶ OITI is more aware of the need to provide accessibility resources to support employees with disabilities since OITI has a staff person with visual impairment. Therefore, OITI is particularly aware of the needs of individuals with visual impairments since they have provided this staff person with appropriate equipment.
- ▶ The Training Office not only focuses on ADA training, but also offers reasonable accommodation services and special needs requirements for training when requested by employees. For example, if a staff person with disabilities is traveling to an outside training course, the Training Office accommodates their specific travel needs.

Familiarity with Requirements of the ADA/Section 504

- ▶ Everyone in the Office of Director has some level of familiarity with ADA /Section 504, in varying degrees. The Office of Civil Rights, which is responsible for developing the policies for the DDOT, has the most knowledge.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ OCTO must approve any changes to the DDOT website, including revisions to the standard templates used among District agencies. Approvals must follow the chain of command within DDOT and in the District.
- ▶ For evacuation purposes, DDOT has recently purchased evacuation chairs on each floor. Although there are trained operators for the evacuation chairs, the availability is a 4:1 ratio of employees with disabilities to available chairs/trained operators. However, the ORM plans to buy more evacuation chairs towards their goal of a 1:1 ratio. This year, there was a line item in the budget for the purchase of evacuation chairs; however, it was for a one-time purchase. A standard line item in the budget would help DDOT to identify needs, provide equipment and materials (e.g., evacuation materials in Braille), and increase compliance with ADA requirements.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ The ORM is proactive in setting preventive measures. This is important because a safe workplace can help to avoid injuries and reduce related costs. Currently, if an employee injures himself in an accident, he will need temporary accommodations. An ADA-compliant workplace often can reduce or avoid unsafe situations.
- ▶ OCR works on accommodating those with hearing impairments by providing American Sign Language (ASL) interpreters at their training and their events. For example, during the Disadvantaged Business Enterprises (DBE) Summit there was an interpreter who signed throughout the entire program. Announcements are made 3 days prior to training to allow those with hearing impairments to request an ASL Interpreter.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ While they do not have any policies or procedures that are ADA-specific, ORM conducts assessments of employee work stations according to standards that are relevant to ADA requirements. ORM works closely with DDOT's ADA Coordinator to satisfy ADA requirements.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ Staff from the OITI felt that providing ADA resources for customers and DDOT staff was a priority. Their goal was to ensure their customers can use OITI's services independently.
- ▶ OCR is in the progress of increasing diversity in DDOT through changes in the hiring process. OCR has also been monitoring closely and implementing best practices. In particular, there have been two recent changes to policy. The first involved the hiring of veterans and the second with the hiring of persons with disabilities. Now, 7 percent of new hires have to be veterans and 7 percent of new hires would be persons with disabilities.
- ▶ OCR feels that ageism is an important issue and has worked with the Senior Community Service Employment Program (SCSEP) to help provide training resources.

Grievance or Complaint Process within DDOT

- ▶ OITI is available to provide assistance to customers via telephone for help in completing the DDOT grievance process online. Most of the grievances logged by OITI have been related to handicapped parking in front of residences.

Concerns, Complaints, or Lawsuits regarding ADA /Section 504

- ▶ The Office of Communications expressed the need for a signage campaign throughout the District to promote awareness of ADA issues.
- ▶ The K Street NW Construction project was noted as an example of the need to enhance ADA infrastructure. The circumstances involved a woman in a wheelchair who rode the DC Circulator and had been let off in the middle of the street. The bus driver stopped to help the woman reach the curb. Although this specific issue was resolved, it highlights the need for improvement.
- ▶ A comment was presented that there is a double standard that exists with regard to bicyclists and ADA guidelines. OCR hopes to partner with MPD and the Washington Area Bicyclist Association (WABA) to develop an awareness campaign. Working with these groups would bring together the various perspectives of pedestrians and bicyclists which would, in turn, bring sensitivity and awareness of ADA issues. The result would be more compliance of these groups with ADA regulations.
- ▶ Consultants and contractors are having issues when it comes to ADA; however, according to the Chief Learning Officer (CLO), DDOT is not responsible for training

beyond DDOT staff. The CLO felt that this responsibility resided with the Office of Civil Rights.

- ▶ Inspectors are supposed to be part of the ADA training process. However, it is not yet mandated.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ The Business Opportunity and Workforce Office, located offsite, is not ADA compliant. Currently, any training where accommodations are needed must occur at DDOT headquarters. Although the office will be moving to a new 100 percent ADA-compliant building, an issue still remains as the office needs to ensure that the trainings are accessible to all employees.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ OITI informally monitors accessibility-related activities for compliance on a case-by-case basis. The Office of Civil Rights is responsible for more regular monitoring.
- ▶ There has been no formal way of tracking complaints and grievances through OITI. Once OITI receives complaints, they forward the complaints to the Office of Civil Rights for processing. OITI does nothing more to follow-up on the complaint or its resolution.
- ▶ OCR expressed the importance of ownership, accountability, and tracking throughout the ADA/Section 504 process. Although there is a lot of pressure to complete deliverables by their deadlines, OCR emphasized the importance of incorporating the guidelines in DDOT's activities.

Incorporate Barrier Removal and Accessibility Guidelines into the Work

- ▶ The Training Office receives support from DDOT. If there is any problem, they talk directly with a particular Administration to determine if there is any barrier to overcome, issue to resolve or material that is needed to complete their function.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ OCR explained that, although a person would have to self-identify first, the resources are there for individuals to know that they have support when, and if, needed. However, more resources would be helpful.
- ▶ The Training Office coordinates with the ADA Coordinator to develop training. The first training course, entitled "Construction Aspects of Training," will be provided this fall for engineers and those who supervise work in the field.

Training Regarding Accessibility Standards / Participation in Training

- ▶ OITI reflected on the need for more information regarding Section 504 ADA requirements. They also requested a checklist describing ADA compliance, specific to their roles, so that they could be more effective. The group also felt the need for more training for staff in order to perform functions better, particularly regarding the DDOT grievance process. No formal training has been provided to the group as a

whole. However, individual staff persons have attended training to improve their work.

- ▶ ORM does not provide ADA-specific training. Training for interacting with persons with various types of disabilities needs to be provided, as well as ADA-specific training for ORM staff.
- ▶ The Training Office mentioned the ADA Field Training and ADA Pocket Handbook as a resource for improving the knowledge of ADA standards and use of equipment in the field.

4.2 Infrastructure Project Management Administration (IPMA)

The following branches and divisions within IPMA were engaged for interviews. A summary of highlights and areas of improvement are described below.

Programs, Services and Activities Responsibilities

- ▶ *Teams 1-4* work on capital projects including reconstructing roads and bridges. As a part of that, they also have to deal with sidewalk and access in these projects. They have to design facilities to meet ADA/Section 504 requirements.
- ▶ The *DC Streetcar Program* includes ADA compliance in all areas including stations, walkways and work zones.
- ▶ The *Anacostia Waterfront Initiative (AWI) team* emphasizes ADA in every aspect of its construction projects.
- ▶ The *Stormwater Management (SWM) team* considers ADA compliance in ADA ramps on new sidewalks near culverts, floodplains, and catch basins. The team reviews ADA standards in regards to fence location, bio-retention areas near curb ramps, different surface textures and slopes.
- ▶ The *Project Development team* considers ADA compliance in maintenance of traffic plans, and work zone procedures and standards.
- ▶ The *Asset Management Division* maintains all assets inclusive of ADA compliance and is responsible for ADA compliance across DDOT.

