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Creating Great Communities for All

PAS MEMO

Planning Accessible Communities

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"We will ride!"—In 1978, Denver became the epicenter of the disability rights movement. Protestors (now known as "the Gang of 19") halted the movement of two Regional Transportation District (RTD) buses for a full 24 hours, demanding their right to accessible public transportation (McCormick-Cavanagh 2018). The protest was organized by Atlantis, an independent-living center supporting people with disabilities, who, prior to the protest, had filed a lawsuit against RTD.

The protest sparked national attention and the suit was settled, with RTD agreeing to retrofit approximately one-third of its fleet to be fully accessible. RTD, which currently services more than three million people and a district of more than 2,300 square miles, became the first public transit agency in the country to add wheelchair lifts to buses (Figure 1).

This historic protest gained national attention, but the work of ensuring that people with disabilities can safely travel throughout the built environment—whether via planes, subways, buses, rideshare, or neighborhood sidewalks—is far from over.

Transportation planners are called to consider the ramifications of a given project or program on vulnerable populations and anticipate the associated impact on community members' mobility and access. Pursuing equitable outcomes commonly includes working with historically disinvested communities, including groups such as people of color and those whose primary language is not English, as well as "transit-dependent" individuals reliant on public transportation for their mobility needs. But people with disabilities may not be strategically and regularly included in targeted outreach and prioritization efforts—and this means that planners may not be adequately identifying and addressing their accessibility and mobility needs.

Dismantling systems of oppression that prevent us from building inclusive communities should be an ongoing and fundamental commitment of the planning profession. It is always worth taking the time to ask whether our standard methods fall short. Are we drawing on the wisdom and lived experiences of community members with disabilities? We speak of bringing stakeholders to the table, but is our table built to



Figure 1. Public bus accessibility features, such as wheelchair lifts, were first adopted by Denver's Regional Transportation District following protests by disability rights advocates in the late 1970s (Caboclin/Getty Images)

accommodate those who wheel and roll as their primary mode of transportation?

Designing infrastructure with an accessibility mindset may immediately conjure up Americans with Disabilities Act (ADA) standards and requirements. But planning with an accessibility mindset goes beyond the built environment to encompass reexamining our default methods for conducting inclusive

outreach and engagement, considering whether community members with vision, hearing, mobility, or cognitive impairments are able to meaningfully participate and share their lived experiences.

This PAS Memo explains the importance of planning and designing truly inclusive communities that engage people with disabilities and meet their accessibility and mobility needs. It provides a brief overview of ADA requirements, describes the importance of developing an ADA self-evaluation and transition plan for public rights-of-way, and explores experiential, accessible engagement strategies. It also offers a case study example of how the City of Boulder, Colorado, used inclusive, accessible community engagement when developing its ADA Self-Evaluation Plan, adopted in 2021.

The Importance of Accessibility

Worldwide, one in six people experiences a significant disability (World Health Organization 2023). As of 2021, 13 percent of the U.S. population has a disability (more than 42 million people), and this number is only expected to grow as the baby boomer generation ages. As shown in Table 1, ambulatory disabilities, or impairments that impact the ability to walk, are the most common type of disability in the United States.

Table 1. Disability Types for the U.S. Population

Disability Type	Percentage of U.S. Population with the Given Disability	Estimated Population Numbers
Ambulatory difficulty	6.6	20,435,576
Independent living difficulty	5.8	14,739,809
Cognitive difficulty	5.4	16,529,501
Hearing difficulty	3.6	11,642,464
Vision difficulty	2.5	8,054,084
Self-care difficulty	2.5	7,852,976

Source: U.S. Census Bureau 2021

Disabilities may result in changes to a person's mobility, vision, or hearing, requiring them to use a mobility aid such as a wheelchair or walker, a visual aid such as a cane or specialized screen reader, or a hearing aid. Disabilities that may not present as outwardly apparent are often referred to as "invisible disabilities," and include such difficulties such as psychological disorders, learning disabilities, and chronic pain or illness. An estimated 10 percent of the U.S. population is affected by a medical condition that can be categorized as an invisible disability (Disabled World 2023). Additionally, about five percent of working Americans (just under eight million) experience a short-term disability annually, due to illness, injury, or pregnancy (Council for Disability Awareness 2021).

Inaccessible environments can have a major impact on residents' quality of life. The impacts are not just physical, but



Figure 2. Inaccessible environments negatively impact the ability of all residents to participate in civic life, employment, and social activities (fstop123/Getty Images)

financial and emotional as well. Barriers to accessibility can create isolating circumstances, impacting the ability of residents to participate in civic life, employment, and social activities (Figure 2).

