



# **ADA Self-Evaluation and Transition Plan**

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*February 2022*

The Texas Department of Transportation (TxDOT) has prepared this transition plan with the assistance of the consultant team led by Cole Design Group, Inc. along with its subcontractor team, Pape-Dawson Engineers, Inc. ADA One, LLC, and Access by Design, LLC. The consultant team, the Civil Rights Division (CIV), and contributing divisions of the Texas Department of Transportation are responsible for the development of the ADA Self-Evaluation and Transition Plan report and program. This group is referred to as the 'project team' throughout this report.



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## 1. Introduction

The Texas Department of Transportation Department (TxDOT) has a long history of being committed to providing for the safety, reliability, and accessibility of the public the agency serves. The people of Texas have come to expect the best highway system in the United States from this agency and should be able to now expect the best transportation system for all our citizens. TxDOT is proud to be a part of changes and progress that can unite, serve, and further the safe and efficient movement of goods, services, and people to ensure everyone is included. TxDOT is responsible for the operation and management of more than 195,000 lane miles of roadways on the State Highway System. This responsibility includes more than 55,000 bridges, 3,400 miles of interstate, an estimated 5,000 miles of sidewalks and other pedestrian facilities, and more than 2,500 TxDOT-owned buildings or sites, such as safety rest areas and travel information centers, across the state. Not all TxDOT miles of roadways on the State Highway System are appropriate for sidewalks and not all buildings have public access. This document reports TxDOT's efforts to evaluate and understand public-facing pedestrian facilities, buildings, sites, as well as other public-facing points of access to TxDOT services, such as TxDOT's websites, and their degree of accessibility for all members of the public.



## 2. Background to this Report

TxDOT is committed to creating accessible programs, policies, and services, in accordance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The ADA is a federal civil rights law that mandates equal opportunity for individuals with disabilities. It prohibits discrimination against people with disabilities in jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA requires state and local governments to make their programs and services accessible to persons with disabilities (28 CFR 35.149-35.151). This requirement extends not only to physical access at government facilities, programs, and events, but also to pedestrian facilities in public rights-of-way.

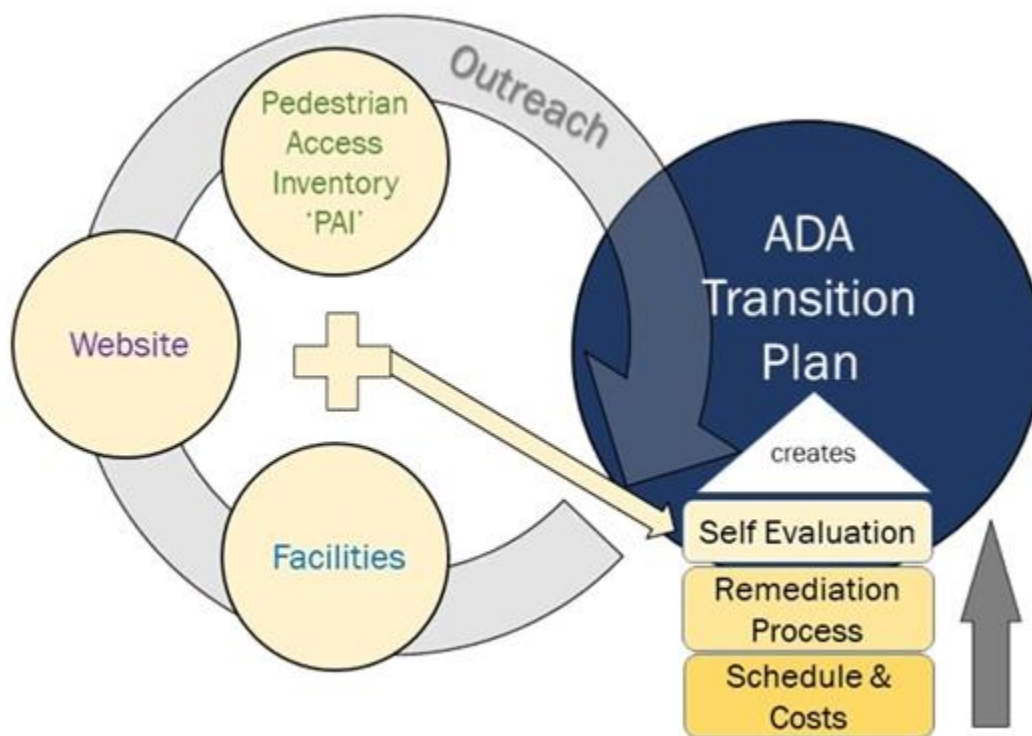
Section 504 of the Rehabilitation Act of 1973, as amended (Section 504), imposes similar prohibitions of discrimination in federal-assisted programs. TxDOT provides assurances to the U.S. Department of Transportation, Federal Highway Administration, stating its commitment to nondiscrimination. See Appendix (Attachment A) for the ADA/Section 504 Assurance.

TxDOT is required by regulations under Title II of the ADA and Section 504 to assess its services, policies, and practices as part of a self-evaluation; to modify any policies or practices that discriminate against people with disabilities; and to develop a transition plan identifying any physical changes to facilities that are necessary to achieve “program access.” A focus on program access is to ensure that programs (such as pedestrian facilities or other various facilities available to the public) are accessible when viewed in their entirety. Program access is discussed further in section 4 of this document. The transition plan must include a schedule for elimination of barriers where required, giving priority to certain types of facilities, such as those that serve state and local government offices and transportation services.

TxDOT developed an ADA Transition Plan in 2004, and since that point in time, TxDOT has constructed many improvements and has remediated many locations across the state to advance accessibility and provide for public access. It is considered best practice for public agencies to update their ADA self-evaluation and transition plans to reflect the changing environment and infrastructure over time. This is important to ensure that agencies can identify and remove barriers to their programs, policies, and activities, which include physical assets, services, and means of communication.

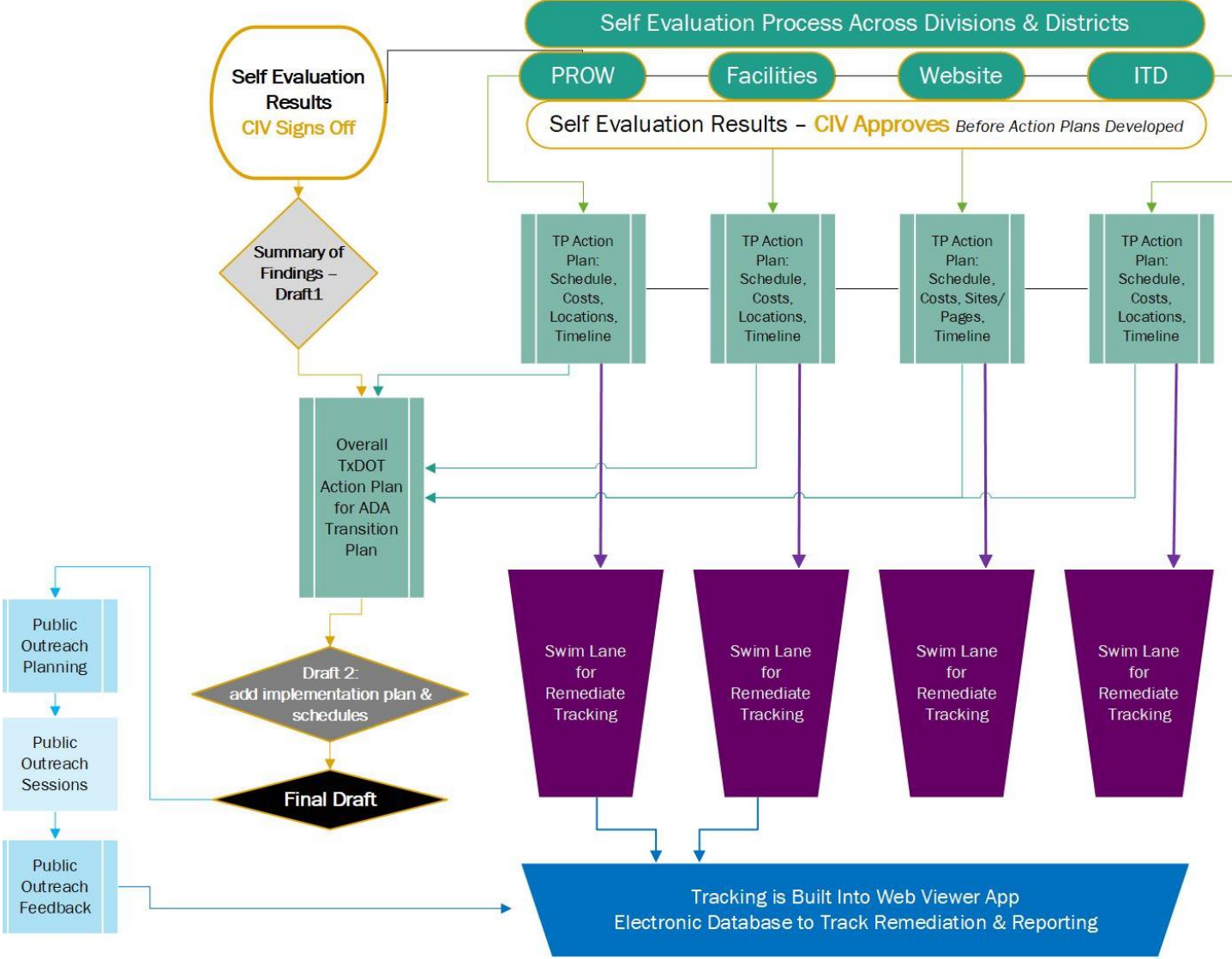
The regulations require the ADA Transition Plan to include:

- An inventory of barriers or physical obstacles in facilities available to the public that limit accessibility of programs or activities - known as a 'self-evaluation.'
- A schedule and methods to be used to make the facilities accessible – known in this report as the 'implementation plan.'
- Public involvement
- Identification of the person responsible for implementation of the plan



This document serves as the updated ADA Self Evaluation and Transition Plan report. It communicates the project scope and the methodology used to evaluate TxDOT's various public-facing assets. It provides a summary of findings identified during the self-evaluation process, with planning-level cost estimates, and communicates TxDOT's robust approach to the prioritization of issues. The report shares the public outreach conducted and communicates how TxDOT intends to remediate accessibility issues over time through an implementation schedule.

The workflow model below reflects the aggressive schedule started in February 2020 to move all data collected into an updated ADA Transition Plan in 2022.





### **3. Applicable Laws, Regulations, Standards and Guidance**

TxDOT has an obligation to follow all federal laws, regulations, standards, and guidance relating to accessibility. TxDOT is committed to upholding the requirements of the ADA and Section 504, including provisions of Title II of the ADA that apply to policies, programs, and services, and to following the ADA Accessibility Standards for facilities. TxDOT has also adopted the draft proposed Public Rights-of-Way Accessibility Guidelines (PROWAG) issued by the U.S. Access Board in 2011. While PROWAG is not yet federal law, FHWA considers it the best practice guidance available to address accessibility in the public rights-of-way. Further, the Texas Department of Information (DIR) requires state agencies to comply with Web Content Accessibility Guidelines (WCAG) 2.0 A/AA, as summarized in Texas Administrative Code §§206.50, .70., which directs state agencies to use WCAG 2.0 A/AA for all new or revised web pages. While the Department of Justice (DOJ) has not developed regulations specific to website compliance, DOJ has encouraged state agencies to comply with WCAG and has required many public agencies to conform to WCAG through settlement agreements and consent decrees.

The Rehabilitation Act of 1973, Section 504 states that “no otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Other federal laws that provide very similar nondiscrimination language based on disability that apply to TxDOT include the Americans with Disabilities Act, and the Architectural Barriers Act. The regulations for the ADA, Title II and Section 504 include administrative requirements for all government entities employing more than fifty people. These administrative requirements are:

- Completion of a self-evaluation to evaluate programs, services, and activities.
- Development of an ADA complaint procedure.
- Designation of a person who is responsible for overseeing Title II compliance.
- Development of a transition plan is required for any public entity with more than 50 employees.

#### **Administrative Requirements, Locations of Information**

- The ADA can be found at: [www.ada.gov/pubs/ada.htm](http://www.ada.gov/pubs/ada.htm)
- Department of Justice’s ADA regulations for Title II, **28 CFR Part 35**, can be found at: <http://www.ada.gov/regs2010/ADAregs2010.htm>
- **Section 504** can be found at: <https://www.hud.gov/programdescription/sec504>
- DOT’s **Section 504 regulations, 49 CFR Part 27** can be found at: <https://www.govinfo.gov/content/pkg/CFR-2013-title49-vol1/xml/CFR-2013-title49-vol1-part27.xml> and <https://www.govinfo.gov/content/pkg/CFR-2010-title49-vol1/pdf/CFR-2010-title49-vol1-part27.pdf>

TxDOT's ADA/504 Program is governed by other laws, regulations, standards, and guidance, including but not limited to:

- **The Architectural Barriers Act of 1968 (ABA)**, which requires that facilities designed, built, or altered with certain federal funds be accessible according to federal standards. The Access Board's updated ADA-ABA Accessibility Guidelines of 2004 have been incorporated into the ABA Accessibility Standards and adopted by the General Services Administration, whose regulation applies to DOT-funded facilities covered by the ABA.
- **1991 ADA Standards for Accessible Design** <https://www.ada.gov/1991standards/adastd94-archive.pdf>
- **2010 ADA Standards for Accessible Design** <https://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.pdf>
- **Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG)** <https://www.access-board.gov/prowag/>
- **ADA Standards for Transportation Facilities** [www.access-board.gov/ada-aba/ada-standards-dot.cfm](http://www.access-board.gov/ada-aba/ada-standards-dot.cfm)
- **Texas Accessibility Code** [https://www.texasaccess.com/technical/tas\\_ada\\_codes/](https://www.texasaccess.com/technical/tas_ada_codes/)
- **Web Content Accessibility Guidelines (WCAG) 2.0 A/AA** <https://www.w3.org/TR/WCAG20/>. WCAG is a set of universal design guidelines for accessible web design. It is created and maintained by the World Wide Web Consortium (W3C) (<https://www.w3.org>), which provides design guidelines for non-proprietary web technologies. The W3C is best known for its standardization of Hypertext Markup Language (HTML), which forms the basis of all modern websites. For DIR, this requirement is summarized in Texas Administrative Code §§206.50, .70.

## 4. Discrimination and Accessibility

A key requirement of Title II of the ADA and Section 504 is program accessibility: programs, benefits, services, and activities provided by public entities or recipients of federal financial assistance must be accessible to people with disabilities. Put another way, a qualified individual with a disability is not to be discriminated against because the entity's facilities are inaccessible or unusable.

Program access may be achieved by either structural methods (e.g., making physical changes to a facility) or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of auxiliary aids and assistance, or provision of services at alternate sites. For example, in some cases a program or service offered on the inaccessible second floor of a building can be made accessible by offering it on the accessible first floor.

In general, both may be utilized to ensure program access, but there are some exceptions where existing facilities are involved. The ADA regulation for Title II, in Section 35.150 states that the regulation:

- Does not require a public agency to make each existing facility accessible.
- Does not require an action that would threaten or destroy the historic significance of historic property.
- Does not require a public agency to fundamentally alter the nature of services, programs, or activities.
- Does not require a public agency to incur undue financial and administrative burdens.

## 5. Undue Burden

While it is rare that TxDOT may not be able to provide program access, there are some instances where it is permissible under the ADA. Access to each service, program, or activity is to be “viewed in its entirety.” Program access does not require each facility be made physically accessible, in all instances, and equal access can be made available at times through creative solutions, as discussed in other sections of this document. However, physical accessibility is a requirement for all new facilities intended to provide programs, and for any facilities undergoing alteration, compliance issues should be remediated to the latest standards.

TxDOT is not required to incur undue financial burden. The decision that achieving compliance would result in an undue burden must be made by the head of the public entity or his/her designee. Representing TxDOT, the Executive Director of the agency, or his or her designee has the authority to identify an undue burden. The decision is to be accompanied by a written statement of reasons for reaching that conclusion.

## 6. Designated Oversight of Implementation: The ADA Coordinator

Title II of the ADA requires the ADA Self-Evaluation and Transition Plan to designate a person who is responsible for overseeing Title II compliance and the implementation of the plan.

### ADA Coordinator

As required by 28 CFR 35.107(1), TxDOT employs Statewide ADA/504 Coordinators who facilitate training, complaint investigation, technical support, guidance, customer service and other ADA program services and activities. The TxDOT Statewide Coordinators are:

Michael D. Bryant, Director  
Civil Rights Division  
125 E. 11th Street  
Austin, TX 78701  
512-416-4700 (Voice)  
512-486-5539 (FAX)  
7-1-1 (Relay Texas)  
[Michael.D.Bryant@txdot.gov](mailto:Michael.D.Bryant@txdot.gov)

### ADA Compliance Program Administrator

Juanita J. Webber  
Civil Rights Division  
125 E. 11th Street  
Austin, TX 78701  
512-416-4700 (Voice)  
512-486-5539 (FAX)  
7-1-1 (Relay Texas)  
[Juanita.Webber@txdot.gov](mailto:Juanita.Webber@txdot.gov)

TxDOT is comprised of twenty-five districts and thirty-six divisions. In addition to the Statewide ADA Coordinator and ADA Compliance Program Administrator, an ADA Liaison has been assigned within the districts and divisions to be responsible for program implementation at the respective levels. Each ADA Liaison coordinates compliance activities with the Compliance Program Administrator and submits required reports regarding goals and accomplishments of TxDOT. The list of ADA Liaisons is available in the Appendix, Attachment B.



## **7. Policy**

TxDOT ensures accessibility policies are implemented statewide. Individual divisions of TxDOT also develop division-level policies that pertain to specific areas of service delivery. All TxDOT policies are developed to ensure nondiscrimination for people living with disabilities. Policies, and their purpose, are identified below and can be found in the Appendix.

### ***7.1 Public Notices***

All TxDOT public meetings are conducted so that people with disabilities have an equal opportunity to participate. All public notices make this affirmative assurance and provide contact information and deadlines for requesting reasonable accommodation. Persons requiring alternative forms of communication, including interpreters or alternate formats of print documents related to public hearings, open house events or any other event where the public may be invited, may contact the TxDOT event sponsor via telephone or email.

### ***7.2 Nondiscrimination Policy Notice***

TxDOT has issued policies and procedures reflecting its intent to make all its services, programs, activities, and facilities accessible. These can be found in the Appendix.

### **7.3 ADA Grievance Procedure**

The DOJ Title II regulation, in 28 CFR 35.107(b) requires a public entity that employs more than 50 people to adopt and publish a grievance procedure providing for the prompt and equitable resolution of complaints alleging discrimination based on disability access to any governmental facility, program, service, or activity provided by the entity.

The resolution of any grievance or inquiry will require reviewing the nature of the alleged noncompliance, establishing governing entities and reviewing options for accommodating remedies to the location of interest. In determining possible solutions to the issue, TxDOT will consider the health and safety of others, the feasibility of alterations, the cost of the possible solutions, availability of funding, ease of implementation and how the solution compares in priority to other proposed ADA projects. The resolution of any one grievance or inquiry by TxDOT does not constitute a precedent upon which TxDOT is bound to or which the complainant party shall solely rely. TxDOT shall take all necessary steps to ensure that communications with all members of the public notifying the ADA Compliance Administrator of the Civil Rights Division (CIV) of the ADA grievances are addressed appropriately. Guidelines established within the following Grievance Procedures are intended to safeguard the processing of all TxDOT complaints associated with ADA/504 concerns.

Grievances pertaining to ADA/504 issues are processed through formal procedures established by TxDOT in compliance with 28 CFR. 35.107(b) and 49 CFR 27.13(b). They require the Department to respond within fifteen (15) days of a complaint; to conduct affirmative attempts for substantive resolution; and continuing actions where conciliation is not possible. Complaints are maintained in accordance with TxDOT's records retention policy, including complainant name; bases; issue(s); resolution, if any; and follow-up, if any. Complaints not within the Department's jurisdiction are referred to appropriate parties with original complaint maintained with referral action as appropriate. The ADA Grievance Procedure is posted on the Department's Website and on public information bulletin boards at central offices and in each district.

As part of the self-evaluation process, it was determined that a written appeal process should be added to the TxDOT Grievance Policy. The adjustment to the policy to include a written appeal process was made in 2021 and can be found in the Appendix.

## **7.4 Design Standards**

Design Standards are an example of a policy implemented at a division level within TxDOT. In 1992, TxDOT began using DOJ's ADA Accessibility Standards as its accessibility standards. In November 2006, U.S. DOT adopted new ADA Standards for Transportation Facilities (ADASTF, <https://www.access-board.gov/guidelines-and-standards>), and in 2010, DOJ adopted revised ADA Standards for buildings and sites. TxDOT has been proactive about meeting or exceeding these federal accessibility standards in developing its state specifications and standards. The TxDOT Design Standards have been revised to meet the 2006 ADASTF and the 2011 Guidelines for Accessible Public Rights-of-Way (PROWAG), [www.access-board.gov/prowag](http://www.access-board.gov/prowag). As of May 15, 2017, the Texas Department of Licensing and Regulation began allowing the use of the PROWAG for projects in the public rights-of-way. This rule change allows TxDOT to use the PROWAG as its de facto 'standards.' TxDOT's Design Division has also published guidance on the installation of curb ramps and sidewalks (ADA Curb Ramp and Sidewalk Guidance).

## **7.5 Policy Attachments Summary**

Policies are posted on TxDOT's website and can also be found in the Appendix of this document.

**Attachment A:** The Department's ADA Assurance is posted on the TxDOT website at:

<http://ftp.dot.state.tx.us/pub/txdot-info/ocr/ada/ada-assurance.pdf>.

**Attachment C:** The Department's ADA Policy Notice is posted on the TxDOT website at:

<http://ftp.dot.state.tx.us/pub/txdot-info/ocr/ada/ada-notice.pdf>

**Attachment D:** The Department's ADA Nondiscrimination Statement is posted on the TxDOT website

at: <http://ftp.dot.state.tx.us/pub/txdot-info/ocr/ada/ada-nondiscrimination-statement.pdf>

**Attachment F:** The Department's current and prior design standards are posted on the TxDOT website

at: <http://www.txdot.gov/business/resources/txdot-specifications.html>.



## 8. Scope of the Project

As discussed earlier in this document, the ADA and Section 504 require TxDOT to complete a self-evaluation and transition plan. A self-evaluation assesses an agency's services, policies, and practices (including the facilities used in providing those services as well as access to technology such as websites) to determine whether they meet the requirement of law and regulations. Due to the significant size and infrastructure of TxDOT, the Agency's divisions and districts have been actively working to update self-evaluation data since 2015. The Civil Rights Division (CIV) facilitated two self-evaluation processes with all TxDOT divisions and districts to review TxDOT policies and practices. The review was completed in questionnaire format and evaluated accessibility deficiencies, compliance, and policies.

In 2018, the Civil Rights Division selected a multi-disciplined consultant team, Cole Design Group, Inc., Pape Dawson Engineers, Inc., Access by Design, LLC, and ADA One, LLC, to assist TxDOT in the development and facilitation of a best-practice ADA Self-Evaluation and Transition Plan. The project scope included evaluating the data collected for public rights-of-way, facilities, websites, and information gathered over many years. While the 'self-evaluation' communicates the compliance challenges of various assets, the transition plan communicates the action plan to remediate facilities over time as necessary to achieve program accessibility.

Please see prior sections of this report that explain that not every asset must be made accessible; however, TxDOT must ensure access to the programs it offers and make changes to facilities where necessary. TxDOT is including not only its right-of-way facilities (such as curb ramps and sidewalks) and other facilities (such as office buildings) in its transition plan, consistent with the laws' requirements, but is also setting out what changes will be made to its website, based on federal agency guidance.

