

OHIO DEPARTMENT OF
TRANSPORTATION



ADA SELF- EVALUATION

TED STRICKLAND
OHIO GOVERNOR

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ODOT IS AN EQUAL OPPORTUNITY EMPLOYER AND PROVIDER OF SERVICES

Introduction

The Americans with Disabilities Act (ADA) of 1990, as amended in the ADA Amendments Act of 2008, is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles (sections) of the ADA relating to different aspects of potential discrimination.

Title II of the ADA specifically addresses the subject of making public services and public transportation accessible to those with disabilities. With the advent of the ADA, designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

The ADA applies to all facilities, including both facilities built before and after 1990. As a necessary step to a program accessible plan to provide accessibility under the ADA, state and local governments, public entities or agencies such as the Ohio Department of Transportation (ODOT) are required to perform self-evaluations of their current facilities, relative to the accessibility requirements of the ADA. ODOT must then develop a Program Access Plan, which can be called a Transition Plan, to address any deficiencies. The Plan is intended to achieve the following:

1. identify physical barriers that limit the accessibility of facilities to individuals with disabilities,
2. describe the methods to be used to make the facilities accessible,
3. provide a schedule for making the access modifications; and
4. identify the public officials responsible for implementation of the Transition Plan.

The Transition Plan will be updated periodically until all accessibility barriers are removed.

Background:

In March 2008, ODOT began working on the process of conducting an ADA self-evaluation to assist it in developing an updated transition plan that will address each area of ADA compliance. As part of that process, in September 2009, ODOT finalized its [strategic plan](#) on how it intended to conduct the ADA Self-Evaluation and the subsequent Transition Plan.

The strategic plan identified how ODOT would evaluate its public facilities, which include rest areas, its pedestrian rights of way, and its employment practices. ODOT asked the Ohio Rehabilitation Services Commission and the Governor's Council on Peoples with Disabilities to review the strategic plan and to provide comments to ensure individuals with disabilities had a voice in this process. No comments were provided by either entity.

Brief Overview of ODOT's Mission, Values, and Goals:

ODOT's 2010-2011 Business Plan has set forth the mission, values, and goals that provide an overview of the agency and its direction for the future.

ODOT's mission: Moving Ohio into a Prosperous New World.

ODOT has identified the following key initiatives for the new biennium:

- Initiative 1: "Target: Zero" – Focus on safety in the workplace, on the construction site, and with the traveling public to assure ZERO tolerance for any safety hazard.
- Initiative 2: "Igniting Ohio's Economic Engine" – Pursue job creation, business development and economic growth as hallmarks of ODOT's construction and investment policies and programs.
- Initiative 3: "All Systems Go" – Identify critical freight and passenger transportation corridors by mode and prioritize public investment to facilitate the seamless, safe, efficient movement of people and goods.
- Initiative 4: "Work Smarter and Get Better Results" – Improve innovation and project delivery, with a focus on quicker decision making, stronger public and private partnerships, and "Smarter Growth" strategies.
- Initiative 5: "World Class Business Practices" – Adopt world-class business practices that assure ODOT approaches its daily operations in a responsible, prudent, innovative and inclusive manner.
- Initiative 6: "Go with Green" – Use the best environmentally-sensitivity practices in our operations and pilot new green initiatives as ODOT leads by example in embracing environmental stewardship and reducing energy consumption.
- Initiative 7: Legislative Strategy – Pursue a comprehensive Federal and State legislative agenda to support the department's initiatives and goals.

ODOT is seizing new transportation opportunities to make Ohio competitive in the global economy of the 21st Century.

- American Recovery and Reinvestment Act of 2009
- Ohio Logistics and Distribution Stimulus Program
- 3C "Quick Start" Intercity Passenger Rail
- U.S. DOT TIGER Discretionary Grants

In addition to improving upon the state's transportation partnerships, ODOT has also improved how it works by implementing a variety of procedures and operational



changes. ODOT is committed to higher ethical standards; fiscal responsibility and improved auditing; and workplace safety and professional training. Every employee regardless of job title or classification is a member of “Team ODOT.”

