



OKLAHOMA
Transportation



Oklahoma Department of Transportation

ADA Self-Evaluation & Transition Plan

Latest Revision: September 2023



Table of Contents

Table of Contents	i
1.0 Introduction	1
1.1 Legislative Mandate	1
1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process ..	1
1.3 Definitions	2
1.4 Discrimination and Accessibility	4
1.4.1 Physical Barriers.....	4
1.4.2 Programmatic Barriers.....	4
1.5 Ongoing Accessibility Improvements.....	4
1.6 Oklahoma Department of Transportation’s Approach	4
2.0 Self-Evaluation Findings Summary	5
2.1 ADA Liaison Committee.....	5
2.2 Programs, Procedures, and Policies Review	5
2.2.1 Programs, Services and Activities Offered (Off-Site and On-Site).....	5
2.2.2 Required Americans with Disabilities Act Language.....	6
2.2.3 Human Resource Processes and Job Descriptions.....	7
2.2.4 Reasonable Accommodation Process.....	8
2.2.5 Emergency Standard Operating Procedure.....	8
2.2.6 External Website Review.....	8
2.2.7 Grievance Process	8
2.2.8 Community Guidance Program	9
2.2.9 Federal Funding Recipient Guidance	9
2.2.10 Adoption of the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)	10
2.2.11 ADA Compliance by Resolution Process.....	10
2.2.12 Correcting Transition Plan Elements	11
2.2.13 Accessible Pedestrian Signals (APS) and Curb Ramp Request Process.....	11
2.2.14 Accessible Building Entrances.....	12
2.2.15 Vacancy Announcements Language	12
2.3 Policy and Procedure Development.....	13
2.3.1 Document Review Procedure.....	13
2.3.2 Project Inspection Procedures.....	13
2.3.3 ADA Information for Consultant Packages	13
2.3.4 ODOT Consultant Certification Policy.....	14
2.4 Design Standards Review.....	14
2.5 Construction Manual Review.....	14
2.6 Facilities Review.....	15
2.6.1 Weigh Stations	16
2.6.2 Rest Stops / Turnouts.....	16
2.6.3 Welcome Centers / Tourism Information Centers.....	17
2.6.4 Buildings.....	18
2.6.5 Capitol Complex	20

2.6.6	National Cowboy & Western Heritage Museum.....	20
2.6.7	In-ground Storm Shelters	20
2.6.8	Signalized Intersections.....	21
2.6.9	Sidewalks	23
2.6.10	Railroad Crossings	25
2.7	Maintenance versus Alterations.....	26
2.8	FHWA Guidance on Closing Pedestrian Facilities.....	27
2.9	Prioritization.....	27
2.10	Staff Training	37
2.11	Public Outreach	38
2.12	Facilities Cost Estimate Overview	38
3.0	Transition Plan	40
3.1	Responsible Officials	40
3.2	Implementation Schedule	42
3.3	Next Steps.....	42
	Appendix (on website)	44

<https://oklahoma.gov/odot/business-center/contract-compliance/ada/self-evaluation-and-transition-plan.html>

[Appendix A: Step-by-Step Documents](#)

[Appendix B: Evacuation Chair Specifications](#)

[Appendix C: Grievance Forms](#)

[Appendix D: Federal Funding Recipient Guidance](#)

[Appendix E: ODOT PROWAG Adoption Memo](#)

[Appendix F: Department of Justice/Department of Transportation Joint Technical Assistance Memo](#)

[Appendix G: ADA Compliance by Resolution Process for Municipalities](#)

[Appendix H: Correcting Transition Plan Elements](#)

[Appendix I: Accessible Pedestrian Signal and Curb Ramp Request Form](#)

[Appendix J: Policy and Procedure Development](#)

[Appendix K: Design Standard Review Summaries and Redlines](#)

[Appendix L: Construction Manual Review Summary](#)

Appendix M: Facilities Reports

- [Appendix M: Facilities Reports Index](#)
- [Appendix M: Facilities Reports Central Division](#)
- [Appendix M: Facilities Reports District 1](#)
- [Appendix M: Facilities Reports District 2](#)
- [Appendix M: Facilities Reports District 3](#)
- [Appendix M: Facilities Reports District 4](#)
- [Appendix M: Facilities Reports District 5](#)
- [Appendix M: Facilities Reports District 6](#)
- [Appendix M: Facilities Reports District 7](#)
- [Appendix M: Facilities Reports District 8](#)

ADA Map Portal

<https://okdot.maps.arcgis.com/apps/webappviewer/index.html?id=42829bf5ebd94caca0c038023b24eea1>

1.0 Introduction

1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. The Oklahoma Department of Transportation (ODOT or the Department) has undertaken a comprehensive evaluation of its policies, programs, and various facilities including the public rights-of-way to determine the extent to which individuals with disabilities may be restricted in their access to ODOT services and activities. In addition, ODOT will be evaluating facilities adjacent to ODOT facilities, partnering with the local municipalities to ensure, as a federal recipient, that the municipalities receive the best guidance available to achieve their ADA compliance to the maximum extent feasible.

1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

ODOT is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the Department and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards that apply to facilities and other physical holdings.

Title II has the broadest impact on the Department. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a self-evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one person who is responsible for overseeing Title II compliance (i.e., the ADA Coordinator); and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the self-evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of ODOT's activities, provides policy and program recommendations, and presents a Transition Plan for the modification of facilities, public rights-of-way, and programs to ensure accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several decades. The ADA Self-Evaluation and Transition Plan is significant in that it establishes ODOT's ongoing commitment to the development and maintenance of policies, programs, and facilities that include all of its citizenry.

ODOT contracted with Kimley-Horn and Associates, Inc. (the Consultant) in partnership with Accessology Too, LLC to develop the Department's ADA Self-Evaluation and Transition Plan. Evaluations were based on the current "2010 ADA Standards for Accessible Design" and the "2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way" (PROWAG). This project will be completed in three separate phases. This document summarizes the findings and recommendations for Phases 1 and 2. Phase 3 will be the implementation and tracking of the Transition Plan by ODOT.

1.3 Definitions

The following is a summary of many definitions found in the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations.

Disability

The term disability means, 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 impairment; or
- Being regarded as having such impairment.

Qualified Individual with a Disability

A qualified individual with a disability means 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 the Department.

Discrimination on the Basis of Disability

Discrimination on the basis of disability means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the Department's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Complaint

A complaint also referred to as a grievance is a claimed violation of the ADA.

Substantial Limitation of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

Major life activities are functions such as walking, seeing, hearing, speaking, breathing, learning, performing manual tasks, or caring for oneself.

ADA Self-Evaluation & Transition Plan



In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long term impact (or expected impact) of or resulting from the impairment.

Having a Record of Impairment

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Reasonable Program Modifications

If the individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;
- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to known disabilities only. Modification is not required if it changes the essential nature of a program or activity of the person with a disability, it creates a hazardous situation, adjustments or modifications requested are primarily for the personal benefit of the individual with a disability, or it poses an undue burden on the Department.

Auxiliary Aids and Services

The term auxiliary aids and services include:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;
- Acquisition or modification of equipment or devices; and
- Other similar services and actions.

1.4 Discrimination and Accessibility

Programmatic accessibility means that, when viewed in its entirety, each program is readily accessible to, and usable by, individuals with disabilities. Programmatic accessibility is necessary not only for individuals with needs related to mobility disabilities, but also to individuals with needs related to speech, cognitive, vision and hearing disabilities. The following are examples of elements that should be evaluated for barriers to accessibility:

1.4.1 Physical Barriers

- Parking
- Path of travel to, throughout and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.4.2 Programmatic Barriers

- Building signage
- Customer communication and interaction
- Access to public telephones
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for ODOT sponsored events

1.5 Ongoing Accessibility Improvements

ODOT facilities, programs, services, policies, practices and procedures will continue to be evaluated on an ongoing basis, and the ADA Transition Plan should be revised to account for changes since the initial self-evaluation. An accessibility inventory of sidewalks and curb ramps on streets and near ODOT facilities was completed during Phases 1 and 2, and an approach will be developed to remove all identified barriers. This Plan will be posted to ODOT's website for review and consideration by the general public. In addition, notice will be provided of the Plan's existence in any official and unofficial ODOT publications. The ADA Coordinator will supervise revisions to the ADA Transition Plan on an ongoing and annual basis.

1.6 Oklahoma Department of Transportation's Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to ODOT's programs, services and activities within a reasonable timeframe. ODOT believes accommodating disabled persons is essential to good customer service, to the quality of life Oklahoma residents seek to enjoy, and to provide effective governance. This Plan has been prepared after careful study of all of ODOT's programs, services and activities.

ODOT shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the Department can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. ODOT will not place surcharges on individuals with disabilities to cover the cost involved in making programs accessible.

2.0 Self-Evaluation Findings Summary

2.1 ADA Liaison Committee

At the beginning of the project, a Liaison Committee was formed to help identify current ODOT programs, procedures, and policies for inclusion in the Self-Evaluation and receive input on the project in general. This committee was composed of representatives from the ODOT Maintenance Divisions. Recommendations from the Liaison Committee were invaluable in the preparation of this Transition Plan.

The ADA Liaison will assist the ADA/504/508 Coordinator in ODOT's efforts to comply with the ADA. The appointed Division Liaison will serve as the first point of contact for their division to answer questions, provide information regarding rights under the ADA, as well as information regarding the complaint process and the Coordinator's contact information. The Liaison shall keep adequate records and logs of all complaints and inquiries. These record logs shall include any correspondences, dates, times and annotations. The Liaison shall keep the ADA/504/508 Coordinator informed of all complaints and inquiries.

A List of the Liaisons is available at:

<https://oklahoma.gov/content/dam/ok/en/odot/civil-rights/Liaisons.pdf>

2.2 Programs, Procedures, and Policies Review

Current programs, procedures, and policies related to the activities and services available to the public and correlate with barriers to access were evaluated to determine the current level of program accessibility within ODOT. The Consultant team met with ODOT's ADA/504/508 Coordinator to discuss the current status regarding ADA requirements including eligibility requirements, participation requirements, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures. Interviews with ODOT department representatives were also conducted.