The ADA Transition Plan is intended to be a 'living' database that allows TxDOT staff to plan, track, and monitor the remediation and progress of accessibility improvements over time. Cole Design Group was engaged for customizing software and technology to aid in the progression of data collection, remediation tracking, and asset data integration. An electronic database system by which to host, evaluate, plan, and track physical assets of TxDOT was a critical part of the scope.

The project team began the project in February 2020. After evaluation of the status of each self-evaluation inventory, it was determined that two program areas required some additional assimilation of self-evaluation. Additional review was performed in the facilities and websites program areas to complete TxDOT's self-evaluation data sets.

TxDOT's public-facing programs and services were evaluated for ADA compliance to include public rights-of-way, facilities, and websites. These were examined in various aspects and organized to include scoping, data collection, evaluating compliance of inventory, costing, and prioritization. Finally, the project team planned and facilitated public outreach and drafted the ADA Self-Evaluation and Transition Plan.

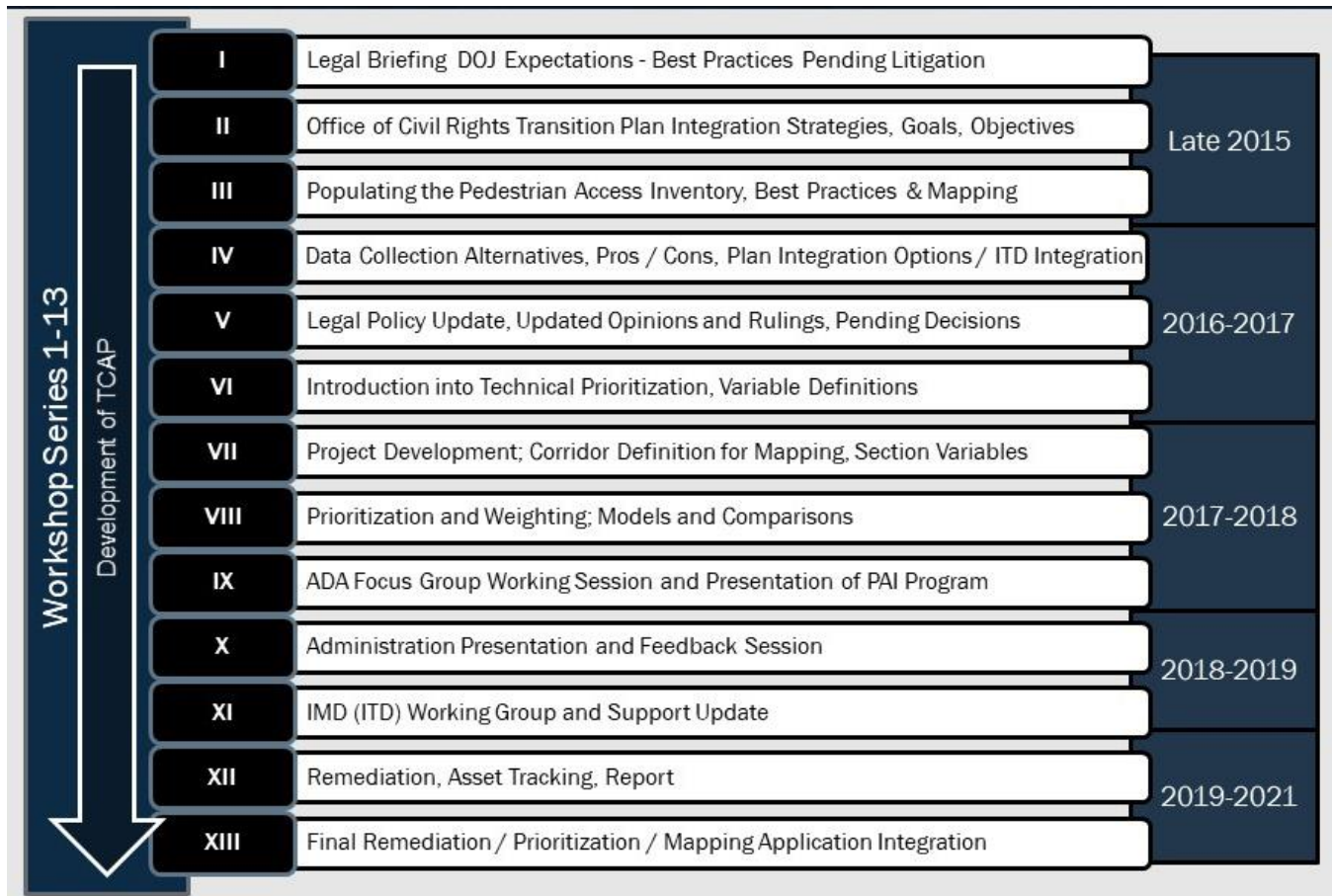
## **8.1 PROW – Scope of the Project**

TxDOT's Design Division led an effort starting in 2015 with a vision to collect 100% of its public rights-of-way inventory in a digital format, to effectively plan both short- and long-term remediation efforts to improve accessibility. In 2015, TxDOT selected the Pape Dawson Engineers and Cole Design Group team, as the accessibility experts, to lead a pilot study of select regions throughout TxDOT. The aim was to identify the best approaches to electronic data collection and means of integration to GIS technology, and to develop a remediation tracking tool that would effectively allow for planning across all divisions and 25 districts of TxDOT.

The pilot study aimed to identify a best practice approach, creating data collection technology tools for intersection data specific to TxDOT needs. The project team developed GIS hosting specifications, created a prioritization strategy and algorithms, and built a web-based application tool that would provide non-GIS TxDOT users a way to interact with the data. The pilot study proved successful in meeting TxDOT's goals. Understanding the magnitude of a statewide data collection effort within a short timeframe of several years, TxDOT had the consultants build data specifications that would allow a multi-consultant approach to sidewalk data collection, while cohesively using the intersection data collection technology built during the pilot study. Further, advanced GIS tools were built for data analysis to ensure continuity in the data of all teams collecting, and to work cohesively within TxDOT's own GIS system. This type of multi-consultant approach had never been attempted by other public agencies using different sidewalk technology. Today, it establishes an advanced standard for comprehensive collection and data management.

The statewide data collection project became known as the Pedestrian Access Inventory (PAI). TxDOT contracted consultant teams to collect and analyze pedestrian infrastructure data. The comprehensive inventory and automated, quantitative prioritization methods allow for better planning of remediation. This baseline provides TxDOT's Design Division the ability to work with the twenty-five districts to determine their implementation schedules on a 4-year cycle, and effectively maintain an updated, relevant ADA Transition Plan. The aim of this program is to bring TxDOT's pedestrian facilities into compliance over time in a strategic, meaningful order and to ensure that no one is denied benefits or services because of their disability.

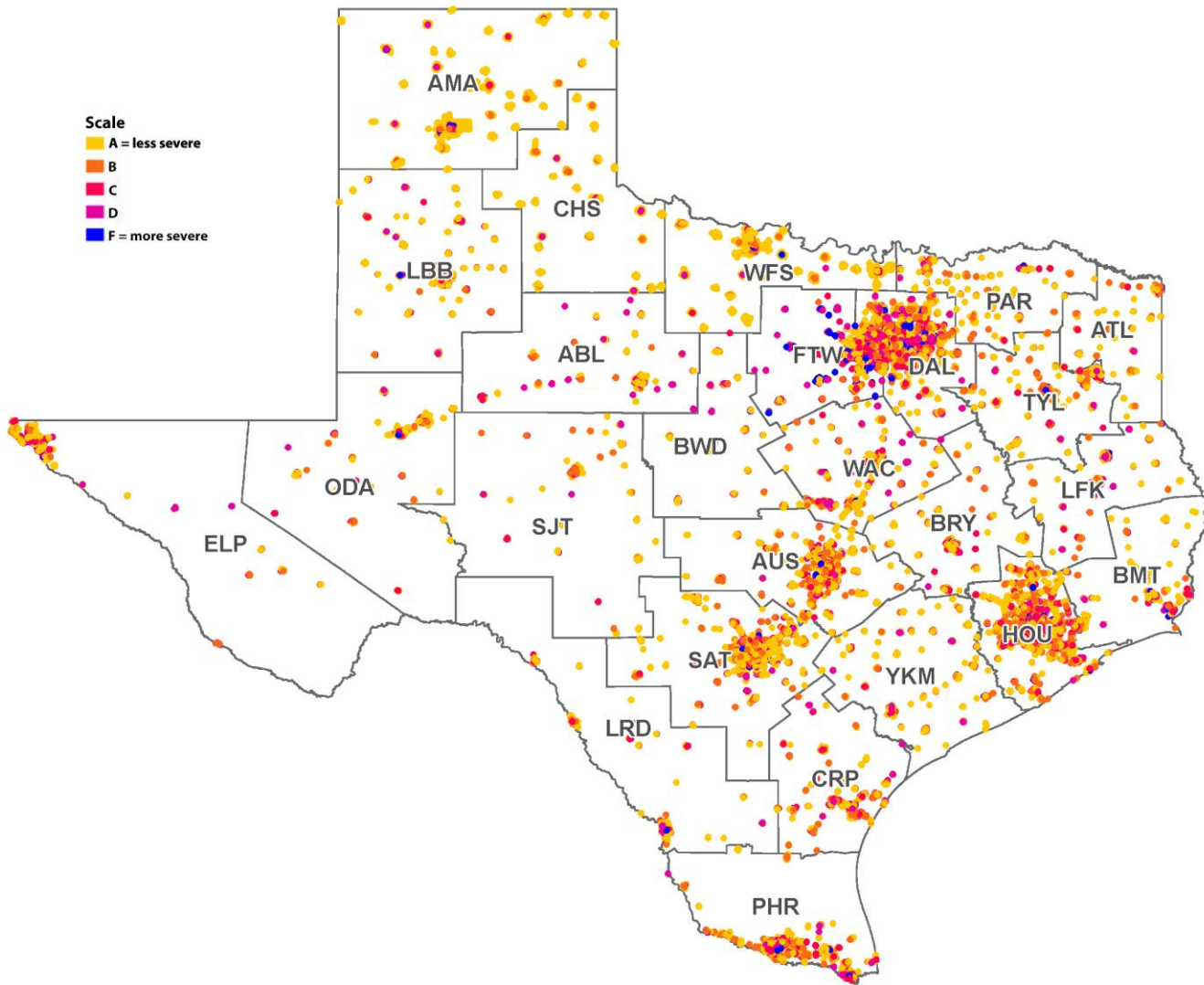
The image below depicts all the major activities of the public rights-of-way scope and work plan of the Pedestrian Access Inventory (PAI) project, starting in 2015 through 2021.



A thorough self-evaluation of TxDOT's public rights-of-way was conducted by assessing:

- sidewalks
- curb ramps
- bus stops
- pedestrian signals

The inventory included a total of 4,419 miles of sidewalk, 131,920 curb ramps, 4,582 island curb cuts, 6,156 bus stops, and 52,179 signal pushbuttons. The aerial image of the state below reflects the magnitude of data collected. The points of data in the image reflect corridors which contain some degree of non-compliance. The legend reflects degrees of severity of compliance issues in these corridors, from “A” being more minor to “F” being more severe.



An overview of the analysis of the data collection and cost summary of the inventory collected for public rights-of-way facilities is located later in this report.

## 8.2 Facility – Scope of the Project

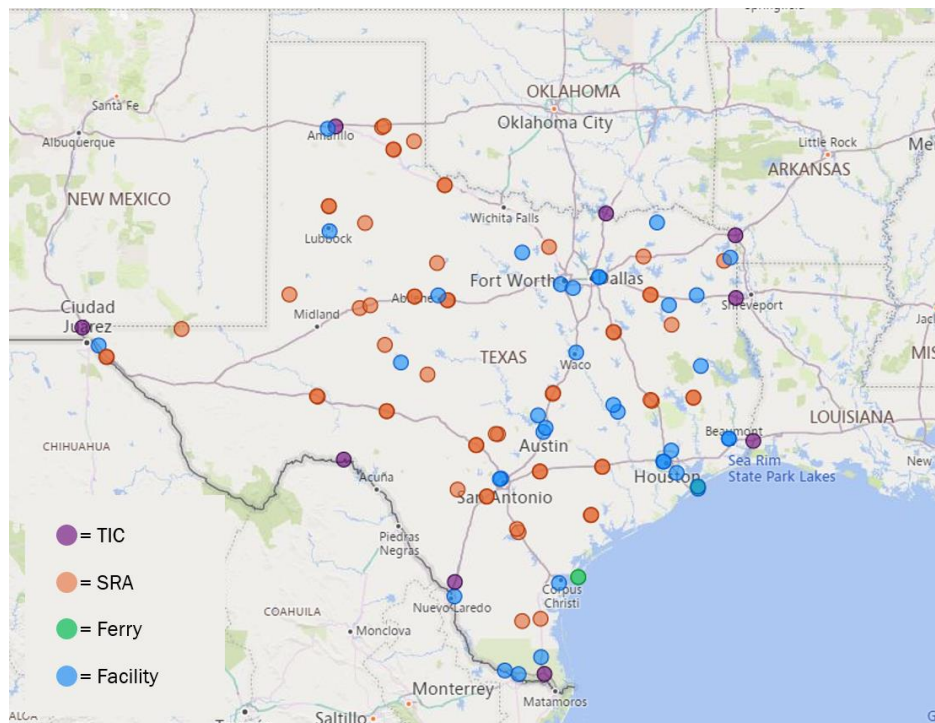
The project team compiled and evaluated the findings for all relevant TxDOT public-facing facilities previously collected in prior years. After reviewing the content available, considering the necessary components to meet Department of Justice standards, and the requirements of the project to ensure the data's compatibility with TxDOT's electronic tracking tool, the project team determined that additional tasks were required to meet the requirements of the ADA Transition Plan.

From fall 2020 to spring of 2021, the consultants engaged in additional assimilation of facility data. The facilities evaluated are managed by several TxDOT divisions which include Support Services Division, Maintenance Division, Travel Information Division, and two districts with oversight of TxDOT ferries. The scope included collaboration with each appropriate TxDOT division, data collection, analysis, prioritization, electronic gathering, and the organization of the public-facing areas of approximately:

- 58 Safety Rest Areas
- 86 General TxDOT Administrative Facilities
- 11 Travel Information Centers
- 2 Ferries
- 157 Total Facilities

See the Appendix for the full list of facilities assessed during this time.

Locations selected for evaluation are reflected in the map below:



## **8.3 Website – Scope of the Project**

As a state agency, TxDOT must comply with Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12131 et seq. (2018), as well as the U.S. Department of Justice’s Title II implementing regulation, 28 C.F.R. pt. 35 (2021). This broad civil rights law requires that no qualified individual with a disability be excluded or denied benefits in any program, service, or activity by a public entity based on their disability. Because websites are a critical means by which public agencies provide information as well as programs, services, and activities to the public, they must be accessible to people with disabilities. While the Department of Justice (DOJ) has not developed regulations specific to website compliance, DOJ has encouraged state agencies to comply with WCAG and has required many public agencies to conform to WCAG through settlement agreements and consent decrees.

One driving factor behind the effort to evaluate TxDOT’s websites was the agency’s need to develop an updated transition plan, and federal guidance to include websites in the self-evaluation process. A second factor supporting TxDOT’s efforts was the need to comply with WCAG 2.0 in Sections 206.50 and 206.70 of the Texas Administrative Code, which is overseen by the state’s Department of Information Resources (DIR). DIR is responsible for overseeing all the state’s information technology infrastructure, including websites.

### **8.3.1. Website – Assessment Scope Prior to 2021**

TxDOT is working on making its websites comply with the Web Content Accessibility Guidelines (WCAG) 2.0 A/AA. Websites at TxDOT are designed, evaluated, maintained, and delivered through two divisions within TxDOT, the Communications Division (CMD) and the Information Technology Division (ITD). CMD manages the primary public-facing website of TxDOT, <http://www.txdot.gov/> domain, while ITD manages all other domains maintained by TxDOT, totaling into the thousands of URL addresses and corresponding pages unique to each site. In addition to sites being managed internal to TxDOT, there are numerous sites managed by third-party vendors to TxDOT.

For years, TxDOT’s divisions, CMD and ITD, have engaged in committed effort to progressively evaluate and update websites, and all communications tools for improved accessibility.

For the purposes of updating TxDOT’s ADA Transition Plan, the project team evaluated the previously collected information in the self-evaluation process of uncovering ADA compliance issues for websites.

The summary of activity and findings of ITD and CMD’s self-evaluation through 2020 include:

- In 2018-2019, TxDOT evaluated websites and active templates. 6024 pages and subpages were evaluated.
- Automated website testing was the predominant mechanism through tools such as WAVE and SiteImprove in previously evaluating accessibility, which were more limited than manual testing.
- ADA defects at the template and component level were identified; AEM were fixed and deployed in production.
- Fixes done at the template and component level were applied to all pages (over 6000 pages) in AEM 6.4.

- TxDOT created an Accessibility Working Group to affect accessibility improvements in technology and communication tools.
  - A Program Charter was created to, in part, address accessibility related challenges.
  - The team incorporated training around accessibility for internal staff.
- ITD built a master inventory list inclusive of 40 third-party sites whose content and data will be imported into ITD-owned websites, thereby allowing TxDOT better control over accessibility in the long-run.
- The third-party sites had preliminary evaluations for compliance with WCAG 2.0 by the TxDOT accessibility working group.
- The methods used by TxDOT in the website self-evaluation included a mix of tool-based testing, automated testing, and manual testing including both WAVE, Axe Pro, and keyboard testing.
- In their previous states, none of the sites were deemed substantially compliant:
  - The worst site was identified to have over 300 known issues.
  - The best site had 8 known issues.
  - In total, over 1,400 accessibility bugs were identified and described.
  - TxDOT hired an accessibility expert internally for the ITD team to aid in testing and monitoring website accessibility.

### 8.3.2 Website – Assessment Scope in 2021

The assessment of TxDOT’s years of website evaluation and progressive steps for improvement, led by two different divisions within TxDOT, while substantial in effort, also found gaps in some areas best identified through robust manual testing.

It was determined that the main public-facing website, [www.txdot.gov](http://www.txdot.gov) would undergo manual testing. This website is predominantly managed by TxDOT’s Communications Division (CMD). Further, because TxDOT’s Information Technology Division (ITD) had taken proactive steps to hire an in-house skilled accessibility-trained professional, allowing for on-going internal testing, the consultant’s recommendation was to evaluate the depth of TxDOT’s current internal capabilities.

The consultant’s team worked with ITD and CMD to create a joint force effort to deepen the website ADA self-evaluation results. In early 2021, the following additional scope effort was defined:

- Manual testing of [www.txdot.gov](http://www.txdot.gov):
  - site controlled by CMD
  - 25 pages to ensure proper coverage of the templates in use and higher traffic
  - evaluation conducted by the consultant
- Joint manual testing of two public facing ITD websites with considerable traffic:
  - *The Southern Gateway*
  - *Keep it Moving Dallas*

- Testing 25 pages each site, again taking the templates into account

**Goals of the 2021 Scope:**

- Provide additional, more in-depth information to compliment the previous findings of the ITD/CMD self-evaluation process.
- Identify any remaining template issues.
- Identify common barriers not detected by automated testing.
- Compare the consultant's evaluation against the TxDOT staff evaluation to determine the level of efficacy.
- Evaluate in-house accessibility professional's testing approach.
- Findings would be used to aid TxDOT in action planning across team roles for the ADA Transition Plan implementation strategies for improved accessibility.

## 9. Methodology to Evaluation

During the ADA self-evaluation process, TxDOT and consultants assessed public rights-of-way, facilities, and select websites, as reflected within the Scope Section of this report. Each of these assets are governed by different federal standards and guidelines. The method of data collection is unique to each asset type, and the data is evaluated against different ADA regulations and standards, which are discussed in Section 3 of this report. This section of the report describes the approach taken in collecting and assessing each unique type of data.

### 9.1 PROW – Methodology

A thorough self-evaluation of TxDOT’s public rights-of-way was conducted by assessing:

- sidewalks
- curb ramps
- island curb cuts
- bus stops
- pedestrian signals

The inventory included a total of 4,419 miles of sidewalk, 131,920 curb ramps, 4,582 island curb cuts, 6,156 bus stops, and 52,179 signal pushbuttons.

The traditional accessibility inventory process in public rights-of-way can be labor-intensive. Many public entities rely on collection methods that provide limited information or assess barriers intermittently. This does not offer comprehensive data or allow for adequate cost estimates for the planning of barrier removal.

TxDOT contracted a multi-consultant project team for data collection across the state. These teams all used the same technology for intersection collection, designed during the pilot study discussed in the Scope Section. Each team had a visual sidewalk collection tool available to them, also developed during the pilot study. Each consultant used a different data collection method for the detailed sidewalk assessment, but all detailed sidewalk data was channeled into a common data specification, designed prior to project kick off, to ensure continuity in data format received by TxDOT into GIS.

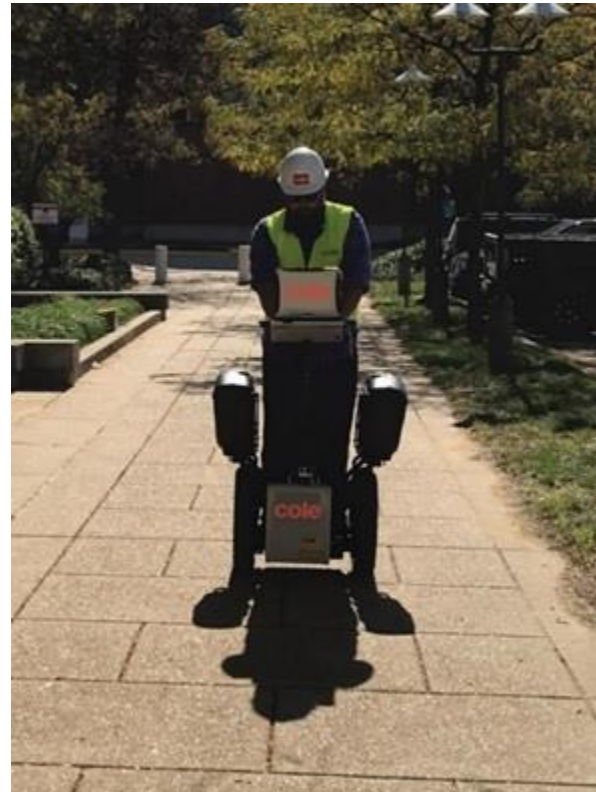
Once the public rights-of-way project kicked-off, each team collected data, performed quality control, and evaluated the data, channeling it into the required, standardized format.

**Sidewalk Collection Approach:** Sidewalk Collection provides the most challenging area of collection due to the magnitude of infrastructure. In addition, TxDOT has some areas with lack of connectivity in sidewalk infrastructure. Teams were given the option to document sidewalk in three ways: detailed collection, visual collection, and marking sidewalk discontinuity.

**Detailed Sidewalk Collection:** TxDOT indicated an interest in utilizing technology that would quickly and adequately document more information, such as the type, severity, and location of sidewalk and curb ramp barriers within the scope boundary. TxDOT contracted the consultant teams able to utilize

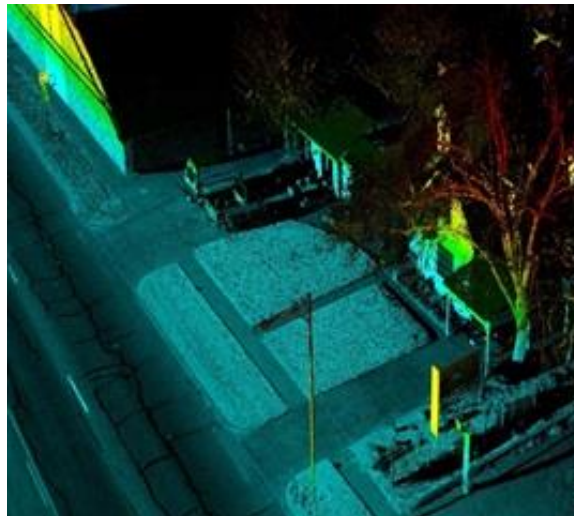
technology to allow for an efficient and effective process to complete TxDOT’s assessment for pedestrian infrastructure within the public rights-of-way.