How ADA /Section 504 of the Rehabilitation Act Impacts the Office

- ▶ All capital improvement projects must meet ADA standards.
- ▶ Everything the teams do in design is performed by Architect/Engineer (A/E) consultants. The consultants are knowledgeable and incorporate ADA regulations into projects. Projects are scoped before proceeding into the design phase.

- ▶ The Administration is in the process of updating the Design and Engineering Manual, Standard Drawings, and Work Zone Traffic Control Plans to include ADA/Section 504 guidelines.

Familiarity with Requirements of the ADA/Section 504

- ▶ IPMA staff is familiar with the requirements of ADA/Section 504 requirements, as part of their daily activities, but to varying degrees. Most rely on the ADA Coordinator to review plans, to inspect construction projects, to provide guidance, etc.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ IPMA would like more support from the ADA Office in the following areas:
 - Design and construction of ADA-compliant curb ramps.
 - Training and certification of A/E consultants for ADA elements.
 - Standards for work zones and stormwater management facilities, particularly in areas with existing conflicts.
 - Contractors' compliance on construction of ADA facilities.
 - More staff from the ADA Coordinator's office to review designs, inspect construction, and perform quality assurance.
 - Enforcing developers to apply ADA guidelines in their construction projects, particularly when they are re-building roadways and intersections. In fact, assistance in enforcing developers to re-build the entire intersection when they are re-constructing only a quadrant of an intersection would be preferred.
 - Coordination meetings before construction starts. It would also be helpful to have random checks. This could help identify and remedy mistakes early in the process.
 - More legal ADA personnel so they are well informed on the minimum law required.
- ▶ The following examples were provided to show that coordination between the various DDOT Administrations would have been helpful to avoid issues of noncompliance:
 - In one case, a private developer installed a linear bio-retention wall near a parking area. There was no room for drivers to exit their vehicles so a fence was added to provide an additional foot of space. However, the fence prevented a person with disabilities from proceeding on their journey.
 - On 22nd and Channing Streets, there is an ADA curb ramp that is affecting the stormwater flow because there is no slope where the streets meet. Water travels from 22nd Street, turns and goes right to a nearby house, resulting in flooding issues.

- On Rhode Island Avenue at Bloomingdale, a contractor parked in a crosswalk that he did not close off. The other side did not have any curb ramps. The Stormwater Management team had to have the curb ramps installed for maintenance of traffic and ensure ADA compliance.
- A culvert was placed in northwest and a pedestrian bridge had to be built for residents to cross. However, the bridge was not ADA-compliant in terms of wheelchair spacing or handrails. The issues of non-compliance were not identified until after the bridge had already been purchased. The SWM team requests more support during the construction phase to ensure ADA compliance.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ IPMA has performed customized design and construction to meet ADA requirements. For example, Team 1 on K Street NW designed and constructed non-standardized curb ramps in order to meet the slope requirements for ADA compliance. Team 3 and the DC Streetcar team scope the projects with the ADA Coordinator.
- ▶ DDOT is diligent in requiring their A/E consultants to comply with ADA regulations. Since DDOT expresses its high expectations at the beginning of a project, there are minimal problems with the ADA-compliant designs prepared by the A/E consultants.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ DDOT works with A/E design consultants and contractors to ensure that proper slopes are being installed on ADA ramps out in the field. The ADA Coordinator provides a second level of inspection for these items.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ The Chief Engineer emphasized the following issues: providing accessible transportation infrastructure in the District, instituting more stringent measures for curb ramp construction, and holding inspectors accountable. The Chief Engineer would like for IPMA staff to be versatile, to have a fundamental understanding of ADA requirements, and to check their own work. He would like for staff to rely less on the ADA Coordinator, which would leave the ADA Coordinator to serve in more of an audit role.
- ▶ Transit service, the streetcar project, and street construction are also DDOT's highest priorities regarding accessibility for persons with disabilities.
- ▶ Public space is a crucial component of the ADA process because design approval (constructability, construction, ADA compliance, etc.) are critical elements of infrastructure.

Grievance or Complaint Process within DDOT

- ▶ The Administrations have a varied level of familiarity with the DDOT grievance process.

Concerns, Complaints, or Lawsuits regarding ADA/Section 504

- ▶ DDOT has received complaints regarding ADA non-compliance for the Circulator, valet parking, and bus shelters, K Street NW sidewalks, curb ramps and bus stop access.
- ▶ DDOT received complaints regarding the placement and design of parking meters in 2006. A lawsuit, initiated by the United Spinal Association, was settled outside of court and resulted in an agreement that every new parking meter installed after 2006 must be ADA complaint.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ Although it's been difficult to achieve full compliance with ADA requirements, and to be consistent in meeting the standards, IPMA has found many ways to comply with the law. But, there are times when curb ramp construction failed to meet standard guidelines.
- ▶ There is particular difficulty in complying with ADA requirements for culverts as curb ramps are prone to more flooding than normal. The ramps are too flat – either because of imprecise standards or incorrect placement by contractors. There are also conflicts between bio-retention facilities and sidewalk widths which creates insufficient space for each element (sidewalk vs. bio-retention facility).
- ▶ Interestingly, many staff are not familiar with the formal waiver process.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ DDOT staff monitor accessibility-related activities by reviewing the design plans prior to construction, and by inspection of construction elements. Drawings are distributed to staff to check, review, and provide input. Such documents are reviewed four times before bidding and construction. Although DDOT staff has a general familiarity with ADA/Section 504 standards and regulations, they depend on the ADA Coordinator for a more in-depth review.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ Currently, IPMA staff relies fully on the ADA Coordinator for guidance, inspection and reviews.

Funding Allocation for Accessibility

- ▶ All projects must meet ADA guidelines. However, there is a budget line item for utility costs, but not for ADA components. Federal funding is available. Currently, an ADA-specific budget would be an additional component of the general obligation fund.

Training Regarding Accessibility Standards/Participation in Training

- ▶ Initially, DDOT staff was resistant to ADA training and guidance. Now, all staff wants ADA training.
- ▶ IPMA staff presented the following recommendations for ADA training:

- Integrated training with all DDOT Administrations. The DDOT Administrations should not be segregated for ADA training as it would be helpful have a range of construction and design perspectives. By working together, the various DDOT Administrations would be able to identify needs and conflicts early and efficiently address ADA compliance issues.
- Real world examples/field trips.
- Examples of lessons learned.
- 3-hour refresher courses every 6 months rather than a 3-day training every 3-6 years.
- Training that is very thorough and detail-oriented.
- A focus on work zones.
- Consultants and contractors included in training.
- Training materials: a draft pocket ADA guide, a series of forms including a technical feasibility form, wavier form, pre-construction form, and post-construction plan.

Exemplary Practices

- ▶ State of Massachusetts and cities of San Francisco and Berkeley in California:
 - Low-height pedestrian push buttons.
- ▶ Maryland DOT:
 - Thorough and detailed-oriented training offered on a yearly basis.
 - Lighted crosswalks.

4.3 Policy Planning and Sustainability Administration (PPSA)

Programs, Services and Activities Responsibilities

- ▶ PPSA is responsible for developing transportation plans and strategic plans including liveability studies, transportation studies, and long-range transportation plans (i.e., moveDC), strategic planning, neighborhood and corridor planning, bike and pedestrian programs, policy development and transportation research. They are responsible for all modes of travel, including freight.
- ▶ PPSA works with various District agencies, communities, businesses and organizations to develop and institute regulations and processes regarding commercial vehicle movement throughout the District.
- ▶ DDOT's Safe Routes to School Program projects improve safety for children who walk and bike to school and also to encourage students to walk to school.