2.2.1 Programs, Services and Activities Offered (Off-Site and On-Site)

As a public entity, ODOT provides various programs, services and activities (PSAs) to the public, as well as to employees. An assessment was conducted by speaking with various ODOT employees, as well as using information from the website to which the public and/or employees would have access. The following PSAs were reviewed:

- National Summer Transportation Institute Program (NSTI)
- Working on Tools to Build Your Future (Career Fairs)
- Engineer-in-Training
- Public Outreach Programs (Work Zone Awareness Week, Litter Campaigns, Open House, and "Grass Events" held outdoors including ribbon cuttings and press conferences)
- Planning and Research Day
- Public Meetings for Projects
- ODOT Job-Specific Tours
- Transit Events

The following issues were found within certain processes during the assessment:

- No mention of physical requirements or qualifications for participation.

- No mention of available accessible transportation or reasonable accommodations.
- Simulators are used for certain activities but it is unknown if the simulators are accessible.
- Alternate plans should be developed in the event the activity cannot achieve full compliance and/or in the case of an issue on-site.
- The Department has a responsibility and obligation to ADA no matter if the PSA is located within an ODOT facility. If the PSA facilitator is not ODOT, the Department is responsible for informing the facilitator of the Department's ADA obligations and expectations. This should be done in the form of a letter to ensure the Department has adequate documentation in the event of a complaint. If there is a significant ADA non-compliant issue that the facilitator is not willing to correct, this should effect the Department's decision to use this PSA facilitator, as the Department could be held responsible.

A document titled "Step-by-Step Approach to ADA Compliant Programs, Services and Activities Provided" is provided in [Appendix A](#).

2.2.2 Required Americans with Disabilities Act Language

The following documents were reviewed to determine if the appropriate ADA language was included as needed:

- Americans with Disabilities Act (ADA) Notification;
- Americans with Disabilities Act (ADA) Non-Discrimination Notification;
- Oklahoma Statute – Title 69 O.S. 2011 § 1205 – Acquisition Policy;
- Right-Of-Way, Public Utility and Encroachment Agreement; and
- Building Lease Language.

Based on the review, the following statement needs to be inserted into all public agendas, into the Department's internal vacancy announcement, and onto job posting website(s).

"The Oklahoma Department of Transportation (ODOT) ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities including all employment practices. To request an accommodation, please contact Chris Thompson, ADA/504/508 Coordinator at 504-521-4140 or the Oklahoma Relay Service at 1-800-722-0353."

This statement has been added to all Department meeting agendas, as well as all information that is disseminated to the ODOT employees and to the public.

Americans with Disabilities Act (ADA) Notification

The Americans with Disabilities Act Notification is compliant with the Department of Justice requirements.

Americans with Disabilities Act (ADA) Non-Discrimination Notification

The ADA Non-Discrimination Clause meets the Department of Justice's requirements and suggested verbiage.

Oklahoma Statute – Title 69 O.S. 2011 § 1205 – Acquisition Policy

In the Oklahoma Statute – Title 69 O.S. 2011 § 1205 Acquisition Policy document, under the Oklahoma Statute - Title 69 O.S. 2011 § 1403 - Public Utilities On State Highways - Location and Removal section, language should be added prohibiting the installation of utility poles in a sidewalk or prepared accessible route. Part D of that section should be modified to address the vertical clearance requirements under the ADA, which ensures nothing along an accessible route is below the required 80" above finished floor.

ADA Self-Evaluation & Transition Plan



Under Oklahoma Administrative Code - OAC - 730:35-1-11, Department Maintenance within Municipalities in the same document, verbiage pertaining to maintaining the accessible routes in an accessible condition should be added. This should clearly identify the responsibility for maintaining ADA compliance as it pertains to all prepared walking surfaces. A policy should be developed to create maintenance schedules that ensure accessible routes are properly maintained.

Right-Of-Way, Public Utility and Encroachment Agreement

The current Right-Of-Way, Public Utility and Encroachment Agreement needs to clearly state the responsibility for maintaining sidewalks and curb ramps in accordance with the ADA continuing obligations requirements. See below for suggested language to be inserted under 4.e:

Maintain all public rights-of-way in operable working condition to be readily accessible to and use by the public to the maximum extent feasible. This shall be maintained in accordance with all applicable laws and regulations set forth by the Department of Justice and the Oklahoma Department of Transportation. This shall include maintaining the path of travel to include debris removal, snow removal and all other encroachments that would cause a barrier towards accessibility.

Building Lease Language

The Oklahoma Department of Transportation currently has active lease agreements with several different entities. These lease agreements have some ambiguity that could potentially put the Department at risk. All lease language needs to clearly identify access responsibilities between the building owner and the Department as the tenant. See below for suggested language to be inserted:

AMERICANS WITH DISABILITY ACT (ADA) COMPLIANCE. The LESSOR shall be fully responsible for compliance with the public accommodations requirements of the ADA at Title 42 USC Ch. 126, Equal Opportunity for Individuals with Disabilities, Subchapter II, Public Services, §§12131 – 12133, and Title 28 CFR Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services, for the leased premises. The ADA regulations provide that no handicapped individual, solely by reason of his or her handicap, be denied the benefits of, or be subject to discrimination under any program or activity conducted on the leased premises. The LESSOR's ADA responsibilities on the leased premises include: (1) The readily achievable removal of physical barriers to access to the building, meeting rooms, offices or common areas; (2) The provision of auxiliary aids and services where necessary to ensure that no disabled individual is treated differently than other individuals on the premises; and (3) The modifications of LESSOR's policies, practices and procedures applicable to all of LESSEE's employees, occupants or visitors to the leased premises as necessary to provide goods and services to disabled individuals.

2.2.3 Human Resource Processes and Job Descriptions

The Oklahoma Department of Transportation Human Resource (HR) Processes, including 67 job descriptions, were reviewed. None of the job descriptions identified “essential” job functions versus “secondary” or “non-essential” job functions. However, all job qualifications are fairly clear. Step-by-step guidance has been developed to assist Human Resources Department with developing ADA compliant HR processes and writing ADA compliant job descriptions.

The job descriptions are written and maintained outside of ODOT by the Human Capital Management Division of the Office of Management and Enterprise Service (OMES). However, ODOT still has responsibility, regardless of where they are hosted. At the very least, ODOT needs to commit to reviewing job descriptions before they are published.

Documents titled “Step-by-Step Approach to an ADA Compliant Human Resources Process” and “Step-by-Step Approach to ADA Compliant Job Descriptions” were developed and are provided in [Appendix A](#).

2.2.4 Reasonable Accommodation Process

The following form was reviewed to determine if a reasonable accommodation could be requested if needed:

- [Reasonable Accommodation Request Form](#)
[ODOT Form RA-01, Revised August 19, 2022 \(used for employment accommodations\)](#)

The form was determined to meet Department of Justice requirements.

2.2.5 Emergency Standard Operating Procedure

The provided Emergency Standard Operating Procedure for the Department was reviewed. The following issues were identified:

- Not all ODOT Divisions have an existing emergency management plan in place. It is recommended that each Division have their own emergency management plan that is consistent throughout the state.
- The only information mentioned in any procedure was one sentence about employees with “special needs” assigning responsibility to “another employee in the Division” with no other specific details.
- No mention of accessibility or special arrangements for sheltering.
No evidence or mention of an existing emergency evacuation chair.
- Specifications for an emergency evacuation chair is provided in [Appendix B](#) and is highly recommended for all existing stairwells.

A document titled “Step-by-Step Approach to an ADA Compliant Evacuation Plan” was developed and is provided in [Appendix A](#).

2.2.6 External Website Review

The Oklahoma Department of Transportation revamped their external website (<http://ok.gov/odot/>) and was published for public view in January 2015. A review of the website revealed the following:

- Basic language for pictures – all text for pictures must have descriptive language that should be equivalent to the actual site of the picture.
- Several links are to PDF documents without enhancement capabilities.
- Videos are not captioned.
- Undersized fonts
 - Must ensure that the default text font size is not smaller than 9 points/pixels.
 - Must ensure that the text font can be expanded to 200%
 - 12-14 points/pixels for body text font is generally recommended.

A document titled “Step-by-Step Approach to an ADA Compliant Website” was developed and is provided in [Appendix A](#).

2.2.7 Grievance Process

The current ODOT complaint processes were reviewed, including:

- Americans with Disabilities Act (Title I) Complaint Process
- Americans with Disabilities Act (Title I) Appeal Process
- Americans with Disabilities Act (Title II) Complaint Process
- Americans with Disabilities Act (Title II) Appeal Process

ADA Self-Evaluation & Transition Plan



- Section 508 Complaint Process
- Section 508 Appeal Process

One area of concern was that the appeal processes was required to be reviewed by an ODOT employee who had direct influence on the original decision. This process was reviewed and altered by ODOT.

The current ODOT complaint forms were also reviewed, including:

- [Americans with Disabilities Act \(Title I\) Complaint Form](#)
[ODOT Form T1-01, Revised August 19, 2022](#)
- [Americans with Disabilities Act \(Title II\) / Section 504 Complaint Form](#)
[ODOT Form T2-504, Revised August 19, 2022](#)
- [Section 508 Complaint Form](#)
[ODOT Form 508-01, Revised August 19, 2022](#)
- [Title VI Complaint Form, Spanish, Revised August, 2022](#)
- [Title VI Complaint Form, FHWA, Revised August, 2022](#)
- [Title VI Complaint Form, FMCSA, Revised August, 2022](#)
- [Title VI Complaint Form, FTA, Revised August, 2022](#)
- [Title VI Complaint Form, TC, Revised August, 2022](#)
- [Title VI Complaint Form, VIT, Revised August, 2022](#)
- [Title VII Complaint Form, Revised September, 2022](#)

Each of these forms was reviewed and determined to meet Department of Justice requirements. Minor revisions were made to the 2012, 2015, & 2020 versions of these forms, including an update to the Department's contact information. 2022 versions of the forms are currently posted on the ODOT website and provided in [Appendix C](#). In addition, ODOT should ensure that there is additional information on the website on how to obtain alternate formats of all forms. The online forms should also have enhancement capabilities, as noted in **Section 2.1.6**.

2.2.8 Community Guidance Program

ODOT is developing the process that will be used to reach out to the general public and local disability community. Because ODOT is divided into several maintenance districts, they are determining the most efficient way to include the community to get the necessary input from all demographics in each district. Once determined, this program will be implemented.

2.2.9 Federal Funding Recipient Guidance

ODOT has developed several ways to help provide both internal guidance to ODOT staff and external guidance to sub-recipients of Federal funding to ensure the Federal ADA requirements are being met. The following documents are provided in [Appendix D](#).