One consultant team used a form of technology designed specifically for sidewalk inventory. This technology, originally developed through a pilot program funded by the Federal Highway Administration, the Ultra-Light Inertial Profiler (ULIP) is mounted on a Segway. The device’s displacement laser, three accelerometers, optical trigger, distance measurement instrument, and gyroscope are designed to measure the sidewalk surface at a rate of 10,000 records per second. Together, these devices capture detailed information about cross and running slope and small surface variations. A mounted computer offers an interactive display during data collection. The technical approach offered by this technology was identified as a best practice in ADA Compliance at Transportation Agencies: A Review of Practices (NCHRP 20-07 Task 249), a National Cooperative Highway Research Program study.



Other consultant data collection teams relied upon sidewalk assessment methods using 3-D mobile light detection and ranging (LiDAR) and image processing. The presences of sidewalks are extracted first using video log image and LiDAR point cloud. Then, the corresponding key features regulated by the ADA, including sidewalk width, cross slope, grade are automatically measured.

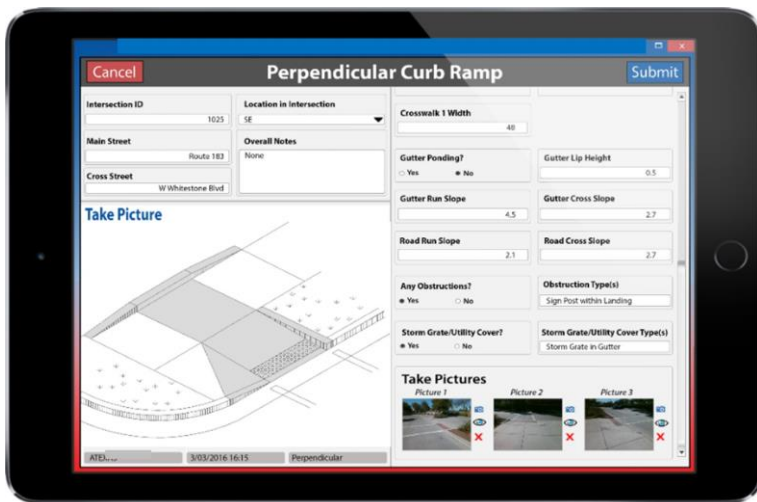
All teams used cost-effective means to extract and integrate ADA compliance assessment data into GIS mapping to extract sidewalk location and measurement information.



**Visual Sidewalk Collection:** The basic collection workflow was a visual (or “windshield”) survey of sidewalks from a moving vehicle in the lane of travel nearest to the sidewalk to be surveyed. Visual Survey crews consisted of at least two surveyors: one to drive the survey vehicle and one to record survey observations in the tablet. The survey vehicle also had a mounted camera for capturing a video record of the survey. Travel speeds for the survey vehicle had to be steady and were reduced below the normal operating speeds on the roadway.

**Sidewalk Discontinuity:** Sidewalk discontinuity occurs where segments of sidewalk are missing or buried. These were logged in the field, or in the office viewing aerial images, with lines placed on a data collector in the aerial map or directly into GIS, to ensure TxDOT can plan for sidewalk connectivity.

**Intersection Collection:** All consultant teams utilized field data specialists and the standardized data collection application created during the pilot study to collect the required information for the curb ramps, signals, and bus stops throughout each district. Based on inspection and measurements of the existing features, field specialists entered data directly into the data collectors, ensured that all relevant characteristics were recorded, and that corresponding photos and videos were properly linked with location data logged into the database, as described in the next section.



Throughout the process, the location of the data collected was linked automatically to a geographic information system (GIS). The geospatial location points, along with digital photos taken in the field were uploaded automatically through the data collection applications as the field data specialists

evaluated the intersections and moved from point to point. The field data specialists utilized the application data entry form and validation forms. Additionally, teams viewed aerial orthophoto image on collection tablets, along with existing rights-of-way, utility, topographic, or other feature data that were preloaded and appeared on the data collectors for easy reference in the field. Digital photos were automatically logged for location and linked to the GIS database, based on synchronized time and date stamps.

### **Geographic Information System (GIS) Database Analysis**

The project team created a geodatabase using the ESRI ArcGIS system. The customized fields for the geodatabase include location, directions, size, features, and obstruction size. The data structure was pre-programmed for data collection, as described above. Data was then logged into a project database and analyzed for compliance by each inventory team for their respective areas of collection.

TxDOT's pedestrian rights-of-way data provides staff geographic data with:

- Positional information: the digital representation of a barrier conforms to the location found in the field.
- Attribute information: the digital representation of a barrier is represented in a manner that best represents the conditions found in the field (% running slope, % cross-slope, inches of vertical separation, etc.).
- Adherence to collection guidance on what features to inventory within the public rights-of-way. This created organized attribute information and improved the quality assurance of the data.

Once the field data collection and validity checks were performed, the raw data for each district was processed for analysis and reporting by the respective collection team. GIS played a pivotal role in the project from data acquisition, organizing with more ease the millions of data points generated during the study.

## **9.2 Facility – Methodology**

Facility data collection and evaluation followed a similar approach to public rights-of-way in collecting data electronically to create efficiency and ensure data readiness for database integration. Collection was completed for the public-facing areas of the facilities.

Collection Areas:

- 1) 58 Safety Rest Areas
- 2) 86 General TxDOT Facilities
- 3) 11 Travel Information Centers
- 4) 2 Ferries
- 5) **157 Total Facilities**

## Assessment Elements:

Typical elements included within a facility assessment included, but was not limited to:

- 1) Access Aisles
- 2) Accessible Routes
- 3) Baby Changing Stations
- 4) Curb Ramps
- 5) Designation Signage
- 6) Drinking Fountains
- 7) Elevators
- 8) Fire Alarms
- 9) Grab Bars
- 10) Grills
- 11) Handrails
- 12) Mirrors
- 13) Operable Parts
- 14) Parking Spaces
- 15) Picnic Tables
- 16) Sales and Service Counters
- 17) Toilet Compartments
- 18) Vending Machines



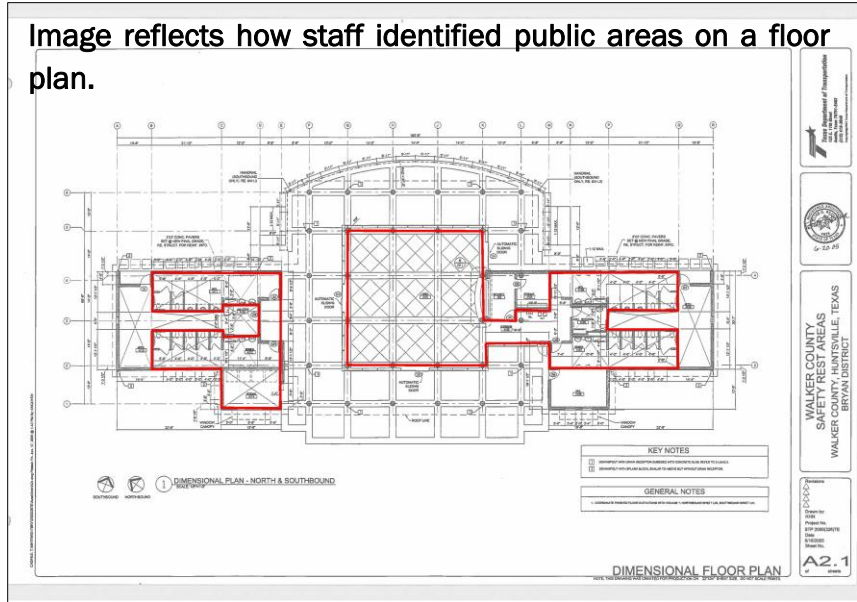
An example of an accessible picnic table at a safety rest area.

For this project, data collection was prioritized to focus evaluation on the spaces within a facility that provided or supported TxDOT programs, services, and activities. These spaces were identified by way of collaborative virtual meetings between TxDOT representatives who managed the specific facility and the consultants. During these meetings, the depth and breadth of program access was discussed allowing for accurate, real-time data collection boundaries to be identified.

**Approach:**

- 1) Teams of two inspectors per site collected data.
- 2) Inspectors utilized tablets to collect data that was uploaded daily.
- 3) Photos were collected and integrated to prioritize the data.
- 4) Inspectors utilized coded floorplans and aerials of sites to deepen understanding of the site.

The project team utilized tablet-style computers for on-site data collection for all facility interior and exterior elements, to both expedite report-writing and minimize use of paper. Teams of two inspectors worked together to evaluate each component within the facility or site.



Measurements were taken and entered in the tablet, photo documentation was also important for ease of later understanding the environment, the space, and the compliance issue identified. This style of data collection allowed teams to capture measurements of each component collected, collect photographs, and upload data into a cloud-based database directly from the field.

Staff in the office reviewed the data for quality control, applied photo mark-ups, organized electronic plans, and inserted aerial GIS photography within the reports for purposes of site location identification. The database populated the compliance measurement against the appropriate ADA regulation, which was loaded into the software, to ensure higher degree of quality and consistency in the analysis. All information was integrated into a robust electronic format and uploaded to the Web Application as discussed earlier in the public rights-of-way section of the report. A facility portion of the electronic database was created to allow facility data uploads to the Web Application tool for managing the data. The structure of the database allows for sorting and filtering of information by various categories. Final written reports convey information in the most plain and usable format possible. The reports and electronic format of data are easily shared across TxDOT divisions and districts.

## Non-Compliant vs 'Program Access' Findings:

The methodology used to analyze and report the data collected for the Facility Self-Evaluation was designed to categorize information into two high-level planning categories: 'Non-Compliant' and 'Program Access'. The 'Non-Compliant' category contains physical elements where a facility or a site does not comply with the applicable standard (the 2010 Standards for Accessible Design). Data

Location Type	Location Description	CATEGORY	DOJ Priority	ISSUE	SURVEY QUESTION
PUBLIC RESTROOMS	Men's 118	Doors/Gates			Side of the door, based on action, is the minimum clearance provided? (See Table
PUBLIC RESTROOMS	Men's 118	Doors/Gates			be opened using no more than
PUBLIC RESTROOMS	Men's 118	Doors/Gates			is a closer, does it take at least 5 ove from a position of 90 position of 12 degrees from the
PUBLIC RESTROOMS	Men's 118	Sinks			edge of the sink or counter (never is higher) no more than
PUBLIC RESTROOMS	Men's 118	Toilet Compartment			hardware ut tight : wrist?
PUBLIC RESTROOMS	Men's 118				

Text Filters

Search

- DRINKING FOUNTAINS
- ELEVATORS
- EXTERNAL ENTRANCES
- EXTERNAL PATHS OF TRAVEL
- FITNESS CENTERS
- FLARED CURB RAMPS
- INTERNAL ENTRANCES
- INTERNAL PATH OF TRAVEL
- INTERNAL SPACES
- LOBBY
- PARKING AND ACCESS AISLES
- PARKING LOT SCOPE
- PATHS OF TRAVEL
- PICNIC UNITS
- PICNIC/RAMADA Si
- PLATFORM LIFTS
- PLAY AREAS
- PORTABLE TOILET U
- PUBLIC RESTROOM:

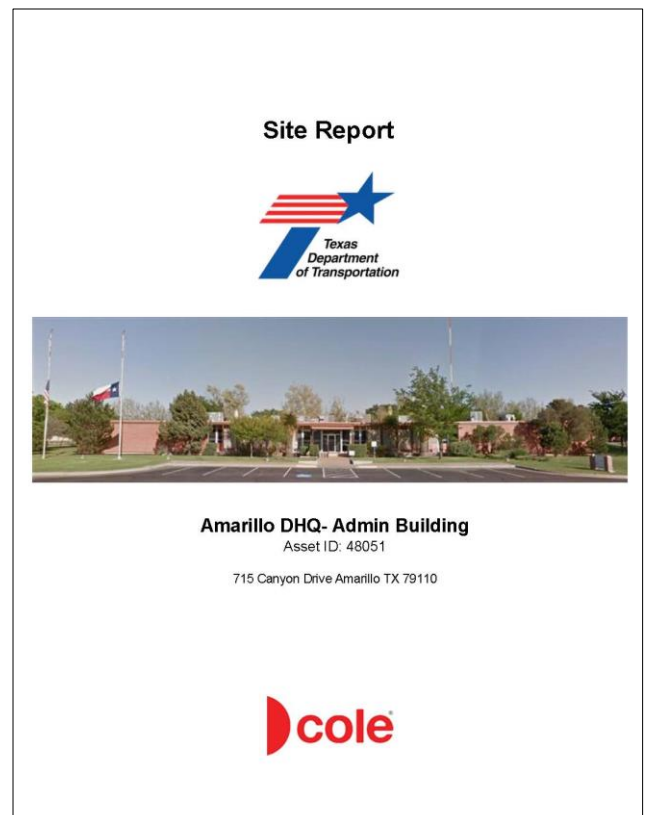
Text Filters

Search

- AA TP DISPENSER REACH
- ACCESSIBLE ROUTE
- BABY CHANGING STATION APPROACH
- BABY CHANGING STATION HEIGHT
- BABY CHANGING STATION KNEE CLEARANCE
- BABY CHANGING STATION REACH

captured as 'Program Access' required deeper review and was included as a category to represent a statutory requirement set forth in the Title II regulations § 35.150 also titled 'Program Access'. This requirement is described in detail in Section 4 of this document, and it allows for possible varied solutions other than just reconstruction alone. This category at a high-level is a compilation of data which needs additional review by TxDOT to determine the most appropriate means of physical remediation or if non-structural remediation is more appropriate. Because this general category of data requires more in-depth review by staff, we specified data in this category to fall into one of three distinct groups of consideration:

- 1) Potentially Safe Harbor
  - a) These are physical elements which do not comply with the 2010 Standards for Accessible



Design. However, they did comply with the 1991 Standards, at the time they were constructed, and as such they may fall under the 'Safe Harbor' provision detailed in the Title II Regulations at 28 CFR 35.151. Safe Harbor as defined by the Title II Regulations:

- o **Safe harbor.** If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.
  - b) It was infeasible for TxDOT to preeminently provide data collection teams the details of original construction date, or date of last alteration for each of the individual elements within the scope of assessment. All elements which could fall under the Safe Harbor provision were included within the 'Program Access' category to ensure they receive further review.
- 2) Physical elements not covered by the 2010 Standards for Accessible Design
- a) Facilities included with the scope of the Self-Evaluation often had elements not specially addressed by the 2010 ADA Standards. In these instances, accessibility standards such as the Architectural Barriers Act which is not explicitly applicable to TxDOT were utilized to ensure that all physical elements facilitating the provision of TxDOT services were still included with the Self-Evaluation. However, as the standards applied were not the 2010 Standards, these elements were included with the 'Program Access' category to receive further review. Examples of elements within this sub-category that would have been identified as potential 'Program Access' barriers includes:
    - i. RV Parking Spaces
    - ii. Picnic Pavilion Scoping (i.e., how many need to be accessible)
    - iii. Outdoor Grills
    - iv. Non-Transfer Benches (e.g., a park bench)
- 3) Not Best Practice
- a) The 'Not Best Practice' sub-category was used to reflect the lack of a physical element being provided. For example, coat hooks are not required to be provided in an accessible toilet compartment. However, if coat hooks were observed by data collectors in standard stalls within the same restroom, the lack of a coat hook in the accessible stall would be identified as a 'Not Best Practice' item for further review. This approach was developed to align with Title II Statutory requirements which prohibit Title II entities from excluding individuals with a disability from receiving the benefits of TxDOT provided services.

### 9.3 Websites – Methodology

The history of TxDOT’s website accessibility review efforts prior to 2021 are discussed in Section 8.3 and Section 8.3.1 and predominantly involved automated testing. This section of the report will discuss the approach to evaluation that was conducted in 2021, as outlined in the Scope Section 8.3.2.

It was determined that independent, manual testing by both TxDOT and the consultant would identify any gaps in prior testing methods and provide TxDOT a strong baseline of understanding for future staff training. Manual testing of limited, public-facing websites was conducted. Website pages were identified for review and carefully evaluated based on the degrees of use, or traffic to sites, and with template-related questions in mind.

Manual web accessibility testing is labor-intensive. Each entire page must be reviewed with a screen reader and varied tools must be used to adequately assess accessibility. The documentation process which includes explanations of accessibility errors must provide web development teams sufficient details to remediate deficiencies. All these techniques lengthen the manual testing process.

The most practical approach to conduct manual accessibility testing is to limit testing to a fixed set of web pages and evaluate the findings across the entire site by focusing on the common errors found. TxDOT utilized the approach and found it to be a successful model at identifying critical template issues, design, and team management approaches that lend themselves to repeat patterns of error.

Three public-facing and high-traffic websites were selected to gain clearer insight into the true accessibility of web content created by different teams:

- <https://www.txdot.gov> (managed by CMD)
- <https://thesoutherngateway.org> (managed by ITD)
- <http://www.keepitmovingdallas.com> (managed by ITD)

The consultant identified 25 sample URLs for each of the three sites (75 pages total) that represented the structure and types of content desired for review. For the Southern Gateway and Keep it Moving Dallas websites, the consultant identified 25 pages believed to meet the defined criteria. This list was validated with ITD. ITD staff and the consultants then each independently tested the Southern Gateway and Keep it Moving Dallas websites to enhance the previous self-evaluation data collected by ITD. For the [www.txdot.gov](http://www.txdot.gov) site, the consultant worked with CMD and agreed to a final set of 25 pages to test. While CMD did not independently retest using manual testing, CMD did provide a list of all errors that were identified as accessibility issues to be remediated.

As previously discussed, TxDOT is working on making its websites comply with the Web Content Accessibility Guidelines (WCAG) 2.0 A/AA. The term “WCAG 2.0 A/AA” requires explanation as it relates to the proper steps of assessment. WCAG A/AA conformance is achieved by fulfilling different WCAG “Success Criteria.” Because of WCAG’s structure, all WCAG Success Criteria follow a three digit-numbering sequence. For instance, WCAG 1.1.1 requires that images include a text description and WCAG 1.4.3 requires that text have a color contrast of 4:5:1. Each Success Criterion is designated as fulfilling Level A, AA, or AAA. For instance, WCAG 1.1.1 (alternative text) is a level A success criterion

and WCAG 1.4.3 (Contrast Minimum) is a level AA success criterion. To achieve WCAG A/AA compliance, a website must fully meet all level A and AA Success Criteria. For WCAG 2.0 A/AA, there are 38 success criteria that must be met; WCAG 2.1 increases this number to 50 success criteria. It is important for testers to identify areas of WCAG 2.1 A/AA compliance as these represent significant barriers for users with disabilities. The steps to achieving WCAG A/AA conformance of 50 success criteria is important for staff training.

## 10. Self-Evaluation – Summary of Inventory Findings

The inventory in this section is summarized to make the content manageable for comprehension. The synopsis provides an overview of the tens of thousands of points of data collected and analyzed. The scope of the project is discussed in depth in Section 8, and the inventory volume is recapped in each section below for public rights-of-way, facility, and websites. The significant amount of information collected and analyzed resulted in thousands of points of data in GIS (containing degrees of compliance, severity, costing, and photo documentation) to support the comprehensive nature of the evaluation process. All information provided in the ADA Transition Plan is taken from detailed data analysis and reporting, completed by accessibility professionals.

### 10.1 PROW - Findings

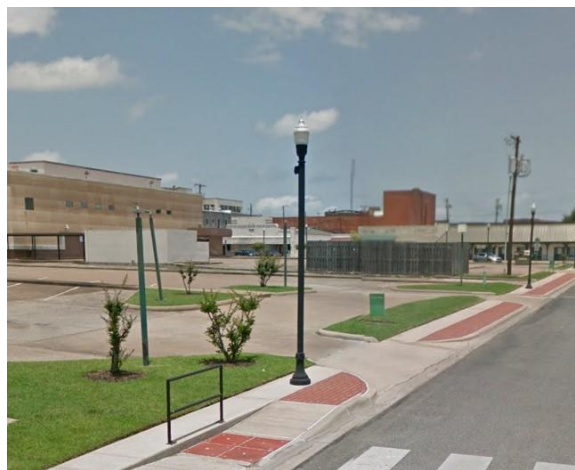
TxDOT’s public rights-of-way (PROW) assessment generated significant amounts of information regarding the accessibility of public rights-of-way. A total of 4,419 miles of sidewalk, 131,920 curb ramps, 4,582 island curb cuts, 6,156 bus stops, and 52,179 pedestrian signal pushbuttons were evaluated. The following tables represent a summary of observations regarding the information gathered.

#### Sidewalk Inventory Data (Statewide)

Sidewalk assessment included 2,606 miles of detailed sidewalk collection and 1,813 miles of visual sidewalk collection. Collection approaches are discussed in detail in the Methodology Section.

#### 1. Sidewalk Obstructions

Obstruction Type	Quantity	Percentage
Utility/Signal/Sign	11,882	24.4%
Vegetation	28,344	58.2%
Other	8,499	17.4%
Total Obstructions	48,725	



#### Comments on Sidewalk Obstructions:

- Vegetation growing overhead or alongside the sidewalk represent many barriers affecting the sidewalk.
- Of the utility category above, power poles, posts, hydrants represent roughly 5,006 locations combined or roughly 10% of all obstructions.

## 2. Sidewalk Discontinuity (Heaves)

Discontinuity Heaves	Quantity
Discontinuity Displacement $\leq 1$ "	59,311
Discontinuity Displacement $> 1$ "	31,376

### Comments on Discontinuity (Heaving):

- Heaves can be caused by many factors, including but not limited to tree root growth and changing soil conditions over time.
- Heaves less than or equal to 1" can often be remediated without replacing the entire sidewalk segment.
- Heaves in areas of sidewalk that require replacement due to other compliance issues are not counted within these totals.



## 3. Sidewalk Discontinuity (Horizontal Openings)

Discontinuity Horizontal Openings	Quantity
Discontinuity Gap $> 0.5$ "	412

### Comments on Discontinuity (Horizontal Openings):

- Sidewalk discontinuity through horizontal openings create mobility challenges in similar ways to sidewalk heaves, but these small 'gaps' are horizontal instead of vertical. Wheelchairs, canes, or other devices may be hindered by these.
- This type of discontinuity accounts for a very low number of incidents, comparatively to the significant, overall amount of sidewalk throughout TxDOT.



#### 4. Sidewalk Cross Slope:

Degree of Cross Slope	Miles	Percentage
0-2% <i>compliant</i>	3125.8 mi	70.7%
2-3%	603.8 mi	13.7%
3-4%	295.0 mi	6.7%
4-7%	276.6 mi	6.3%
7%+	65.2 mi	1.5%
5%+ Visual*	52.6 mi	1.1%



\*Indicates sidewalk observation of cross slope is visually inspected as non-compliant. The remainder of the table above is reflecting cross slope measurements from detailed sidewalk collection methodologies.

#### 5. Sidewalk Run Slope (Detailed)+

Degree of Run Slope	Miles	Percentage
0-5% <i>compliant</i>	4403.9 mi	99.7%
5-8.33%	11.0 mi	0.2%
8.34-10.0%	2.0 mi	0.1%
10.1-12.5%	1.2 mi	0.0%
12.6%+	0.9 mi	0.0%

+Where the sidewalk is contained within the street or highway rights-of-way, sidewalk run slope is permitted to match the general grade of the adjacent street or highway right-of-way, according to PROWAG 302.5.

#### Comments on Sidewalk Slopes:

- Detailed Sidewalk collection records all degrees of slope; visual sidewalk collection only records cross slope approximately 5%+ or greater, which can be visually detected.
- Run slope violations are generally less common compared to cross slope deficiencies within inventoried data.

## 6. Sidewalk Gaps in Connectivity

Connectivity Issue Type	Miles	Percentage
Missing Sidewalk**	58.3 mi	1.3%
Buried Sidewalk	261.6 mi	5.9%
Narrow Sidewalk (Less than 48")	1.0 mi	0.0%
Missing Sidewalk Connection to Bus Pads	120.8 mi	2.7%
Sidewalk with Proper Service Connections#	3977.3 mi	89.2%



\*\*Missing Sidewalk is a gap in service either between 2 existing portions of sidewalk or gap in service to a transit service.