How ADA /Section 504 of the Rehabilitation Act Impacts the Office

- ▶ When performing planning studies, PPSA assesses ADA accessibility for more bike and pedestrian programs than other DDOT Administrations. The assessments include application of crosswalks, and installation of HAWK signals. PPSA is the first DDOT Administration to review ADA accessibility guidelines in the context of a transportation study.
- ▶ An example of PPSA's consideration of ADA guidelines was the resurfacing of the 15th Street NW bike lanes project. The biggest costs to the project were adding curb ramps at the intersections.
- ▶ PPSA also considers ADA guidelines for commuter buses that travel through the District. There are approximately 147 commuter bus stops in the District, of which 79 percent are ADA-compliant. The rest are not ADA compliant.
- ▶ ADA compliance is also considered in the Safe Routes to Schools Program, ensuring compliance with accessibility guidelines. The main purpose of these projects is to promote children's safety, including for persons with disabilities, along travel routes to schools.

Familiarity with Requirements of the ADA/Section 504

- ▶ PPSA staff has a general familiarity with ADA/Section 504 regulations but not with the specifics. They understand that all facilities have to be improved to fulfill ADA requirements.
- ▶ For example, the relationship between ADA and their liveability studies is clear. For their long-range transportation plan, moveDC, it was necessary to think about accessibility for all ages and travel modes.
- ▶ The Safe Routes to Schools Program team has an in-depth knowledge of ADA/Section 504 requirements since the coordinator of the program is also the President of the Association of Pedestrian and Bicycle Professionals (APBP). The APBP has developed pedestrian accessibility training with the U.S. Access Board.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ PPSA would like to know what type of work triggers what kind of ADA requirements. They need clarification so that they do not miss opportunities. For example, PPSA asked how to determine the appropriate location for a curb ramp landing? How do you deal with drainage and tree placement? Currently, staff relies on the ADA Coordinator to address these issues. Staff thought it helpful to have briefings to identify issues at the conceptual level. If ADA regulations were made a priority at the conceptual level, it would help the process to move forward more efficiently.
- ▶ They also need help in costing out ADA compliance items. Staff previously had flexibility to do it, but they need training to continue performing this task in the future.

- ▶ PPSA needs assistance in reviewing private development. In particular, staff asked about the role of ADA in development reviews. This may mean that the ADA Coordinator participates at Public Space Meetings. Or, it may mean that a checklist is developed to address items of ADA compliance for use by PPSA staff.
- ▶ PPSA would like more information regarding how other jurisdictions deal with commuter buses owned by other entities.
- ▶ PPSA would like to see a system created that would make it easier to identify locations with ADA issues and rank them based on the urgency of the situation. They also requested more assistance with prioritizing potential project solutions and how to address non-compliant issues.
 - Example: Prioritizing a location where the curb ramp has correct slopes but does not have detectable warning surfaces vs. an area where there is no ramp constructed.
 - Example: A school for persons with disabilities did not have a landing area at the top of the curb ramp. PPSA suggested a parallel ramp, however; inspectors did not follow through with their recommendations.
- ▶ PPSA would like guidance in handling situations where there is an interruption of sidewalk space. This situation often causes a line of cars that result in pedestrians walking between cars in the line or the pedestrians walking into the street to continue their journey. Staff explained that this is a really big problem and is very unsafe.
- ▶ Right-of-way is a big accessibility issue and PPSA currently does not have a dedicated staff person for these issues.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ PPSA works closely with OCR for recommendations regarding ADA compliance. They have fully engaged the OCR in the moveDC process and, as way to increase accessibility to public meetings and information sessions; PPSA has held webinars as suggested by OCR.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ As a result of working closely with pedestrian advisory groups, they have identified sidewalks as a priority. Sidewalks are important for pedestrians as well as for people with strollers and wheelchairs. Also, protected tracks and bike lanes make people feel safer which, in turn, leads to a wider demographic of people who use these modes of transportation.
- ▶ Another priority for DDOT is to serve persons with disabilities and ensuring connectivity regardless of transportation mode (i.e. sidewalks, bike lanes, and roadways).

- ▶ ADA compliance on the permitting process side and parking conflicts with tour buses are also priorities.

Grievance or Complaint Process within DDOT

- ▶ PPSA staff was not familiar with the DDOT grievance process.

Concerns, Complaints, or Lawsuits regarding ADA/Section 504

- ▶ PPSA staff was not aware of concerns, complaints or lawsuits.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ PPSA does not encounter many circumstances for which they are not able to comply with accessibility standards or regulations because they primarily design at the conceptual level.
- ▶ The Bike and Pedestrian team usually handles ADA compliance. They have not yet had to seek a waiver for any of the bike lane projects.
- ▶ There have been situations in the Safe Routes to School Program in which there seemed to be no potential for ADA compliance. For example, what to do about placing crosswalks where there are no sidewalks or situations where there is a sidewalk with no curb ramp and no crosswalk. These types of exceptions should be placed in the Design and Engineering Manual or a separate Policy and Procedure created for ADA compliance.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ PPSA makes recommendations for ADA compliance in its review of studies and conceptual plans. However, the recommendations sometimes change by the time they reach the design or implementation phase of a project. This gap between conceptualization and implementation is something that needs to be bridged. The DDOT Administrations have mixed priorities and different challenges.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ To gather information on ADA/Section 504 resources at DDOT, PPSA staff first looks for related information at the resource website. Then they turn to the Google search engine, and then contact the ADA Coordinator, Cesar Barreto.
- ▶ PPSA recommended that it would be easier to gather ADA/Section 504 related information if there were a “one stop” location on the internet. This would be particularly useful if coupled with some sort of training. Also, PPSA recommends a policy compendium for ADA/Section 504 and other relevant information.
- ▶ PPSA receives support from DDOT staff and consultants regarding ADA concerns from projects. Constant communication about questions and concerns about ADA issues are always discussed with the ADA Coordinator.

Funding Allocation for Accessibility

- ▶ There is no funding allocated specifically for ADA-related expenses. Staff recommended a separate budget for ADA needs.

Training Regarding Accessibility Standards / Participation in Training

- ▶ PPSA staff participated in ADA training years ago. But newer staff has not received any training. Most of the staff has obtained training from outside organizations.
- ▶ PPSA would like to see training that involves staff from other DDOT Administrations and includes multiple disciplines. An implementation briefing and training regarding ADA issues, even if it's only on a conceptual level, would prepare staff to address ADA requirements.
- ▶ Training should be mandatory for all staff. Consistent training and participation would highlight the importance of ADA issues at DDOT.

Exemplary Practices

- ▶ PPSA highlighted the Georgia Avenue Great Streets project as an example of exemplary practices regarding accessibility. This project was a big win for PPSA.
- ▶ Arlington County, Virginia contains examples of best practices in ADA compliance.
- ▶ At a pedestrian conference, a student presented how she assesses sidewalk quality by identifying the indicators that are most important in assessing pedestrian infrastructure. This could be a criteria used at DDOT. (scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1008&context=subsust)

4.4 Progressive Transportation Services Administration (PTSA)***Programs, Services and Activities Responsibilities***

- ▶ PTSA is responsible for all mass transit activities by the local government. This includes oversight and a jurisdictional relationship with WMATA including funding; operation and maintenance of the DC Streetcar and DC Circulator. The Administration is responsible for all components of mass transit – bus stops, DC Streetcar station stops, platforms – and all must be ADA-compliant. Also, PTSA is responsible for bus shelters – a contract they maintain with Clear Channel – which must be ADA-compliant. PTSA purchases transit vehicles that are ADA-compliant.