- Maintenance versus Alterations Guidance for ADA Compliance
- Traffic Signal Guidance for ADA Compliance
- ADA Checklist for Recipients

ODOT also maintains an internal ADA Recipient Tracking Database. This database was created to help track the Oklahoma Department of Transportation's good faith effort toward providing ADA guidance to recipients who receive federal funding.

2.2.10 Adoption of the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)

On May 9, 2012, ODOT formally adopted the PROWAG as the official accessibility guidelines for the public rights-of-way. These guidelines will be used in lieu of the ADA Accessibility Guidelines for public rights-of-way purposes only. A copy of the adoption memo is provided in [Appendix E](#).

2.2.11 ADA Compliance by Resolution Process

The ADA/504/508 Coordinator has been working with Senior Staff and the District Engineers in creating a process to ensure that the Department is in compliance with the ADA, as well as ensuring that the Department is providing adequate guidance to sub-recipients (i.e., local jurisdiction or city/county). This process is designed to enhance communication between ODOT and sub-recipients, while also satisfying the Department's requirements to provide guidance to local jurisdictions. Within this process, the Department will implement the request for the local jurisdiction to do their part in ensuring ADA Compliance by way of an approved resolution. This approved resolution would provide both commitment and agreement to help local jurisdictions follow through with their obligation to comply with the ADA.

New Construction: Compliant ODOT Projects

Any ODOT project that has been deemed ADA compliant with all applicable ADA requirements at the time of construction shall be turned back to the local jurisdiction after construction is complete in accordance with Oklahoma Statutes (Titles 69 & 74) and the Oklahoma Administrative Code (OAC Title 730). Once inspections have been performed and the project has been deemed ADA compliant, the local jurisdiction shall be responsible for maintaining ADA compliance to the maximum extent feasible in accordance with all applicable requirements.

New Construction: Non-Compliant ODOT Projects

The Department will be responsible for bringing non-compliant elements into compliance for any ODOT project that has been deemed non-compliant with any applicable ADA requirements. Exceptions may include partnering with local jurisdictions by resolution agreement to ensure ADA compliance to the maximum extent feasible. This resolution agreement shall provide clarification on responsibility, whether it is by resolving the issue at the time of the project or planned projects within the local jurisdiction's ADA Transition Plan. Once inspections have been performed and the project has been deemed ADA compliant, the local jurisdiction shall be responsible for maintaining ADA compliance to the maximum extent feasible in accordance with all applicable requirements.

ODOT Alterations Projects

All future ODOT alteration projects shall comply with all applicable ADA requirements, including the "Department of Justice/Department of Transportation Joint Technical Assistance on Title II of the American's with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing", which is provided in [Appendix F](#). ODOT has ADA compliance obligations that must be met. ODOT has the option to address these ADA issues in two different ways:

- Follow the "Maintenance versus Alterations Guidance for ADA Compliance" along with other applicable ADA laws and regulations to achieve ADA compliance to the maximum extent feasible. The "Maintenance versus Alterations Guidance for ADA Compliance" is ODOT's interpretation of the Department of Justice's Joint Technical Assistance Memo and is provided in [Appendix D](#). If this option is chosen, ODOT takes full responsibility for the ADA compliance of the project.

- Communicate with the local jurisdiction and enforce Title II/504 requirements, which include a Local Jurisdiction Resolution or Agreement for their responsibilities on the Project. This Resolution or Agreement must document what the local jurisdiction is taking responsibility for (e.g., curb ramps, sidewalks, etc.), the exact scope, the location of said elements, and the project schedule. It shall also include a statement to include the resolution within the local jurisdiction's ADA Transition Plan.

Once inspections have been performed and the project has been deemed ADA compliant, it shall be turned back to the local jurisdiction after construction is completed in accordance with Oklahoma Statutes (Titles 69 & 74) and the Oklahoma Administrative Code (OAC Title 730). The local jurisdiction shall be responsible for maintaining ADA compliance to the maximum extent feasible in accordance with all applicable requirements. The "Sample Resolution Request Letter" and "Sample Resolution Approval Letter" are provided in [Appendix G](#).

2.2.12 Correcting Transition Plan Elements

The ADA/504/508 Coordinator has been working with the ODOT Local Government Division, Facilities Management Division, Project Management Division, and the Field Districts regarding ODOT's process on ensuring that the Department is in compliance with the ADA, as well as ensuring that the Department is providing adequate guidance to sub-recipients. An official process has been adopted and has been outlined in the following documents provided in [Appendix H](#):

- Projects through the Local Government Division
- Projects through the Project Management Division
- Projects through the Field Districts

2.2.13 Accessible Pedestrian Signals (APS) and Curb Ramp Request Process

The Department has created a method for citizens to request accessible pedestrian signals (APS) and/or curb ramps for specific locations. The draft process includes the following steps:

1. Consult with the requestor and Disability specialist. Formulate the request and Keep a request log.
2. Send a copy of the request to the ODOT Traffic Engineer for review. The Traffic Engineer shall conduct a site visit and an engineering study to determine if the APS and/or curb ramps would be effective and/or safe for operation. All information for this study shall be in writing and kept for documentation.
3. Once the study has been completed, the Traffic Engineer and the ODOT ADA Coordinator shall meet and review the study, ODOT's ADA Transition Plan, ODOT's 8-Year Work Plan, and all other applicable elements.
4. If the review results in a decision not to consider the APS and/or curb ramps, the Traffic Engineer and the ADA Coordinator must document the reasons and submit their findings to the ODOT Chief Engineer.
5. If the Traffic Engineer, ADA Coordinator, and Chief Engineer are in agreement with the decision to not install the APS and/or curb ramps, the ODOT ADA Coordinator must advise the requestor of the findings. A copy of the findings shall be provided to the Local Jurisdiction's ADA Coordinator responsible for the location in which the APS and/or curb ramps were requested.
6. If the review results in a decision to install the APS and/or curb ramps, the Traffic Engineer shall send an approval letter to the ODOT ADA Coordinator. The ODOT ADA Coordinator will then contact the Division Engineer for the area of the requested installation.

The "Accessible Pedestrian Signal and Curb Ramp Request Form" is provided in [Appendix I](#).

2.2.14 Accessible Building Entrances

The Americans with Disabilities Act requires that all building entrances are accessible. The Central Office (Division 9) has an entrance labeled as an “accessible entrance” located on the southeast side of the building; however, this entrance is not fully accessible, as all ODOT employees are not allowed to use this entrance without prior approval. Chuck Howard (Maintenance Division, Equipment/Central Garage Branch Manager) was interviewed regarding this issue and stated that a person with a disability must request approval to use the entrance from Maintenance Division staff. If approved, their name will then be added to an approved list prior to gaining access. This entrance should be available to all ODOT employees whether they have a permanent disability, short term disability, or no disability. The following recommendations should be implemented:

- This entrance should be made available to all ODOT employees as a point of access into the building using their ODOT badge. Access should not have to be requested and approved through the Maintenance Division.

2.2.15 Vacancy Announcements Language

Upon initial review, ODOT Vacancy Announcements did not state the Department's stance on discrimination based on a disability. As part of ODOT's regulatory responsibility under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 (Section 504), ODOT must ensure that recipients of Federal aid and state and local jurisdictions that are responsible for roadways and pedestrian facilities do not discriminate on the basis of a disability in any highway transportation program, activity, service, or benefit ODOT provides to the general public.

The ODOT Vacancy Announcements should include a discrimination statement; for example:

“In compliance with the Americans with Disabilities Act, the Oklahoma Department of Transportation (ODOT) ensures that no qualified individual with a disability shall, on the basis of a disability, be excluded from participation in or be denied the benefits of the services, programs or activities of a public entity or be subjected to discrimination by the any public entity. ODOT will provide reasonable accommodations for persons with disabilities, upon request. To request an accommodation, please contact Chris Thompson, ADA/504/508 Coordinator at 405-521-4140 or the Oklahoma Relay Service at 1-800-722-0353, no later than 72 hours before any scheduled event.”

Previously, the following statement was added to all Department vacancy announcements disseminated to State employees & the public.

“The Oklahoma Department of Transportation (ODOT) ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities including all employment practices. To request an accommodation, please contact the ADA/504/508 Coordinator at 405-521-4140 or the Oklahoma Relay Service at 1-800-722-0353.”

With the State's recent adoption of Workday, the Office of Management & Enterprise Services agency now administers language put on vacancy announcements. Below is the statement that is now used on vacancy announcements disseminated to State employees & the public.

“Equal Opportunity Employment

The State of Oklahoma is an equal opportunity employer and does not discriminate on the basis of genetic information, race, religion, color, sex, age, national origin, or disability.”

2.3 Policy and Procedure Development

2.3.1 Document Review Procedure

The ADA Liaison Committee indicated that there is no ADA-specific review procedure for any type of documents. This ADA-specific review procedure may be used by a person who serves as the Department's ADA Coordinator. It is recommended that the Department draft a procedure that outlines specific policies and procedures for the review process for any project that may include any type of ADA element. This is an important aspect to ensure that the Department is putting forth a good faith effort to ensure ADA compliance.

As part of the review procedure for any project that contains any type of ADA element, the ADA Coordinator is to be notified of the final inspection of any project containing sidewalk facilities. If the ADA Coordinator is unable to attend the final inspection meeting, a completed & signed ADA Inspection Guide should be sent to the ADA Coordinator to document the good faith effort put forth on the specific project.

2.3.2 Project Inspection Procedures

During training sessions, the ADA Liaison Committee and ODOT Project Inspectors indicated that ODOT would benefit from ADA compliance checklists for facilities/buildings and the public rights-of-way. Checklists were developed as part of this project and are intended for field personnel to use as a guide during project inspections to verify accessibility compliance. However, these checklists are not intended to be an all-inclusive manual for designing or evaluating pedestrian facilities. There is no assurance that this checklist is sufficient in a given situation. ODOT Project Inspectors must also use experience and knowledge of the Americans with Disabilities Act and the accompanying Federal Regulations to determine whether a project is in compliance with the legal requirements of the Act itself rather than this checklist. If ODOT Project Inspectors identify a specific concern that cannot be addressed, the ODOT Project Inspectors should contact the ADA Coordinator, project Design Engineer, or Project Manager to resolve the issue or concern.

"Access Due-Diligence Checklists: Buildings" and "Access Due-Diligence Checklists: Public Rights-of-Way" are provided in [Appendix J](#).