A good example of a definition of "accessible" is that of the Washington, D.C., Office of Disability Rights: "a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability" (District of Columbia Office of Disability Rights n.d.). Furthering accessibility and considering the needs of people with disabilities is an important tenet of inclusive community building.

Accessible transportation environments make a world of difference for those persons with disabilities who live, work, and play in our communities. In addition, the "curb cut effect" recognizes that curb cuts (i.e., curb ramps) benefit a variety of users, from a parent pushing a stroller to a traveler with a suitcase to a person using a wheelchair or crutches (Sheridan 2021). Those of us who do not have a disability may take for granted our ability to easily navigate our downtowns and neighborhoods, not realizing that some members of our communities are forced to survey an area prior to attending an event, boarding a bus, or planning an appointment to ensure they can access their destination safely.

The Americans with Disabilities Act

The Americans with Disabilities Act (ADA) celebrated its 30th anniversary in 2020. This federal civil rights law protects people with disabilities from discrimination on the basis of their disability. The ADA comprises five sections (titles) that address requirements for various entities (Table 2, p. 3).

The ADA was signed into law by President George H.W. Bush in 1990, following inspiring activism in Washington, D.C., earlier that year. One notable event, the "Capitol Crawl," was organized by the grassroots organization American Disabled for Attendant Programs Today (ADAPT), and included nearly 1,000 people marching, rolling, and wheeling from the White

Table 2. Americans with Disabilities Act Title Requirements

Title I	Employers
Title II, Subtitle A	State and local governments, including programs and services
Title II, Subtitle B	Public transit providers
Title III	Businesses that serve the public
Title IV	Telecommunication companies
Title V	Requirements for implementation and other guidance

Source: ADA.gov

House to the U.S. Capitol. Participants highlighted the impact of inaccessible architecture by leaving their mobility devices behind and physically crawling to reach the top of the Capitol steps. The Capitol Crawl was just one event in a weeklong series of protests calling for greater regulations to legally codify the rights of individuals with disabilities (Little 2020).

The following year, the U.S. Department of Justice (DOJ), U.S. Equal Employment Opportunity Commission (EEOC), and Federal Communications Commission (FCC) issued Titles I–IV of the ADA, establishing groundbreaking regulations related to transportation, employment, and telecommunications. Title II of the ADA went into effect in 1992 and applies to state and local governments, including state executive agencies, courts, legislatures, towns, cities, counties, school districts, universities, community colleges, water districts, special purpose districts, regional transit authorities, other state and local government instrumentalities, and Amtrak (ADA National Network 2020).

Title II of the ADA

Title II of the ADA applies to state and local governments and is intended to ensure that people with disabilities can meaningfully participate in civic opportunities, including services, programs, and activities (ADA.gov n.d.c.). Title II is intended to grant people with disabilities equal access to the benefits and activities offered in their city and reasonable accommodations as needed. The <u>Title II webpage</u> provides a full list of services and activities for which compliance is required; its requirements are summarized below.

Equal opportunity for people with disabilities. Title II requires that state and local governments, no matter their size, follow the ADA. If a person with a disability is unable to access services, they can file a grievance outlining the issue and requesting it be resolved. If an individual's grievance would cause an undue burden on the entity ("a significant difficulty or expense"), the entity must seek an alternative to ensure individuals with disabilities still receive appropriate (comparable) benefits or services. A familiar example of a reasonable modification would be for a public library to allow people with

disabilities who use service dogs to bring them inside, regardless of the "no pets" rule (ADA.gov n.d.c.).

Accessibility requirements. The 2010 <u>ADA Standards for Accessible Design</u> are paired with Title II and Title III regulations to provide requirements for building and facility accessibility and apply to both new construction and alterations of facilities (ADA.gov n.d.a.).

Accessible communications. Title II urges state and local governments to "communicate with people with disabilities as effectively as you communicate with others" (ADA.gov n.d.c.). Under the ADA, communicating effectively with people with disabilities includes recognizing the diverse needs of community members with disabilities, from ensuring closed captioning for planning board and project meetings, to evaluating the compatibility of virtual meeting platforms (like Zoom and Microsoft Teams) with screen readers, to considering how accessible a chosen meeting location is based on the presence or lack thereof of accessible building entrances and bathrooms.

ADA self-evaluation and transition plans. Title II also established a requirement that state and local governments (and those related entities mentioned above) must complete an ADA self-evaluation and transition plan by January 26, 1993. The ADA self-evaluation needs to include an inventory of the existing state of the public right-of-way, including those facilities built before the ADA was law. The transition plan (sometimes called a program access plan) involves developing actionable strategies, noting responsible departments and timelines to bring inaccessible elements into compliance (Jacobs Engineering Group 2009).