How ADA/Section 504 of the Rehabilitation Act Impacts the Office

- ▶ The Federal Transit Administration (FTA) and State Management (for the District) perform safety reviews of the District's transit elements and equipment. That is where ADA/Section 504 compliance impacts the Administration.

Familiarity with Requirements of the ADA/Section 504

- ▶ PTSA staff has a basic level of familiarity with ADA/Section 504 requirements.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ PTSA needs technical assistance in getting bus shelters and buses to ADA compliance (especially following failures of state safety reviews).
- ▶ WMATA determines which bus stops need improvements. DDOT implements ADA compliance during the design and construction processes. PTSA would like to know a strategy/approach for determining bus stop improvements. More can be accomplished with improved coordination and communication with WMATA.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ PTSA works with the ADA Coordinator to ensure compliance with ADA requirements.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ The Office of Civil Rights sets the policies – PTSA just follows the policies.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ Making sure all bus stops and DC Streetcar station stops are in compliance. However, some of this responsibility falls on IPMA.
- ▶ Improving current systems and ensuring future systems are ADA-compliant.

Grievance or Complaint Process within DDOT

- ▶ PTSA stated that grievances go through the Office of Civil Rights. PTSA has not addressed a grievance or complaint.

Concerns, Complaints, or Lawsuits regarding ADA/Section 504

- ▶ PTSA was unaware of any complaints or lawsuits.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ Some bus stop locations are not ADA-compliant but PTSA is trying to rectify this issue. PTSA tries to use a standard 5- by 8-foot landing pad so that wheelchairs can access buses safely, but it can be difficult because of different priorities among agencies. Most of this is the result of the lack of interagency cooperation but communication between agencies could be improved.
- ▶ Trees and tree boxes are often a hindrance to ADA compliance.
- ▶ Example: When bus stops were relocated to the median along K Street NW, it made the bus stops completely inaccessible for persons with disabilities. Then, there were difficulties getting the bus stop moved back to a more accessible location. The situation resulted in a Title VI complaint.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ PTSA undergoes state review of its activities including assessment of bus stops for ADA compliance.

- ▶ PTSA participates in the Federal 5310 program, and must perform audits of non-profit organizations for ADA compliance.

Incorporate Barrier Removal and Accessibility Guidelines into the Work

- ▶ This activity is more relevant to IPMA than PTSA.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ The Office of Civil Rights prepares policies. The ADA Coordinator provides technical assistance.

Funding Allocation for Accessibility

- ▶ PTSA serves as a grantor for the Federal 5310 program and must make sure that non-profit organizations are in compliance with ADA requirements.
- ▶ More funding is needed to cover ADA-related expenses.

Training Regarding Accessibility Standards/Participation in Training

- ▶ There has been no recent training for PTSA staff, although some have participated in training in the past.

4.5 Urban Forestry Administration (UFA)

Programs, Services and Activities Responsibilities

- ▶ UFA is responsible for maintaining the tree canopy in the District and does so with certified landscaped architects and arborists on staff. UFA works with the other DDOT Administrations, particularly IPMA, to monitor street tree plantings in new design projects and maintaining street trees during construction.

How ADA/Section 504 of the Rehabilitation Act Impacts the Office

- ▶ UFA focuses mainly on horizontal displacements regarding ADA compliance. Their main purpose is to accomplish the minimum requirements for a clear width within pedestrian access routes. The tree planting spaces consider ADA requirements.

Familiarity with Requirements of the ADA/Section 504

- ▶ UFA staff mentioned previous discussions with the ADA Coordinator about the difficulty in providing access to persons with disabilities while seeking to preserve trees. They have become familiar with ADA requirements as a result of assessing ADA compliance for construction impacts where street trees or bio-retention facilities are involved.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ UFA faces challenges with trees causing a visual barrier to wayfinding signs. It seems to be a coordination issue with other divisions. For example, a tree will be planted as planned and then another division will place a wayfinding sign near the tree. This has caused many complaints from residents because the tree grows and eventually obstructs the sign.

- ▶ Another challenge is when sidewalk is required and/or needed and there are existing trees in the area.
- ▶ There is also an effort to reduce the amount of paving in the District, so as to reduce the heat island effect.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ In cases when a sidewalk does not exist, planting new trees is not an option because of the ADA/Section 504 requirements for future sidewalk construction.
- ▶ The material called Porous Flexible Paving (“Flexi-Pave”) has been a big help when it comes to compliance with the minimum clearance width under ADA requirements. This material has allowed UFA to avoid removing trees. Residents’ issues or concerns about the Flexi-Pave material are mostly about the palette color, as it is not very similar to the existing materials in the sidewalk, such as concrete and brick.

Grievance or Complaint Process within DDOT

- ▶ UFA did not know of any waiver process for typical cases.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ UFA considers ADA at the beginning of each project. They work very hard to preserve trees, but sometimes it is difficult to preserve trees and accomplish ADA requirements. For example, utilities located in a construction area will be more of a priority than the existing trees. For example, trees were removed along North Capitol Street because there was no option to avoid the trees’ protrusion into the public rights-of-way.
- ▶ There are no installation standards for bio-retention projects; however, ADA requirements are used to create a detailed design for them.
- ▶ Another issue is tree fences. UFA has published a standard specification for a DDOT-approved tree fence. Some of the older decorative iron fences are not ADA-compliant.

Locate ADA / Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ UFA works closely with the ADA team. The ADA team is consulted on issues affecting UFA projects. Direct contact with the ADA Coordinator is very important for an effective project development process.

Funding Allocation for Accessibility

- ▶ UFA does not have a specific budget for ADA purposes.

Training Regarding Accessibility Standards / Participation in Training

- ▶ UFA recognizes the importance of keeping staff up-to-date regarding ADA requirements and uses training available through DDOT University.

Exemplary Practices

- ▶ “Flexi-Pave” has been a big help when it comes to compliance with the minimum clearance width under ADA requirements. In some cases, UFA has been able to avoid displacing trees.

4.6 Transportation Operations Administration (TOA)

Programs, Services and Activities Responsibilities

- ▶ TOA houses the *Chief Traffic Engineer* for DDOT, who works with planning, design, construction and implementation of traffic and transportation-related services for the entire District.
- ▶ The *Streetlight Division* is responsible for design, installation and maintenance of streetlights in the District and they comply with the minimum clearance width for new projects.
- ▶ *Traffic Signal Engineers* are responsible for design, construction, and maintenance of all traffic signals in the District.
- ▶ TOA is also responsible for parking operations, including the Red Top Parking Meter Program and the Residential Parking Program.