An ADA Inspection Guide for all projects that contain sidewalk facilities has been created. This guide will assist ODOT staff, contractors, and other entities directly involved with the construction/inspection of projects that contain pedestrian facilities. The guide is to be released to all ODOT staff directly involved with the construction/inspection phases of applicable projects and posted on the Civil Rights webpage. An ADA Design Manual is to be created to assist consultants, Districts, and other entities with the design of compliant public rights-of-ways.

2.3.3 ADA Information for Consultant Packages

As a part of the ADA self-evaluation process, the ADA Liaison Committee suggested that any packages given to consultants, regarding ODOT's requirements for project completion, be reviewed and ADA expectation information be added into each individual package that is provided to consultants. The consultant packages do not currently include any ADA expectations and/or ADA requirements. Instead, it is recommended that language related to compliance with the ADA be added to the consultant's scope of services by referencing the ADA, 2010 ADA Standards, and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) in the contract language.

ODOT is in the process of instituting the requested changes.

2.3.4 ODOT Consultant Certification Policy

As a part of the ADA self-evaluation process, the ADA Liaison Committee suggested that ODOT might benefit from requiring any consultant doing work for the Department be certified through an ADA-specific training program, in which the consultant would receive a certificate of completion. Instead, it is recommended that ODOT complete reviews of design plans prior to closing out a project with a consultant. If any elements are deemed non-compliant by ODOT engineers, ODOT shall require the consultant to redesign any identified elements. This work will be covered under the original scope of services if ADA compliance is referenced in the contract language as noted in **Section 2.2.3**.

2.4 Design Standards Review

Currently ODOT is in the process of developing multiple new standards for pedestrian related facilities. Once finalized, these standards will be put in place as ODOT's Standards for construction.

Previously, the following design standard documents were reviewed for consistency with the 2010 ADA Standards and PROWAG. All items out of compliance were redlined on the standard and summarized for further review by ODOT Staff (see [Appendix K](#)).

- 1999 Roadway Design Standards
- 1999 Traffic Engineering Highway Lighting Design Standards
- 1999 Traffic Engineering Traffic Control Design Standards
- 1999 Traffic Engineering Signal Design Standards
- 1999 Traffic Engineering Signing Design Standards
- 2009 Roadway Design Standards
- 2009 Traffic Engineering Highway Lighting Design Standards
- 2009 Traffic Engineering Traffic Control Design Standards
- 2009 Traffic Engineering Signal Design Standards
- 2009 Traffic Engineering Signing Design Standards
- 2009 Traffic Engineering Quality Control Standards for Temporary Traffic Control Devices

The following design standard documents were reviewed but no pedestrian elements were contained in the documents:

- 1999 County Bridge Design Standards
- 1999 State Bridge Design Standards
- 1999 Traffic Engineering Traffic Notes
- 2009 County Bridge Design Standards
- 2009 State Bridge Design Standards
- 2009 Traffic Engineering Safety Standards
- 2009 Traffic Engineering Traffic Notes

2.5 Construction Manual Review

The ODOT Construction Manual, Chapter 500 (Structures) was reviewed for compliance with the ADA. Many of the elements within this document do not pertain to accessibility, and those that do have no mention of access specifically. ODOT should (1) determine if each section of the chapter should be updated to include ADA compliance information, (2) determine if a new chapter on ADA compliance should be developed as a "best practice" and added to the Construction Manual, or (3) determine if a combination of both should be implemented to ensure the highest likelihood of incorporating ADA compliance into the daily routine of all disciplines. Below are a few examples of how select sections within Chapter 500 could be modified to include ADA compliance.

- **Section 501.02, PRECONSTRUCTION CONSIDERATIONS** – This section addresses all ‘preconstruction considerations’ but has no mention of ADA. This section could be modified to include language to ensure any pedestrian routes blocked temporarily during a construction project will have an accessible pedestrian route around the construction project. It should also specifically address the requirements of the temporary route, to ensure compliance.
- **Section 501.03, INSPECTION GUIDELINES DURING CONSTRUCTION** – This section could include language to ensure forms meet slope and cross slope requirements before concrete is poured and other ‘in construction’ preventative activities that should be incorporated into the construction process. Section (C), Construction Operations, specifically addresses grades and this would be the time during the construction process for the field crews to contact the Resident Engineer if grades will not be able to fully comply with ADA requirements because of underground utilities and/or existing conditions not previously noted.
- **Section 501.03 (E.1) Daily Work Report** – The Daily Work Report should include ADA Administration requirements developed by ODOT to ensure compliance is worked into the daily routine.
- **Section 501.04, POST-CONSTRUCTION CONSIDERATIONS** – This section does not address ADA requirements. Post-construction audits should be completed according to the checklist developed through the Transition Plan process to ensure compliance with all ADA features altered or added. Each of the Post-Construction Consideration sections throughout the Construction Manual should include checklists at the end of the section that includes required ADA elements to be sure these elements are fully integrated into the construction process.

A complete list of recommendations for each section is provided in [Appendix L](#).

2.6 Facilities Review

From 2012-2016, ODOT conducted a comprehensive evaluation of architectural barriers in ODOT weigh stations, rest stops, turnouts, welcome centers/tourism information centers, buildings, Capitol Complex parking lots, signalized intersections, and sidewalk and associated curb ramps. This evaluation provides ODOT with an overview of the architectural barriers that prevent people with disabilities from using its facilities and participating in its programs.

The infrastructure evaluation process was accomplished using field crews equipped with measuring devices and Global Position System (GPS) based data collection forms. The evaluations identified physical barriers in public rights-of-way facilities based on Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) and physical barriers in ODOT leased or owned facilities based on the 2010 ADA Standards for Facilities. Detailed measurements of the existing conditions, planning-level recommendations for removing the physical barriers, and photos of each facility were recorded during the evaluation process and were included in the facility reports in [Appendix M](#) and the [ADA Map Portal](#). Field crews were also required to note if the specific facility was in close proximity to a significant pedestrian attractor (e.g., government office, medical facility, school, etc.). This additional information assisted the Consultant team and ODOT staff in prioritizing barriers for removal. All data collected is compatible with the ODOT’s existing Geographic Information Systems (GIS) database.

Summary reports were developed for each facility type to document the findings of the evaluations. The reports identify the compliance status of each facility with regard to federal standards and include the following elements:

- Listing of facilities that are in compliance with current ADA standards;
- Listing of facilities that are not in compliance with current ADA requirements;
- Recommended actions to resolve non-compliance issues for each facility;

- Prioritized list of improvements using criterion developed by the Consultant and ODOT staff;
- “Cost estimate report” that assigns conceptual budget estimates to each recommended action; and
- Photolog summary for facilities, signalized and unsignalized intersections, and issues along sidewalk corridors (sidewalk photos provided in the GIS database only).

Copies of the facility reports are provided in [Appendix M](#) and in the [ADA Map Portal](#).

2.6.1 Weigh Stations

Weigh station evaluations documented elements in the exterior and interior of the building including accessible parking spaces, the path of travel from the parking area to the building entrance, and access to goods and services, restrooms, and break rooms.

Twenty-two (22) weigh stations were identified by ODOT staff for evaluation. Of the 22 identified facilities, 11 were either closed permanently (but still existed) or had been torn down and no building exists. None of the weigh stations’ buildings are accessible. Even the new weigh stations (built since 1990) have steps leading up to the entrance with no accessible entry.

Weigh stations are not exempt from compliance, but there is no requirement for accessible truck parking spaces. Only the car spaces serving the building were evaluated for compliance, if provided.

All Weigh stations built since January 26, 1992 should be brought into full compliance to meet their original obligation.

Suggested improvements were identified for each weigh station and are provided in the facility reports. Each facility report includes the following information:

- Project location information, including physical address and GPS coordinates
- The evaluations included the following elements:
 - Parking
 - Accessible route
 - Building entrance
 - Restrooms
 - Break rooms
 - Drinking fountains
- Description of the violation and location
- Code reference and text
- Suggested improvement
- Estimated cost
- Priority level – Each violation is assigned a high, medium, or low priority level. “High” priorities are colored red, “medium” priorities are colored yellow, and “low” priorities are colored green.

2.6.2 Rest Stops / Turnouts

Rest stop evaluations documented elements in the exterior and interior of the building including accessible parking spaces, the path of travel from the parking area to the building entrance, and access to goods and services, restrooms, retail areas, picnic areas, and truck areas. No compliance was evaluated, or needed, at the turnouts because there were no amenities offered.

Twenty (20) rest stops and thirty-one (31) turnouts were identified by ODOT staff for evaluation. Eleven (11) of the turnouts on the original evaluation list no longer exist and two (2) were under construction at the time of inspection (District 4 – SB Perry Turnout and District 7 – WB Amber Turnout).

Ten (10) of the rest stops on the original evaluation list no longer exist or are being removed. Compliance at the remaining rest stops varied. Some of the rest stops have accessible parking while others do not. Some of the accessible parking is designated but not compliant, and fully compliant parking was found at only two rest stops. Most of the rest stops do not have accessible animal relief areas and only four (4) rest stops have accessible restrooms. Two (2) of the rest stops have accessible picnic areas.

Suggested improvements were identified for each rest stop and are provided in the facility reports. Each facility report includes the following information:

- Project location information, including physical address and GPS coordinates
- The evaluations included the following elements:
 - Parking
 - Accessible route
 - Building entrance
 - Restrooms
 - Animal relief area
 - Picnic area
 - Truck area
- Description of the violation and location
- Code reference and text
- Suggested improvement
- Estimated cost
- Priority level – Each violation is assigned a high, medium, or low priority level. “High” priorities are colored red, “medium” priorities are colored yellow, and “low” priorities are colored green.

In June of 2020 an Interstate Rest Area Study was done to assess all of the rest areas/pullouts on Oklahoma’s Interstate highways. There are federal regulations that relate to commercial use of Interstate right of way, conversion of Interstate rest areas to serve alternate purposes, and rest area layout and design. The study done assessed the rest areas related to accommodate the needs of the public, distance to alternative facilities, coordination with bordering states, federal-aid funding, and federal funding credits.

The study recommended that all Rest areas be closed and demolished based on data showing that alternative commercial rest areas were within a specified distance. Due to this recommendation and federal approval, the District official was given authority to choose which rest areas stayed in operation within their respective District boundaries.