Developing an ADA self-evaluation and transition plan demonstrates an entity's intent to achieve compliance and is a valuable way of demonstrating this commitment, should an ADA grievance be filed. Ideally, the transition plan is updated frequently as a way to track progress towards achieving compliance.

However, the majority of U.S. cities and towns are not in compliance with this requirement. A <u>2020 study</u> evaluating the content and quality of municipalities' existing ADA transition plans for the public right-of-way found that of the 401 jurisdictions examined, only 54 (13 percent) had ADA transition plans readily available, and only seven of the 54 plans (13 percent) met all the minimum criteria required. Further, only four of those plans were posted to webpages meeting accessibility guidelines, rendering the rest inaccessible to residents with the greatest stake in their implementation (Eisenberg et al. 2020).

Entities that have not yet developed an ADA plan are out of compliance with the law and at risk of lawsuits or mandates that compliance be achieved within a designated timeframe, which can be quite costly. DOJ is the federal agency responsible for enforcing settlement agreements. Its **Project Civic Access** (PCA) initiative, launched in 1999, works to bring entities flagged for noncompliance into compliance with the ADA. As of 2021, PCA has achieved 222 settlement agreements within 207 localities in all 50 states, the District of Columbia, and Puerto Rico. Settlement agreements include agreed-upon modifications that achieve shared accessibility goals, such

as setting ADA grievance procedures or modifying planning board chambers to provide further accessibility-related virtual meeting features (Hoel 2021).

We've heard it time and time again: what is measured matters. Creating an ADA self-evaluation plan and transition plan is not only legally responsible to ensure adherence to federal guidelines as a municipality, but it also signals a commitment to creating an inclusive and equitable community. A lot has changed in the transportation realm since 1991 when the requirement to develop an ADA self-evaluation plan was first established. For those municipalities with outdated plans, a refreshed and forward-thinking transition plan update is necessary. For those without a self-evaluation in place, the legal liability is great, as is the need.

ADA Self-Evaluation and Transition Plans

An ADA self-evaluation and transition plan creates a foundation for comprehensive accessibility planning. It opens the dialogue between city staff and people with disabilities to identify desired outcomes, existing barriers, and a trajectory for improved communications in a more inclusive environment. Every community should prioritize developing an ADA plan for the benefit of their residents, their families, and visitors.

At a minimum, a community's ADA self-evaluation and transition plan must comprise six mandatory elements:

- Develop a full inventory of the public right-of-way, noting accessibility barriers. Typical features include sidewalks, curb ramps, and pedestrian crossings/traffic signals. Jurisdictions with transit systems should also evaluate bus stop access routes to map and remediate instances of the all-too-common "floating" bus stop, wherein a concrete pad is present but lacks an access route to adjoining sidewalks.
- Describe actionable methods for achieving accessibility. A plan must be devised to bring inaccessible transportation infrastructure into compliance. Noting planned or potential funding sources is an important way for an entity to demonstrate its commitment to targeted improvements. Some typical funding sources include the capital improvement plan (CIP), local taxes, or transportation-specific funds. State and federal grants are also potential sources to investigate.
- Detail a schedule for removing accessibility barriers. Tied to the requirement above, an actionable plan includes timelines for achieving compliance—noting milestones, action items, and responsible entities/departments. We have all known plans that were developed and then sat on the shelf, never to be consulted again. The transition plan should be a living document, updated regularly to track progress until all barriers are removed (Eisenberg et al. 2020).
- Identify a responsible representative to act as ADA Coordinator. The ADA Coordinator is responsible for focusing on moving action items identified in the plan forward to achieve measurable gains in ADA compliance.

- They should be trained in ADA requirements and be comfortable acting as the point person for community members who have questions or concerns about ADA compliance or discrimination. Depending on the structure of city departments, the ADA Coordinator may report to the human resources or civil rights department (Jacobs Engineering Group 2009).
- Develop an ADA grievance procedure. Some entities
 may already have a more general grievance procedure in
 place that can be modified to address accessibility-related
 concerns. Grievance procedures include a description of
 the steps the entity will take to address the grievance, estimated review time frames, and the intended resolution, including details on the appeal process and record-keeping
 for submitted claims (New England ADA Center 2017).
- Provide meaningful opportunities for public participation. This requirement underscores all of the above requirements. Plan development must place an emphasis on reaching persons with disabilities, their caregivers, and local disability advocacy organizations. Without this element, a plan's development cannot accurately capture community member needs or achieve the goal of fostering inclusive planning.