How ADA/Section 504 of the Rehabilitation Act Impacts the Office

- ▶ Everything that TOA does must comply with ADA requirements. They have to consider the whole transportation network and anything related to the network. They ensure that transitions from one mode of transportation to another are made easily and are accessible.
- ▶ The majority of past streetlight projects are not compliant with ADA requirements.
- ▶ With the ADA Coordinator’s help, TOA worked with design standards and made signal changes to incorporate ADA guidelines. Every new design incorporates Accessible Pedestrian Signals (APS). Both pre-time and actuated signal modes are being used. The advantage of the pre-time mode is the verbal signal. With the actuated mode, you have to push the button for the visual and verbal signal.
- ▶ Due to ADA guidelines, the signal pole location changed to the back of the curb ramp. This has resulted in a number of challenges including the substantial increases in price for a signal project because of the extent you have to move the pole.
- ▶ The *Parking Management team* uses an Inspection Checklist for Parking Meters based on ADA guidelines, U.S. Access Board and Office of Disability Rights (ODR). The team started setting Standards and Policies, and reviews of parking meter locations to maximize accessibility. The team is aiming for a goal of full accessibility. The standard height used for parking meters is 48 inches, which is the appropriate height for making payments to the meter. However, the Red Top parking meters have a slope on the screen so that, even if a payment can be made,

the slope of the screen affects visibility. DDOT is reducing the height of the parking meter posts to make them more accessible, especially for wheelchair users. Their goal is to provide at least one accessible meter in each block.

- ▶ TOA provides ADA permits for residential parking. Residents just need to provide documentation (DMV, physician notarized application) to receive the permit.

Familiarity with Requirements of the ADA/Section 504

- ▶ TOA understands the importance of accessibility mostly due to their training. Most staff has a general familiarity with ADA/Section 504 requirements. TOA's contractors, particularly for traffic signal installation, are very aware of the necessary curb ramp slope and grade.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ TOA would like to consider the locations of crosswalks more often. Questions include: Should there really be a crosswalk there? Is that really the safest place to cross?
- ▶ Example: Consider how persons with disabilities used the sidewalk at the African American Museum prior to construction. Construction activities caused the closure of the sidewalk for four years. Pedestrians who previously used that sidewalk to get to work, school, or do errands still needed to use the sidewalk but now had to cross to the other side of the street. It would have been helpful to have data on how many people used the sidewalk, especially in locations without ADA ramps and crosswalks.
- ▶ It is challenging to make developers update all corners when improving an intersection. The BZA does not require developers to update all the corners in an intersection that's being improved. DDOT cannot make developers install APS in all corners, so it is suggested that this become a part of the design manual. In cases like this, developers try and use a design that keeps the original foundation so that they do not have to build a new conduit. Adding APS to a project that did not originally plan to incorporate APS adds a lot of financial cost but, if ADA is going to be a priority of in the District, then ADA requirements should be planned for early on in the project.
- ▶ More coordination is needed between TOA and UFA to establish mutual priorities for parking meter and tree box installations. TOA coordinates with IPMA and PPSA, and provides recommendations for the Red Top Parking Meter Program.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ TOA works to limit oversights or errors during the planning or design phase.
- ▶ There are a number of existing facilities that need to be improved in compliance with ADA requirements. Example: If an intersection is being modified, then improvements to sidewalks on both sides of the street should be considered.

Designers should not consider only one piece of the intersection without considering the entire intersection.

- ▶ TOA is emphasizing ADA compliance on all of their projects. They are ensuring ADA compliance for special events as well. ADA requirements should be adhered to at all times to promote accessibility for all users.
- ▶ Continued communication between agencies is important. Example: The worst thing to do is install an ADA-compliant sidewalk if another agency is going to remove the entire sidewalk as part of another project scheduled to take place there. Sometimes sidewalks were installed knowing that, later, the sidewalk would have to be modified to make it ADA-compliant. This sort of rushed process can occur because of political pressure to finish the project.
- ▶ If a person with disabilities makes a request for APS to be installed at a crossing or intersection, TOA asks the person from which direction they access the intersection so that TOA can ensure their accessibility needs are met. This leads to other questions such as: Do we have adequate APS in specific locations? Is there something about this intersection that makes it less safe to cross?

Office-Specific Policies or Procedures Related to Accessibility

- ▶ TOA relies on DDOT's Standards and Specifications. With the release of the "Gold Book," TOA added APS to the standards. Standard drawings are being updated. Short poles also have been included in the standard drawings and adopted into the Gold Book.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ Adherence to ADA/Section 504 requirements should be a priority within DDOT.
- ▶ DDOT should prioritize bringing all four corners of an intersection (full intersection) up to ADA requirements. Any intersection that is modified should be improved to ADA requirements.

Grievance or Complaint Process within DDOT

- ▶ TOA is familiar with the grievance and complaint process within DDOT. They understand that the Chief Engineer can approve a waiver, but agreed that any waiver should have written documentation so that, if the reason for the waiver is questioned at any time in the future, the documentation will be available for consultation. Written documentation is very important especially when there are changes in the Administration. Also, any changes or exceptions should be shared with the traffic engineers.
- ▶ TOA has received complaints from residents regarding abuse of the handicapped parking regulations. However, DDOT staff feels that this is beyond DDOT's role. TOA is working with the Office of Civil Rights to develop guidelines regarding procedures in response to complaints.

Concerns, Complaints, or Lawsuits regarding ADA / Section 504

- ▶ TOA does not deal with lawsuits, as sometimes the Legal Division does not share that information.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ TOA receives requests from residents for safer access to the sidewalk; however, there are some cases where this cannot be achieved.
- ▶ TOA highlighted difficulties involved with ADA compliance, especially in areas where right-of-way is limited and the sidewalk cannot be expanded (e.g., Georgetown). Sometimes TOA cannot even meet the minimum ADA requirements.
- ▶ Another issue involves installing crosswalks where there is no ramp. APS needs to be installed if an intersection is to be modified. However, adequate funding for APS and detection systems is necessary to be included in the cost of modifying the intersection.
- ▶ Example: Non-compliance occurred when a sidewalk was closed because ADA ramps could not be installed due to grates that extended to the corner. Since a ramp could not be built, it affected the provision of a crosswalk. Crosswalks affect traffic signal operations and pedestrian movements.
- ▶ Trees that were planted a long time ago in locations that have historical significance are posing obstacles to ADA compliance. In addition, it is difficult to move catch basins. The amount of right-of-way was inadequate for installing an ADA-compliant ramp because of obstacles, such as fences and trees, in the right-of-way.
- ▶ Residential permit parking must be located in front of residences and close to an accessible walkway. If not, DDOT cannot provide an accessible residential parking permit.

Incorporate Barrier Removal and Accessibility Guidelines into the Work

- ▶ Example: Poles had to be installed in a narrow sidewalk but the base of the pole was too wide to meet ADA/Section 504 requirements for accessibility. TOA contacted the pole manufacturer to order a reasonable pole base size to fit into the existing sidewalk and achieve ADA compliance for the clearance width.
- ▶ TOA has received comments from persons with disabilities who cannot access parking meters, making this another issue for consideration in the Red Top Parking Meter Program.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ TOA receives a large amount of support from the ADA Coordinator who reviews various documents on behalf of TOA. However, TOA cautions the ADA Coordinator to not make any verbal agreements with contractors or other outside agencies. Sometimes this creates obstacles for TOA. Instead, TOA advises the ADA

Coordinator to document issues, in writing, during the planning stage and to not make verbal agreements without a written record of the agreement reached.