2.6.3 Welcome Centers / Tourism Information Centers

Welcome center / tourist information center evaluations documented elements in the exterior and interior of the building including accessible parking spaces, the path of travel from the parking area to the building entrance, and access to goods and services, restrooms, break rooms, animal relief areas, picnic area, and gift shops.

Twelve (12) welcome centers / tourist information centers were identified by ODOT staff for evaluation. The majority of these centers were substantially compliant. Only three (3) centers had non-compliant parking, but all of the centers had some violation along the exterior path of travel. The building entrances, transaction counters and restrooms were compliant in most of the facilities; however, the transaction counters in some were covered by computer equipment and brochures and were not available for transactions with people in wheelchairs. Fortunately, the transaction counters can be brought into compliance without requiring construction by using ODOT staff to remove the items listed in the facility reports. Only one (1) center had non-compliant restrooms.

Suggested improvements were identified for each welcome center and tourism information center and are provided in the facility reports. Each facility report includes the following information:

- Project location information, including physical address and GPS coordinates
- The evaluations included the following elements:
 - Parking
 - Accessible route
 - Building entrances
 - Restrooms
 - Break rooms
 - Counter
 - Retail area
 - Animal relief area
 - Picnic area
 - Gift shop
- Description of the violation and location
- Code reference and text
- Suggested improvement
- Estimated cost
- Priority level – Each violation is assigned a high, medium, or low priority level. “High” priorities are colored red, “medium” priorities are colored yellow, and “low” priorities are colored green.

2.6.4 Buildings

Building evaluations documented elements in the exterior and interior of the building including accessible parking spaces, the path of travel from the parking area to the building entrance, and access to goods and services, restrooms, and drinking fountains.

District 1 – Fourteen (14) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has an accessible entrance, but no accessible restrooms. None of the maintenance or residency buildings have any accessible features.

District 2 – Fifteen (15) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has accessible parking and an accessible entrance, but no accessible restrooms. None of the maintenance buildings and only one residency building have accessible restrooms.

The Atoka Maintenance Yard has not been constructed but the blueprints were reviewed for ADA compliance. Review comments were provide to the Facilities Management Division and incorporated into the plans.

District 3 – Seventeen (17) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has accessible parking and an accessible entrance, but no accessible restrooms. None of the maintenance buildings and only one residency building have accessible restrooms.

District 4 – Thirty-one (31) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. None of the maintenance and only three residency buildings have an accessible restroom. ODOT currently leases a building to the Department of Public Safety; however, this building was not evaluated as it will be demolished as part of the nearby interchange project.

District 5 – Nineteen (19) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has an accessible entrance, but no accessible restrooms. None of the maintenance or residency buildings have any accessible features.

The Altus Maintenance Yard has not been constructed but the blueprints were reviewed for ADA compliance. Review comments were provide to the Facilities Management Division and incorporated into the plans.

ADA Self-Evaluation & Transition Plan



District 6 – Fifteen (15) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has no fully compliant features. A new maintenance building has accessible parking and an accessible entrance, but does not have compliant restrooms or other features.

District 7 – Fifteen (15) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has no fully compliant features. A residency building was recently constructed, but is not fully compliant.

District 8 – Fourteen (14) buildings were identified by ODOT staff for evaluation. None are fully compliant and most have no compliance at all. The district office has accessible parking, an accessible entrance, and accessible restrooms. One residency building and one county yard building has compliant restrooms, but the associated parking and building entrances are not compliant.

The Central Office building was evaluated and found to have compliance issues in all of the parking lots. Although the building entrances are substantially compliant, programmatic issues prevent full access for employees with disabilities.

- None of the restrooms are fully compliant and signage around the building directs people to the “accessible” restrooms that do not comply. All restrooms need to be brought into compliance. In the meantime, signage should not direct people to a non-compliant restroom. This should be a high priority item for resolution. None of the drinking fountains are accessible. The building has cylindrical knobs into the majority of the offices and common use areas, and levers are required.
- The ADA/504/508 Coordinator, spoke with Charlies Effinger, Administrator of Construction Projects with OMES Division of Capital Assets (DCAM), Office of Facilities Management, regarding the Central Office non-conformities. Mr. Effinger stated that since ODOT leases the Central Office Building, all ADA modifications would be the responsibility of DCAM.
- The “Accessible Entrance” located on the Southeast Side of the building is not considered to be “Readily Accessible” as required in the ADA Law and Regulations. ODOT employees must be on a list as a person with a disability to have badge access to use this entrance. It is recommended that everyone have equal access and not be forced to self-identify as having a disability in order to have access to this entrance. It has been said that one of the reasons for the list, is to keep the door closed due to the wind and heating/cooling of the building. In this case, it is suggested that the accessible entrance be relocated to the South Side entrance by the snack bar. This particular entrance currently has automatic doors, a vestibule, and is located in front of the accessible parking.

Suggested improvements were identified for each building and are provided in the facility reports. Each facility report includes the following information:

- Project location information, including physical address and GPS coordinates
- The evaluations included the following elements:
 - Parking
 - Accessible route
 - Building entrance
 - Restrooms
 - Break rooms
 - Drinking fountains
- Description of the violation and location
- Code reference and text
- Suggested improvements
- Estimated cost

- Priority level – Each violation is assigned a high, medium, or low priority level. “High” priorities are colored red, “medium” priorities are colored yellow, and “low” priorities are colored green.

Please note, job descriptions do not alleviate the responsibility of providing access, especially within new construction. “Desk Clerks” could easily be disabled, and a few of them are, and while they do not use mobility aides, they have mobility issues. ODOT should not misrepresent the job descriptions to avoid compliance. While not all types of ODOT maintenance facilities may be high on the priority list, there are no existing facilities exempt from the ADA and all new facilities must comply.

In addition, two (2) Ports of Entries were evaluated and were found to be non-compliant. One has been constructed and the other has not. As new construction, there are few “exemptions” that apply and those that do cannot be based on job description. While the 2010 ADA Standards section “203.3 Raised Areas” for security, life safety, or fire safety is a valid exception, it has nothing to do with counter heights, and it does not work as an exception in the layout of the building that was reviewed.

2.6.5 Capitol Complex

The Capitol Complex is located in Oklahoma City (District 4) along N. Lincoln Boulevard between N.E. 18th Street and N.E. 28th Street. Sidewalk, unsignalized intersections, and signalized intersections were evaluated along N. Lincoln Boulevard from N.E. 38th Street to N.E. 28th Street and from N.E. 21st Street to NE 4th Street. No existing signalized intersections or sidewalk are located along N. Lincoln Boulevard south of N.E. 28th Street and north of N.E. 21st Street, so no facility evaluations were completed in that area. Building evaluations were not completed for this area; however, 19 parking lots surrounding the Capitol Complex buildings were evaluated. Rick Lowery, District 4 Annex, provided a detailed Capitol Complex map showing all parking lots from which ODOT is responsible for removing snow and ice. Some of the most of the common issues found include:

- Required number of accessible van spaces are not provided;
- Existing slope of accessible parking space exceeded the maximum allowance;
- Parking spaces and access aisles are not level;
- Parking space signage either does not exist or is not compliant;
- No accessible parking spaces;
- Curb ramps located in the access aisles;
- No access aisles present; and
- Accessible parking is not on the shortest accessible route.

Capital parking complex reports can be found in [Appendix M: Facilities Reports Division 4](#) and the [ADA Map Portal](#).

2.6.6 National Cowboy & Western Heritage Museum

The Museum is located at 1700 NE 63rd Street in Oklahoma City. Although 63rd Street is not an ODOT roadway, ODOT has jurisdiction over the public rights-of-way for this facility. There are no existing sidewalks along 63rd Street so no evaluations were completed along the building front. A building evaluation was not completed for this facility.

2.6.7 In-ground Storm Shelters

In-ground storm shelters are not exempt from compliance. Currently, ODOT does not have any in-ground storm shelters that comply with the ADA.

According to ODOT, in-ground storm shelters are located in several ODOT field districts. These shelters are intended for employee use only. However, in the event of an emergency, the public will be allowed to access them as necessary.

If a person with a disability needs to take shelter, others in the shelter will be required to provide assistance and/or ODOT will provide, at the front desk in the district office, a listing of other shelter options in close proximity.

2.6.8 Signalized Intersections

A windshield inventory of existing pedestrian facilities was performed to identify the number and location of existing signalized intersections along ODOT roadways then all locations were fully measured. 1,108 signalized intersections were identified statewide and evaluated as part of this project.

Signalized intersection evaluations documented the conditions and measurements along the pedestrian street crossing, curb ramps and adjacent sidewalk, and pedestrian signal equipment and adjacent clear spaces. Common curb ramp issues included not having a curb ramp installed where existing sidewalk configurations require a curb ramp, excessive curb ramp running and cross slopes, excessive flare cross slopes, non-existent or non-compliant detectable warning surfaces, excessive landing area running and cross slopes, and ponding at the base of the curb ramps. Common push button issues included push buttons installed at locations inconsistent with the current *Manual on Uniform Traffic Control Devices (MUTCD)* guidance, push button diameters less than two inches, push buttons mounted too high, excessive push button clear space running and cross slopes, and missing or non-accessible push button clear spaces.

Detailed recommendations for each signalized intersection are provided in the facility reports. On each report the following information is provided:

- Project location information, including a unique location identifier (GPS ID);
- Pay item list with estimated construction quantities;
- Vicinity map with ramp labels;
- Field observations for pedestrian crossings, curb ramps, and pedestrian signal equipment. Pedestrian crossing issues are denoted by “Poor”, “Dangerous”, an “X”, “Worn”, or “No Striping”. Curb ramp and pedestrian signal equipment issues are denoted by an “X”. For each identified issues, a recommendation is provided to bring the element into compliance.
- Photographs of each curb ramp;
- Unique field conditions; and
- Curb ramp type recommendations.

Table 1 and **Table 2** provide summaries of the issues identified for signalized intersection curb ramps and pedestrian push buttons.