To develop a strong ADA transition plan, it is critical early on to gather both internal and external stakeholders with expertise and lived experience in accessibility. Internal stakeholders typically include representatives from the public works, transportation, and planning departments (such as engineers, planners, facilities management, or pavement management program staff); the communications department (those tasked with developing websites and print and digital communications); and risk management/civil rights and GIS/information resources departments (to assist with mapping accessibility barriers and compliance issues). The sidebar on p. 5 discusses the importance of coordinating with your municipality's IT/GIS department regarding infrastructure data needs for the public right-of-way inventory.

It is also a wise recommended practice to coordinate with your state department of transportation to understand whether it has completed its own ADA inventory of facilities, as well as any transit authorities operating within your jurisdiction, as they may track compliance data regarding bus stops or access to them. Additionally, these entities may have their own ADA compliance departments that are familiar with local accessibility stakeholders or have systems in place for flagging any accessibility-related community concerns they receive (see Minnesota's Metro Transit accessibility webpage as an example).

If you have not previously involved accessibility stakeholders in past planning efforts, it can feel daunting to understand who to invite to the table. Consider beginning with reaching out to local chapters of the <u>AARP</u> or <u>National Federation of the Blind</u>, the <u>Area Agency on Aging</u>, or the <u>regional ADA Center</u>. Do not forget to engage youth as well—contact the local school district to connect with their Special Education Department and caregivers of students with disabilities.

Mapping (In)Accessibility: Tools of the Trade

A good first step in ADA plan development involves coordinating with your municipality's IT/GIS department to understand what accessibility-related infrastructure data is already available. If this data is not available in a central hub, reach out to the departments responsible for transportation infrastructure upgrades, such as the planning department, building services, pavement management program, or parks and recreation department. Some cities have tracking tools in place for departments to note when their projects have made ADA-related upgrades. If you do not currently have such a system in place, consider it a worthy ADA transition plan item to implement.

Depending on the budget, the size of the jurisdiction (survey area), and staffing available to conduct the ADA self-evaluation, municipalities may choose different routes to achieve their evaluation objectives. Some may hire interns or devote existing staff member time to conduct an on-the-ground accessibility survey using tools such as levels and phone apps (such as <u>ArcGIS Collector</u>). There also are dozens of companies with technological expertise and equipment to conduct accessibility evaluations using tools such as Light Detection

and Ranging (Lidar) (Figure 3), Segways equipped to collect accessibility data in real time, and specialized apps for curb ramp evaluations. Further, consulting firms are available to help with outlining evaluation needs, structuring public outreach, and plan writing.



Figure 3. Vehicle-mounted Lidar equipment can be used to collect accessibility data (Alena Nesterova/Wikimedia (CC BY-SA 4.0))

There is also nothing wrong with Googling "disability advocacy groups" to find other relevant entities in your area. In large cities (or if your city is adjacent to one), you may find local chapters of organizations serving individuals with particular types of disabilities, such as the <u>National Multiple Sclerosis Society</u>, <u>National Autism Association</u>, <u>U.S. Brain Injury Alliance</u>, and more.

Convening an accessibility committee or ADA advisory team to meet regularly during ADA plan development can help facilitate direct input from accessibility stakeholders. Hosting listening sessions with disability advocacy groups and other related stakeholders, particularly before project milestones are completed (such as the public right-of-way inventory or finalizing of the grievance procedures), is essential. And experiential learning events offer meaningful ways for planners to directly engage those both with and without disabilities in the planning process. See the sidebar on p. 8 for further information on this approach.

Accessible Engagement

Ensuring that both in-person engagement activities and online forums are accessible should be a top priority on every municipality's outreach checklist.

For in-person events, this includes considering the accessibility of the physical building or space itself, as well as access to it. Does the building have entrance ramps, elevators to the meeting room, and accessible bathrooms? Is the location readily accessible via transit—both at the beginning and ending times of your meeting? Consider that people with disabilities who attend your event may rely on local transit or paratransit services and remember that service frequency may decline

later in the evening. If you are unsure what accessibility factors to consider when scheduling meetings, consider reaching out to a local disability advocacy organization for their feedback on the best meeting locations or times.

For virtual events (whether via Microsoft Teams, Zoom, or another platform), it's important to ensure that the platform's accessibility features are readily available to attendees. Some typical features and options include the following:

- Captioning/transcription options. Platforms such as
 Zoom automatically provide live captioning. The meeting host must toggle on the "Live Transcription" button
 to enable this feature. However, consider reviewing and
 correcting captions before posting the meeting recording to avoid confusion. You can also assign someone to
 manually type in captions during the meeting or use a
 third-party service.
- American Sign Language (ASL) interpretation. Ask attendees to request when registering for a meeting whether they will need this option (or other accommodations). If you do have an ASL interpreter present, be sure to "spotlight" then so they are always in view for attendees. ASL interpretation is also available for online platforms (Figure 4, p. 6).
- Accessibility tutorials. Attendees who are new to using the meeting platform may benefit from a quick how-to regarding additional accessibility features they can enable on their end, such as increasing the font size of chats, using keyboard shortcuts, and customizing the audible announcements programmed for screen readers to hear.