- ▶ TOA pointed out that, in the past, staff were not comfortable approaching the ADA Coordinator because he was very detail-oriented. This level of detail was overwhelming for some staff persons who were primarily concerned with just getting their project done. Staff did not understand that, with the ADA Coordinator's assistance, they have an opportunity to make their project accessible for as many users as possible.
- ▶ The Parking Management team receives support from the ADA Coordinator to complete the Red Top Meter Inspection Checklist and other requirements for this program.
- ▶ Support from some DDOT Administrations (IPMA, PTSA, Public Space) is sufficient; however, more support or collaboration with UFA is needed.

Funding Allocation for Accessibility

- ▶ There is currently no funding allocated for ADA improvements. Additional funding will help to improve these issues regarding ADA compliance. For example, moving a light pole costs around \$6,000-\$8,000; if ADA compliance requires a system upgrade, the cost increases to \$10,000.
- ▶ For traffic signal projects, funding for accessibility is incorporated into the overall budget.
- ▶ Local funds are provided for parking meter and parking programs. TOA would like to perform research in hopes of identifying and pursuing a Federal grant.

Training Regarding Accessibility Standards / Participation in Training

- ▶ Annual ADA training, including refresher courses, would help explain best practices of ADA compliance across the nation.
- ▶ ADA training would be helpful for inspectors during field inspections.
- ▶ ADA training should focus on planning and design. Suggestions could be made for each particular project on how to comply with ADA requirements, especially with regard to placing push buttons on existing poles.
- ▶ The District Center Project, located on H Street between 9th Street and 11th Street, can be used as a field study during ADA training.
- ▶ ADA training and coordination should occur across all agencies.
- ▶ Pedestrian crossing data would be helpful in certain cases such as when loading is an issue.

- ▶ TOA staff recently received training from the ADA Coordinator and the Office of Disability Rights for the Red Top Parking Meter Program. Inspectors are actually involved in ADA training offered by the ADA Coordinator.

Exemplary Practices

- ▶ A device that can be scanned so that a person who is blind can hear what the lanes do (i.e., turn left, right, go straight).

4.7 Public Space Regulations Administration (PSRA)

Programs, Services and Activities Responsibilities

- ▶ PSRA is responsible for the permitting process for use of public space, including electronic permitting process, review of applications, review of design and construction plans for permit applications, and permit issuance. However, PSRA does not have responsibility for roadway vending (mobile/sidewalk) since that is the responsibility of DCRA. PSRA also reviews civil plans for developments and sidewalks, and cafes.
- ▶ The *Customer Relations Division's* role is to work with customer relations, focusing on the interest of accessibility in any area.
- ▶ The *System Inspection and Oversight Division* (SIOD) includes inspectors who oversee private uses of public space and enforce DDOT standards and specifications. Approximately 1,200 inspections a week are performed (FOIA, Cityworks, Permits, etc.). Inspectors are responsible for ensuring contractors maintain pedestrian access and ADA access at work zones and, if not, they make adjustments in the field. If a major problem becomes apparent, the inspectors can issue a stop work order and shut down the construction, or issue a notice of violation (NOV) which can result in fines and administrative hearing.

How ADA/Section 504 of the Rehabilitation Act Impacts the Office

- ▶ PSRA inspects ADA compliance in the field and is responsible for maintenance of traffic plans, streetscapes, safety issues (work zone), construction zones, and all work zones. They must ensure that all these elements comply with ADA requirements.
- ▶ PSRA follows MUTCD and ADA 2010 standards and PSRA must check that all drawings, designs, and materials are ADA-complaint. PSRA must also ensure that temporary work zones are ADA-compliant.
- ▶ For the electronic permitting process and processing at kiosks, those who need help can receive assistance through online service or personal in-office service. The kiosks can be used to make a permit application and there is a phone number for those persons who need additional services. Example: There was a customer with Parkinson's disease who needed assistance submitting an application. PSRA was available to fill out the entire application on behalf of the customer.

- ▶ DDOT enforces ADA compliance. Example: Although a developer wanted a permit to install a 2.5-foot sidewalk, DDOT asserted an 8-foot sidewalk. Otherwise, a lawsuit against DDOT could have been made.

Familiarity with Requirements of the ADA/Section 504

- ▶ It is part of PSRA's planning and project management to consider ADA guidelines. Although staff has a basic level of familiarity with ADA requirements, they admitted to needing additional training to become more familiar with the guidelines and increase their effectiveness in performing their responsibilities.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ Inspectors are trained for general inspections due to limited availability (ADA included in review). There are 24 inspectors and over 40,000 permits. Typically, many permits have multiple inspection needs. However, when a specialist is needed, one will be obtained. There is a need more SIOD inspectors; there are more cranes in the District than there are inspectors.
- ▶ There is no checklist or standard procedure currently in place to examine ADA compliance.
- ▶ Preliminary Design Review Meeting (PDRM) projects should have accessibility regulations from the very beginning, so that applicants know what is expected of them regarding ADA compliance.
- ▶ The website where the permit applications are submitted is managed by OITI and the permit kiosks are contracted from DCRA. Assistance with these two agencies is always needed.
- ▶ Recommendations:
 - Handbook and cards containing copies of all the permits and regulations that each staff person should know when enforcing the public space.
 - Hardcopies and a tablet/cell phone application with all ADA regulations for the inspectors' use (since they use their tablets and cell phones in the field).
 - An application which directly communicates with the ADA Coordinator or IPMA team for quality assurance purposes.
 - Applications on which people can indicate the location of an ADA non-compliance issue.
 - A clear process for ADA non-compliant issues that goes directly to DDOT for follow-up and resolution.
 - More people involved in ADA reviews would be very helpful for compliance purposes.

- To promote customer relations, it would be helpful to develop a mechanism which engages direct communication for tracking of ADA non-compliant issues.
- An ADA lead in each DDOT Administration.
- The ADA Coordinator needs to review projects in the field, first, before the SIOD inspector arrives.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ PRSA is responsible for providing services for customers regardless of disability. Example: A person in a wheelchair pointed out that a doorway was too narrow. The building was subsequently retrofitted to be ADA-compliant.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ The Language Access Program is one of the resources PSRA offers. There are staff persons trained to offer specific services such the Language Access Program and Translation Services.
- ▶ Public space regulations regarding sidewalk cafes, which can sometimes extend large distances in the sidewalk right-of-way. Inspectors review approved plans, approved drawings of plans (which consider ADA requirements). The plans consider all aspects of ADA compliance including umbrella height, awning height, table heights, and clear space. Merchants have 3 days to correct any ADA non-compliant issues.
- ▶ Both PSRA and DCRA enforce sidewalk vending issues. Applications for sidewalk vending progress from DCRA to PSRA. Each unit reviews ADA compliance in the field. DDOT approves the locations for sidewalk vending and sends comments to DCRA. DCRA enforces ADA compliance.
- ▶ PSRA no longer uses steel plates but uses other materials instead. It's now a standard procedure – no slip resistance, highly visible color (orange), and new ramping materials.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ Priorities for PSRA include:
 - Providing appropriate accommodations for everyone. There is a need to create a system where persons with visual impairments can operate independently.
 - Providing equal opportunity for all people to benefit from ADA design.
 - Providing internal/external training for contractors to incorporate ADA compliance.
 - Focusing on persons with visual and auditory impairments to help guide them through construction sites.
 - Promoting safety first. Contractors must follow the law.