Table 1. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Issue	Total Evaluated	Number Non-Compliant	Percent Non-Compliant
Flare cross slope > 10%	2,345	1,532	65.3%
No color contrast	3,295	1,966	59.7%
No texture contrast	3,295	1,937	58.8%
Landing running slope > 2%	2,673	1,229	46.0%
Ramp running slope > 8.3%	3,295	1,309	39.7%
No ramp where ramp is needed	5,892	2,113	35.9%
Ramp cross slope > 2%	3,295	1,078	32.7%
Landing cross slope > 2%	2,673	835	31.2%
Ponding in ramp, landing, or flares	3,295	1,008	30.6%
Traversable sides	950	220	23.2%
No flush transition to roadway	3,295	733	22.2%
Ramp width < 48"	3,295	547	16.6%
No landing	3,295	543	16.5%
Obstruction in ramp, landing, or flares	3,295	524	15.9%
No 48" crosswalk extension	2,348	172	7.3%
Curbed sides < 90°	950	47	4.9%
Ramp does not land in crosswalk	3,296	107	3.2%
Ramp counter slope > 5%	3,295	30	0.9%

Table 2. Summary of Push Button Issues

Push Button Issue	Total Evaluated	Number Non-Compliant	Percent Non-Compliant
Missing push button where push button is needed	10,312	4,893	47.4%
Clear floor space running slope > 2%	1,939	894	46.1%
Clear floor space cross slope > 2%	1,939	884	45.6%
Missing pedestrian head where pedestrian head is needed	10,312	4,663	45.2%
Push button offset from curb > 10'	3,227	1,323	41.0%
No clear floor space or no access	3,227	1,290	40.0%
Push button diameter not 2"	3,227	1,076	33.3%
Push button offset from crosswalk > 5'	3,227	916	28.4%
Push button height > 48"	3,227	335	10.4%
Push button orientation not parallel	3,227	74	2.3%

2.6.9 Sidewalks

A windshield inventory of existing pedestrian facilities was performed to identify the number of miles and location of existing sidewalk within ODOT right-of-way. In addition, all existing unsignalized intersections along these sidewalk corridors were also identified. Approximately 584.1 miles of sidewalk and 6,037 unsignalized intersections (including driveways where curb ramps either exist or are needed) were evaluated as part of this project. Approximately 0.2 miles of sidewalk were under construction at the time of evaluations and were not included. An additional 5.4 miles of sidewalk were originally identified for evaluation but after further investigation were determined to be outside the ODOT right-of-way. Exact locations of the sidewalk under construction and sidewalk outside the ODOT right-of-way are provided in the project shapefiles.

Sidewalk evaluations documented the conditions and measurements along the pedestrian path of travel including the sidewalk, pedestrian crossings at cross streets and pedestrian crossings at driveways. Common sidewalk issues included excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, permanent obstructions in the sidewalk such as power poles or utilities, temporary obstructions in the sidewalk or path of travel such as weeds and low hanging tree branches, and missing sidewalk segments. Where excessive foliage overgrowth was present, the condition of the underlying sidewalk could not be evaluated but was assumed to be in poor condition to allow for the overgrowth.

For missing sidewalk segments less than 200 feet in length, sidewalk was recommended to be installed for the purpose of completing the path of travel along the entire project corridor. For gaps greater than 200 feet, the missing sidewalk segment was documented but new sidewalk installation was not included in the project costs. Accordingly, any driveways or cross streets bounded by missing sidewalk segments greater than 200 feet in length were also documented, but non-compliant crossings were not included in the project cost estimates.

Non-compliant curb ramps and street crossings at unsignalized intersections perpendicular to the project corridor were recommended to be removed and replaced where no existing sidewalk was leading up to the ramps or crossing. Where no existing curb ramps are serving an existing marked crosswalk at unsignalized intersections to cross perpendicular to the project corridor, curb ramps were recommended to be installed. While the Joint Technical Assistance memo does not require the curb ramps to be installed in either situation, the decision was made by ODOT staff to include these ramps in the Transition Plan. However, it is recommended that an additional engineering study be conducted at all locations where pedestrian crossings are being accommodated perpendicular to the project corridors but are not protected by a traffic signal to determine if an active crossing treatment is appropriate or if the marked crossing is even needed.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, "curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb." For sidewalk installations constructed on or after March 15, 2012 similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New construction and alterations, which states, "newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways."

Detailed recommendations for each sidewalk corridor and unsignalized intersection are provided in the facility reports. On each sidewalk report the following information is provided:

- Project location information, including a unique corridor identifier (GPS ID);
- Pay item list with estimated construction quantities;
- Length and cost of evaluated sidewalks, cross streets, and driveways by priority; and

- Cost estimate summary for all unsignalized intersections along the sidewalk corridor. The unsignalized intersections each have their own report and associated improvement cost estimates, but the total unsignalized intersection cost estimate is also summarized within each sidewalk report for informational purposes only.

Each unsignalized intersection report includes the following information:

- Project location information, including a unique location identifier (GPS ID);
- Pay item list with estimated construction quantities;
- Vicinity map with ramp labels;
- Field observations for pedestrian crossings and curb ramps. Pedestrian crossing issues are denoted by “Poor”, “Dangerous”, an “X”, “Worn”, or “No Striping”. Curb ramp issues are denoted by an “X”. For each identified issues, a suggested improvement is provided to bring the element into compliance.
- Photographs of each curb ramp;
- Unique field conditions; and
- Suggested curb ramp type.

Table 3 provides a summary of the issues identified for unsignalized intersection curb ramps.

Table 3. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Issue	Total Evaluated	Number Non-Compliant	Percent Non-Compliant
No color contrast	9,045	5,821	64.4%
No texture contrast	9,045	5,518	61.0%
Flare cross slope > 10%	5,303	3,155	59.5%
Ponding in ramp, landing, or flares	9,045	4,488	49.6%
Ramp cross slope > 2%	9,045	3,601	39.8%
Landing running slope > 2%	8,250	2,808	34.0%
Landing cross slope > 2%	8,250	2,601	31.5%
No ramp where ramp is needed	20,586	6,416	31.2%
No flush transition to roadway	9,045	2,687	29.7%
Ramp running slope > 8.3%	9,045	2,306	25.5%
Obstruction in ramp, landing, or flares	9,045	1,982	21.9%
Traversable sides	3,742	780	20.8%
Ramp width < 48"	9,045	1,574	17.4%
Curbed sides < 90°	3,742	576	15.4%
Ramp counter slope > 5%	6,305	659	10.5%
No landing	9,045	782	8.6%
No 48" crosswalk extension	8,055	181	2.2%
Ramp does not land in crosswalk	9,045	108	1.2%

2.6.10 Railroad Crossings

ODOT is not responsible for the maintenance of pedestrian facilities within the railroad right-of-way; however, 80 at-grade railroad crossings were evaluated for compliance with PROWAG to understand how these railroad crossing affect the pedestrian path of travel along sidewalks within ODOT right-of-way. Elements evaluated included transitions to and from adjacent sidewalk, flangeway gap width, and detectable warning surfaces.

Per discussions with the ODOT Railroad Division, only those railroad crossings that have existing sidewalk leading up to both sides of the tracks, where pedestrians are already being accommodated, were chosen for evaluation.

Railroad crossing issues and recommendations are included as part of the sidewalk facility reports provided in [Appendix M](#) and the [ADA Map Portal](#). **Table 4** provides a summary of the issues identified for the evaluated railroad crossings.

Table 4. Summary of Railroad Crossing Issues

Railroad Crossing Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No flush transition to/from adjacent sidewalk	80	78	97.5%
No detectable warning surface in advance of track crossing	80	68	85.0%
Flangeway gap > 3 inches	80	44	55.0%
No concrete panel present at rail crossing	80	21	26.3%

Where there are multiple tracks at a single location, the detectable warning surfaces should only be installed on the sidewalk leading up to the outside edge of each track. PROWAG Figure R305.2.5 Pedestrian At-Grade Rail Crossings shows a minimum of 6 feet between the detectable warning surface and the outer track. Detectable warning surfaces should be 2 feet in length and separated by a 2 foot minimum length of surface without detectable warnings. Therefore, the minimum distance between rails of two different tracks would be need to be at least 18 feet for additional detectable warning surfaces to be installed between tracks.

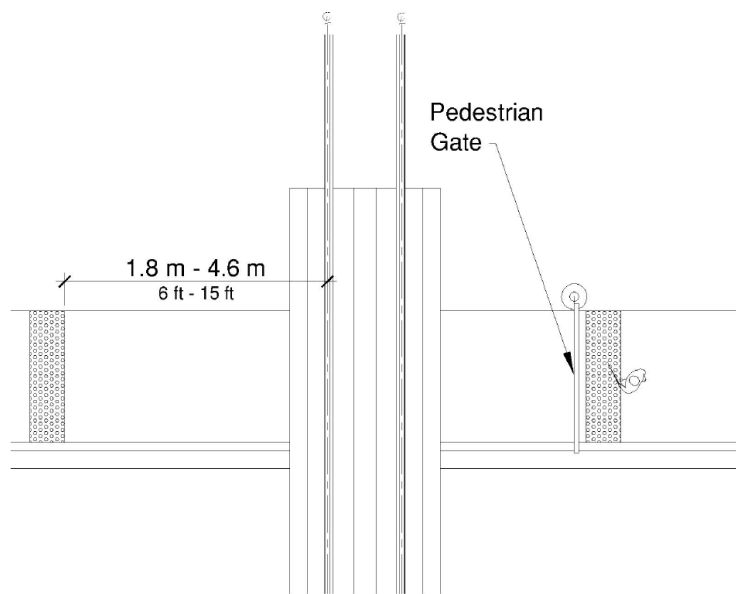


Figure R305.2.5
Pedestrian At-Grade Rail Crossings

2.7 Maintenance versus Alterations

The Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We suggest this clarification with regard to when curb ramp installation is required as part of a project be disseminated to the appropriate ODOT staff.