#Sidewalk with Proper Connections constitutes remaining inventory of the total collected (4,419 miles) which provides connectivity to services. Portions of this total may have other compliance deficiencies as indicated throughout this summary.

## 7. Sidewalk Connectivity through Driveways

Non-Compliance at Driveways	Quantity
Commercial Entrance (Detailed)	38,324 ea.
Residential Entrance (Detailed)	6,541 ea.
Commercial Entrance (Visual)	9,392 ea.
Residential Entrance (Visual)	3,015 ea.



### Comments on Sidewalk Connectivity through Driveways:

- Sidewalk compliance issues at driveways represent a gap in service (missing sidewalk between two unconnected sections or transit access) or other deficiencies (change in level, narrow, or nonuniform surface).
- Sidewalk cross slopes at driveway crossings often exceed the 2% maximum allowable per PROWAG and present a challenge if sidewalk connectivity utilizes the driveway to continue the accessible path.
- Driveways are noted separately from sidewalk collection alone to estimate reconstruction cost more accurately for remediation planning purposes.

**Curb Ramps Inventory Data (Statewide)**

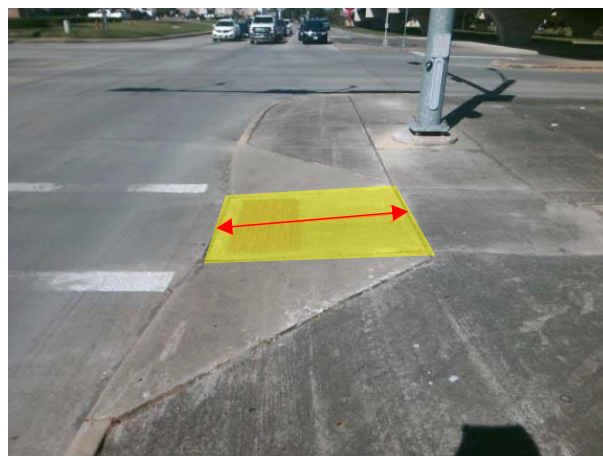
131,920 existing curb ramps were evaluated. Observations indicated many curb ramps comply substantially with the accessibility standards and guidelines detailed in PROWAG.

Existing Curb Ramps Evaluated	124,864
Existing Curb Ramps not evaluated (i.e., under construction or inaccessible)	85
Missing Curb Ramps	6,971
<b>Total</b>	<b>131,920</b>

The following tables summarize the evaluations for existing curb ramps which were collected within TxDOT right-of-way.

**1. Curb Ramps Running Slope**

Degree of Run Slope	Quantity	Percentage
< 8.33% <i>compliant</i>	87,624	70.2%
8.34-10%	25,557	20.5%
10-12.5%	8,029	6.4%
12.6+%	3,654	2.9%
<b>Total Collected</b>	<b>124,864</b>	

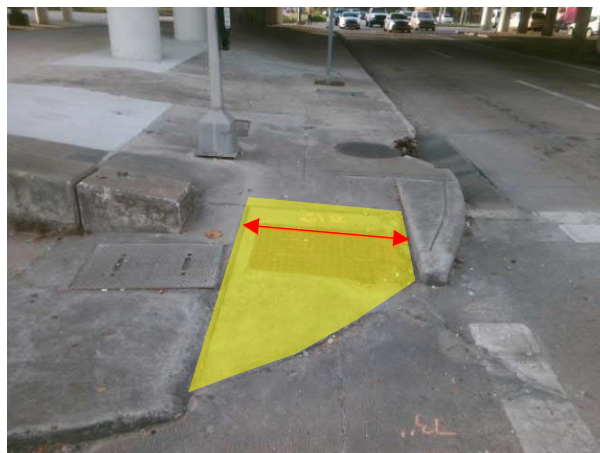


**Comments on Curb Ramp Run Slope:**

- Table does not include missing curb ramps or curb ramps under construction.
- 70% of all curb ramps had compliant running slopes.

## 2. Curb Ramp Cross Slope<sup>^</sup>

Degree of Cross Slope	Quantity	Percentage
0-2.0%	72,053	57.7%
2.01-3.0%	28,403	22.7%
3.1-4.0%	11,520	9.2%
4.1-7.0%	9,806	7.9%
7.1+%	3,082	2.5%
Total Collected	124,864	



<sup>^</sup>PROWAG allows for curb ramp cross slope to match the grade of the street or highway grade at street crossings without yield or stop control and at midblock pedestrian street crossings per 304.5.3

### Comments on Curb Ramp Cross Slope:

- Table does not include missing curb ramps or curb ramps under construction.
- Majority of curb ramps had compliant cross slopes.

## 3. Detectable Warning Surfaces (DWS)

Detectable Warning Surface Status	Quantity
Compliant DWS	9,430
Missing DWS	1,683
Retrofit DWS	19,529
Not assessed	101,278



### Comments on Detectable Warning Surfaces:

- Initial assessment is defined as a ramp structure found to be non-compliant early in the field assessment process. The 'not assessed' category tabulated in the table reflects curb ramps failing under other criteria, in which case, the DWS is not assessed.
- Non-Compliant DWS were mostly due to the DWS not extending the full width of the curb ramp.
- Retrofit DWS is an otherwise compliant curb ramp which requires a newly installed DWS to achieve compliance.

#### 4. Missing Curb Ramps

Ramp	Quantity
Missing Ramp	6,971

##### Comments on Missing Curb Ramps:

- Missing Curb Ramps are ramps that are not present in locations where they are required, based on the existing layout of pedestrian infrastructure and supporting accessible paths of travel.
- T-intersections may be the cause of a reported missing curb ramp. These locations should be reviewed individually by TxDOT to determine if an alternate approach can be proposed to rectify the deficiency.



#### Transit / Bus Stop Pad Inventory Data

The team evaluated 6,156 bus stop locations. Numerous locations did not have bus stop boarding areas or alighting facilities. Where the bus stop boarding area did exist, a high number had accessible slope and dimensional deficiencies. The bus stop boarding area findings are summarized below.

##### Bus Stop Pads

Bus Stop Pad Results	Quantity
Compliant Bus Stop Pad	1,000
Missing Bus Stop Pad	2,160
Non-Compliant Existing Bus Stop Pad	2,996



##### Comments on Bus Stop Pads:

- 35.1% of all bus stop pads are missing.
- 48.7% of bus stop pads have non-compliant length, width, or slopes.

## Pedestrian Signal Pushbuttons

Pedestrian signal pushbuttons were evaluated at 36,495 locations. Locations have varying button arrangements from two buttons per post to only one. Each pushbutton is evaluated individually and resulted in a total of 52,179 pushbuttons evaluated. Most of the pedestrian signal pushbuttons were non-APS pushbuttons (Accessible Pedestrian Signal). The following summarizes the findings:

### 1. Pedestrian Signal Pushbuttons

Type of Signal	Quantity
APS	14,882
Non-Aps	37,280
Not Collected**	17

*\*\*Indicate those which were inaccessible during field inventory due to construction or environmental factor. It was assumed these buttons were noncompliant for purposes of the field inventory.*

### 2. Pedestrian Signal Pushbutton Compliance\*\*

Signal Pushbutton Compliance	Quantity
Fully Compliant Pushbuttons	492
Non-Compliant Pushbutton	51,687

*\*\*Pedestrian Signal Pushbuttons are evaluated on many components of criteria. If a singular deficiency is noted during field evaluation, the pushbutton will be reflected as non-compliant, but it may still be usable. Field evaluation criteria includes requirements of PROWAG Operable Parts; clear space, reach ranges, operating pressure, closed-fist operation, slopes, obstructions, etc.*

Tables 3 and 4 below provide specific information about areas of non-compliance. The quantities of non-compliance contained in the following tables are reflected in the totals indicated in Table 2 above.

### 3. Pedestrian Signal Pushbutton Clear Floor Space

Pushbutton Clear Floor Space	Quantity
Compliant Clear Floor Space	25,380
<sup>1</sup> Non-Compliant Clear Floor Space	22,454
Missing Clear Floor Space	4,345

<sup>1</sup>Quantities are independent of one another. Non-Compliant clear space reflects more than one component of evaluation criteria. The count may represent more than one compliance issue at a single location.



The photo depicts a singular post, but with multiple compliance issues but is used for clear floor space example.

### 4. Pedestrian Signal Pushbutton Reach Ranges (Height)

Pushbutton Height	Quantity
Compliant Height	33,948
Non-Compliant Height ( <i>compliant button, but height adjustment required</i> )	1,503
Non-Compliant Button & Height <sup>2</sup>	16,728

<sup>2</sup>Non-compliant button, when replaced, will correct to compliant height.

#### Comments on overall Pedestrian Signal Pushbutton observations:

- 71.4% of the pedestrian signal pushbuttons were non-APS signals.
- 43.4% of the pedestrian pushbutton clear floor spaces were non-compliant or missing.
- 99.1% of the pedestrian pushbutton locations are technically non-compliant.
- Common compliance issues include clear floor space and reach range exceeding PROWAG.

## 10.2 Facility - Findings

TxDOT’s facility assessment generated a significant amount of information regarding the accessibility of TxDOT buildings and sites utilized by the public. Over 45,000 points of data were collected and evaluated from 157 separate facilities. Most of the information collected was determined to be compliant with the 2010 ADA Standards. This was particularly evident in facilities which had been constructed or altered after March 15, 2012.

The following tables reflect the Total Items Assessed:

Total Non-Compliant Items by Priority Levels with a more detailed breakdown of components within each Priority Level listed in Section 11: Cost Estimates.

Non-Compliant	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
1 - Entry	752	1398	382	0	2550
2 - Services	1268	565	89	0	1904
3 - Restrooms	2509	1571	393	5	4478
4 - Other	118	123	17	0	258
<b>Total</b>	<b>4647</b>	<b>3657</b>	<b>881</b>	<b>5</b>	<b>9190</b>
“Program Access” Items for Administrative Review	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
1 - Entry	140	69	25	2	266
2 - Services	601	256	20	1	848
3 - Restrooms	699	654	148	4	1505
4 - Other	11	6	0	0	17
<b>Total</b>	<b>1454</b>	<b>985</b>	<b>193</b>	<b>7</b>	<b>2636</b>

The following information represents a summary of common observations throughout all facility types. Observations are grouped by priority levels to provide consistency with the presentation of facility data in other sections of this document. A detailed description of the priority levels can be found in section 12.2.

The findings summarized below represent the highest impact issues per priority levels. These non-compliant items were found at both a high frequency and the issues also represent a significant portion of estimated cost to remediate.

## Priority Level 1- Entry

### Common Observations:

#### 1) Non-compliant slopes within accessible routes

- a) The most common slope issue type was cross slope. This is the slope of walking surface which runs perpendicular to the primary direction of travel. The image below depicts a cross slope within an accessible route.



#### 2) No accessible route provided to an amenity

- a) Routes that received this classification of barrier were either routes constructed with surface materials that were not firm, stable, or slip resistant (e.g., gravel, dirt, grass) or routes which provided no accessible means of vertical access (generally due to stairs). Routes in this category are different from accessible routes which have non-compliant features, such as a route with a cross slope steeper than the allowable value. The image below showcases an example of a route that does not provide an accessible means of vertical access.



### 3) Ramps and curb ramps with non-compliant slopes

- a) Examples of compliance issues found included slopes steeper than the allowable value in various attributes of ramps and curb ramps. This includes ramp running slope, ramp cross slope, and ramp landing slopes. The following images display slopes steeper than the allowable value.



## Priority Level 2- Services

### Common Observations:

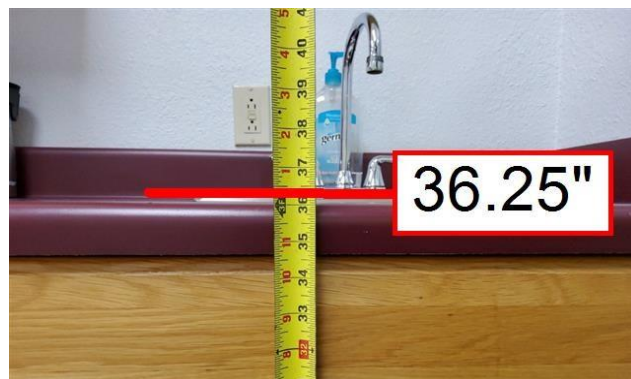
#### 1) Non-compliant work/dining surfaces

- a) The most common barrier identified for work/dining surfaces was the lack of an accessible forward approach. A forward approach allows a wheelchair user to pull fully underneath a work/dining surface for use. Picnic tables, conference tables, and tables in lobbies or breakrooms are common examples of a work/dining surface. The following image shows a picnic table that does not provide an accessible forward approach.



#### 2) Non-compliant sinks in non-restroom spaces

- b) Inspection teams sometimes observed that sinks provided in public meeting or gathering spaces were installed too high and without the space for a forward approach (when required). The image below is an example of a sink installed too high.



### 3) Non-compliant sales/service counters

- c) Service counters facilitate interaction between TxDOT and the public. Examples include reception counters in an administrative building, public information desks at safety rest areas, or a security counter at a travel information center. The most common barrier identified with these counters was the counter surface being installed too high. The photo below shows an example of a service counter that is mounted too high.



## Priority Level 3- Restrooms

### Common Observations:

#### 1) Inaccessible toilet compartments

- a) The most impactful common observation regarding toilet compartments was insufficient clearance, or space, within the compartment. Other common observations in toilet compartments consisted of inaccessible door hardware, fixed objects preventing full use of grab bars, and toilet paper dispensers mounted in the wrong location. The images below depict a toilet compartment that has multiple non-compliant features and a grab bar which is obstructed by a fixed object.



#### 2) Inaccessible entrance doors

- a) The most common issues with entrance doors into restroom facilities was inaccessible hardware. This was often doors which were too heavy to open or closed too fast after being opened. Both issues are related to the closer hardware of the door. More significantly, entrance doors at times did not provide enough clearance, or space, for an individual with an ambulatory impairment to open the door. The image below depicts a door which does not provide sufficient maneuvering clearance.



## Priority Level 4- Other

### Common Observations:

#### 1) Non-compliant drinking fountains

- a) An inspection observation in some facilities included drinking fountains provided within a facility, or at an exterior site, which did not allow for both chair users and individuals who have issues bending or stooping to have access to a drinking fountain. The image below is an example of a drinking fountain that is inaccessible to a person who uses a wheelchair.



### Compliant Observations:

While this report depicts several common observations where compliance is an issue, there are several locations throughout TxDOT where compliant facilities and pedestrian features were found. Newer facilities and those recently renovated had a higher degree of data that reflected better ADA compliance than older facilities requiring some future remediation. This picture denotes a compliant toilet room stall which meets with the 2010 ADA standards. The image below is an example of an ADA compliant restroom.



## 10.3 Websites - Findings

The manual testing efforts related to website accessibility described in previous sections are the focal point in this section, as these efforts provide the most thorough evaluation relating to website accessibility against the WCAG 2.0 guidelines. A recap of historical efforts is also listed at the bottom of this section, to reiterate the years of TxDOT's activity and commitment to improving website accessibility.

### 10.3.1 Common Accessibility Findings through Manual Testing

As discussed in depth in Section 9.3, the project team determined that independent, manual testing by both TxDOT and the consultant would identify any gaps in prior testing methods. Manual testing of limited, public-facing websites was conducted. Website pages were identified for review and carefully evaluated based on the degrees of use, or traffic to site and with template-related questions in mind.

Three public-facing and high-traffic websites were selected to gain clearer insight into the true accessibility of TxDOT's web content:

- <https://www.txdot.gov> (managed by CMD)
- <https://thesoutherngateway.org> (managed by ITD)
- <http://www.keepitmovingdallas.com> (managed by ITD)

All three sites reviewed by TxDOT and the consultants, in their independent studies, included barriers for people with disabilities. During its review, the consultant team categorized accessibility barriers based on their severity.

- **Blocking** = Will prevent some users from accessing content or accomplishing a task.
- **Critical** = May prevent some users from accessing content or accomplishing a task
- **Major** = Will have a significant impact on user experience and prevents conformance with accessibility guidelines
- **Minor** = May impact some users negatively but primarily prevents conformance with accessibility guidelines
- **Low** = Not likely to impact users but prevents conformance with accessibility guidelines

Reviewing the most significant categories of barriers (blocking, critical, or major), the consultant team found that barriers tended to occur in the following areas. Each of these topics were expanded upon in the full self-evaluation report.

- **Dynamic or Non-Standard HTML Controls.** This includes accordion controls that do not provide information about their state (WCAG 4.1.2) or on-screen notifications that do not provide information that an item has been changed (WCAG 4.1.3). These controls are not accessible to users with disabilities.
- **Adobe Acrobat Files.** A high percentage of Adobe Acrobat (.pdf) files were inaccessible (WCAG 1.1.1).

- **Color Contrast.** There were areas of insufficient color contrast. This problem existed both for text (WCAG 1.4.3) and for important non-text content (WCAG 1.4.11).
- **Visual Focus.** Several pages did not ensure that focus was visible as focus was moved between different elements on the screen (WCAG 2.4.7).
- **Headings and Landmarks.** The main content within pages was sometimes not properly structured using headings and landmarks (WCAG 1.3.1).
- **Alternative Text is Not Used Correctly.** On some pages, alternative text was missing, or important images were marked as decorative images by setting the alternative text to an empty string (WCAG 1.1.1).
- **Reflow.** Some pages did not resize correctly with enlarged content on smaller displays (WCAG 1.4.10)

### 10.3.2 Comparative Testing Results of Manual Testing

ITD and the consultant team each reviewed the Southern Gateway and Keep it Moving Dallas websites. It is important to understand when comparing the test results that each team took different approaches in the testing process, by design. The purpose was to evaluate the consultant team’s manual testing with TxDOT’s internal manual testing. The ITD team examined each page and noted *each error* that they encountered on *each page*. The consultant team identified *one representative example of each type of error*. This difference in reporting resulted in a drastically larger number of issues reported by ITD than the consultant, on the surface, because ITD was reporting *repeat types of errors* across the websites. When the ITD and consultant reports were objectively compared, the consultant identified a *larger number of unique issue types*, summarized in the table below:

	Unique Accessibility Issues on Keep it Moving Dallas Website	Unique Accessibility Issues on Southern Gateway Website
Consultant Review	20	31
ITD Review	12	17

The consultant team determined that ITD did a good job at testing accessibility issues for a team relying on in-house resources. The results of this final step of the self-evaluation revealed areas where deeper training or modified approaches would best equip TxDOT moving forward to self-perform assessments. When the project team compared the two evaluations side-by-side, additional opportunities were identified that TxDOT could focus on to ensure fewer gaps in future testing. These include:

- **Adobe Acrobat (.pdf) Documents.** Ensure strong testing efforts for Adobe Acrobat files. This is important because Acrobat files are a key means by which TxDOT provides timely information and collects input from users. The project team recognized that many files are created by other divisions within TxDOT. A methodology to ensure pdf documents are made accessible or content is provided in simple html format, is important.

- **Alternative Text on Images.** Images and other non-text content requires alternative text to be useful for screen reader users. Sometimes the requirements for alternative text were misapplied. In some cases, decorative images were improperly identified as inaccessible when an alternative text field was left empty. In other cases, images had alternative text fields completed, but the language did not provide a meaningful description, and these were not flagged as errors.
- **Headings and Landmarks.** Headings and landmarks are key structural elements in a web page. Testers incorrectly identified heading issues as violations of WCAG 2.4.6, when they were really violations of WCAG 1.3.1. Testers also failed to identify some missing landmarks and regions.
- **Color Contrast.** In some instances, testers did not identify contrast errors outside of standard text (such as text in HTML controls like submit buttons). In other cases, testers missed color contrast issues with images of text (WCAG 1.4.3). Testers also missed color contrast issues with non-text controls, such as icons that affected expanding and collapsing content (WCAG 1.4.11).
- **Identifying Coding as Accessibility Errors.** On the Southern Gateway website, sometimes text overlapped and was unreadable to all users. These errors were categorized as WCAG 1.4.4 errors, presumably because this success criteria addresses overlapping text, when the issue was poor coding.
- **Missed Issues.** In some instances, important issues were not tested. For instance, on the Southern Gateway site, a link for contact information loads an image that provides contact information. This image, however, is completely inaccessible to screen readers (WCAG 1.1.1 and 1.4.5). Other instances occurred where pages did not reflow properly but were missed in testing (WCAG 1.4.10).
- **Issues with Visible Focus.** On several web pages, focus was not visible. In some instances, these issues were not identified per WCAG 2.4.7. In other instances, these issues were incorrectly identified as violations of WCAG 2.1.1.

The purpose of this approach to evaluation was to uncover if and where TxDOT's testing methodology and staff training could be improved upon. The comparative analysis identified the following areas of opportunity:

- **Too Much Reliance on Automated Testing Tools.** TxDOT indicated a primary reliance on automated testing, WAVE and SiteImprove, to provide their test data. Automated testing tools are good at scanning large numbers of web pages but fail with more subtle aspects of web testing. This reliance becomes clear in some areas of testing. For instance, proper manual testing could accurately identify most instances where ordinary text did not provide sufficient color contrast against background colors. However, none of the color contrast issues for images of text were identified with the automated tool.
- **Better Use of Common Accessibility Testing Tools.** While thorough testing of WCAG requires manual testing, not all testing requires special training with screen readers and other assistive technology. In the full report, the consultant team described several issues where free, easy-to-use testing tools can accurately test for accessibility. TxDOT could use these tools to test web content.

- **Use Screen Reader Testing.** While most of the WCAG requirements can be tested using easy-to-use testing tools, some WCAG requirements can only be tested by using assistive technology. There are several screen readers on the market and Job Access with Speech (JAWS) is the most popular of these screen readers. In addition, the robust (but free) Non-Visual Desktop Access (NVDA) screen reader is available. Furthermore, MacOS provides a robust built-in screen reader (VoiceOver). Assistive technology must be used to assess compliance with WCAG 4.1.2 and 4.1.3 if non-standard controls or dynamic content is used on web pages.
- **More Rigorous Testing Methodology.** While ITD's testing results revealed many compliance issues, other errors failed to be caught or were categorized incorrectly. This reveals that TxDOT's testing efforts may not be systematic or rigorous. Categorizing errors correctly is important because it reinforces the purpose of each WCAG Success Criteria and makes it easier for web design teams to understand how specific issues affect users with disabilities.

Each of these gaps in testing approach, along with suggested corrective actions, are discussed in the full report.

### 10.3.3 Website Accessibility Efforts Recap - Prior to 2021

- In 2018-2019, TxDOT evaluated websites and active templates. 6024 pages and subpages were evaluated.
- Automated website testing was the predominant mechanism through tools such as WAVE in previously evaluating accessibility.
- ADA defects at the template and component level were identified; AEM were fixed and deployed in production.
- Fixes done at the template and component level were applied to all pages (over 6000 pages) in AEM 6.4.
- TxDOT created an Accessibility Working Group to affect accessibility improvements in technology and communication tools.
  - A Program Charter was created to, in part, address accessibility related challenges.
  - The team identified the need for training around accessibility for internal staff.
- ITD built a master inventory list inclusive of 40 third-party sites whose content and data will be imported into ITD-owned websites, thereby allowing TxDOT better control over accessibility in the long-run.
- The third-party sites had preliminary evaluations for compliance with WCAG 2.0 by the TXDOT accessibility working group.
- The methods used by TxDOT in the website self-evaluation included a mix of tool-based testing, automated testing, and some manual testing including both WAVE, Axe Pro, and keyboard testing.
- In their current states, none of the sites can be deemed “substantially compliant”.
  - The worst site was identified to have over 300 known issues.
  - The best site had 8 known issues.
  - In total, over 1,400 accessibility bugs were identified and described.
- TxDOT hired an accessibility expert internally for the ITD team to aid in testing and monitoring website accessibility.