Concerns, Complaints, or Lawsuits regarding ADA/Section 504

- ▶ PSRA is not involved in any lawsuits nor has it received complaints. Lawsuits originate through OAG. Lawsuits are filed against DDOT, as a whole, rather than the individual Administrations.
- ▶ PSRA wants to work with TOA to try to reduce their 7-day closures. Long-term closures are a thing of the past.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ PSRA monitors sites, periodically, throughout the permit process. A final inspection is made before restoration of public space. Conditions must return to pre-construction conditions or better.

Locate ADA/Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ PSRA receives support from the ADA Coordinator who is always responsive to requests. However, PSRA wants the ADA Coordinator to participate in more project reviews. PSRA consults with the ADA Coordinator on major projects. Of course, the ADA division would need more resources to maintain its responsiveness on more projects.

Funding Allocation for Accessibility

- ▶ PSRA do not have any ADA-specific funds.

Training Regarding Accessibility Standards/Participation in Training

- ▶ PSRA has attended training in the past, but not recently. ADA training in the field was previously provided to inspectors who viewed ADA non-compliance issues in the 55 M Street SE vicinity. Participants, however, did not receive special ADA certification. They also participated in training provided by the DDOT Training Office and the Office of Civil Rights. One staff member participated in a training in which he wore headphones projecting “white noise” and walked through the community experiencing the limitations of having an auditory impairment.
- ▶ When training is scheduled, staff makes every effort to participate. Training occurs on-site at PSRA's offices to increase involvement/participation.
- ▶ PSRA would like to provide training for everyone involved in projects including the people who work on the utilities. Full internal training of ADA/Section 504 requirements for the staff is recommended. On-going, consistent training is needed, to reinforce standards to the team.
- ▶ From the permitting side, PSRA encourages trainings and an application where people can review the ADA regulations, mostly concentrated in the Planning Review Division, because they are more involved in ADA details and reviews.
- ▶ PSRA recommends that the ADA Coordinator prepare a pocket manual for inspectors. PSRA observes various conditions in the public space and they need guidance regarding ADA compliance issues.

Exemplary Practices

- ▶ Use of upcoming technology with motioned sensor sidewalks that provide street closing notifications.

5. SUMMARY OF FINDINGS

The following is a summary of the findings from the interviews of DDOT staff regarding the considerations of accessibility in their daily activities.

Programs, Services and Activities Responsibilities

- ▶ Each DDOT Administration has program, services and activities regarding ADA/Section 504 regulations. Every staff member has at least a basic knowledge of the regulations.

How ADA/Section 504 of the Rehabilitation Act Impacts the Office

- ▶ Each DDOT Administration seeks successful implementation of the guidelines within their roles and responsibilities although the levels of success vary. The Office of Civil Rights sets or guides the policies for DDOT, as a whole, and is charged with ensuring that DDOT activities achieve the criteria.
- ▶ IPMA and TOA are responsible for design and construction of infrastructure where ADA/Section 504 requirements must be followed. PSRA is responsible for ensuring that external construction activities are in compliance with ADA requirements. The roles of the other DDOT Administrations affect ADA compliance in relation to DDOT assets in public rights-of-way throughout the District.

Familiarity with Requirements of the ADA/Section 504

- ▶ DDOT staff has varying levels of familiarity with the requirements of ADA/Section 504. Regardless of their level of familiarity, staff relies heavily on the ADA Office for guidance, design reviews, construction inspection, and training.

Areas to See Support or Assistance with Implementing Accessibility Requirements

- ▶ Staff would like to have more support from the ADA Coordinator and his team to provide guidance on the ADA requirements, quality assurance reviews of design plans, work zones and construction elements, as well as inspection and training. This would require more resources to be made available to the ADA Coordinator and his team (e.g., more staff and more funding). DDOT staff would like more resources to help them effectively apply ADA/Section 504 requirements in their daily activities, ranging from field training, to guide books and pocket manuals, to checklists for identification of items needed for quality assurance reviews.

Measures/Activities/Initiatives to Ensure Office is in Compliance

- ▶ Only a few DDOT Administrations have direct measures and initiatives to ensure ADA compliance in their daily responsibilities. IPMA uses their inspectors to ensure

construction is in compliance with ADA regulations. UFA uses “Flexi-Pave” material to achieve ADA compliance while preserving street trees. TOA uses design and equipment such as APS and short poles to ensure ADA compliance of traffic signal and streetlight placement. Every DDOT Administration coordinates with the ADA Coordinator to promote effectiveness in achieving ADA compliance.

Office-Specific Policies or Procedures Related to Accessibility

- ▶ Office-specific policies vary among the DDOT Administrations. All DDOT Administrations look to the Office of Civil Rights for setting general policies that can apply for each Administration. At IPMA, the teams work with A/E design consultants and contractors to follow ADA regulations on their projects. PPSA and PTSA work closely with the Office of Civil Rights to incorporate accessibility in their studies, activities, and plans. TOA relies on following DDOT’s Standards and Specifications. PSRA uses its Language Access Program and Translation Services to assist with accessibility needs.

Highest Priority or Priorities for Accessibility by DDOT

- ▶ Each DDOT Administration has its own priorities, but they all agree that DDOT’s highest priority is to provide accessibility for every resident in the District and across all modes of transportation. DDOT works to ensure this overall priority by implementing ADA compliance where they can during planning, design, or construction inspection.

Grievance or Complaint Process within DDOT

- ▶ Not all staff members are familiar with DDOT’s grievance process.

Concerns, Complaints, or Lawsuits regarding ADA / Section 504

- ▶ Not all staff members are aware of legal actions, complaints or lawsuits regarding ADA non-compliance issues. Some staff, because of their daily activities, was aware of legal actions because of their involvement in critical projects such as the K Street NW Rehabilitation Project.

Not Able to Comply with Accessibility Standards or Regulations

- ▶ This occurs due to engineering conflicts, interagency conflicts, lack of communication and coordination, and lack of knowledge. For example, if ADA ramp construction near culverts results in flooding due to the ramp slopes, the ramp cannot be placed in a location that is ADA-compliant. If there are conflicts with bio-retention facilities and sidewalk widths, the green infrastructure may take precedence. Trees and tree boxes can also be a hindrance to meeting ADA compliance.
- ▶ Some bus stop locations may not be ADA-compliant. However, WMATA oversees bus stop improvements (not DDOT); therefore, more interagency coordination is needed.

- ▶ There is difficulty in placing crosswalks where there is no sidewalk or where there is a sidewalk but no curb ramp and no crosswalk. There are areas where ADA compliance cannot be achieved because the right-of-way is limited and the sidewalk cannot be expanded. Further, in order to have a handicapped parking space in front of a residence, the area in front of the residence needs to have an accessible path or a permit cannot be issued.

Monitor Accessibility-Related Activities to Ensure Compliance

- ▶ There is no consistent process throughout DDOT for monitoring accessibility-related activities to ensure compliance. However, each DDOT Administration monitors its own activities according to its own best practices. OITI informally monitors accessibility-related activities for compliance on a case-by-case basis. The Office of Civil Rights is responsible for more regular monitoring; however, there is no formal method of tracking the monitoring.
- ▶ IPMA monitors their design plans prior to construction, and by inspection of construction elements.
- ▶ PTSA reviews bus stops for ADA compliance. PSRA monitors external construction sites and work zones periodically throughout the permit process for ADA compliance. All DDOT Administrations rely on the ADA Coordinator to assist in monitoring their activities.