The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

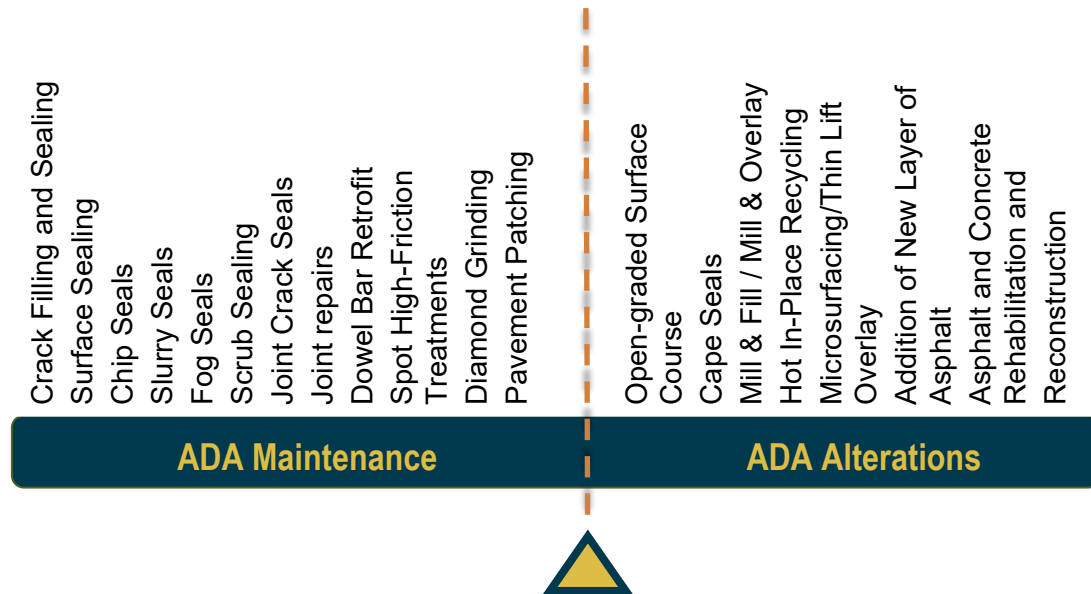
FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. **Figure 1** provides a summary of the types of projects that fall within maintenance versus alterations.*

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased

accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

2.8 FHWA Guidance on Closing Pedestrian Facilities

The FHWA has provided guidance on closings pedestrian crossings. If an engineering study (performed by ODOT and not included in the scope of this Transition Plan) determines the crossing is not safe for any user, the crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a physical barrier on both sides of the sidewalk is required.
- A sign should be used to communicate the closure. These signs should use simple language and graphics.

The agency wishing to close a certain intersection crossing should have a reasonable and consistent policy on how to do so written in their Transition Plan or as a standalone document. ODOT should develop and implement a policy to close pedestrian crossings that are currently accommodated based on the existing conditions at the crossing location (e.g., existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk currently serving the crossing), but should not be accommodated due to safety concerns established by an engineering study.

2.9 Prioritization

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, signalized intersections, sidewalks, and unsignalized intersections. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

Facilities were prioritized on a 3-point scale, which is defined in **Table 5**. This prioritization methodology has been developed by the Consultant staff to aid ODOT in determining how the facilities should be prioritized for improvements based on the severity of non-compliance with ADA.

ADA Self-Evaluation & Transition Plan



Signalized intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in **Table 6**. This prioritization methodology has been developed by the Consultant staff to aid ODOT in determining which signalized intersections should be prioritized for improvements over other signalized intersections based on the severity of non-compliance with ADA.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, “Low” based on the severity of non-compliance, which is defined in **Table 7**. Compliant segments of the sidewalk corridor were given a priority label of “Compliant”.

Table 5. Prioritization Factors for Facilities

Priority	Criteria
<p style="text-align: center;">High</p>	<ul style="list-style-type: none"> • Dangerously steep slopes, protruding objects, obvious safety liabilities • Areas where complaints have been filed • New construction built out of compliance • Older construction severely out of compliance • Alterations that did not bring required elements into compliance (adding a break room or restroom that is not compliant) • Narrow doors (less than 32" clear width) • No accessible parking • No accessible route from parking to building entrances • No accessible route to adjacent sidewalk system, when provided • Severely non-compliant parking (bad slopes, gravel surface, etc.) • Maneuvering clearance – Area in front of the entrance door slopes over 4% in any direction • Maneuvering clearance – Entrance door has less than 16" on the pull side of the door • Non-compliant showers/benches/changing areas, when they are part of the primary function • No accessible route to covered areas inside buildings on site (no elevator to upper areas, steps only, narrow doors, etc.) • No accessible counter heights (reception counters, utilities counters, etc.), above 38" • No access to public areas (coffee bars, break rooms, conference rooms, smoking areas, etc.) • No access to court amenities • Gaps or grates with openings greater than ½" • Sidewalk provided around park or building amenity, but does not connect to the amenity • Obstructed clear floor space • No grab bars • Maneuvering clearance – Area in front of interior doors slope over 4% in any direction • Door is too heavy (over 20 lbs.) • Maneuvering clearance – Interior door has less than 16" on the pull side of the door • Lavatory is more than 35.5", lavatory centerline is less than 14" • No knee clearance when required • Accessible parking is not on the shortest route to accessible entrance • Non-compliant parking (structural solution - demolish and regrade) • Protrusion into path of travel over 9" or below 70" • No accessible toilets • Seating provided, but none accessible • No accessible showers/benches/changing areas • Floor slopes over 4% in any direction • Stall door located in front of water closet • No ambulatory stall provided • Urinal mounted above 20" • Audible alarm system with no visual strobes

Table 5. Prioritization Factors for Facilities (cont.)

Priority	Criteria
Medium	<ul style="list-style-type: none"> • Non-compliant parking (non- structural solution - restriping, etc.) • Non-compliant public access spaces (coffee bars, break rooms, conference rooms, smoking areas, etc.) • Non-compliant interior door clearances (between 16.1" and 17 15/16") • Non-compliant restroom amenities (water closet, urinal, lavatory) • Knob hardware • Maneuvering clearance – Area in front of interior doors slopes between 2.1% and 3.9% in any direction • Lavatory/sink pipes are not wrapped or protected, lavatory/sink is 34.1" to 35.5", lavatory centerline is 14" to 14.9" • No accessible bench provided • Non-compliant playground surface • Non-compliant playground equipment • Non-compliant restroom amenities (water closet, urinal, lavatory) • Floor slopes between 2.1% and 3.9% in any direction • Flush control is on the wrong side • Vision panel is 46" or above • Non-compliant showers/changing areas • Non-compliant dug outs at ball fields • Non-compliant dispensers (above 54" paper towel, coat hook, etc.) • Accessible toilet stall door is not self-closing • Vision panel is 43.1" to 45.9" • Accessible toilet stall does not have handles on both sides of door • Non-compliant grab bars • Non-compliant showers/benches/changing areas • Non-compliant signage • No accessible cabinets • Accessible route with moderate access issues (level changes that can be ground down or fitted with device) • Baby changing station if mounted over 36" in height or in wrong location • Accessible seating not integrated or on sloped area • Transaction counter for employee use, above 34" • Urinal mounted between 18" - 19.9" • Non-compliant drinking fountains • No accessible telephones • Coat hooks are mounted above 48" • Grab bars mounted over 37" • Protrusions into path of travel 6.1" to 9" or between 70.1" and 80" • Water closet seat height 20" or above

Table 5. Prioritization Factors for Facilities (cont.)

Priority	Criteria
<p style="text-align: center;">Low</p>	<ul style="list-style-type: none"> • Non-compliant parking (striping, signage) • Baby changing station mounted 34.1" to 35.9" • Non-compliant dispensers (between 48" - 54" paper towel, coat hook, etc.) • Non-compliant pay phone • Not enough accessible cabinets • Minor level changes, gaps or cracks in accessible route • Vision panel is 1/2" to 3" too high • Knee clearance minimally off. Any dimension for knee clearance less than 1" • No visual strobe provided in employee area • Water closet over 19" less than 20" • Coat hook is not in accessible stall, but is in other stalls • Grab bars mounted up to 37", or 1" over compliance • Non-compliant public phones • Protrusions into path of travel 4.1" to 6" • Any element covered under 'safe harbor' but not compliant because the room was not fully compliant with old standard • Any element within a reasonable tolerance, but not fully compliant

Table 6. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known accident/injury at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within 2 blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within 2 blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within 2 blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	One curb ramp per corner and another is needed to serve the other crossing direction
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48 inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above

Table 7. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5	3.5 ≥ Value > 2.0	
Width of sidewalk is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, Sinking, or Cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing Sidewalk			Missing Sidewalk
Cross street cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Cross street running slope is greater than 5%	Value > 7.0	7.0 ≥ Value ≥ 6.0	6.0 > Value > 5.0
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0	36.0 < Value < 42.0	42.0 < Value < 48.0
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0	6.0 ≥ Value ≥ 4.0	4.0 > Value > 2.0
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Poor-Dangerous (elevation change greater than ½ inch or gaps greater than 1 inch)	Poor (elevation change between ¼ inch and ½ inch or gaps between ½ inch and 1 inch)	
Cross slope of sidewalk is greater than 2%	Value > 3.5	3.5 ≥ Value > 2.0	
Transition between existing sidewalk and rail crossing is not flush	No		
No existing pre-fabricated panel exists over railroad track to accommodate pedestrians or panel is plastic	Yes – Plastic No		
Flangeway gap is greater than 3 inches	Yes		
Detectable warnings are not installed in advance of pedestrian railroad crossing on one or both sides of the track	No		

Table 8, Table 9, and Table 10 provide summaries of the prioritization classifications for signalized intersections, sidewalks, and unsignalized intersections, respectively.

Table 8. Prioritization Summary Signalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	195
3 (high)	27
4 (high)	82
5 (medium)	377
6 (medium)	50
7 (medium)	37
8 (medium)	81
9 (low)	26
10 (low)	-
11 (low)	15
12 (low)	-
13 (low)	218
Total	1,108

Table 9. Prioritization Summary for Sidewalk Corridors

Line type	Length (miles) by Priority						Total
	1 (high)	2 (medium)	3 (low)	Compliant	Not Prioritized	Handrail Needed	
Sidewalk Line	51.23	89.39	2.57	186.78	-	-	329.97
Sidewalk Issues (including missing sidewalk)	50.46	13.28	58.31	0.75	0.09	0.46	123.37
Driveways	22.25	18.99	16.02	27.44	-	-	84.70
Cross Streets	2.11	4.56	11.02	28.42	-	-	46.10
Total	126.06	126.62	87.92	243.39	0.09	0.46	584.13

Table 10. Prioritization Summary for Unsignalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	1,515
3 (high)	1,005
4 (high)	42
5 (medium)	1,469
6 (medium)	1,005
7 (medium)	43
8 (medium)	8
9 (low)	243
10 (low)	2
11 (low)	-
12 (low)	20
13 (low)	685
Total	6,037

2.10 Staff Training

The Consultant team developed three specific trainings for ODOT personnel. The main training was developed for the inspectors and was provided twice in each District. This class was created to help the inspectors understand what is required to achieve compliance and what, procedurally, should be done when compliance is technically infeasible. The Consultant team helped ODOT staff understand what to look for and who to contact if they find an access problem in the field. A similar training was developed for the design team to help them understand both the letter and the spirit of ADA compliance when existing conditions prevent full compliance. The requirement for full compliance was emphasized unless there is a documented reason in both trainings. The final training was for the management team to help them understand what was taught to the other two groups and what decisions need to be made to ensure ODOT maintains compliance moving forward. The trainings classes are summarized in **Table 11**:

Table 11. Staff Training Summary

Date	Training	Number of Attendees
March 27, 2014	Managers Training	32
March 28, 2014	Managers Training	33
March 12, 2014	Design Training	29
March 14, 2014	Design Training	50
January 07, 2014	Inspector Training District 1	24
January 08, 2014	Inspector Training District 1	16
January 16, 2014	Inspector Training District 2	16
March 11, 2014	Inspector Training District 3	20
March 31, 2014	Inspector Training District 4	36
April 01, 2014	Inspector Training District 4	35
April 22, 2014	Inspector Training District 5	17
February 12, 2014	Inspector Training District 6	14
February 13, 2014	Inspector Training District 6	18
February 20, 2014	Inspector Training District 7	27
February 26, 2014	Inspector Training District 8	14
February 27, 2014	Inspector Training District 8	11

2.11 Public Outreach

ODOT hosted three (3) public workshops to provide a summary of the Transition Plan and receive feedback on the Transition Planning process and any other concerns related to accessibility. ODOT advertised the public meetings following the standard meeting and legal notice announcement process and also contacted over 100 individuals from disability organizations via email to inform them of the meetings. **Table 12** summarizes the workshop information.