## 11. Cost Estimates

Creating cost estimates for the ADA Transition Plan is intended to approximate costs. Because there are many varied approaches to remediation, and because it will take years to fully address all issues, cost estimates can change over time.

The detailed data collection and analysis approach, described in prior sections of this report, allowed the consultants to create compliance and cost reports for each facility type within corridors, facilities, and sites. Each report identifies the compliance status of every TxDOT facility with regards to federal and state standards and includes the following:

- Listing of facilities that are compliant with current ADA standards.
- Listing of facilities that are non-compliant with current ADA standards.
- Recommended actions to resolve non-compliant issues for each facility.
- Prioritized list of improvements using criteria developed by the project team.
- “Cost Report” that assigns conceptual budget estimates to each recommended action.
- Photo log summary, where appropriate, for facility data or Video Log for sidewalk data.

Further, as described in Sections 4 and 5, program access may be achieved by either structural methods (e.g., making physical changes to a facility) or non-structural methods. In general, both may be utilized to ensure program access, but there are some exceptions where existing facilities are involved. The ADA regulation for Title II, in Section 35.150 states that the regulation:

- Does not require a public agency to make each existing facility accessible.
- Does not require an action that would threaten or destroy the historic significance of historic property.
- Does not require a public agency to fundamentally alter the nature of services, programs, or activities.
- Does not require a public agency to incur undue financial and administrative burdens.

The following represents conceptual cost estimates to remove non-compliant elements identified. *The cost estimates in this report reflect planning level estimates* at the time of assessment and can suggest some duplication, due to estimating an individual item’s cost per unit, at the concept stage. Actual costs can only be firmly determined once the approach to creating program access is finalized. Sites to be remediated will receive more exact budgets during the remediation scope development, design, and construction processes. TxDOT anticipates it will take decades to remediate all the items discovered. Prioritization is an important aspect to the ADA Transition Plan, discussed in later sections.

Planning level cost estimates, subject to change based on the approach and the year of remediation, are as follows:

### 11.1 Public Rights-of-Way (Statewide)

Facility Type	Preliminary Cost Barrier Estimate
Sidewalk (Detailed)	\$950,908,399
Sidewalk (Visual)	\$201,855,108
Sidewalk Connectivity	\$84,879,464
Curb Ramps	\$363,612,721
Curb Cuts (Medians)	\$27,925,049
Bus Stops	\$8,777,447
<b>Total Planning-Level Estimate</b>	<b>\$1,637,958,188</b>

### 11.2 Facilities

#### Total Cost of Non-Compliant Items

Priority Level	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
1 - Entry	\$1,373,940	\$2,603,730	\$690,425	\$400	\$4,668,495
2 - Services	\$933,975	\$453,410	\$43,200	\$450	\$1,431,035
3 - Restrooms	\$3,281,585	\$2,198,980	\$431,040	\$7,085	\$5,918,690
4 - Other	\$269,600	\$221,150	\$19,450	\$0	\$510,200
<b>Total</b>	<b>\$5,859,100</b>	<b>\$5,477,270</b>	<b>\$1,184,115</b>	<b>\$7,935</b>	<b>\$12,528,420</b>

The tables, on following pages, depict costs of correcting non-compliant items by Priority Levels, discussed earlier in this report.

**Cost of Non-Compliant Items by Category: Priority 1 – Approach & Entrance**

	<b>General TxDOT Administrative</b>	<b>Safety Rest Area</b>	<b>Travel Information Center</b>	<b>Ferry</b>	<b>Total</b>
Access Aisle, Passenger Loading Zone	\$3,500	\$6,500	\$0	\$0	\$10,000
Access Aisles	\$79,000	\$86,500	\$44,750	\$0	\$210,250
Accessible Routes	\$397,890	\$1,531,080	\$365,675	\$400	\$2,295,045
Curb Ramps	\$142,600	\$209,600	\$141,450	\$0	\$493,650
Doors/Gates	\$301,200	\$175,300	\$34,650	\$0	\$511,150
External Entrance Scope	\$46,800	\$800	\$0	\$0	\$47,600
Handrails, Ramps	\$52,500	\$18,750	\$8,500	\$0	\$79,750
Operable Parts	\$800	\$0	\$0	\$0	\$800
Parking Scope	\$18,450	\$9,000	\$1,350	\$0	\$28,800
Parking Scope, Passenger Loading Zone	\$5,000	\$0	\$0	\$0	\$5,000
Parking Scope, RV	\$0	\$450	\$900	\$0	\$1,350
Parking Scope, Semi- Truck	\$0	\$10,000	\$0	\$0	\$10,000
Parking Spaces	\$91,400	\$137,750	\$35,150	\$0	\$264,300
Picnic/Ramada Scope	\$10,000	\$300,000	\$0	\$0	\$310,000
Play Area Scope	\$0	\$26,750	\$0	\$0	\$26,750
Protruding Objects	\$4,000	\$12,500	\$2,500	\$0	\$19,000
Ramps	\$220,500	\$78,750	\$55,500	\$0	\$354,750
Signage, Designation	\$300	\$0	\$0	\$0	\$300
<b>Total</b>	<b>\$1,373,940</b>	<b>\$2,603,730</b>	<b>\$690,425</b>	<b>\$400</b>	<b>\$4,668,495</b>

Cost of Non-Compliant Items by Category: Priority 2 – Access to Good & Services

	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
Accessible Routes	\$6,325	\$19,960	\$900	\$0	\$27,185
Accessible Routes, Play Area	\$0	\$5,000	\$0	\$0	\$5,000
Assembly Area Scope	\$9,000	\$0	\$0	\$0	\$9,000
Bench, Non-Transfer	\$2,500	\$19,000	\$2,500	\$0	\$24,000
Counters, Sales/Service	\$94,500	\$3,500	\$0	\$0	\$98,000
Counters, Work Surface	\$7,200	\$0	\$0	\$0	\$7,200
Doors/Gates	\$325,625	\$27,300	\$7,450	\$0	\$360,375
Elevator Car	\$8,750	\$0	\$0	\$0	\$8,750
Elevator Communication	\$4,750	\$0	\$0	\$0	\$4,750
Fire Alarms	\$77,250	\$16,500	\$0	\$0	\$93,750
Grills	\$0	\$31,200	\$0	\$0	\$31,200
Handrails, Ramps	\$18,500	\$0	\$0	\$0	\$18,500
Handrails, Stairs	\$4,500	\$0	\$0	\$0	\$4,500
Operable Parts	\$22,850	\$22,950	\$4,400	\$0	\$50,200
Platform Lift	\$250	\$0	\$0	\$0	\$250
Platform Lift, Controls	\$500	\$0	\$0	\$0	\$500
Play Area Scope	\$0	\$27,500	\$0	\$0	\$27,500
Protruding Objects	\$65,000	\$23,500	\$2,500	\$0	\$91,000
Ramps	\$47,250	\$0	\$0	\$0	\$47,250
Room/Space Scope	\$45,000	\$20,000	\$10,000	\$0	\$75,000
Signage, Designation	\$39,400	\$2,200	\$0	\$0	\$41,600
Sinks	\$98,625	\$0	\$0	\$0	\$98,625
Transfer Platforms	\$0	\$1,500	\$0	\$0	\$1,500
Tray Slides	\$2,500	\$0	\$0	\$0	\$2,500

<b>Vending Machines</b>	\$0	\$2,000	\$0	\$0	\$2,000
<b>Work/Dining Surface Scope</b>	\$18,150	\$229,500	\$15,000	\$450	\$263,100
<b>Work/Dining Surfaces</b>	\$35,550	\$1,800	\$450	\$0	\$37,800
<b>Total</b>	<b>\$933,975</b>	<b>\$453,410</b>	<b>\$43,200</b>	<b>\$450</b>	<b>\$1,431,035</b>

**Cost of Non-Compliant Items by Category: Priority 3 – Toilet Rooms**

	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
Accessible Routes	\$0	\$10,350	\$0	\$0	\$10,350
Baby Changing Stations	\$1,800	\$29,250	\$14,850	\$0	\$45,900
Bench, Non-Transfer	\$4,000	\$0	\$0	\$0	\$4,000
Bench, Transfer	\$567,325	\$239,625	\$71,500	\$2,900	\$881,350
Doors/Gates	\$67,500	\$100,500	\$1,500	\$750	\$170,250
Fire Alarms	\$37,920	\$17,980	\$5,360	\$285	\$61,545
Grab Bar Rear	\$33,930	\$22,395	\$10,025	\$200	\$66,550
Grab Bar Side	\$5,510	\$7,830	\$2,355	\$0	\$15,695
Grab Bar Side, AA	\$400	\$0	\$0	\$0	\$400
Grab Bar, Shower	\$36,300	\$28,500	\$6,300	\$0	\$71,100
Mirrors	\$40,050	\$14,150	\$2,800	\$250	\$57,250
Operable Parts	\$7,000	\$5,000	\$300	\$200	\$12,500
Protruding Objects	\$57,500	\$121,000	\$18,000	\$0	\$196,500
Restroom Scope	\$815,300	\$275,500	\$8,000	\$0	\$1,098,800
Showers	\$13,000	\$0	\$0	\$0	\$13,000
Signage, Designation	\$10,700	\$11,200	\$300	\$0	\$22,200
Signage, Direction/Information	\$9,800	\$0	\$0	\$0	\$9,800
Sinks	\$210,325	\$111,650	\$42,700	\$0	\$364,675
Toilet Compartment, AA	\$73,300	\$43,600	\$17,625	\$0	\$134,525
Toilet Compartment, Single User	\$540,000	\$228,000	\$60,000	\$0	\$828,000
Toilet Compartment, WC	\$378,200	\$683,650	\$127,400	\$0	\$1,189,250

Toilet Paper Dispensers	\$31,800	\$28,800	\$8,875	\$0	\$69,475
Urinals	\$41,800	\$26,250	\$4,400	\$0	\$72,450
Water Closet, AA	\$47,625	\$12,000	\$250	\$0	\$59,875
Water Closet, Single User	\$97,750	\$38,750	\$5,000	\$2,500	\$144,000
Water Closet, WC	\$152,750	\$143,000	\$23,500	\$0	\$319,250
<b>Total</b>	<b>\$3,281,585</b>	<b>\$2,198,980</b>	<b>\$431,040</b>	<b>\$7,085</b>	<b>\$5,918,690</b>

**Cost of Non-Compliant Items by Category: Priority 4 – Other Items**

	General TxDOT Administrative	Safety Rest Area	Travel Information Center	Ferry	Total
Accessible Routes	\$200	\$15,400	\$750	\$0	\$16,350
Drinking Fountain Scope	\$0	\$4,000	\$0	\$0	\$4,000
Drinking Fountains	\$180,000	\$86,250	\$7,500	\$0	\$273,750
Protruding Objects	\$78,600	\$105,000	\$8,500	\$0	\$192,100
<b>Total</b>	<b>\$269,600</b>	<b>\$221,150</b>	<b>\$19,450</b>	<b>\$0</b>	<b>\$510,200</b>

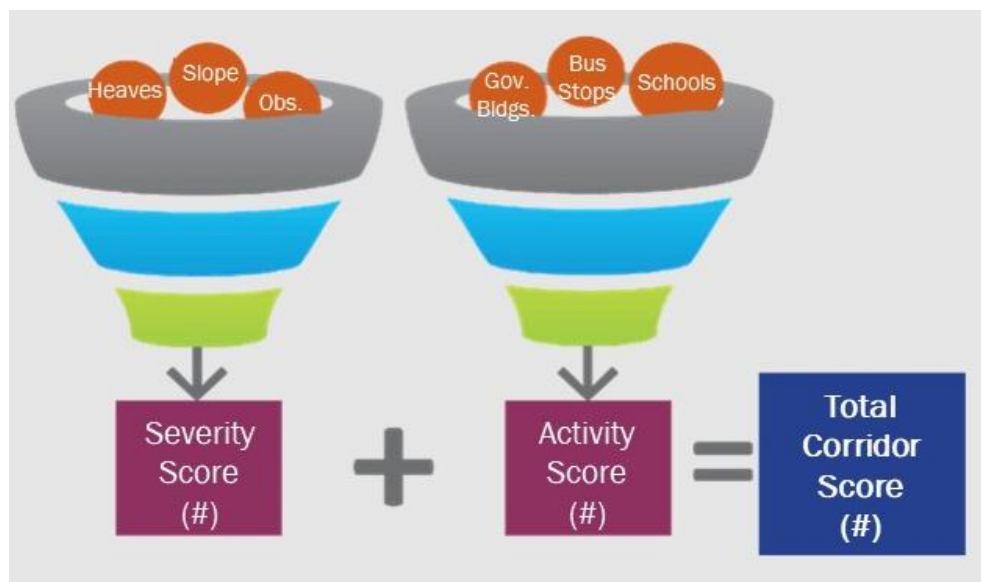
**11.3 Websites**

Website improvement cost estimates will be developed each year based on scope development annually. TxDOT has been in the process of a major website redesign of TxDOT.gov, which is budgeted and scheduled to be complete by mid-2022 and will incorporate other project-specific websites previously built by third parties on behalf of TxDOT. A key component of the redesigned site is meeting the highest levels of accessibility. This will include addressing identified issues, as well as training staff on accessibility for future development. Costing of other identified issues or long-term development plans will be dependent upon the approach determined through ITD or CMD each budget cycle.

## 12. Prioritization

Recognizing that the Texas Department of Transportation has limits to annual funding, like all public agencies, TxDOT cannot make all barriers identified accessible immediately. The ADA Transition Plan sets forth the priorities for upcoming years, with longer-term planning processes identified. Because agencies are not able to remediate everything at one time, a robust prioritization process is important.

TxDOT evaluated and quantified priorities in preparation of producing the implementation schedule provided later in this report. The self-evaluation process provided the necessary, detailed data to determine the compliance barriers of pedestrian facilities, buildings, and websites to identify corrective measures. There are varied approaches to identifying the highest priorities in planning. An advanced method of prioritization is to consider not only the severity of a barrier, but the level of use of that asset (such as a ramp, sidewalk, facility, picnic table, restroom, service counter, website, etc.) by members of the disability community and citizens at large. Knowing that a feature does not meet the ADA criteria is not enough. When many areas need to be addressed, the agency must prioritize what to fix first.



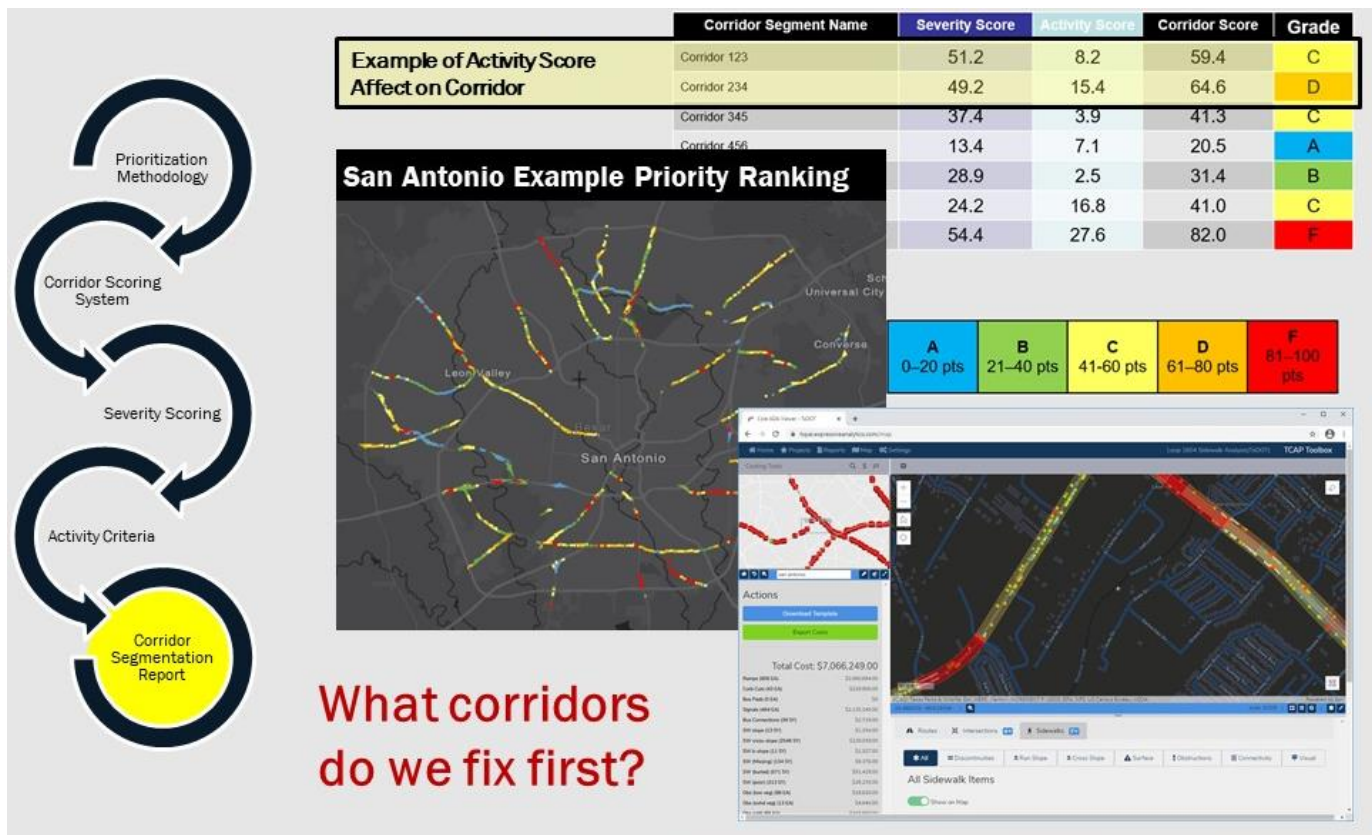
The image depicts the 'Barrier Ranking System' concept that allowed TxDOT a quantitative process for prioritization. The following pages describes how each asset was ranked by the project team.

## 12.1 Public Rights-of-Way

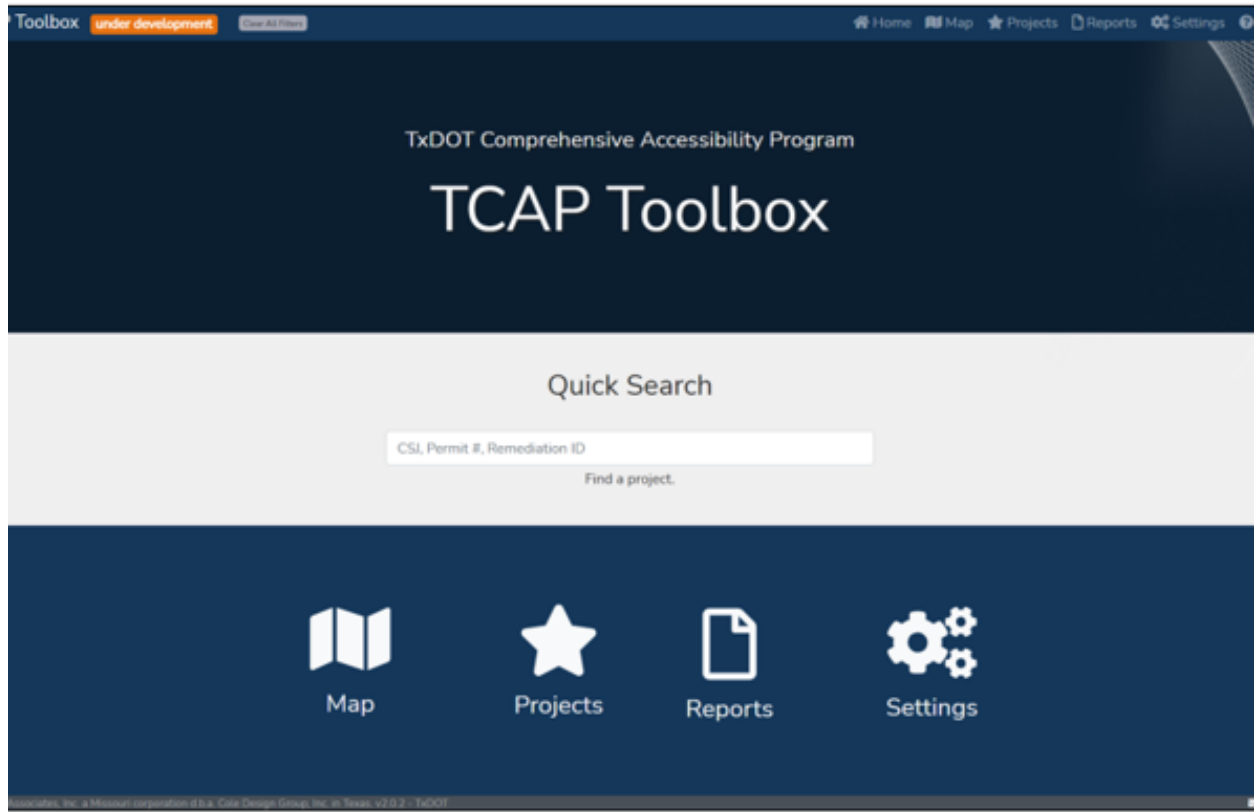
It can be an arduous process for agencies to determine what to prioritize or what to fix first, especially in the public rights-of-way, because of the vast amount of collected data. TxDOT benefitted from an advanced technological approach in prioritization.

The project team developed a sophisticated 'Barrier Ranking System', which utilized a weighted algorithm system - combining impedance scoring with activity scoring. TxDOT can see the types and severities of compliance deficiencies within the Web App Viewer and GIS systems discussed earlier in this report. This combined with looking at activity generators, such as government buildings, and varied essential services, created a quantitative measurement for both the severity of corridors or ramps in non-compliance, combined with their degree of use or activity. This provided a more objective ability for TxDOT staff to review issues and aided in the development of the implementation schedule. Public comments can also be added to this geographic information to ensure public feedback is considered as projects are created by TxDOT over time.

The following graphic depicts quantitative scoring for corridors.



The Web Application built specifically for TxDOT's robust needs allows for data interaction, project planning, and tracking.



## **12.2 Facilities**

In addition to the application of the prioritization criteria discussed earlier in the document, TxDOT's approach to selecting the facilities and sites to be evaluated was a method of prioritization as well. As an organization, TxDOT has over 2,500 facilities under its responsibility. However, many of these facilities are not open to the public and do not house TxDOT services, programs, or activities that are public facing. Examples of these types of facilities include:

- Maintenance shops
- Equipment storage
- Hazardous material storage
- Material laboratories
- Radio towers

For the self-evaluation, TxDOT identified facilities across divisions and districts where public-facing interaction was taking place. Specifically, TxDOT staff identified even the spaces within the facilities where public activity takes place to streamline data collection, as many areas of TxDOT facilities are not open to the public. This selection process was completed to ensure that the self-evaluation of facilities not only met with the regulatory requirements but also allowed for meaningful data that could be prioritized for identifying and removing non-compliant elements which truly prevent access to TxDOT services, programs, and activities.

The prioritization levels, or categories, applied to TxDOT owned and operated facilities included within this self-evaluation were defined in advance of the data collection effort. CIV worked with TxDOT divisions to define prioritization criteria. It is considered industry standard to consider the approach and entrance to a facility first, then what a person encounters entering and navigating the space to obtain desired services or activities, followed by access to toilet rooms, and amenities. For instance, consider a person achieving access from bus stops or parking spots, across ramps and sidewalks, through doors to service counters, down hallways to restrooms, navigating to meeting space locations, and using other services, like drinking fountains. For a full understanding of information collected and how data is prioritized in implementation planning efforts, please see a sample facility report in the Appendix, which focuses on improving program access. While this general prioritization approach is based upon Regulation 28 CFR Part 36, and applies specifically to commercial entities, the guidance provides a usable framework for the public that TxDOT serves.