In its 2010-2011 Business Plan, ODOT unveiled its new pledge to serve Ohioans. The pledge is as follows:

As a member of Team ODOT, **SERVICE** is my commitment:

- **Safety First:** I will focus each day on safety: my own, my teammates, our workplace, our work practices, and our customers – the traveling public – with a “Target: Zero” goal for any and all safety hazards;
- **Every Partner:** I will remember that partnership is the key to success and help all members of Team ODOT succeed, along with all our public and private partners;
- **Respect for My Customers:** I will bring a positive attitude to everything I do, remembering Ohioans are my customers and deserve respect, prompt and effective solutions, and the best return on their investment of precious tax dollars in our transportation system;
- **Value of My Job:** I will commit myself fully every day to be a productive and safety-conscious member of Team ODOT, and in return, be given meaningful, valuable work and treated without discrimination or prejudice;
- **Integrity:** I will conduct myself with honor, integrity and professionalism by following the highest ethical standards;
- **Clear Communication:** I will communicate with everyone respectfully, clearly, honestly, effectively, and timely; and
- **Eye to the Future:** I will always look for and welcome new ways to assure ODOT’s continuous improvement through partnership, innovation, wise investment, technology and environmental stewardship.

(*The above information was provided from the 2010-2011 Business Plan. To review the 2010-2011 Business Plan, please visit <http://www.dot.state.oh.us/policy/2010-2011BusinessPlan/Documents/ODOT2010-2011BusinessPlan-WEB.pdf>.)

Brief Overview of ODOT:

ODOT's activities encompass all 88 counties in the State of Ohio. These counties are broken into 12 districts statewide. Each district is responsible for three to nine counties. Each district is responsible for: assisting in strategic planning; short and long term goal setting; performance measurements; and policy development and deployment on both the statewide and district-wide level. Each district also represents and communicates the activities, views and policies of the Department with representatives of local, state and federal agencies, elected officials of local, state and federal governments, consultants, contractors, vendors, the news media and the general public.



Brief Description of the ADA Program:

ODOT has implemented its ADA Program through practices, policies, and procedures. ODOT is committed to the fair and equal employment of individuals with disabilities and to extending equal opportunity and access to its programs and benefits to individuals with disabilities.

As the state agency responsible for designing, building, and maintaining the transportation systems for the State of Ohio, ODOT has ADA responsibilities in separate but equally important areas: employment, public right of way facilities, and facilities. ODOT has developed a collaborative approach with coordination among the Division of Equal Opportunity, the Office of Architectural Services, and the Office of Roadway Engineering.

As part of its efforts to comply with the ADA, ODOT has a policy related to requesting an accommodation, which includes the complaint process should an individual feels he or she has been discriminated against, harassed, or denied the services and benefits offered

by ODOT. As outlined in the policy, all requests for accommodation and complaints must be referred to the Division of Equal Opportunity.

Program Areas

Division of Equal Opportunity

Kimberly A. Watson
Internal Civil Rights Manager
ADA/504 Coordinator
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On behalf of Director Molitoris, the Division of Equal Opportunity is responsible for coordinating and enforcing ODOT's compliance with the ADA and Section 504 of the Rehabilitation Act.

Pursuant to ODOT's [ADA Policy \(32-003\(P\)\)](#), the Division of Equal Opportunity is responsible for investigating discrimination and harassment complaints in which disability discrimination is alleged and for making determinations related to reasonable accommodation requests.

Once the self-evaluation is completed, the Division of Equal Opportunity will consult advocacy groups and members within the disabled community, including employees, to assist with the self-evaluation and transition plan processes to ensure that interested parties have a voice in the plan documents.