Incorporate Barrier Removal and Accessibility Guidelines into the Work

- ▶ Only a handful of DDOT Administrations incorporate barrier removal into their daily activities. The Training Office can coordinate directly with an Administration to see if there is any barrier or materials needed to complete their function. IPMA, TOA, and PSRA, because of their roles in construction, have more direct responsibility for removal of barriers.

Locate ADA / Section 504 of the Rehabilitation Act Resources at DDOT

- ▶ All DDOT Administrations coordinate with the ADA Coordinator and his team for guidance and direction regarding implementation of ADA requirements. Although the vision is for DDOT staff to become fully proficient in ADA regulations, most staff still rely entirely on the ADA Coordinator's team. Staff, however, would like additional resources such as a compendium of ADA guidelines, checklists to use in their daily activities, and an internal website with ADA regulations and best practices.

Funding Allocation for Accessibility

- ▶ Most capital projects under DDOT do not have a separate budget line item for ADA components. Projects are funded on both federal and local levels; therefore, projects are automatically under ADA compliance requirements. However, there are some projects (such as bike and pedestrian projects) where ADA compliance must be incorporated, separately. Staff desire separate funding for non-capital projects that staff can access for accessibility compliance needs.

Training Regarding Accessibility Standards/Participation in Training

- ▶ Training has been infrequent, with staff receiving varying degrees of training over a number of years. Training has re-emerged thanks to the ADA Coordinator and his team. However, staff members who desire the training would like more hands-on training with real-world examples and field trips. They want training that can be directly applied to their daily roles and responsibilities. They also want their A/E consultants and construction contractors to be trained in ADA requirements.

Exemplary Practices

Best practices that staff would like to bring to the District include:

- ▶ State of Maryland: Lighted crosswalks.
- ▶ Arlington County, Virginia: Numerous examples throughout the jurisdiction.
- ▶ Assessment of sidewalk quality by identifying indicators that are most important in assessing pedestrian infrastructure.
- ▶ Devices that allow persons with visual impairments to hear what the lanes do (i.e., turn left, right, go straight).
- ▶ Motion-sensored sidewalks that provide street closing notifications.

Findings

From the interviews, a few general statements can be made regarding the current implementation of ADA/Section 504 requirements within the DDOT:

- ▶ DDOT staff desire to fully comply with ADA regulations.
- ▶ There are no written procedures for DDOT staff to use in complying with ADA/Section 504, although they are somewhat knowledgeable about the regulations.
- ▶ DDOT staff complies with ADA based on individual interpretations of available guidance.
- ▶ There is no consistent level of familiarity with ADA/Section 504 regulations across the various DDOT Administrations.
- ▶ DDOT staff seek assistance from the ADA Office for challenging issues that are not clearly resolvable – some for guidance and others for full-level technical, design and inspector support.
- ▶ There is interactivity between the various DDOT Administrations in their efforts to satisfy their ADA compliance responsibilities.
- ▶ There are no consistent procedures for monitoring compliance of ADA/Section 504. For example, System Inspection and Oversight Division (SIOD) inspectors are more

effective than other staff in monitoring ADA/Section 504 compliance; however, they still need additional training and guidance.

- ▶ There is a need for an executive-level “champion” to advocate for ADA compliance throughout DDOT. Although the ADA Office is doing a fine job, there needs to be an executive-level member at DDOT to emphasize the importance of this function.
- ▶ There is a need for additional funding for ADA requirements beyond the capital program and asset management activities.
- ▶ There is a need to communicate to all staff regarding legal actions, complaints or lawsuits against DDOT which can, and should, impact the daily activities of DDOT staff.

6. RECOMMENDATIONS

DDOT is making progress regarding implementation of accessibility guidelines throughout the District. However, there is still more for DDOT to do in order to become proficient in the implementation of accessibility throughout all of its functions. The following recommendations would continue DDOT’s progress toward full compliance with ADA regulations.

6.1 Policies

- ▶ Written policies and procedures should be developed and distributed to all staff. The policies and procedures should be clearly defined and aligned with staff’s specific roles and responsibilities. The policies and procedures should include guidelines for compliance and methods for responding to customer concerns.
- ▶ Each DDOT Administration should have its own policies and procedures for implementing accessibility guidelines in its daily activities.
- ▶ The Office of Civil Rights and the ADA Office should take the lead in overseeing policy development and ensuring that each DDOT Administration has its own policy and procedures.
- ▶ The Training Office should be responsible for training staff on the policies and procedures.
- ▶ Policies should be made available in DDOT’s *Design and Engineering Manual and Standards and Specifications* so that the Architecture/Engineer/Construction (A/E/C) community is fully aware of the policies.

- ▶ Federal and local funding should be made available for non-capital-related projects so that staff can have access to additional funding, if necessary, to ensure ADA compliance in their activities.
- ▶ The Director should designate a senior-level DDOT executive in the Office of the Director to be the “champion” for ensuring ADA compliance throughout the agency. This person would work directly with the Director and have oversight over the activities of the Office of Civil Rights and the ADA Office. This does not remove the current reporting responsibilities for the Office of Civil Rights or the ADA Office, but provides a level of support that is needed to emphasize the importance of compliance throughout DDOT.
- ▶ A quarterly legal brief should be developed and shared with staff that discusses current legal actions regarding ADA non-compliance. Included with this legal brief would be a strategy for mitigation or specific action items as determined by ADA staff (Office of Civil Rights, ADA Office and General Counsel’s Office).
- ▶ DDOT should convene an internal Technical Advisory Group with representatives from each DDOT Administration to garner input and feedback on agency policies and procedures.

6.2 Staffing

- ▶ The ADA Office should have a team – not just two individuals but a full team – that can perform audits of all DDOT Administrations. In the interim period, prior to hiring additional DDOT staff skilled in ADA compliance and its application for transportation infrastructure projects, DDOT can procure a program management contract with a reputable A/E firm to provide staff support for the ADA Office.
- ▶ DDOT should hire an attorney with expertise in handling ADA compliance issues that can work directly with the ADA Office and the Office of Civil Rights in drafting policies and action items for the agency.

6.3 Training

- ▶ Training should be provided to all DDOT staff, regardless of their roles or daily activities.
- ▶ Training should be offered on an annual basis, with refresher courses available regularly throughout the year.
- ▶ Training courses should include real-world examples and field trips so that staff can view applications that directly relate to their specific monitoring and inspection responsibilities.
- ▶ Training materials should be developed for staff use. Pocket manuals, checklists, guidelines for various applications and standard drawings should be made available for staff use after they receive training.

- ▶ Training should be focused on the following areas:
 - ADA Regulations, Policies and Procedures
 - Implementation of ADA Policies in Planning Activities
 - Implementation of ADA Policies in Design and Construction
 - ADA Compliance in Difficult Situations
 - Interagency Coordination for ADA Compliance
 - Inspecting for ADA Compliance in Work Zones and on Construction Sites
 - ADA Compliance for the A/E Design Community
 - ADA Compliance for Construction Contractors

6.4 Monitoring

- ▶ As part of the development of policies and action items, DDOT should develop monitoring guidelines for design, construction, inspection and operations activities. These guidelines need to be clearly aligned with DDOT staff responsibilities regarding monitoring and inspection for ADA compliance.
- ▶ The guidelines should not only include what items need to be monitored and inspected, but also should identify the regulations and define the criteria that staff must use in performing their monitoring and inspection responsibilities.
- ▶ The guidelines should encompass internal activities, such as accommodating employees with disabilities, DDOT website accessibility, and online permitting accessibility.