The Prioritization levels applied are:

- Priority 1-Entrance
- Priority 2-Services
- Priority 3-Restrooms
- Priority 4-Other

**Priority 1-** This level has been applied to non-compliant elements within the spaces that facilitate the public arrival, approach, and entrance into a service providing facility. In general, the ‘facility’ is the main structure of a site, such as a Safety Rest Area, but at times could be an ancillary ‘facility’ which provides a service such as a picnic pavilion. This guidance comes from §36.304:

(1) First, a public accommodation should take measures to provide access to a place of public accommodation from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, widening entrances, and providing accessible parking spaces.

**Priority 2-** This level has been applied to non-compliant elements that prevent the public from accessing the goods and services being provided at a given facility once inside of the facility itself. These barriers could be a service counter in a lobby that is too high, a door with an opening force above the regulatory limit, or a picnic table that does not provide the required space for a chair user to pull underneath the table fully. This guidance comes from §36.304:

(2) Second, a public accommodation should take measures to provide access to those areas of a place of public accommodation where goods and services are made available to the public. These measures include, for example, adjusting the layout of display racks, rearranging tables, providing Braille, and raised character signage, widening doors, providing visual alarms, and installing ramps.

**Priority 3-** This level has been applied to non-compliant elements that prevent the public from accessing amenities provided within restrooms at a given facility. This guidance comes from §36.304:

(3) Third, a public accommodation should take measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps, providing accessible signage, widening of toilet stalls, and installation of grab bars.

**Priority 4-** This level has been applied to non-compliant elements that impact the public which do not fall within the first three categories. Most of the identified barriers in this last priority level are drinking fountains. These items are viewed as a secondary or tertiary service in relation to the primary function of a facility. This guidance comes from §36.304:

(4) Fourth, a public accommodation should take any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation.

### **12.3 Websites**

For websites, TxDOT determined the highest activity websites for priority, but the self-evaluation also gave insights into programmatic approach needs, which could have fast-reaching implications. The ITD and CMD teams used the self-evaluation findings to review the existing Program Charter for accessibility improvements and looked for efficiencies like template designs, training programs for TxDOT content creators, and quality control steps to maximize the implementation strategy for remediation.

## 13. Public Outreach

TxDOT solicited feedback from the public through six virtual, public outreach sessions scheduled in 2022. The sessions were held live and recorded to be later posted to TxDOT's website for access during the public comment period. All information pertaining to public outreach is available on TxDOT's website at <https://www.txdot.gov/inside-txdot/division/civil-rights/ada-transition-plan.html>.

Public outreach is intended to ensure that members of the community living with disabilities have an opportunity to be informed about TxDOT's process, updated ADA Transition Plan, and provide feedback. The event was promoted to public agencies, disability advocacy groups, and through various TxDOT communication vehicles.

### Public Outreach Open Houses:

- 6 virtual Zoom sessions:
  - North Region morning
  - North Region (2nd session) afternoon
  - South Region morning
  - West Region afternoon
  - East Region morning
  - East Region (2nd session) afternoon
- Session links were provided along with materials on TxDOT's website.

**Live & Recorded Viewing:** For individuals, unable to attend in person, videos of the sessions were made available as a recorded viewing opportunity during the public comment period.

**ADA Self-Evaluation and Transition Plan:** This report was made available for participants during the public outreach sessions and throughout a public comment period.

**Electronic publicity of the Public Outreach Sessions and Community Survey** was made available online to ensure all citizens had an opportunity to understand TxDOT's findings and provide valuable feedback from the disability community and citizenry at large to TxDOT. A video of the live public outreach session was available for viewing for those who could not attend open sessions, during the comment period.

Feedback received from citizens allows for additional consideration as TxDOT updates the implementation plan in cycles over time for both short- and long-term remediation efforts. See the Implementation Schedule in this report, for more information.

## 14. Implementation Schedule

Because TxDOT has significant infrastructure in the public rights-of-way, safety rest areas, travel information centers, government buildings, and websites it is not possible to remove all barriers to accessibility immediately. Barriers will be removed systematically to ensure equality among TxDOT programs. It is the intent of TxDOT to address barriers to accessibility on an on-going basis. Implementing improvements is contingent upon immediate necessity, degree of complexity, overall cost, and budget approval.

TxDOT reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

The schedules on the following pages are based on the locations or information evaluated and reflected in this report. The schedule will be planned on a four-year cycle to ensure any newly identified issues or changing environments in the public rights-of-way, facilities, or websites can be addressed over time. The implementation schedule will be updated every four years. TxDOT intends to integrate the accessibility data into on-going funded capital and maintenance programs, operating budgets, or other development initiatives as appropriate. All ADA remediation is subject to biennium budget approval. The following table provides a schedule for implementation, subject to adjustment.

## **14.1 Public Rights-of-Way – Design Division**

### **Commitment to Remediation and Accessible Public Rights-of-Way**

The Texas Department of Transportation Department (TxDOT) has a long history of being committed to providing for the safety, reliability, and accessibility of its transportation infrastructure to serve the public. Since 2005, TxDOT furthered its commitment to accessibility within the public rights-of-way (ROW) by creation of the Statewide Curb Ramp Program which creates dedicated remediation projects throughout the state. Since inception, this program has funded authorizations through fiscal year 2021 totaling \$280,904,957 with a focus on barrier removal specific to the remediation of curb ramps, transit, and sidewalk improvements. The project has contributed to significant success throughout the state transportation system in making the ROW more accessible.

While TxDOT had completed a data collection effort to evaluate ADA compliance in 2002, the agency recognized the challenges with incomplete compliance data, making project planning for ADA remediation difficult without known locations or accurate quantities of deficiencies. Further, lack of “smart data” caused staff to over or under scope a project. The biggest challenge was the inability to prioritize projects in a manner that ensured TxDOT was maximizing financial stewardship, while effectively incorporating the needs of the disability community. This awareness led TxDOT to envision a statewide collection effort and the development of technology to manage and prioritize data for use across all twenty-five districts, and the supporting divisions which plan, design, and construct remediation projects. This effort is detailed in the Approach and Methodology sections of this report.

TxDOT is committed to developing not only an ADA Transition Plan report, but also the TxDOT Comprehensive Accessibility Program (TCAP). For public rights-of-way (ROW), TxDOT has invested over \$21M in the planning, statewide collection, and technology development from 2015-2021, to ensure the TCAP program can be integrated throughout TxDOT’s planning, design, and construction process.

The TCAP includes a geospatial inventory of all noncompliant pedestrian accessible elements contained within the Pedestrian Access Inventory database (PAI). The PAI comprises ADA assets within the public ROW and was completed in June 2021 and includes 100% collection of accessibility elements within the ROW. This system allows planners, designers, and maintenance personnel access to information to make informed decisions related to ADA deficiencies and program remediation work into their projects. The TCAP is the formal name of the Web Application (WebApp or TCAP WebApp) described earlier in this document, which references an ArcGIS system housing the PAI data, facility data, notations of locations for grievances, and reporting. The development of these systems is described in the Methodology section of the report. All data is available to TxDOT divisions and districts, with a project remediation tracking module coming online in early 2022.

### **Funding and Timing**

TxDOT anticipates it will take decades to address all issues identified in the self-evaluation process. Further conditions are ever evolving and changing due to environment, growth, and members of the disability community communicating new needs. As discussed in the prioritization section of this

report, TxDOT understood the importance of creating a robust prioritization process and database to analyze the needs from an accessibility perspective, to best plan and execute improvements.

As detailed in the introduction of the Implementation Schedule, TxDOT will plan remediation on a four-year cycle, and utilize any funding mechanism available to incorporate necessary remediation into projects. TxDOT does not rely on transportation alternative funds to complete remediation projects. Dedicated funding sources utilizing category 10 funds are a primary source of dedicated funding in addition to traditional project financing.

All ADA remediation is subject to biennium budget approval and those funds identified in the Statewide Transportation Improvement Program (STIP), which is TxDOT's four-year capital improvement program that fulfills federal (23 USC 135 and 23 CFR 450.218) and state (43 TAC 16.103). A federally approved STIP is required for projects to be eligible for federal funding under Title 23 USC and Title 49 USC, Chapter 53 which includes projects subject to ADA improvements.

It can take many years for a roadway or transit project to transition from planning and development (i.e., preliminary engineering work, environmental analysis, right-of-way acquisition, and design) to construction or implementation. The STIP identifies projects, programs, and services that are within four years of being designed, constructed, or implemented to meet passenger and freight transportation needs identified during the transportation planning process. The TCAP WebApp allows for full visibility of the necessary remediation in TxDOT corridors and each corridor segment's level of prioritization based on compliance severity and activity (or usage of the corridor segment) by the public. The STIP and ADA Transition Plan objectives align with a focus on:

- Developing an inventory of system infrastructure,
- Analyzing existing conditions and performance,
- Prioritizing needs and developing priorities,
- Developing fiscally constrained programs which identify and allocate funding consistent with priorities,
- Contain a mechanism to monitor project success and system changes,
- Provide reporting on performance, investment strategy, and project selection ensuring decision makers can align and optimize resources, and
- Federally approved STIP projects require ADA improvements, per federal agency guidance, for public rights-of-way scope development.

TxDOT intends to spend an estimated \$500 million between fiscal years 2022-2025 across all districts toward remediation and improvements. With the TCAP WebApp remediation tracking being made available in early 2022, the tool will ease the planning and tracking process across districts within each four-year planning cycle.

### **TCAP Integration**

Major initiatives being undertaken after the review of self-evaluation data include better processes related to project planning, programming, and training for all TxDOT staff and project participants. TxDOT has developed a remediation tracking process which will ensure necessary remediation is integrated at project inception and provides the ability to track and manage accessibility assets from

planning phase through the construction and operations phases of the projects. This process is integrated into the TCAP WebApp discussed in other portions of this document. The WebApp will specifically address the findings of the self-evaluation through the following:

- Project planning and programming will now have real-time access to accessibility inventory along the public ROW. Planners can integrate, program, and identify necessary remediation as part of the planned projects.
- Planners can assess the prioritization of corridors by reviewing severity rankings, activity rankings, and composite rankings.
- Remediation tracking will be automated through the WebApp. The process will track accessibility assets through project development, monitoring for changes as scope is finalized, and the project constructed.
- The State of Texas additionally maintains a requirement under Chapter 469 of the Texas Government Code for all projects with planned pedestrian improvements more than \$50,000 to be reviewed by third-party inspection process facilitated by a Registered Accessibility Specialist. The approval process will be tracked within the WebApp project status, with the ability to log inspection status, noted deficiencies, and develop an opportunity for correction prior to final contract release.
- Texas Administrative Code establishes a formal variance procedure to waive or modify an accessibility standard. Variance Application submittal and status information will also be tracked in the system.
- The system will allow emerging data or changes within the public ROW to be included to gain visibility to project planners and decision makers.
- Grievances and requests will be logged within the WebApp by Civil Rights Division or the local District ADA Liaisons. The WebApp module will track and monitor responses, timeline for correction, and any corrective actions taken by TxDOT.
- Training will be developed for all TxDOT staff who engage at various stages of a project.
- The STIP details planned projects in a 4-year cycle which includes those eligible for partnerships with other agencies or funding sources.

TxDOT is aware of the challenges uncovered in its public rights-of-way self-evaluation and stands firm on its commitment to promote safety and accessibility for all users of the state’s transportation system. The self-evaluation provides a snapshot in time of the system. TxDOT realizes that conditions are constantly evolving, directly impacting the built infrastructure including environmental parameters, construction, population changes, public requests, and advancement in technology. TxDOT maintains a commitment to the public with the understanding that every implementation schedule of each district requires constant evaluation, will be treated as a living document, and will undergo revisions as TxDOT strives to deliver projects that achieve improved accessibility and meet performance goals.

### **District Implementation Schedules – The Development Process**

The Design Division works collaboratively with other divisions and all twenty-five districts of TxDOT to deliver transportation improvements which incorporate accessible pedestrian elements. Through the

development process of the PAI, the TCAP, and the ADA Transition Plan, TxDOT engaged all districts and divisions to analyze information from the self-evaluation, consider cost impacts, prioritization details, and plan schedules.

The STIP projects are identified and mapped in the TxDOT's Statewide Planning Map; this information is overlaid into the TCAP WebApp, via GIS. The TCAP WebApp provides prioritization of severity ranking, activity ranking, and composite ranking of all compliance data. TxDOT staff can see compliance data, planning level costing, prioritized compliance issues, along with TxDOT planned projects to ensure proper analysis of compliance elements for pedestrian facilities which need to be incorporated into upcoming projects. TxDOT acknowledges that with this information, the planning of projects can now be influenced by the accessibility challenges the data reveals.

While all districts have engaged in the Implementation Schedule Planning Process, the TCAP WebApp has only been recently been released to all districts. However, a select group of districts have been engaged in the development of the PAI and TCAP dating back to 2015, and these districts have a deeper level of exposure and training from 2016 through 2021 into the ADA transition planning process. The San Antonio District is an example of such a district, actively participating in the pilot study to aide in development of the overall program. This included use of self-evaluation data collected into active project planning for years, beta testing the TCAP WebApp development from 2016-2021, and engaging with the Civil Rights Division to consider the District ADA Liaison's role of integration to the processes.

All Districts utilized the TCAP data for the purposes of investigating the 2022-2025 implementation plan cycle. All districts reviewed compliance data overlaid with Statewide Planning Map data, with prioritized corridor reports which include macro- to micro-levels of ADA compliance data within the corridor segments (see Summary of Findings regarding this information) and costing to evaluate appropriate projects for the upcoming four-year cycle. This included projects administered by TxDOT within the STIP and outside partners including private development. Additional goals of the planning process included defining TxDOT procedures to create project integration strategies across TxDOT to balance varied urban, suburban, and rural district sizes and needs.

### **Implementation Plan Schedule – San Antonio District (FY22-FY25)**

To showcase this process, below is the San Antonio District (SAT) schedule for the upcoming four-year cycle. Utilizing TCAP, SAT representatives identified appropriate types of projects currently programmed within the STIP and scheduled for letting from FY2022 to FY2025. These projects were then geographically mapped against the Pedestrian Access Inventory within the TCAP WebApp and reviewed for necessary remediation compliance. This process allowed SAT district to ensure the proper pedestrian facilities requiring improvements were incorporated into the project. Further, staff evaluated the prioritization ranking of each project and adjusted plans accordingly. The projects identified within the following table represent planned projects that incorporate improvements consisting of newly proposed facilities and remediation of existing barriers within the project limits, within the 2022-2025 planned cycle.

District representatives can now log these projects within the TCAP WebApp initiating the remediation tracking process. As part of ongoing project development and design review, the District Design

Review Team can specifically reference TCAP data and document changes throughout design review, and at each stage of the project. This is important because many projects at TxDOT are multi-year. This will enable the district to ensure each project is adequately addressing requirements of the ADA and document any challenges along the way to project completion. Should any elements be missed or constructed incorrectly, the district will document the problem to be addressed and track the appropriate actions take place. Design variances or program access solutions will also be documented in the TCAP WebApp.

### San Antonio District (FY22-FY25) Implementation Schedule

CSJ	HIGHWAY	Type of Work	County	Letting Year	Proposed Pedestrian Improvements	Total Project Cost
052102041	SL 13	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$20,250	\$101,114
143301032	FM 2252	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$59,650	\$82,034
002509085	FM 78	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$59,850	\$339,581
029103076	SH 16	SAFETY IMPROVEMENT PROJECTS	Kerr	2022	\$62,250	\$306,181
127201021	FM 1101	SAFETY IMPROVEMENT PROJECTS	Comal	2022	\$63,350	\$316,707
143301031	FM 2252	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$74,724	\$74,724
052106150	IH 410	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$74,950	\$372,932
002509086	FM 78	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$80,400	\$402,439
021501055	SH 46	SAFETY IMPROVEMENT PROJECTS	Comal	2022	\$81,525	\$327,277
052101055	SL 13	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$82,575	\$425,266
001608043	SL 368	SAFETY IMPROVEMENT PROJECTS	Bexar	2022	\$128,250	\$641,213
001608034	SL 368	INTERSECTION & OPERATIONAL IMPRV	Bexar	2022	\$500,000	\$30,000,000

CSJ	HIGHWAY	Type of Work	County	Letting Year	Proposed Pedestrian Improvements	Total Project Cost
029110114	SH 16	INTERSECTION & OPERATIONAL IMPRV	Bexar	2022	\$550,000	\$10,800,000
021507027	SH 46	WIDEN NON-FREEWAY	Comal	2022	\$804,293	\$38,627,400
223001020	FM 1560	WIDEN NON-FREEWAY	Bexar	2022	\$1,000,000	\$21,000,000
223001021	FM 1560	WIDEN NON-FREEWAY	Bexar	2022	\$1,500,000	\$39,000,000
025306037	SS 536	PEDESTRIAN, SIDEWALKS & CURB RAMPS	Bexar	2022	\$2,000,000	\$2,000,000
046502027	FM 1518	WIDEN NON-FREEWAY	Bexar	2022	\$2,246,983	\$44,737,762
007208144	IH 10	INTERCHANGE (NEW OR RECONSTRUCTED)	Bexar	2022	\$5,760,000	\$310,438,574
002509083	FM 78	SAFETY IMPROVEMENT PROJECTS	Bexar	2023	\$59,850	\$339,581
001608041	SL 368	INTERSECTION & OPERATIONAL IMPRV	Bexar	2023	\$1,400,000	\$26,000,000
021603034	FM 466	INTERSECTION & OPERATIONAL IMPRV	Guadalupe	2024	\$55,000	\$1,464,845
007302083	US 281	SAFETY IMPROVEMENT PROJECTS	Bexar	2024	\$76,500	\$496,514
032804046	SH 97	REHABILITATION OF EXISTING ROAD	Atascosa	2024	\$250,000	\$8,000,000
002509081	FM 78	OVERLAY	Bexar	2024	\$335,000	\$16,073,352
052104285	IH 410	FREEWAY OPERATIONAL IMPROVEMENTS	Bexar	2024	\$550,000	\$70,000,000
007302082	US 281	SAFETY IMPROVEMENT PROJECTS	Bexar	2024	\$1,050,000	\$3,498,795
007308183	IH 37	FREEWAY OPERATIONAL IMPROVEMENTS	Bexar	2025	\$220,000	\$18,400,000
350801029	SH 151	WIDEN FREEWAY	Bexar	2025	\$259,000	\$80,000,000
053501077	IH 10	WIDEN FREEWAY	Guadalupe	2025	\$300,000	\$90,000,000
053501074	IH 10	WIDEN FREEWAY	Guadalupe	2025	\$400,000	\$169,000,000
245202130	SL 1604	WIDEN FREEWAY	Bexar	2025	\$450,000	\$53,600,000
029106053	SH 16	WIDEN NON-FREEWAY	Bandera	2025	\$499,174	\$10,243,256
245203113	SL 1604	WIDEN FREEWAY	Bexar	2025	\$500,000	\$61,000,000

CSJ	HIGHWAY	Type of Work	County	Letting Year	Proposed Pedestrian Improvements	Total Project Cost
036602089	SH 123	WIDEN NON-FREEWAY	Guadalupe	2025	\$900,000	\$23,000,000
001605111	IH 35	WIDEN FREEWAY	Comal	2025	\$1,000,000	\$369,000,000
002407059	US 90	CONVERT NON-FREEWAY TO FREEWAY	Bexar	2025	\$1,200,000	\$110,000,000
245201066	SL 1604	WIDEN NON-FREEWAY	Bexar	2025	\$1,400,000	\$40,000,000
002408138	US 90	CONVERT NON-FREEWAY TO FREEWAY	Bexar	2025	\$2,500,000	\$1,600,000,000

All ADA remediation is subject to biennium budget approval. All schedules for implementation are subject to adjustment per needs in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

### Implementation Plan Process

Based on the findings and lessons learned from the initial study TxDOT will continue with the process defined below. Each district or division is responsible for its geographical area or service including reporting, verification of prioritization, and proactively engaging grievances and requests.

- For all planned projects, review the TCAP WebApp to validate and incorporate any necessary remediation not currently identified within the project. This includes analysis of prioritization data and its applicability to funding requirements. Additionally, review accessibility limits to determine if minor adjustments substantially benefit remediation and adjust project limits if necessary.
  - For projects associated with alternate funding, those prepared by a partner agency, or associated with a public request / grievance require review of accessibility elements within the projects limits to certify each is being properly addressed. Proceed with project creation into TCAP and begin formalized remediation workflow.
- TxDOT to train staff to follow DOJ/DOT interpretation of ‘alteration versus maintenance’ in defining project parameters for inclusion of ADA remediation
- Document and identify limits and assets which are scheduled to be remediated within TCAP’s WebApp. Any accessibility elements not included should be documented and returned to the PAI for continued monitoring. This process is considered dynamic, and elements may change status throughout project development.
  - Verify TxDOT statewide policies are being incorporated into project planning:
    - Project work type classification includes necessary remediation
    - Design variances are logged where full compliance cannot be achieved

- Leverage district-specific protocols to confirm, manage, and document planned accessibility improvements for all projects at interim milestone stages. These protocols are typically not included in the formalized TCAP remediation workflow detailed below.
- Continually monitor public requests, grievances, and other environmental changes which may require additional considerations for project inclusion. These are to be logged in the grievance/request module of the TCAP WebApp.
- Finalize project including completion of any required governmental oversight (FHWA, TDLR, etc.) which may affect remediation totals. Close project within TCAP WebApp and finalize reporting.

Figure 1 below depicts the workflow which supports the Implementation Plan Process described. This workflow is built into the planning and project management tools of the TCAP WebApp.