Employment

Aisha Powell
Affirmative Action Officer
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In September 2008, ODOT submitted its 2008 EEO Strategic Plan and ADA Self-Evaluation to the Ohio Department of Administrative Services, Equal Opportunity Division (DAS/EOD). ODOT's plan was approved by DAS/EOD on April 6, 2009. To review the 2008 EEO Strategic Plan and ADA Self-Evaluation, please visit: <http://portal.dot.state.oh.us/Divisions/QualityHR/Personnel/EEOProgram/default.aspx>



Facilities

Office of Architectural Services
 Rick Puderbaugh
 Facilities Program Manager
 ADA/504 Co-coordinator
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Facility Composition:

ODOT owns and operates over 1,600 buildings throughout the State of Ohio. These buildings serve several basic functions falling into three major categories; Office Buildings, Operational Garages and Outposts, and Safety Rest Areas. The buildings are located throughout Ohio and are managed by the Department’s Facility Management offices located at the Central Office Headquarters and District Headquarters. Each building has been and continues to be designed to the standards and guidelines in existence at the time of its construction. Tables 1 & 2 below illustrate the breakdown of types, quantity, space types, average and total areas.

TABLE 1: ODOT FACILITIES

OPERATIONAL BUILDING FACILITIES						
TYPE	QUANTITY	AVERAGE				GRAND
		OFFICE	GARAGE	OTHER	TOTAL AVG.	TOTAL S.F.
Hilltop HQ	1	312,510				312,510
Central Garage	1	96,464	86,403	81,596	264,463	264,463
District HQ's	12	74,172	29,164	50,213	153,549	1,842,588
County Garages	92		18,428	15,307	33,735	3,103,620
Outposts & Yards	140		3,572	7,008	10,580	1,481,200
Rest Areas*	111			1,631	1,631	181,041
						<u>7,185,422</u>

TABLE 2: ODOT REST AREA FACILITIES

*REST AREA FACILITIES		
TYPE	QUANTITY	TOTAL
Modern Interstate	44	44
Modern Non-Interstate	38	
Primitives	24	
Parking Only	5	67
		<u>111</u>

Attachment A – ODOT Facilities

- Phase I: Safety Rest Areas
- Phase II: Headquarters Buildings
- Phase III: County Garages

Survey Results and ODOT Transition Plan:

In September 2009, ODOT Office of Facilities Operations Management conducted an ADA Facilities Survey training class for district and Central Office personnel, and published a training guide for use in the field.

All districts completed surveys of headquarters and county garage facilities using the survey forms found on the Whole Building Design Guide website. During the process, ODOT reviewed its major construction program and eliminated from survey any facility which was recently constructed or scheduled for replacement or renovation within three years.

ODOT has started an aggressive major renovation programs for 45 of its Safety Rest Area buildings of a similar design. To date, ODOT has completed two of these renovations on I-75 in Auglaize County and has a number of others in the construction and design phases. These projects alone will represent approximately \$20 million of capital investment over the next several years and will address many of the accessibility issues within the Rest Area buildings.

After completing the surveys, a deficiency report was prepared for each headquarter, county garage, and rest area location. Each primary design area (parking, access routes, rest rooms, etc.) was reviewed. Where deficiencies were found, they were categorized and tasks assigned to rectify the issue. Estimated completion dates were assigned for those tasks categorized as maintenance or capital projects. Issues involving structural changes to the facility were categorized as not feasible and will be addressed when the facility is scheduled for major renovation or replacement.

Each district and Central Office facilities department is responsible for budgeting and completing the tasks. Long-range planning is done on a 4-to-8 year cycle, but actual budgets are only available on an annual basis. This may cause some shift in estimated completion dates over time.

To date, ODOT has identified in excess of 400 maintenance issues, 200 capital issues, and 100 replacement or renovation issues across the state. Estimated completion dates vary from district to district, but extend to at least FY 2020. The majority of maintenance projects should be completed by the end of FY 2011.

[Attachment B](#) - Statewide Deficiency Report

Long Range Follow Up:

For long-term assurance of compliance and to ensure that improvements to existing buildings are being completed, the Office of Facilities Operations Management will incorporate a monitoring and tracking system to ensure that District Facility Management Offices are fulfilling obligations for completing ADA maintenance

improvement projects identified during the assessments. New buildings or major renovations will be fully ADA compliant.