Figure 4. ASL interpretation can be offered on online platforms (Significan't Sign Video/Wikimedia (CC BY-SA 4.0))

- Accessible supplemental materials. Provide accessible meeting materials (such as tagged PDFs) to attendees beforehand if possible, so they can view them in real time during the presentation while using their chosen accessibility tools (such as screen readers).
- Humanizing presenters. To create an inclusive experience for people who are vision impaired or blind, it is a good recommended practice to humanize presentations. This can be done by sharing details about physical appearance during introductions. For example, "Hi, my name is Jenny. I'm a woman in my early 30s with medium-length brown hair. Today I am wearing a purple sweater and blue scarf."
- Platform help features. Know in advance where to direct attendees if they have additional questions about the platform's accessibility features that you are unable to answer, so they are not left in the lurch during your presentation. For example, Microsoft Teams has a Microsoft Disability Answer Desk, Quick Start Guide for Using Microsoft Teams with a screen reader, and Accessibility Tools for Microsoft Teams page. Zoom also has an Accessibility page.

Inclusive Communications

How do your municipality's residents reach you to gather information, ask questions, or learn more about an upcoming project breaking ground in their neighborhood? Many residents may begin the process with an online search. It is more critical than ever to consider the accessibility of your municipality's online materials, including webpages, engagement platforms, and outreach materials.

Colorado was the first state in the nation to pass a law (HB21-1110) requiring state and local public entities to meet website accessibility standards and establishing penalties for noncompliance (Miller 2021). The law requires state agencies to submit website accessibility plans by July 1, 2022, and implement their plans by July 1, 2024. Though local agencies are not required to submit an accessibility plan, they should still achieve compliance by this same date (Colorado Governor's

Office of Information Technology n.d.). At least <u>15 states</u> have passed policies or requirements for accessibility regarding their use of information and communications technology (General Services Administration 2022).

The W3C Web Accessibility Initiative (WAI) defines online accessibility as the ability for people to "perceive, understand, navigate, and interact with the Web," as well as "contribute to the Web," regardless of any auditory, cognitive, neurological, physical, speech, or visual disability (Miller 2021). The WAI webpage offers background info on technical specifications and standards, so municipalities can confidentially understand whether their webpage is adequately structured to be accessible to individuals with disabilities. It also offers excellent resources, such as free online courses to understand how to make audio, video, and print media accessible (W3C Web Accessibility Initiative 2023). Resources such as Siteimprove offer tools to analyze existing websites and understand the impacts of noncompliance on users.

Taking accessibility into account for city communications and outreach platforms—including social media sites, webpages, press releases, and others—means providing content in a format that acknowledges that people with disabilities in your community may be interested in attending outreach events or providing feedback on topics that matter to them as residents, as parents, as students, and as individuals with disabilities. Outreach and communications professionals should be familiar with how to properly caption images and tag PDFs to be screen-reader capable, and, when promoting an event or outreach tool, know who on staff to list as a contact for individuals to ask questions of or to request special accommodations.

Further, consider whether your materials and communications truly represent the residents of your community, including persons with disabilities who live, work, and play there. Does your Pedestrian Plan mention scooters, but not wheelchairs? Perhaps your city's social media runs a series of feature posts for Black History Month—what about for Disability Awareness Month in March or the celebration of the ADA (Disability Pride Month) in July? Striving for inclusion often means discovering our standard way of operating may have inadvertently left people behind and course-correcting appropriately.

The City of Boulder's ADA Self-Evaluation Plan

The City of Boulder, Colorado's Transportation & Mobility (T&M) Department began developing its ADA Self-Evaluation for Transportation in 2018. In creating the city's pedestrian plan, the T&M Department recognized that the city's existing ADA Plan, which dated from the 1990s and only partially touched on transportation facilities, was obsolete. Developing a new ADA self-evaluation and transition plan to outline existing conditions and outline a trajectory for improvements was necessary.

The initial existing conditions phase involved evaluating existing policies and programs related to accessibility and mapping its transportation infrastructure (including sidewalks, curb ramps, multiuse paths, access to transit stops, pedestrian



Figure 5. Accessible transportation symposium in Boulder, Colorado, in June 2019 (Photo courtesy of Darcy Varney Kitching)

crossings, and traffic signals), noting compliance-related data where available, to identify barriers and opportunities for improvement. At the time of the ADA self-evaluation plan's writing, the city's transportation network included approximately 9,700 curb ramps, 450 miles of sidewalk, 74 miles of multiuse path, 500 pedestrian crossings, 12 Accessible Pedestrian Signals (APS), 34 Rectangular Rapid Flashing Beacons (RRFBs), and 600 RTD transit stops (some of which were owned by the city and some by RTD).