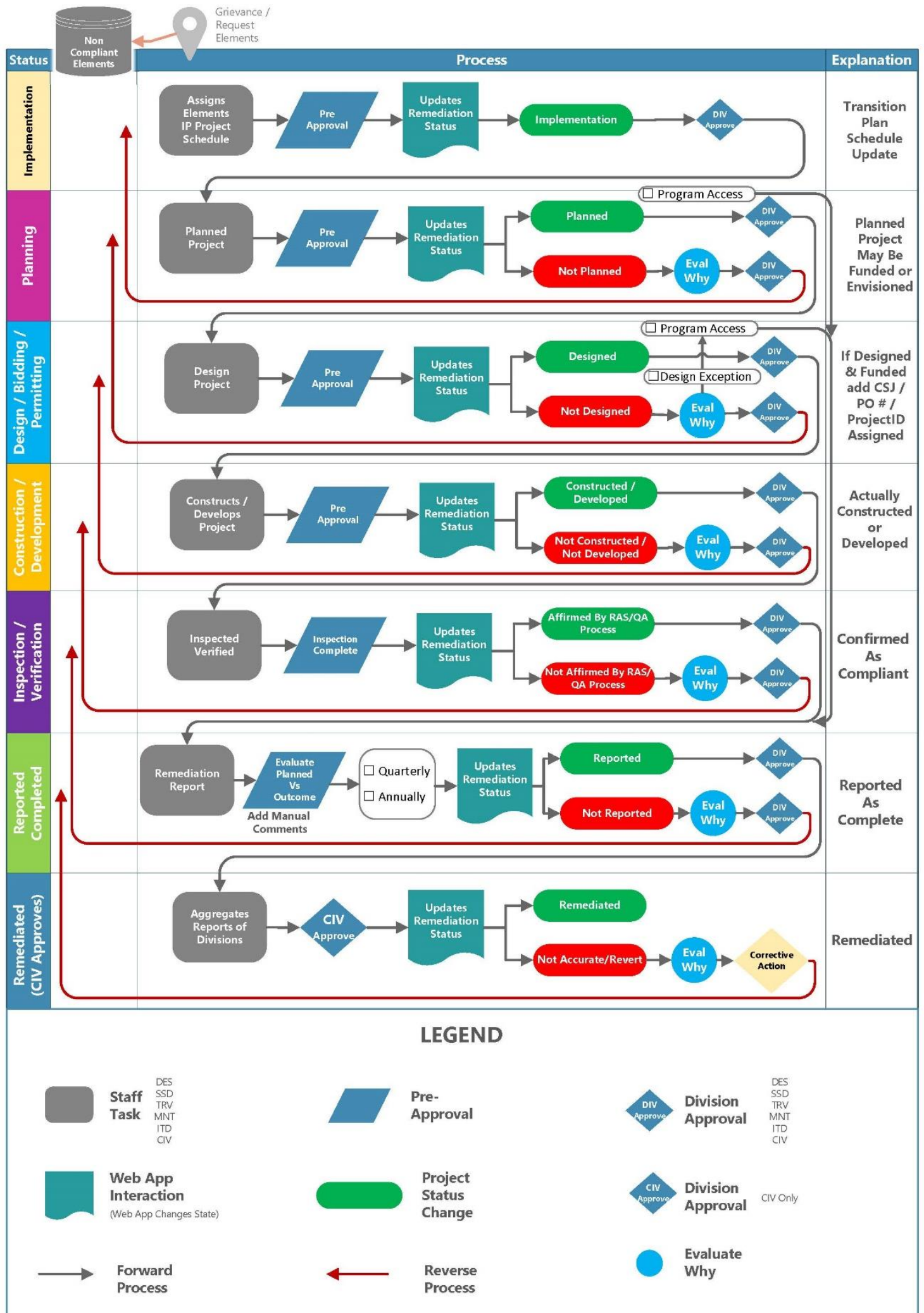


Figure 1: TxDOT Remediation and Tracking Workflow

### Implementation Goals:

- TXDOT continues to make significant progress toward improving compliance with the state's transportation system and is scheduled to invest over \$500 million between FY 2022 and FY 2025 on accessibility improvements within the Public ROW.
- Additionally, TxDOT will create a process to utilize the dedicated program funding source to address high priority areas and citizen requests which may arise outside of STIP planned improvements.
- With the magnitude of information collected, and the size of TxDOT as an agency, it is apparent an on-going program commitment is necessary to fully train all staff and integrate the TCAP processes. With data coming online in summer 2021, the TCAP WebApp expanding users in fall 2021 for implementation planning, and the enhanced project remediation tracking system coming online in January 2022, TxDOT is committed to the TCAP WebApp project investment.
- TxDOT anticipates fully integrating the TCAP WebApp users beyond the current 100-user licenses in 2022 to engage additional staff as necessary for full integration to all TxDOT staff who can benefit from access to the tool for planning and executing accessible pedestrian facilities in ROW.
- Design Division and each district is responsible for ensuring the implementation schedules for the first cycle follows the San Antonio District example in approach and execution, with full integration to the TCAP WebApp tracking.

## 14.2 TxDOT Facilities – Support Services Division

All ADA remediation is subject to biennium budget approval. All schedules for implementation are subject to adjustment per needs in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

### Estimated Cost of Remediation

Facility Name	TxDOT Asset ID	FY2022	FY2023	FY2024	FY2025	FY2026
Abilene DHQ - Admin.	88056			\$107,520		
Abilene DHQ - Veh. Titles & Reg.	88005		\$13,075			
Amarillo DHQ - Admin.	48051		\$93,180			
Amarillo DHQ - Veh. Titles & Reg.	48007			\$61,175		
Atlanta DHQ & Maint. - Admin.	198006					\$194,630
Atlanta DHQ & Maint. - Eng.	198046				\$40,530	
Austin DHQ & Maint. - Admin. (2)	148113			\$150,485		
Austin DHQ - Warehouse.	148082	\$23,310				
Austin DHQ Shipping	148081	\$43,985				
Beaumont DHQ & Maint. - Admin.	208068		\$59,860			
Beaumont DHQ & Maint. - Area Eng.	208075		\$75,500			
Beaumont DHQ & Maint. - Train.Cntr	208080	\$39,560				
Beaumont DHQ & Maint. - Veh. Titles & Reg.	208003	\$9,950				
Beaumont DHQ & Maint. - Warehouse	208070		\$31,800			
Beaumont DHQ- Beaumont Area Office	208002		\$24,335			
Brownwood DHQ - Area Eng.	238055	\$61,515				
Brownwood DHQ - Maint.	238064		\$34,685			
Bryan DHQ & Maint. - Admin.	178006	\$42,690				
Childress DHQ - Area Eng.	258061	\$40,160				
Childress DHQ - Admin.	258067		\$75,515			
Corpus Christi DHQ - Admin.	168078				\$200,265	
Corpus Christi DHQ & Maint.- Area Eng.	168090					\$115,810
Corpus Christi DHQ & Maint.- Veh. Titles & Reg.	168002	\$32,285				

Dallas DHQ - DalTrans	188019			\$77,200		
Dallas DHQ - NE Annex	188090	\$35,315				
Dallas DHQ Annex	188101	\$21,075				
Dallas DHQ Admin. Bldg.	188077		\$34,400			
El Paso DHQ - Admin.	248012					\$184,470
El Paso DHQ - TMC Bldg.	248028				\$100,725	
Ferry Operations	N/A	\$7,935				
Fort Worth DHQ - Admin	28044			\$94,735		
Fort Worth DHQ - TransVision Center	28003				\$136,210	
Fort Worth DHQ Area Eng. & Maint.	28079	\$29,700				
Fort Worth DHQ & Area Eng. & Maint. - Area Eng.	28195	\$9,650				
Fort Worth DHQ and Area Engineer and Maintenance - FT Worth District Facilities	28055					\$70,800
Fort Worth DHQ and Area Engineer and Maintenance - McCart Conference Space	28056					\$28,056
Fort Worth DHQ & Area Eng. & Maint. – Admin Addition	28009					\$70,040
Fort Worth DHQ & Area Eng. & Maint. - Permit	28059		\$46,015			
Galveston-Port Bolivar Ferry - (Bolivar Side)	128215	\$43,225				
Houston DHQ - Admin	128210				\$111,245	
Houston South AE & Maint. – Admin.	128079		\$58,720			
Houston South AE & Maint.	128098		\$24,250			
Houston South AE & Maint. - Restrooms	128243		\$57,785			
Houston South AE & Maint.- Public Meeting Space	128097		\$17,250			
Houston TranStar	128228					\$112,595
Humble North AE & Maint.	128029					\$94,620
Jacksboro Maint. Facility - Office Building	28106		\$58,565			
Laredo DHQ & Maint. - Area Eng. & Maint.	228009	\$80,355				
Laredo DHQ & Maint.	228105			\$155,190		
Laredo DHQ & Maint. - Admin.	228104				\$111,675	
Lubbock DHQ & Area Eng. - Admin.	58050	\$34,425				

Lubbock DHQ & Area Eng. - Area Eng.	58076		\$28,350			
Lubbock DHQ & Area Eng. - Train.Cntr	58083	\$70,035				
Lubbock DHQ & Area Eng. - Veh. Titles & Reg.	58003		\$15,420			
Lufkin DHQ - Area Eng.	118013	\$57,120				
Lufkin DHQ & Maint. - Admin.	118060			\$100,560		
Odessa DHQ & Area Eng. & Maint. - Area Eng.	68073	\$20,220				
Odessa DHQ & Area Eng. & Maint. - Veh. Titles & Reg.	68064	\$11,185				
Odessa DHQ & Area Eng. & Maint. - Admin.	68065		\$45,235			
Paris DHQ Eng.	18078				\$94,270	
Paris DHQ & Maint. - Admin.	18007				\$70,575	
Paris DHQ & Maint. - Teleconference & Train.Cntr	18057				\$80,890	
Pharr DHQ & Maint. - Admin.	218077	\$53,625				
Pharr HQ Area Eng. & Maint.	218002		\$45,485			
Pharr HQ Teleconference & Train.Cntr	218095			\$45,975		
Port Aransas Ferry Maint. Ops	168155					\$ 86,360
Port Galveston-Ferry Maint. Operations - Rest Area Center (Galveston side)	128172			\$56,335		
Raymondville Maint. Facility-Admin.	218132	\$4,700				
San Angelo DHQ - Admin.	78048	\$46,550				
San Angelo HQ Lab Bldg C.	78047		\$19,660			
San Angelo HQ Veh. Title & Reg.-Bldg. E	78001		\$47,810			
San Antonio DHQ & Maint. - Admin. (Blds. 1, 3 & 4)	158050			\$188,270		
San Antonio DHQ & Maint. - Area Eng.	158051	\$48,575				
San Antonio DHQ & Maint. - Transportation Operations	158054		\$80,770			
San Antonio DHQ & Maint. - Warehouse (Bldg. 8)	158053				\$81,950	
San Antonito DHQ & Maint. - Admin. (Bldg 2)	158102				\$109,195	
Tyler DHQ - Admin	108042					\$91,910
Tyler DHQ - Gentry Building	108027	\$32,555				
Tyler DHQ - Trans Ops	108069					\$157,845

Waco DHQ & Maint. - Admin.	98035	\$61,995				
Waco DHQ & Maint. - Eng.	98095			\$59,350		
Wichita Falls DHQ - Admin.	38067	\$24,475				
Wichita Falls DHQ - Area Eng.	38072		\$67,070			
		<b>FY2022</b>	<b>FY2023</b>	<b>FY2024</b>	<b>FY2025</b>	<b>FY2026</b>
<b>Total</b>		<b>\$986,170</b>	<b>\$1,054,735</b>	<b>\$1,096,795</b>	<b>\$1,137,530</b>	<b>\$1,207,136</b>

### 14.3 Safety Rest Areas – Maintenance Division

All ADA remediation is subject to biennium budget approval. All schedules for implementation are subject to adjustment per needs in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

Facility Name	TxDOT Asset ID	Estimated Remediation Cost				
		FY2022	FY2023	FY2024	FY2025	FY2026
Gray County WB SRA	N/A					\$76,330
Donley County SB SRA	N/A			\$88,400		
Donley County NB SRA	N/A			\$76,300		
Hardeman County SB SRA	N/A			\$99,055		
Hardeman County NB SRA	N/A			\$105,655		
Van Zandt County WB SRA	N/A			\$73,740		
Van Zandt County EB SRA	N/A			\$88,680		
Navarro County NB SRA	N/A		\$178,980			
Bell County SB SRA	N/A	\$108,235				
Hopkins County WB SRA	N/A	\$42,415				
Walker County NB SRA	N/A				\$91,935	
Walker County SB SRA	N/A				\$66,590	
Donley County EB SRA	N/A					\$113,275
Bell County NB SRA	N/A	\$101,120				
Navarro County SB SRA	N/A		\$155,275			
Polk County NB SRA	N/A				\$139,620	
Colorado County EB SRA	N/A					\$119,635
Guadalupe County WB SRA	N/A		\$131,725			
Guadalupe County EB SRA	N/A		\$118,865			
Polk County SB SRA	N/A				\$117,800	
Colorado County WB SRA	N/A					\$126,410
<b>Total</b>		<b>\$251,770</b>	<b>\$584,845</b>	<b>\$531,830</b>	<b>\$415,945</b>	<b>\$435,650</b>

### 14.4 Travel Information Centers – Travel Information Division

All ADA remediation is subject to biennium budget approval. All schedules for implementation are subject to adjustment per needs in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

Facility Name	TxDOT Asset ID	Estimated Cost of Remediation			
		FY2022	FY2023	FY2024	FY2025
Amarillo TIC	48096		\$90,965		
Anthony TIC	248010	\$99,150			
Denison TIC	18038	\$139,160			
Gainesville TIC	38024			\$114,850	
Langtry TIC	568056			\$80,725	
Laredo TIC	228010		\$114,435		
Texarkana TIC	198020		\$141,615		
Orange TIC	208004	\$135,590			
Harlingen/Valley TIC	218011				\$67,580
Waskom TIC	198019			\$142,000	
Wichita Falls TIC	38006				\$60,545
<b>Total</b>		<b>\$373,900</b>	<b>\$347,015</b>	<b>\$337,575</b>	<b>\$128,125</b>

## **14.5 Websites – Communications and Information Technology Divisions**

All ADA remediation is subject to biennium budget approval. All schedules for implementation are subject to adjustment per needs in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in TxDOT programs, on-going evaluations, funding constraints and opportunities.

### **Lessons Learned**

While significant accessibility progress has been made to TxDOT.gov web pages, additional work remains the focus of the website redesign effort underway. Efforts include ensuring that any content identified for migration will be remediated for accessibility, new content is tested to meet accessibility standards before it is deployed on the public-facing website, and that those working on web-related content and design are trained and educated regarding web accessibility standards.

### **Remediation and Implementation Planning**

Efforts are in progress to integrate SiteImprove, which is an automated scanning tool that helps to identify accessibility, SEO, Quality Assurance, and Usability issues for resolution and an overall snapshot in time of those items that can be identified using an automated scan.

While automated tools help, a human is needed to physically review the site itself and the reports from the software. SiteImprove tags issues, potential issues, and resolved issues for review and uses a series of testing questions to help facilitate remediation. SiteImprove also measures progress by crawling the websites on a 5-day cycle or a single page scan can be requested on demand.

TxDOT is in the process of reviewing and incorporating a robust QA testing process that includes manual accessibility review. Items that are targeted for a manual review will be tested as required.

TxDOT has reviewed, confirmed, and documented the accessibility issues outlined in the report, and these issues have been logged in an internal ticketing system, for validation, remediation, and implementation as part of the redesign underway.

Extensive efforts are in progress to train staff developers, designers, content contributors, and QA teams on the appropriate checks and solutions for accessibility.

All assets such as PDF files, images, and videos are also being reviewed and documented to address remediation.

TxDOT will be incorporating those files into the Digital Asset Management System (DAM) as migration begins to the future TxDOT.gov. All assets will pass accessibility checks before being incorporated to the new website.

### **The Accessibility Roadmap and Way Ahead**

TxDOT is committed to creating an accessible experience at TxDOT.gov for all people, including people who use assistive technologies to navigate websites with vision and hearing impairments.

In striving to make TxDOT.gov universally accessible, TxDOT utilizes the following practices, which are informing the current redesign and will carry forward from 2022-2025:

- Testing website content and functionality using current WCAG accessibility standards,
- Providing dedicated staff to test, audit, and train on current accessibility guidelines, standards, and best practices,
- Maintaining an Accessibility Policy linked to in the footer of every page on TxDOT.gov,
- Ensuring website publications are available in accessible formats, including HTML and Adobe Acrobat PDF files,
- Using assistive technologies to validate accessibility of new website content, and
- Testing on multiple internet browsers, including Google Chrome, Microsoft Edge and Explorer, and Safari; multiple device types, including desktop computers, mobile phones, and tablets; and multiple operating systems, including MS Windows, Apple iOS and Macintosh, and Google Android.

The redesigned TxDOT.gov is scheduled to go live in the first half of 2022. TxDOT will continue to provide updates on the redesign progress through quarterly updates.

## **15. Appendix**

Attachment A:	ADA/Section 504 Assurance
Attachment B:	ADA Liaisons by District
Attachment C:	ADA Policy Notice
Attachment D:	ADA Nondiscrimination Statement
Attachment E:	Grievance Appeals Process
Attachment F:	Design Standards
Attachment G:	List of Facilities Evaluated
Attachment H:	Glossary of Terms

## Attachment A: ADA/Section 504 Assurance

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### AMERICANS WITH DISABILITIES ACT and SECTION 504 OF THE REHABILITATION ACT OF 1973

#### ASSURANCE

28 Code of Federal Regulations Part 35.130, Title II of the Americans with Disabilities Act prohibits discrimination on the basis of disability by public entities. Subtitle A protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. It extends the prohibition of discrimination in federally assisted programs established by section 504 of the Rehabilitation Act of 1973 to all activities of state and local governments, including those that do not receive federal financial assistance, and incorporates specific prohibitions of discrimination on the basis of disability from Titles I, III, and V of the Americans with Disabilities Act. This rule, therefore, adopts the general prohibitions of discrimination established under section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.

The Texas Department of Transportation (TxDOT), HEREBY AGREES THAT, as a condition to receiving any federal financial assistance from the U.S. Department of Transportation through the Federal Highway Administration, is subject to and will comply with all laws and regulations, and hereby gives assurance that no qualified disabled person shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discriminations, including discrimination of employment, under any program or activity that received or benefits from this federal financial assistance. TxDOT further assures that its programs will be conducted, and its facilities operated, in compliance with all the requirements imposed by or pursuant to 49 CFR Part 27, 28 CFR Part 35, and 42 USC §§ 12101 - 12213.

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\_\_\_\_\_  
Marc D. Williams, P.E.  
Executive Director  
Texas Department of Transportation

9/30/2021

\_\_\_\_\_  
Date

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## Attachment B: ADA Liaisons by District

### TxDOT ADA Liaisons

District/Division	Name	Title	E-mail	Phone
Abilene	Bryce Wade	Environmental Specialist	Bryce.Wade@txdot.gov	(979)-215-7188
Abilene	Julie Rogers	Contract Specialist	julie.rogers@txdot.gov	325-676-6942
Abilene	Russell Chapman	Construction Inspector	Russell.Chapman@txdot.gov	(325) 676-6895
Abilene	Ryan Carrigan	General Engineering Tech	Ryan.Carrigan@txdot.gov	(325) 676-6927
Abilene	Tanya Brown	Public Information Officer	Tanya.Brown@txdot.gov	(325) 676-6817
Amarillo	Brenda Foster	Maintenance Support Tech	Brenda.Foster@txdot.gov	(806) 763-8137
Amarillo	Jamie Leavitt	Administrative Assistant	Jamie.Leavitt@txdot.gov	(806) 356-3248
Amarillo	Janet Williams	Business Operations Manager	Janet.Williams@txdot.gov	(806) 733-2334
Atlanta	Jason Overmyer	Landscape Architect	Jason.Overmyer@txdot.gov	(903) 799-1205
Atlanta	Jesse Farr	Transportation Engineer	jesse.farr@txdot.gov	(903) 799-1213
Atlanta	Rickie Shields	Construction Records Auditor	Rickie.Shields@txdot.gov	(903) 799-1242
Audit	Kristina Richter	DE/DD Executive Assistant	Kristina.Richter@txdot.gov	(512) 463-8626
Austin	Amanda Owens	Transportation Landscape Architect	Amanda.Owens@txdot.gov	(512) 832-7172
Austin	Chris Hluz	Transportation Engineer	Chris.Hluz@txdot.gov	(512) 832-7092
Austin	Dwayne Halbardier	Transportation Engr Supvr	Dwayne.Halbardier@txdot.gov	(512) 832-7051

Austin	Hector Tamez	Transportation Engineer	Hector.Tamez@txdot.gov	(512) 832-7143
Austin	Joseph Goessling	Transportation Engineer	Joseph.Goessling@txdot.gov	(512) 832-7201
Austin	Keith Taylor	Transportation Engr Supvr	Keith.Taylor@txdot.gov	(512) 832-7063
Austin	Mark Baker	Transportation Landscape Architect	Mark.Baker@txdot.gov	(512) 416-3087
Austin	Matthew Kelly	Transportation Engineer	Matthew.Kelly@txdot.gov	(512) 997-2219
Austin	Richard Garcia	Transport Engineer Spec	Richard.E.Garcia@txdot.gov	(512) 997-2216
Austin	Roy Garcia	Transportation Engineer	Roy.F.Garcia@txdot.gov	(512) 832-7137
Austin	Taylor Hibbens	Right of Way Agent	Taylor.Hibbens@txdot.gov	(512) 832-7142
Austin	Terry Newton	Transportation Engineer Specialist	Terry.Newton@txdot.gov	(512) 308-4473
Aviation	Kari Campbell	Aviation Grants Section Dir	Kari.Campbell@txdot.gov	(512) 416-4543
Aviation	Rose Pankhurst	AVN Grant ADM	ROSE.PANKHURST@txdot.gov	512-416-4561
Beaumont	Arnold Vowles	Planner	Arnold.Vowles@txdot.gov	(409) 898-5773
Beaumont	Peter Jungen	Transportation Engineer Supervisor	Peter.Jungen@txdot.gov	(409) 898-5762
Beaumont	Samantha Harris	Transportation Engineer	Samantha.Harris@txdot.gov	(409) 898-5728
Bridge	Debra Lyon	Business Operations Manager	Debra.Lyon@txdot.gov	(512) 416-2115
Brownwood	Jodie Kelly	Design Project Coordinator	Jodie.Kelly@txdot.gov	(325) 642-7996
Bryan	Stephen Copley	Landscape Architect	Stephen.Copley@txdot.gov	(979) 778-9631
Childress	Chris Reed	Director of Construction	Chris.Reed@txdot.gov	940-937-7251
Communications	David Munns	Creative Services Section Director	David.Munns@txdot.gov	(512) 486-5844

Communications	Don Barrett	Information Architect	Don.Barrett@txdot.gov	(512) 416-2119
Compliance	Parsons Townsend	Compliance Section Director	Parsons.Townsend@txdot.gov	(512) 463-6325
Construction	Sarah Blackburn	Business Ops Project Mgr	sarah.blackburn@txdot.gov	(512) 416-2472
Contract Services	Yvette Ruedas	Special Projects Coordinator	Yvette.Ruedas@txdot.gov	(512) 416-2159
Corpus Christi	Aurora Guajardo	Engineering Assistant	Aurora.Guajardo@txdot.gov	(361) 808-2474
Corpus Christi	Charles Benavidez	Deputy District Engineer	Charles.Benavidez@txdot.gov	(361) 808-2261
Corpus Christi	Gabriel Longoria	Transportation Engineer Supervisor	Gabriel.Longoria@txdot.gov	(361) 808-2383
Corpus Christi	Paula Sales-Evans	Director of Transportation Planning & Development	Paula.SalesEvans@txdot.gov	(361) 808-2222
Dallas	Rachael Twiggs	Transportation Engineer	Rachael.Twiggs@txdot.gov	(214) 320-6669
Design	Jennifer Loa	Transportation Landscape Architect	Jennifer.Loa@txdot.gov	(512) 416-3086
Design	Pete Krause	Landscape Arch Section Dir.	Pete.Krause@txdot.gov	(512) 416-2714
Design	Rebecca Byford	Pedestrian Facility Project Manager	Rebecca.Byford@txdot.gov	(512) 416-2749
El Paso	Sandra Sierra	Special Projects Coordinator	Sandra.Sierra@txdot.gov	(915) 790-4209
Environmental Affairs	Sarah Matthews	Business Operations	Sarah.Matthews@txdot.gov	(512) 416-2608
Financial Management	Cynthia Ochoa	DE/DD Executive Assistant	Cynthia.Ochoa@txdot.gov	(512) 486-5505
Financial Management	Kurt Ahlhorn	Special Projects Coord	Kurt.Ahlhorn@txdot.gov	(512) 486-5653
Fleet Operations	Darah Walrip	Info. Spec.	Darah.Walrip@txdot.gov	325-676-6950

Fleet Operations	Edwin Baez	Spec. Proj. Coord.	Edwin.Baez@txdot.gov	512-465-7372
Fort Worth	Chris Houghton	Transportation Specialist	Chris.Houghton@txdot.gov	(817) 370-6730
Fort Worth	Faisal Abdel- Qader	Transportation Engr Supvr	Faisal.AbdelQader@txdot.gov	(817) 370-6673
Houston	Jannie Blackmon	Construction Records Auditor	Jannie.Blackmon@txdot.gov	(713) 802-5008
Houston	Pablo Pinales	Human Resources Officer	Pablo.Pinales@txdot.gov	(713) 802-5469
Human Resources	Carol Cunard	HR Specialist	Carol.Cunard@txdot.gov	(512) 486-5418
Human Resources	Gene Chapa	Employee Relations Specialist	Gene.Chapa@txdot.gov	(512) 486-5347

## Attachment C: ADA Policy Notice



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### AMERICANS WITH DISABILITIES ACT and SECTION 504 OF THE REHABILITATION ACT OF 1973

#### NOTICE

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (“ADA”), the Texas Department of Transportation (TxDOT) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

TxDOT does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

TxDOT will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in TxDOT’s programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

TxDOT will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in TxDOT offices, even where pets are generally prohibited.