Table 12. Public Workshop Summary

Date	Location	Number of Attendees
February 8, 2016	City of Tulsa Rudisill Regional Library	0
February 9, 2016	City of Oklahoma City City Hall Council Chamber	3
February 10, 2016	City of Lawton City Hall	2

A sampling of comments received at the workshop are summarized below:

- Advertise future meetings via social media;
- Include additional outreach to disability organizations to help publicize the meetings; and
- There is a lack of sidewalk and/or ADA compliant sidewalk along ODOT bridges.

2.12 Facilities Cost Estimate Overview

Table 13 summarizes the estimated costs to bring each of the facility type, including adjacent municipal facilities as previously stated in Section 1.0, into compliance, by District.

Table 13. Facility Cost Estimate Summary

District	Weigh Stations	Rest Stops	Tourism Information Centers	Capitol Complex Parking Lots	Buildings	Signalized Intersections	Sidewalks	District Total
1	N/A	\$25,987	\$6,264	N/A	\$654,730	\$6,098,000	\$11,534,000	\$18,318,981
2	\$150,808	N/A	\$1,104	N/A	\$521,113	\$4,277,000	\$21,295,000	\$26,245,025
3	N/A	\$20,449	N/A	N/A	\$797,072	\$6,916,000	\$32,743,000	\$40,476,521
4	\$182,752	\$4,988	\$58,735	\$153,799	\$875,439	\$15,047,000	\$36,456,000	\$52,778,713
5	N/A	N/A	\$3,759	N/A	\$806,631	\$2,290,000	\$27,690,000	\$30,790,390
6	\$54,888	N/A	N/A	N/A	\$787,691	\$1,941,000	\$16,408,000	\$19,191,579
7	\$76,886	\$93,775	\$7,450	N/A	\$780,710	\$5,156,000	\$17,188,000	\$23,302,821
8	N/A	\$13,344	\$20,253	N/A	\$514,671	10,781,000	\$25,621,000	\$36,950,268
Central	N/A	N/A	N/A	N/A	\$258,701	N/A	N/A	\$258,701
Total	\$465,334	\$158,543	\$97,565	\$153,799	\$5,996,758	\$52,506,000	\$188,935,000	\$248,313,000

[This page intentionally left blank]

3.0 Transition Plan

The Transition Plan combines the findings of the facility surveys, policy assessments, program evaluations, and community review. Specific policy and program recommendations can be found in Section 2.0. The specific infrastructure modifications required to make programs accessible are located in the [Appendix M](#) and the [ADA Map Portal](#). Each facility report contains a complete list of architectural barriers and barrier removal actions.


3.1 Responsible Officials

Brian Taylor, Chief Engineer, is responsible for implementing the Transition Plan. To help disseminate the information from the Self-Evaluation, District Meetings were held with each of the District Engineers, Division/District Liaisons, and other Division/District Staff to review the findings and recommendations specific to each of the maintenance districts with the Consultant team. **Table 14** lists the current District Engineers:


Table 14. District Engineers

District		Name
1	Muskogee	Chris Wallace
2	Antlers	Anthony Echelle
3	Ada	Ron Brown
4	Oklahoma City	Trenton January
5	Clinton	Brent Almquist
6	Buffalo	Ron McDaniel
7	Duncan	Jay Earp
8	Tulsa	Randle White
9	Central Office	Brian Taylor

In lieu of contacting Brian Taylor or the District Engineers, the public may contact ODOT's ADA/504/508 Coordinator, Chris Thompson, via the following information:



Chris Thompson
 ADA/504/508 Coordinator
 Contract Compliance Division
 Oklahoma Department of Transportation
 Oklahoma City, Oklahoma 73105-3204
 Office: (405) 521-4140
cmthompson@odot.org



3.2 Implementation Schedule

Table 15 details the statewide barrier removal cost estimates and suggested implementation schedule by facility type. This suggested 30 year plan will serve as the implementation schedule for the Transition Plan update. ODOT reserves the right to change the barrier removal priorities on an ongoing basis in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in ODOT programs.

It is the intent of ODOT to have its ADA Coordinator work together with Department Senior Staff to determine the funding sources for architectural barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in ODOT’s Construction Work Plan to be addressed on a fiscal year basis.

Table 15. Proposed Implementation Schedule

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget
Weigh Stations	\$465,334	5	\$93,067
Rest Stops	\$158,543	5	\$31,709
Tourism Information Centers	\$97,565	5	\$19,513
Capitol Complex Parking Lots	\$153,799	5	\$30,760
Buildings	\$5,996,758	10	\$599,437
Signalized Intersections	\$52,506,000	20	\$2,625,300
Sidewalks	\$188,935,000	30	\$6,297,833
Total	\$248,349,000		
Total Annual Budget (years 1 - 5)			\$9,697,619
Total Annual Budget (years 6 - 10)			\$9,522,570
Total Annual Budget (years 11 - 20)			\$8,923,133
Total Annual Budget (years 21 - 30)			\$6,297,833

3.3 Next Steps

FHWA has provided a memo which outlines all the requirements of a Transition Plan. Below is a list of elements ODOT has addressed to meet the FHWA requirements:

- Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers for short term (planned capital improvement projects);
- Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA;
- Provide prioritization information through the [ADA Map Portal](#), planning, and investments directed at eliminating other identified barriers over time;
- ODOT has committed \$5,000,000 annually to ADA Specific Projects, at least \$4,000,000 annually to be included in normal Construction Projects for ADA Improvements, and \$1,000,000 annually for Facility Improvements;
- ODOT will be working these projects in conjunction with the 8 Year Work Plan;
- Through a partnership with the Transportation Alternatives Program, some inventory will be brought into compliance when the communities’ intent is to repair on system inventory; and
- To further track 8 Year Work Plan projects, track ADA Specific Projects, and to update prioritization the [ADA Map Portal](#) has been developed and will be continually updated.

Appendix (on website)

<https://oklahoma.gov/odot/business-center/contract-compliance/ada/self-evaluation-and-transition-plan.html>

Appendix A: Step-by-Step Documents

- Step-by-Step Approach to ADA Compliant Programs, Services and Activities Provided
- Step-by-Step Approach to an ADA Compliant Human Resources Process
- Step-by-Step Approach to ADA Compliant Job Descriptions
- Step-by-Step Approach to an ADA Compliant Evacuation Plan
- Step-by-Step Approach to an ADA Compliant Website

Appendix B: Evacuation Chair Specifications

Appendix C: Grievance Forms

- Americans with Disabilities Act (Title I) Complaint Form
- Americans with Disabilities Act (Title II) / Section 504 Complaint Form
- Section 508 Complaint Form
- Title VI Complaint Form
- Title VII Complaint Form

Appendix D: Federal Funding Recipient Guidance

- Maintenance versus Alterations Guidance for ADA Compliance
- Traffic Signal Guidance for ADA Compliance
- ADA Checklist for Recipients

Appendix E: ODOT PROWAG Adoption Memo

Appendix F: Department of Justice/Department of Transportation Joint Technical Assistance Memo

Appendix G: ADA Compliance by Resolution Process for Municipalities

- Sample Resolution Request Letter
- Sample Resolution Approval Letter

Appendix H: Correcting Transition Plan Elements

- Projects through the Local Government Division
- Projects through the Project Management Division
- Projects through the Field Divisions

Appendix I: Accessible Pedestrian Signal and Curb Ramp Request Form

Appendix J: Policy and Procedure Development

- Access Due-Diligence Checklists: Buildings

- Access Due-Diligence Checklists: Public Rights-of-Way

Appendix K: Design Standard Review Summaries and Redlines

- 1999 Roadway Design Standards
- 1999 Traffic Engineering Highway Lighting Design Standards
- 1999 Traffic Engineering Traffic Control Design Standards
- 1999 Traffic Engineering Signal Design Standards
- 1999 Traffic Engineering Signing Design Standards
- 2009 Roadway Design Standards
- 2009 Traffic Engineering Highway Lighting Design Standards
- 2009 Traffic Engineering Traffic Control Design Standards
- 2009 Traffic Engineering Signal Design Standards
- 2009 Traffic Engineering Signing Design Standards
- 2009 Traffic Engineering Quality Control Standards for Temporary Traffic Control Devices

Appendix L: Construction Manual Review Summary

Appendix M: Facilities Reports

- [Appendix M: Facilities Reports Index](#)
- [Appendix M: Facilities Reports Central Division](#)
 - Buildings
- [Appendix M: Facilities Reports District 1](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 2](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 3](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 4](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Capitol Complex Parking Lots
 - Signalized Intersections

- Sidewalk
- [Appendix M: Facilities Reports District 5](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 6](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 7](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk
- [Appendix M: Facilities Reports District 8](#)
 - Weigh Stations
 - Rest Stops
 - Welcome Centers / Tourism Information Centers
 - Buildings
 - Signalized Intersections
 - Sidewalk

ADA Map Portal

<http://okdot.maps.arcgis.com/apps/webappviewer/index.html?id=42829bf5ebd94caca0c038023b24eea1>