Given the city did not have funding to complete a comprehensive inventory at the time, and the COVID-19 pandemic caused further strain on city staffing and budget, available accessibility conditions information was mapped via GIS/Information Resources' data. For example, the Missing Sidewalk Links Program data, paired with an imagery scan, highlighted inaccessible routes where sidewalk gaps existed. The city was also able to map curb ramps installed or upgraded since 2012 through the Annual Sidewalk Repair Program, Pavement Management Program, or the Colorado Department of Transportation (CDOT)'s replacement efforts.

The process involved ongoing community involvement, including providing presentations to interested parties (such as CU–Boulder Disability Services, the Age Well Advisory Committee, and the Transportation Advisory Board), hosting experiential events (such as a "roll n' stroll" at the library and an accessible hike), and connecting with stakeholder groups at related events. This included an accessible symposium (Figure 5), which brought together individuals with disabilities, service providers (such as adaptive sports companies),

and city staff to celebrate accessibility wins, hear firsthand experiences, and deepen community connections. Staff shared an <u>information brochure</u> and gathered valuable feedback from community members (Figure 6) via paper surveys, including a link to a companion online survey link/barrier mapping tool. The online survey was also promoted via city communications channels and at meetings with interested area organizations.

Community members identified five main types of barriers to accessibility: those that were weather related, transit related,



Figure 6. Feedback themes from the City of Boulder's ADA self-evaluation plan outreach (Graphic courtesy of author)

and safety related, plus crosswalk challenges and sidewalk challenges. The project team also identified four major categories of gaps in city policies and programs: inconsistency in design standards, gaps in communications and engagement, gaps in data tracking and monitoring, and funding/coordination/prioritization challenges.

City staff published <u>the ADA Self-Evaluation Plan for the Transportation System</u> in 2021, with an accompanying plaintext executive summary file to ensure screen reader compatibility. The process also included creating a new ADA <u>webpage</u> detailing how to file an ADA grievance. The ADA transition portion of the plan, which will be starting soon, will prioritize,

Roll a Mile in My Shoes: Experiential Events

Experiential events offer a valuable opportunity to learn from residents with disabilities, fostering opportunities to deepen staff and community members' collective understanding about the types of barriers present in the built environment.

City of Boulder staff hosted two experiential events during the development of the ADA self-evaluation plan. The first was a "roll n' stroll" library event (Figures 7 and 8), which included a library scavenger hunt developed by residents with disabilities. Attendees were loaned wheelchairs and encouraged to test out typical tasks—such as checking out a book, using a water fountain, and rolling up the ramp between parts of the building—and asked to gauge how comfortable these tasks were to complete.

The event also served as an unexpected reminder of the mobility challenges that residents with disabilities face. One of the event organizers, who is a wheelchair user, was unable to attend after heavy snow and unshoveled sidewalks impacted his ability to safely access his neighborhood bus stop.





Figures 7 and 8. City of Boulder roll n' stroll experiential event with community members at the Boulder Public Library in February 2020 (Photos courtesy of Darcy Varney Kitching)

The second City of Boulder event was an experiential wheel-chair hike at a popular neighborhood trailhead, led by two Open Space and Mountain Parks (OSMP) staff members who are wheelchair users themselves (Figure 9). Though the city's trail system is maintained by OSMP and was outside of the scope of the ADA self-evaluation, attendees nonetheless benefitted from a deeper understanding of the impact that varied slopes and materials had on ease of navigation in a wheelchair.

When designing an experiential event, work with disability advocacy groups and accessibility stakeholders to determine the equipment you will need (e.g., wheelchairs, blindfolds and canes, or other items to help participants experience the world as someone with a given disability would) and where you can acquire it. Cast a wide net for invitees, including those involved with developing the ADA plan, engineers, and other staff in charge of designing transportation infrastructure, as well as members of local boards and committees who may hear of accessibility-related challenges from community members (e.g., planning board, city council, and pedestrian/bicycle advocacy committees). Consider which entities may be tasked over the long term with granting future funding requests to assist with meeting the ADA plan's goals.

There is enormous value in better understanding the lived experiences of people with disabilities—impacting the lens which we as planners view the built environment and the details we consider in how we build accessible, inclusive neighborhoods and cities.