Anyone who requires auxiliary aids or services for effective communication, or a modification of policies and procedures to participate in a program, service or activity of TxDOT, should contact TxDOT’s ADA/504 Coordinator as soon as possible, but no later than 48 hours before the scheduled event.

The Americans with Disabilities Act does not require TxDOT to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of TxDOT is not accessible to persons with disabilities should be directed to the ADA/504 Coordinator.

TxDOT will not charge a fee on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy, such as retrieving items from locations that are open to the public, but are not accessible to persons who use wheelchairs.

Contact Information  
Texas Department of Transportation  
Civil Rights Division  
ADA/504 Coordinator  
125 E. 11<sup>th</sup> Street, Austin, Texas 78704  
[CIV\\_ADA@txdot.gov](mailto:CIV_ADA@txdot.gov) | (512) 416-4700

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OUR MISSION: *Through collaboration and leadership, we deliver a safe, reliable, and integrated transportation system that enables the movement of people and goods.*

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## Attachment D: ADA Nondiscrimination Statement

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### AMERICANS WITH DISABILITIES ACT and SECTION 504 OF THE REHABILITATION ACT OF 1973 NONDISCRIMINATION STATEMENT

The Texas Department of Transportation (TxDOT) does not discriminate against any qualified disabled person solely by reason of his or her disability, exclude from participation in, deny the benefits of, or otherwise subject individuals to discrimination, including discrimination of employment, under any program or activity that receives or benefits from federal financial assistance.

Additionally, TxDOT ensures its programs will be conducted, and its facilities operated, in compliance with all non-discriminatory practices and requirements imposed by or pursuant to 49 Code of Federal Regulations (CFR) Part 27, 28 CFR Part 35 and 42 USC §§ 12101 - 12213.

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Marc D. Williams, P.E.

Executive Director

Texas Department of Transportation

9/30/2021

Date

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## **Attachment E: Grievance Appeals Process**

### **Texas Department of Transportation Grievance Appeals Process under The Americans with Disabilities Act**

The Department of Justice (DOJ) Title II regulation requires a public entity that employs 50 or more persons to “adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part,” but it does not mention specifically what the grievance procedures should include. 28 CFR 35.107(b). Specifically, 28 CFR 35.107(b)(4) requires the entity to have an appeals process. TxDOT’s grievance appeals process is as follows:

1. Complainant may appeal outcome within 10 days of the decision. He/she must:
  - (a) Complete form (under development) to request an appeal.
  - (b) Submit to Appeals Team for review (to be identified by Director of Civil Rights Division).
2. The Appeals Team must review the reason for the appeal. Consider the following.
  - (a) Violation with no resolution,
  - (b) Violation with a resolution but time of barrier removal is unreasonable, and
  - (c) Do not agree with the resolution.
3. The Appeals Team reviews the request to:
  - (a) Determine if Agree/Disagree,
  - (b) Provide rationale & supportive documentation, and/or
  - (c) Provide new alternatives.
4. The Appeals Team returns the request to ADA Compliance Administrator/District/Division whichever is applicable to:
  - (a) Make necessary changes
  - (b) Provide the response to the Complainant
5. The ADA Administrator informs the Complainant of the decision.

## Attachment F: Design Standards

The TxDOT Design Standards have been revised to meet the 2006 ADA and the 2011 Guidelines for Accessible Public Rights-of-Way (PROWAG), [www.access-board.gov/prowag/](http://www.access-board.gov/prowag/). As of May 15, 2017, the Texas Department of Licensing and Regulation began allowing the use of the PROWAG for projects in the public rights-of-way. This rule change allows TxDOT to use the PROWAG as its de facto 'standards.' TxDOT's Design Division has also published guidance on the installation of curb ramps and sidewalks (ADA Curb Ramp and Sidewalk Guidance).

The following link provides the Pedestrian Facilities standard sheets that are included in construction projects with pedestrian elements. This document demonstrates that TxDOT has adopted the guidance from PROWAG as our standard:

<https://ftp.dot.state.tx.us/pub/txdot-info/cmd/cserve/standard/roadway/ped18.pdf>

## Attachment G: List of Facilities Evaluated

<b>Facility Name</b>	<b>Facility Category</b>
Abilene DHQ - Admin	General TxDOT Administrative Building
Abilene DHQ - Service Station	General TxDOT Administrative Building
Abilene DHQ - Vehicle Titles and Registration	General TxDOT Administrative Building
Amarillo DHQ - Admin	General TxDOT Administrative Building
Amarillo DHQ - VTR	General TxDOT Administrative Building
Amarillo Travel Information Center	Travel Information Center
Andrew County Northbound	Safety Rest Area
Anthony Travel Information Center	Travel Information Center
Atlanta DHQ - Admin	General TxDOT Administrative Building
Atlanta DHQ - Engineering	General TxDOT Administrative Building
Austin DHQ Admin- Bldg. 1	General TxDOT Administrative Building
Austin DHQ Admin- Bldg. 2	General TxDOT Administrative Building
Austin DHQ Shipping	General TxDOT Administrative Building
Austin DHQ Warehouse	General TxDOT Administrative Building
Beaumont DHQ Admin	General TxDOT Administrative Building
Beaumont DHQ Area Engineer	General TxDOT Administrative Building
Beaumont DHQ Area Engineer-Vehicle Title & Reg.	General TxDOT Administrative Building
Beaumont DHQ- Area Office	General TxDOT Administrative Building
Beaumont DHQ Area Training Center	General TxDOT Administrative Building
Beaumont DHQ- Warehouse	General TxDOT Administrative Building

Dallas DHQ - DalTrans	General TxDOT Administrative Building
Dallas DHQ - NE Annex	General TxDOT Administrative Building
Dallas DHQ Administration	General TxDOT Administrative Building
Dallas DHQ Annex	General TxDOT Administrative Building
Denison Travel Info Center	Travel Information Center
Dewitt C. Greer Bldg.	General TxDOT Administrative Building
Donley County Eastbound	Safety Rest Area
Donley County Northbound	Safety Rest Area
Donley County Southbound	Safety Rest Area
El Paso County Eastbound	Safety Rest Area
El Paso DHQ Admin.	General TxDOT Administrative Building
El Paso DHQ TMC Bldg.	General TxDOT Administrative Building
El Paso Westbound	Safety Rest Area
Fort Worth DHQ- Bldg. 1	General TxDOT Administrative Building
Fort Worth DHQ- Bldg. 2	General TxDOT Administrative Building
Fort Worth DHQ- Bldg. 3	General TxDOT Administrative Building
Fort Worth DHQ- Bldg. 4	General TxDOT Administrative Building
Fort Worth DHQ - Admin	General TxDOT Administrative Building
Fort Worth DHQ - District Facilities	General TxDOT Administrative Building
Fort Worth DHQ - Permit	General TxDOT Administrative Building
Fort Worth DHQ - TransVision Center v2	General TxDOT Administrative Building
Gainesville Travel Information Center	Travel Information Center

Gillespie County Ranch Road 1	Safety Rest Area
Gillespie County US 290	Safety Rest Area
Gray County Westbound	Safety Rest Area
Guadalupe County Eastbound	Safety Rest Area
Guadalupe County Westbound	Safety Rest Area
Hale County Northbound	Safety Rest Area
Hale County Southbound	Safety Rest Area
Hardeman County Northbound	Safety Rest Area
Hardeman County Southbound	Safety Rest Area
Haskell County Southbound	Safety Rest Area
Hopkins County Westbound	Safety Rest Area
Houston DHQ - Admin	General TxDOT Administrative Building
Houston DHQ - Parking Garage	General TxDOT Administrative Building
Houston South Area Engineer- Bldg. 1	General TxDOT Administrative Building
Houston South Area Engineer- Bldg. 2	General TxDOT Administrative Building
Houston South Area Engineer- Bldg. 3	General TxDOT Administrative Building
Houston South Area Engineer- Bldg. 4	General TxDOT Administrative Building
Houston TranStar	General TxDOT Administrative Building
Howard County Eastbound	Safety Rest Area
Humble North Area Engineer	General TxDOT Administrative Building
Jacksboro Maintenance Facility - Office	General TxDOT Administrative Building
Kenedy County	Safety Rest Area

Kerr County Eastbound	Safety Rest Area
Kerr County Westbound	Safety Rest Area
Langtry Travel Information Center	Travel Information Center
Laredo DHQ - Admin.	General TxDOT Administrative Building
Laredo DHQ - Area Engineering	General TxDOT Administrative Building
Laredo DHQ-Warehouse	General TxDOT Administrative Building
Laredo Travel Information Center	Travel Information Center
Live Oak County Northbound	Safety Rest Area
Live Oak County Southbound	Safety Rest Area
Lubbock DHQ - Administration	General TxDOT Administrative Building
Lubbock DHQ - Area Engineer	General TxDOT Administrative Building
Lubbock DHQ - Training Center	General TxDOT Administrative Building
Lubbock DHQ - Vehicle Titles and Registration	General TxDOT Administrative Building
Lufkin DHQ - Admin	General TxDOT Administrative Building
Lufkin DHQ - Area Engineer	General TxDOT Administrative Building
Medina County Northbound - IH35	Safety Rest Area
Medina County	Safety Rest Area
Medina County Southbound - IH35	Safety Rest Area
Mitchell County Westbound	Safety Rest Area
Navarro County Northbound	Safety Rest Area
Navarro County Southbound	Safety Rest Area
Nolan County Eastbound	Safety Rest Area

Nolan County Westbound	Safety Rest Area
Odessa DHQ- Area Engineer	General TxDOT Administrative Building
Odessa DHQ - DMV	General TxDOT Administrative Building
Odessa DHQ - Admin.	General TxDOT Administrative Building
Orange Travel Information Center	Travel Information Center
Paris DHQ- Admin.	General TxDOT Administrative Building
Paris DHQ- Engineering	General TxDOT Administrative Building
Paris DHQ- Teleconference and Training	General TxDOT Administrative Building
Pecos East County Eastbound	Safety Rest Area
Pecos East County Westbound	Safety Rest Area
Pharr DHQ- Admin.	General TxDOT Administrative Building
Pharr DHQ Engineer & Maintenance	General TxDOT Administrative Building
Pharr DHQ Teleconference & Training	General TxDOT Administrative Building
Polk County Northbound	Safety Rest Area
Polk County Southbound	Safety Rest Area
Port Aransas Ferry	Ferry
Port Aransas- Maintenance Ops	General TxDOT Administrative Building
Port Galveston-Bolivar Side	General TxDOT Administrative Building
Port Galveston Ferry	Ferry
Port Galveston- Galveston Side	General TxDOT Administrative Building
Raymondville Maintenance Admin.	General TxDOT Administrative Building
Rio Grande Valley Travel Information Center	Travel Information Center

San Angelo DHQ- Bldg. 1	General TxDOT Administrative Building
San Angelo DHQ- Admin.	General TxDOT Administrative Building
San Angelo DHQ- Title & Reg.	General TxDOT Administrative Building
San Antonio DHQ- Bldg. 1	General TxDOT Administrative Building
San Antonio DHQ - Engineering	General TxDOT Administrative Building
San Antonio DHQ- Admin.	General TxDOT Administrative Building
San Antonio TransGuide	General TxDOT Administrative Building
San Antonio DNQ-Warehouse	General TxDOT Administrative Building
Sutton County Eastbound	Safety Rest Area
Sutton County Westbound	Safety Rest Area
Texarkana Travel Information Center	Travel Information Center
Tyler DHQ - Gentry Bldg.	General TxDOT Administrative Building
Tyler DHQ- Admin.	General TxDOT Administrative Building
Tyler DHQ- Transportation Operations	General TxDOT Administrative Building
Van Zandt County Eastbound	Safety Rest Area
Van Zandt County Westbound	Safety Rest Area
Victoria County Northbound	Safety Rest Area
Victoria County Southbound	Safety Rest Area
Waco DHQ- Admin.	General TxDOT Administrative Building
Waco DHQ- Engineering Bldg.	General TxDOT Administrative Building
Walker County Northbound	Safety Rest Area
Walker County Southbound	Safety Rest Area

<b>Waskom Travel Information Center</b>	<b>Travel Information Center</b>
<b>Wichita Falls DHQ- Admin</b>	<b>General TxDOT Administrative Building</b>
<b>Wichita Falls DHQ- Area Engineer</b>	<b>General TxDOT Administrative Building</b>
<b>Wichita Falls Travel Information Center</b>	<b>Travel Information Center</b>
<b>Wise County Northbound</b>	<b>Safety Rest Area</b>

## Attachment H: Glossary of Terms

### 2010 ADA Standards Defined Terms

**Accessible** - A site, building, facility, or portion thereof that complies with this part.

**Accessible Means of Egress** - A continuous and unobstructed way of egress travel from any point in a building or facility that provides an accessible route to an area of refuge, a horizontal exit, or a public way.

**Addition** - An expansion, extension, or increase in the gross floor area or height of a building or facility.

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

**Alteration** - A change to a building or facility that affects or could affect the usability of the building or facility or portion thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.

**Amusement Attraction** - Any facility, or portion of a facility, located within an amusement park or theme park which provides amusement without the use of an amusement device. Amusement attractions include, but are not limited to, fun houses, barrels, and other attractions without seats.

**Amusement Ride** - A system that moves persons through a fixed course within a defined area for the purpose of amusement.

**Amusement Ride Seat** - A seat that is built-in or mechanically fastened to an amusement ride intended to be occupied by one or more passengers.

**Area of Sport Activity** - That portion of a room or space where the play or practice of a sport occurs.

**Assembly Area** - A building or facility, or portion thereof, used for the purpose of entertainment, educational or civic gatherings, or similar purposes. For the purposes of these requirements, assembly areas include, but are not limited to, classrooms, lecture halls, courtrooms, public meeting rooms, public hearing rooms, legislative chambers, motion picture houses, auditoria, theaters, playhouses, dinner theaters, concert halls, centers for the performing arts, amphitheaters, arenas, stadiums, grandstands, or convention centers.

**Assistive Listening System (ALS)** - An amplification system utilizing transmitters, receivers, and coupling devices to bypass the acoustical space between a sound source and a listener by means of induction loop, radio frequency, infrared, or direct-wired equipment.

**Boarding Pier** - A portion of a pier where a boat is temporarily secured for the purpose of embarking or disembarking.

**Boat Launch Ramp** - A sloped surface designed for launching and retrieving trailered boats and other watercraft to and from a body of water.

**Boat Slip** - That portion of a pier, main pier, finger pier, or float where a boat is moored for the purpose of berthing, embarking, or disembarking.

**Building** - Any structure used or intended for supporting or sheltering any use or occupancy.

**Catch Pool** - A pool or designated section of a pool used as a terminus for water slide flumes.

**Characters** - Letters, numbers, punctuation marks and typographic symbols.

**Children's Use** - Describes spaces and elements specifically designed for use primarily by people 12 years old and younger.

**Circulation Path** - An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.

**Closed-Circuit Telephone** - A telephone with a dedicated line such as a house phone, courtesy phone or phone that must be used to gain entry to a facility.

**Common Use** - Interior or exterior circulation paths, rooms, spaces, or elements that are not for public use and are made available for the shared use of two or more people.

**Cross Slope** - The slope that is perpendicular to the direction of travel (see running slope).

**Curb Ramp** - A short ramp cutting through a curb or built up to it.

**Detectable Warning** - A standardized surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path.

**Element** - An architectural or mechanical component of a building, facility, space, or site.

**Elevated Play Component** - A play component that is approached above or below grade and that is part of a composite play structure consisting of two or more play components attached or functionally linked to create an integrated unit providing more than one play activity.

**Employee Work Area** - All or any portion of a space used only by employees and used only for work. Corridors, toilet rooms, kitchenettes and break rooms are not employee work areas.

**Entrance** - Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibule if provided, the entry door or gate, and the hardware of the entry door or gate.

**Facility** - All or any portion of buildings, structures, site improvements, elements, and pedestrian routes or vehicular ways located on a site.

**Gangway** - A variable-sloped pedestrian walkway that links a fixed structure or land with a floating structure. Gangways that connect to vessels are not addressed by this document.

**Golf Car Passage** - A continuous passage on which a motorized golf car can operate.

**Ground Level Play Component** - A play component that is approached and exited at the ground level.

**Key Station** - Rapid and light rail stations, and commuter rail stations, as defined under criteria established by the Department of Transportation in 49 CFR 37.47 and 49 CFR 37.51, respectively.

**Mailboxes** - Receptacles for the receipt of documents, packages, or other deliverable matter. Mailboxes include, but are not limited to, post office boxes and receptacles provided by commercial mail-receiving agencies, apartment facilities, or schools.

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

**Mezzanine** - An intermediate level or levels between the floor and ceiling of any story with an aggregate floor area of not more than one-third of the area of the room or space in which the level or levels are located. Mezzanines have sufficient elevation that space for human occupancy can be provided on the floor below.

**Occupant Load** - The number of persons for which the means of egress of a building or portion of a building is designed.

**Operable Part** - A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element.

**Pictogram** - A pictorial symbol that represents activities, facilities, or concepts.

**Play Area** - A portion of a site containing play components designed and constructed for children.

**Play Component** - An element intended to generate specific opportunities for play, socialization, or learning. Play components are manufactured or natural; and are stand-alone or part of a composite play structure.

**Private Building or Facility** - A place of public accommodation or a commercial building or facility subject to Title III of the ADA and 28 CFR part 36 or a transportation building or facility subject to Title III of the ADA and 49 CFR 37.45.

**Public Building or Facility** - A building or facility or portion of a building or facility designed, constructed, or altered by, on behalf of, or for the use of a public entity subject to Title II of the ADA and 28 CFR part 35 or to Title II of the ADA and 49 CFR 37.41 or 37.43.

**Public Entrance** - An entrance that is not a service entrance or a restricted entrance.

**Public Use** - Interior or exterior rooms, spaces, or elements that are made available to the public. Public use may be provided at a building or facility that is privately or publicly owned.

**Public Way** - Any street, alley or other parcel of land open to the outside air leading to a public street, which has been deeded, dedicated or otherwise permanently appropriated to the public for public use and which has a clear width and height of not less than 10 feet (3050 mm).

**Qualified Historic Building or Facility** - A building or facility that is listed in or eligible for listing in the National Register of Historic Places or designated as historic under an appropriate State or local law.

**Ramp** - A walking surface that has a running slope steeper than 1:20.

**Residential Dwelling Unit** - A unit intended to be used as a residence, that is primarily long-term in nature. Residential dwelling units do not include transient lodging, inpatient medical care, licensed long-term care, and detention or correctional facilities.

**Restricted Entrance** - An entrance that is made available for common use on a controlled basis but not public use and that is not a service entrance.

**Running Slope** - The slope that is parallel to the direction of travel (see cross slope).

**Self-Service Storage** - Building or facility designed and used for the purpose of renting or leasing individual storage spaces to customers for the purpose of storing and removing personal property on a self-service basis.

**Service Entrance** - An entrance intended primarily for delivery of goods or services.

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

**Soft Contained Play Structure** - A play structure made up of one or more play components where the user enters a fully enclosed play environment that utilizes pliable materials, such as plastic, netting, or fabric.

**Space** - A definable area, such as a room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.

**Story** - That portion of a building or facility designed for human occupancy included between the upper surface of a floor and upper surface of the floor or roof next above. A story containing one or more mezzanines has more than one floor level.

**Structural Frame** - The columns and the girders, beams, and trusses having direct connections to the columns and all other members that are essential to the stability of the building or facility as a whole.

**Tactile** - An object that can be perceived using the sense of touch.

**Technically Infeasible** - With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.

**Teeing Ground** - In golf, the starting place for the hole to be played.

**Transfer Device** - Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility aid to and from an amusement ride seat.

**Transient Lodging** - A building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor.

**Transition Plate** - A sloping pedestrian walking surface located at the end(s) of a gangway.

**TTY** - An abbreviation for teletypewriter. Machinery that employs interactive text-based communication through the transmission of coded signals across the telephone network. TTYS may include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems. TTYS are also called text telephones.

**Use Zone** - The ground level area beneath and immediately adjacent to a play structure or play equipment that is designated by ASTM F 1487 (incorporated by reference, see "Referenced Standards" in Chapter 1) for unrestricted circulation around the play equipment and where it is predicted that a user would land when falling from or exiting the play equipment.

**Vehicular Way** - A route provided for vehicular traffic, such as in a street, driveway, or parking facility.

**Walk** - An exterior prepared surface for pedestrian use, including pedestrian areas such as plazas and courts.

**Wheelchair Space** - Space for a single wheelchair and its occupant.

**Work Area Equipment** - Any machine, instrument, engine, motor, pump, conveyor, or other apparatus used to perform work. As used in this document, this term shall apply only to equipment that is permanently installed or built-in in employee work areas. Work area equipment does not include passenger elevators and other accessible means of vertical transportation.

## **PROWAG Defined Terms**

**Accessible** - Describes a facility in the public right-of-way that complies with this document.

**Alteration** - A change to a facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

**Blended Transition** - A raised pedestrian street crossing, depressed corner, or similar connection between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that has a grade of 5 percent or less.

**Cross Slope** - The grade that is perpendicular to the direction of pedestrian travel.

**Curb Line** - A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

**Curb Ramp** - A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

**Element** - An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

**Facility** - All or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

**Grade Break** - The line where two surface planes with different grades meet.

**Operable Part** - A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element.

**Pedestrian Access Route** - A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

**Pedestrian Circulation Path** - A prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

**Public Right-of-Way** - Public land acquired for or dedicated to transportation purposes, or other land where there is a legally established right for use by the public for transportation purposes.

**Qualified Historic Facility** - A facility that is listed in or eligible for listing in the National Register of Historic Places or designated as historic under an appropriate state or local law.

**Running Slope** - The grade that is parallel to the direction of pedestrian travel.

**Shared Use Path** - A multi-use path designed primarily for use by bicyclists and pedestrians, including pedestrians with disabilities, for transportation and recreation purposes. Shared use paths are physically separated from motor vehicle traffic by an open space or barrier and are either within the highway right-of-way or within an independent right-of-way.

**Vertical Surface Discontinuities** - Vertical differences in level between two adjacent surfaces.

## Website- Defined Terms

**AEM** - Adobe Experience Manager.

**Assistive Technology** - hardware and/or software that acts as a user agent, or along with a mainstream user agent, to provide functionality to meet the requirements of users with disabilities that go beyond those offered by mainstream user agents.

**Conformance** - satisfying all the requirements of a given standard, guideline or specification.

- Content and controls must be understandable.
- Content must be perceivable.
- Content must be robust enough to work with current and future technologies.”
- Interface elements in the content must be operable.

**Success Criteria** - The testable requirements of WCAG to be met in order to achieve conformance.

**Text Alternative** - Text that is programmatically associated with non-text content or referred to from text that is programmatically associated with non-text content. Programmatically associated text is text whose location can be programmatically determined from the non-text content.

**User Agent** - any software that retrieves and presents Web content for users.

**WAVE** - WAVE is a set of evaluation tools that are designed to help content authors make web pages more accessible to users with disabilities. While it provides accurate and useful information, WAVE (like all automated testing tools) can only robustly test a small fraction of the requirements in WCAG 2.0 A/AA. The WAVE help page specifically states, “WAVE cannot tell you if your web content is accessible. Only a human can determine true accessibility.”

**Web Content Accessibility Guidelines (WCAG)** - WCAG is a set of universal design guidelines for accessible web design. It is created and maintained by the World Wide Web Consortium (W3C) (<https://www.w3.org>), which provides design guidelines for non-proprietary web technologies. The W3C is best known for its standardization of Hypertext Markup Language (HTML), which forms the basis of all modern web sites.

**Web Content Accessibility Guidelines (WCAG) Design Principals** - A w3 produced guide to WCAG states, “The overall goal is to create Web content that is perceivable, operable and understandable by the broadest possible range of users and compatible with their wide range of assistive technologies, now and in the future. The basic principles include:

**Web Page** - a non-embedded resource obtained from a single URI using HTTP plus any other resources that are used in the rendering or intended to be rendered together with it by a user agent.