Public Right-of-Way Facilities

Office of Roadway Engineering Services

Michael Bline

Maria Ruppe

Standards and Geometrics Engineers

ADA/504 Co-coordinators

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ODOT's Office of Roadway Engineering Services is responsible for developing the public rights-of-way self-evaluation and subsequent transition plan. The self-evaluation encompasses the identification of inaccessible pedestrian features of the state highway system, including non-compliant (1) curb cuts, (2) curb ramps, and (3) pedestrian corridors, and the subsequent scheduling and construction of ADA compliant replacement features. These are known as work items as described in the strategic plan. If an existing curb acts as a pedestrian barrier, an existing curb ramp is not built to current standards, or if an existing accessible pedestrian route is blocked by non-compliant factors, ODOT will identify the locations. The next step is to program and build a solution for each work item. Typical locations are found in villages and developed areas adjacent to incorporated municipalities which are located in public right-of-way and within ODOT's jurisdiction.

Other accessibility issues associated with transportation improvements (e.g., accessible pedestrian bridges) were addressed on a case-by-case basis with the responsible jurisdiction.

Public Rights-of-Way

The ultimate transition plan will include a schedule for removing barriers to access. Through its plan, ODOT is implementing a program to eliminate (1) curb barriers, (2) non-compliant curb ramps, (3) existing deficient sidewalk/pedestrian corridors, and (4) inaccessible pedestrian activated signals. Since the scope is so large, action to solve compliance issues will be undertaken on a priority ranking system.

Other inaccessible features may be added if eventually considered a requirement for the transition plan. Examples of these features: (1) the requirement for accessible on-street parking, (2) installation of audible pedestrian signals, and (3) grade separated pedestrian crossings, among others.

This self-evaluation addresses non-accessible locations within ODOT's jurisdiction. ODOT recognizes that a majority of curb barriers, non-compliant curb ramps, and inaccessible pedestrian corridors are geographically located within the jurisdiction of cities, municipalities and other local governments. Since such locations are beyond the

responsibility of ODOT and because Ohio is a home rule state¹, it is strongly recommended for local communities to develop and to adhere to their own transition plan as described in the Local Outreach portion of ODOT's [ADA Self-Evaluation Strategic Plan](#).

ADA Accessibility Work Items Covered by this Self-Evaluation

Non-Accessible Curb Barriers: At all intersections in the state of Ohio within ODOT's jurisdiction and where an existing curb prohibits disabled access, the curb will be removed and replaced with a compliant curb ramp or some other solution. Such locations are identified as curbs within legal crosswalks with: (1) sidewalks leading up to a curb and not having a curb cut, or (2) in areas without sidewalks but where pedestrian access is allowed, or (3) in residential or commercial areas without sidewalks where pedestrians would be allowed to travel. A solution to these curb barriers may very well be to install an appropriate curb ramp design based on ODOT's Standard Construction Drawings, Base Pavement (SCD BP)-7.1. For the purposes of this plan, intersections will mean all street crossings where pedestrians are allowed to cross.

Non-Compliant Curb Ramps: Existing curb ramps that are not currently ADA complaint will be removed and replaced with a compliant curb ramp as shown on ODOT's BP-7.1, or some other acceptable solution. This requires curb ramps constructed before the advent of accessibility standards, or those curb ramps built according to previous ODOT standards, be removed and replaced with a new curb ramp. If the existing curb ramp meets one of the current standard designs for ramps (perpendicular, parallel or combination) in every way (i.e. top and bottom landing size and slopes, ramp width, running and cross slopes, flare slope, lips and bevels, and gutter slopes) with the exception of detectable warnings, then install approved detectable warnings using the manufacturer's approved process.

Ineffective Detectable Warnings: If an existing curb ramp is fully compliant in design and construction except for not having detectable warnings, an approved detectable warning product needs to be installed at the base of the curb ramp per ODOT's SCD BP-7.1. If the curb ramp is fully compliant but it is missing or has broken truncated domes, the damaged part(s) needs to be removed and new part(s) installed to make the curb ramp as if it was "new." For the purposes of this plan, a curb ramp may be missing up to 25 percent of its domes and still be considered "as new."