Figure 9. Experiential wheelchair hike with Boulder community members, led by a city staff member who is a wheelchair user (Photo courtesy of Vijay Viswanathan)

plan, and draft a schedule to make the improvements identified in the self-evaluation.

What Planners Can Do: Action Steps

The right to safe, accessible mobility and access for people with disabilities is a fundamental legal and civil right. As planners, we have the opportunity and responsibility to champion causes that make an impact on our community members' quality of life. The following recommendations offer a range of opportunities to get started, and the sidebar on p. 9 offers additional resources for a deeper dive.

Understand ADA standards. Challenge yourself to acquire a baseline knowledge of ADA, the <u>ADA Standards for Accessible Design</u>, and web accessibility standards. Consider whether ADA-related trainings and experiential events would be helpful for broadening the knowledge of and empathy towards people with disabilities of your municipality's staff, particularly those in outreach/engagement, communications, and transportation design/engineering departments.

Review your jurisdiction's ADA compliance status. As a starting point, determine whether your municipality has an existing ADA self-evaluation or transition plan. If so, when was it last updated? If an accessibility grievance is posed, is there a formal procedure in place for evaluating the grievance? Who conducts the evaluation—a designated ADA Coordinator, or someone else?

Investigate where accessibility gaps exist. Conducting field visits, developing online barrier mapping tools, and asking stakeholders about their accessibility concerns while navigating your municipality will help identify where gaps exist. Remember that infrastructure that appears accessible according to code (or on paper) may fail to provide adequate access for various reasons (e.g., if the location of a utility pole narrows a six-foot sidewalk to two feet, making it unnavigable in a wheelchair).

Do not forget to consider the impacts of temporary activities on accessibility. Construction sites can prove particularly problematic for people with disabilities, such as when an intersection is closed and the "sidewalk closed ahead" sign is placed in the middle of the sidewalk.

Seek opportunities to upgrade transportation infrastructure. Alterations to facilities in the public right-of-way—including reconstruction, rehabilitation, widening, resurfacing, and signal installation—trigger FHWA requirements for ADA upgrades to noncompliant facilities (FHWA Office of Civil Rights 2019). Look for opportunities to advance infrastructure accessibility through collaborative efforts, such as including an Accessible Pedestrian Signal (APS) on a newly upgraded signal pole where you've received prior requests for APS installation, even when compliance upgrades are not directly triggered. Many municipalities look for opportunities to improve ADA compliance during planned CIP project upgrades, for example, to effectively move the needle forward on achieving city-wide compliance.

Plan, budget, and build partnerships. Developing an ADA plan offers the opportunity to outline timelines to achieve

compliance and assign appropriate funding sources to meet these goals. Creating partnerships to both address existing issues and prevent future ones is likewise crucial to reimagining a more accessible city. Strategic partnerships could include fairly compensating a member of the local chapter of the National Federation of the Blind to review a new-to-the-city engagement platform to ensure its accessibility for common types of screen readers.

Seek guidance from peers. Beginning the ADA plan development process may feel daunting. A helpful place to begin is by reaching out to nearby cities or those similar to your own who have written their own ADA plans. Ask them to share key resources and lessons learned. Consider hiring consultant support to help with the self-evaluation if current staffing capacity does not support it. This could include assistance with the physical evaluation process, community outreach, or plan writing.

Learn from the lived experiences of people with disabilities. Don't rely on this article or your own research to understand the needs of people with disabilities working, living, playing, and visiting in your community. Ask them! Hold a forum, partner to plan an experiential event, engage them in your ongoing planning efforts—whether directly related to your ADA plan or not. Before engaging with community members, review How to Write About People with Disabilities or a similar resource to learn about the preferred language to demonstrate respect and honor the lived experiences of people with disabilities. When in doubt, ask: "How should I describe your disability?"

Foster an inclusive planning culture. Development of an ADA self-evaluation and transition plan may be the first opportunity staff members have to work with residents with disabilities. Findings from the self-evaluation phase may likely reveal gaps in the outreach and communications status quo, improvements to which, as discussed in this *Memo*, can foster a more inclusive culture of engagement over the long term.

Conclusion

Inclusive design, planning, and outreach requires reaching and representing everyone who calls our communities home (or considers them great places to visit). Considering accessibility at every step along the planning process is a vital tenet of building inclusive places.

The ADA self-evaluation and transition plan process provides a municipality with a deepened understanding of accessibility gaps in infrastructure and programs and a trajectory for both addressing existing barriers and ensuring new ones aren't created. If your local ADA plan is outdated—or doesn't yet exist—this is a vital first step in addressing the accessibility of both the built environment and municipal programs and services.

Consider as well, as you begin development of your next comprehensive plan or transportation master plan: how are the needs of those rolling or using mobility aids represented? Who in your community can speak to the unique needs and experiences of the people with disabilities who live, work,

Resources for Accessible Planning and Design

Accessible Planning and Design

ADA Standards for Accessible Design. ADA.gov, U.S. Department of Justice Civil Rights Division. This master ADA design document provides guidance on new construction, alterations, program access changes, and removal of barriers. It addresses accessibility requirements in a multitude of circumstances, from parking spaces to bus stops to benches and much more in between. It also includes information on Title II compliance.

Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). U.S. Access Board, 2011. Though still in "draft" form, these public rights-of-way accessibility guidelines cover design details for important pedestrian facilities that the ADA Standards for Accessible Design do not elaborate on in detail, such as crosswalks, curb ramps, pedestrian signals, on-street parking, and shared use paths. Some municipalities choose to exceed ADA standards by designing and upgrading pedestrian facilities to meet PROWAG guidelines.

"Curb Ramps and Pedestrian Crossings Under Title II of the

ADA." Chapter 6 in ADA Best Practices Tool Kit for State and Local Governments, U.S. Department of Justice Civil Rights Division, 2007. This resource provides digestible guidance on requirements for designing accessible curb ramps. The document defines important measurement metrics like "rise," "running slope," "detectable warnings," and more. Note that updates to ADA requirements subsequent to 2007 are not reflected in this document.

FHWA's Separated Bike Lane Planning and Design Guide. Federal Highway Administration Bicycle and Pedestrian Program, 2015. This guide provides a template for including smart accessibility-focused considerations in the design of separated bike lanes (SBL). Without the foresight to consider the necessity of people with disabilities maintaining safe access to the curb, conflicts may arise between modes. These guidelines include guidance for ensuring cohesive SBL interfacing with uses such as transit lanes (which may deploy wheelchair lifts) and accessible parking/loading zones.

Creating an ADA Self-Evaluation and Transition Plan ADA Title II Action Guide for State and Local Governments: Action Steps. New England ADA Center, 2017. The New England ADA Center provides a wealth of great resources for public entities looking to understand the step-by-step requirements for ADA Plan development, including how to assemble the right team, resources for additional training, and templates and example documents.

ADA Transition Plans: A Guide to Best Management Practices.

National Academy of Sciences National Cooperative Highway Research Program Project Number 20-7 (232), Jacobs Engineering Group, 2009. This report focuses on ADA self-evaluation and transition plans created by departments of transportation (DOTs) and cites interviews, questionnaires, and website research to explore common issues encountered in plan development. The report highlights keys to success callouts that summarize approaches that proved beneficial to the drafting and implementation of transition plans.

Accessibility IS a Civil Right: Start Planning. American Planning Association, APA Learn. This on-demand streaming course provides an overview of ADA Title II requirements, with a focus on ADA transition plan development. It offers case studies from different municipalities and highlights successful engagement strategies to include people with disabilities in planning for accessibility.

Accessible Outreach and Engagement

Accessibility Fundamentals. W3C Web Accessibility Initiative, 2023. Understanding web accessibility guidelines is essential for anyone adding to or creating materials for public entities' webpages. This resource outlines Web Accessibility Initiative guidelines and other relevant standards, explores common inaccessibility barriers to webpage access, and offers training courses.

Accessibility in Print: Best Practices Guide. Alta Planning & Design, 2019. This guide provides an overview of accessible graphic design principles, including for people with disabilities and those with Limited English Proficiency (LEP). The guide explores how to develop materials that consider the needs of those who are blind, color blind, low vision, dyslexic and more, including creating documents in braille, with large text printing, and through audio versions.

Guidelines: How to Write About People with Disabilities.

Research and Training Center on Independent Living, 2020. These guidelines were first published in 1984 and remain a vital resource that is upgraded regularly. Suggestions outlined in the guidelines are directly sourced from surveys of disability advocacy organizations and people with disabilities.

engage, and play there? As you work to make planning in your community more equitable and inclusive, consider the historic 1990s mantra from the disability rights movement: "nothing about us without us."

About the Author

Jenny Godwin, AICP, is a transportation planner who works at Consor Engineers in Denver. Her interest in accessible outreach and planning stems from her prior role as Project Manager leading development of the City of Boulder's ADA self-evaluation plan. Learning from Boulder residents with disabilities about accessibility challenges in the transportation environment has radically changed how she views both her work and day-to-day travel.

This Memo is based on the author's window of experience with a specific project. Readers are encouraged to consult ADA standards and local counsel for specific questions and detailed requirements to make well-informed decisions regarding compliance. The author is not herself a person with a disability, and so respectfully draws on her experiences collaborating with and learning from people with disabilities in writing this article.

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