In addition to detectable warnings installed on curb ramps, they are also required at other locations where curb ramps may not be present, such as where sidewalks cross railroads, among others locations. See ODOT's Location & Design (L&D) Manual Section 306.3.5 for more information. To view the L&D Manual, you may visit

¹ Under the Ohio Constitution, municipal corporations such as cities and villages have been afforded the power to govern themselves in local municipal matters, which includes the construction and maintenance of roadways within their jurisdictions. ODOT does not have the authority to conduct maintenance or construction activities on roadways within the jurisdiction of a municipal corporation without express permission by the municipality to do so.

[http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Locaton%20and%20Design%20Manual/Section 300 April 2011.pdf](http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Locaton%20and%20Design%20Manual/Section%20300%20April%202011.pdf)

[Attachment C](#) – Non-Compliant Curb Ramp Deficiency Report

Non-Accessible Pedestrian Routes: This plan also addresses existing sidewalks that have become inaccessible due to heaving, breaking, concrete spalling, rough texture, excessive cross slopes, utilities, street furnishings, protrusions or overhanging objects, or some other factor. If within the ODOT right-of-way, the existing sidewalk pedestrian corridor does not have the proper width, cross slope, changes in level, then the offending section of sidewalk needs to be removed and replaced with an accessible sidewalk. This only applies to the core pedestrian zone (usually a 5 foot wide zone, but never less than 36 inches), so if the remainder of the sidewalk width is not fully ADA compliant, but still usable by able-bodied persons, the rest of the sidewalk width does not have to be replaced. However, in the application of this plan, it may be easier and more prudent to replace the entire sidewalk width.

Objects protruding overhanging into objects in and over the pedestrian zone also contribute to non-accessible routes and should be removed or relocated.

[Attachment D](#) – Non-Accessible Pedestrian Routes Deficiency Report

[Attachment E](#) – Bridge Deficiency Report

Inaccessible Pedestrian Buttons: As part of this plan, each Traffic Signal with pedestrian activated pedestrian button was inventoried to determine if the button is indeed accessible. If the button is not accessible (button height, reach distance, or proximity to the pedestrian route) then provisions must be made to eliminate the barrier. Approved pedestrian button products can be located on the [Office of Traffic Engineering's website](#).

[Attachment F](#) – Inaccessible Pedestrian Buttons Deficiency Report

Long-Range Follow Up:

For long-term assurance of compliance and to ensure that improvements to public rights of way barriers are being completed, the Office of Roadway Engineering Services will incorporate a monitoring and tracking system to ensure that the districts are fulfilling obligations for completing ADA barriers during the assessments.

Resources

Applicable Policies

Curb Ramps Required in Resurfacing Plans. [Policy 519-002 \(P\) \(1996\)](#)
[Urban Paving Policy and ADA Curb Ramps](#). IOC from Division of Local Programs
(2000)

Design Guidance

ODOT Location and Design Manual Section 306 Pedestrian Facilities
[http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Locati
on%20and%20Design%20Manual/Section_300_April_2011.pdf](http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Locati%20on%20and%20Design%20Manual/Section_300_April_2011.pdf)

FHWA Designing Sidewalks and Trails for Access, Part 2
<http://www.fhwa.dot.gov/environment/sidewalk2/contents.htm>

PROWAG Draft Guidelines for Public-Rights of Ways
<http://www.access-board.gov/prowac/index.htm>

Construction Guidance

ODOT Standard Drawing BP-7.1 New Curb Ramps
[http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Stand
ard%20Construct%20Drawings/bp7.1_10-15-10.pdf](http://www.dot.state.oh.us/Divisions/Engineering/Roadway/roadwaystandards/Stand%20ard%20Construct%20Drawings/bp7.1_10-15-10.pdf)

Curb Ramp Inspection Checklist, [Intersection](#) and [Sidewalk](#)

[Digital Level Specifications](#)