

Rhode Island Department of Transportation



Interim ADA/Section 504 Transition Plan

March 31, 2014

**RHODE ISLAND DEPARTMENT OF TRANSPORTATION
Interim ADA/Section 504 Transition Plan
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| | Page |
|--|------|
| INDEX | i |
| I. INTRODUCTION | 3 |
| A. Organization | 4 |
| 1. ADA Program | 5 |
| 2. ADA Committee | 5 |
| B. Development of RIDOT's ADA Program: 1992 to 2011 | 5 |
| 1. Americans with Disabilities Act: Self-Evaluation and Compliance Plan for the State of Rhode Island and Providence Plantations | 6 |
| 2. Rhode Island and Providence Plantations ADA Status Report: July 26, 1998 | 6 |
| 3. 2007-2011 Self-Evaluation & Program Expansion | 7 |
| ADA Program | 8 |
| Engineering Design Database | 8 |
| Construction Project Database | 8 |
| II. SELF-EVALUATION: REVIEW & FINDINGS | 9 |
| A. Technical Review | 9 |
| 1. Specifications, Standards, Manuals and Memoranda | 9 |
| Standard Specifications for Road and Bridge Construction | 9 |
| RIDOT Standard Details | 11 |
| LFRD Bridge Design Manual | 12 |
| Design Policy Memoranda | 12 |
| “To All Consultants” Memoranda (TAC) | 13 |
| CAD Standards Manual | 13 |
| Standard Symbols and Standard Notes Drawings | 13 |
| The Work Breakdown Structure (WBS) | 13 |
| 2. Policies and Practices | 13 |
| Technical Infeasibility Determination Policy | 13 |
| Detectible Warning Surfaces (DWS) | 15 |
| Sidewalk Maintenance | 15 |
| B. Review of Physical and Communications Barriers | 16 |
| 1. Location of Utility Facilities and Appurtenances / Utility Accommodation Policy | 16 |
| 2. www.dot.ri.gov | 17 |
| 3. ADA Compliant Telephone Services | 17 |
| 4. Accessible Public Meetings | 17 |
| 5. Curb Ramps | 18 |
| 6. Survey of RIDOT Facilities | 23 |
| 7. Process for Verifying ADA Alterations | 24 |

| | |
|---|----|
| III. PLAN TO MODIFY AND IMPLEMENT COMPLIANT PROCEDURES, POLICIES, AND SPECIFICATIONS | 25 |
| A. Revisions to Technical Documents | 25 |
| 1. Specifications, Standards, Manuals and Memoranda | 25 |
| RIDOT Standard Details | 25 |
| RIDOT Highway Design Manual | 26 |
| Traffic Design Manual | 30 |
| Accessible Pedestrian Signal (APS) Policy | 30 |
| B. ADA Training | 32 |
| C. Curb Ramp Schedule Methodology | 33 |
| D. Placeholder for Curb Ramp Schedule | 36 |
| E. Public Participation Plan | 38 |
| IV. PLACEHOLDER FOR BUDGET AND MULTI-YEAR PLAN | 39 |
| V. SURVEY FORMS | 40 |
| VI. APPROACH TO ACCESSIBILITY | 40 |

I. INTRODUCTION

The Rhode Island Department of Transportation (RIDOT or the Department) is a direct recipient of federal funds under the Federal-aid highway program of the Federal Highway Administration (FHWA). RIDOT administers numerous programs, projects and activities and is responsible for a diverse transportation system of more than 1,100 miles of road, 800 signalized intersections, and approximately 800 bridges, as well as a network of bicycle paths and routes and a nascent commuter rail system. RIDOT's mission is to maintain and provide a safe, efficient, environmentally, aesthetically, and culturally sensitive intermodal transportation network that offers a variety of convenient, cost-effective mobility opportunities for people and the movement of goods supporting economic development and improved quality of life.

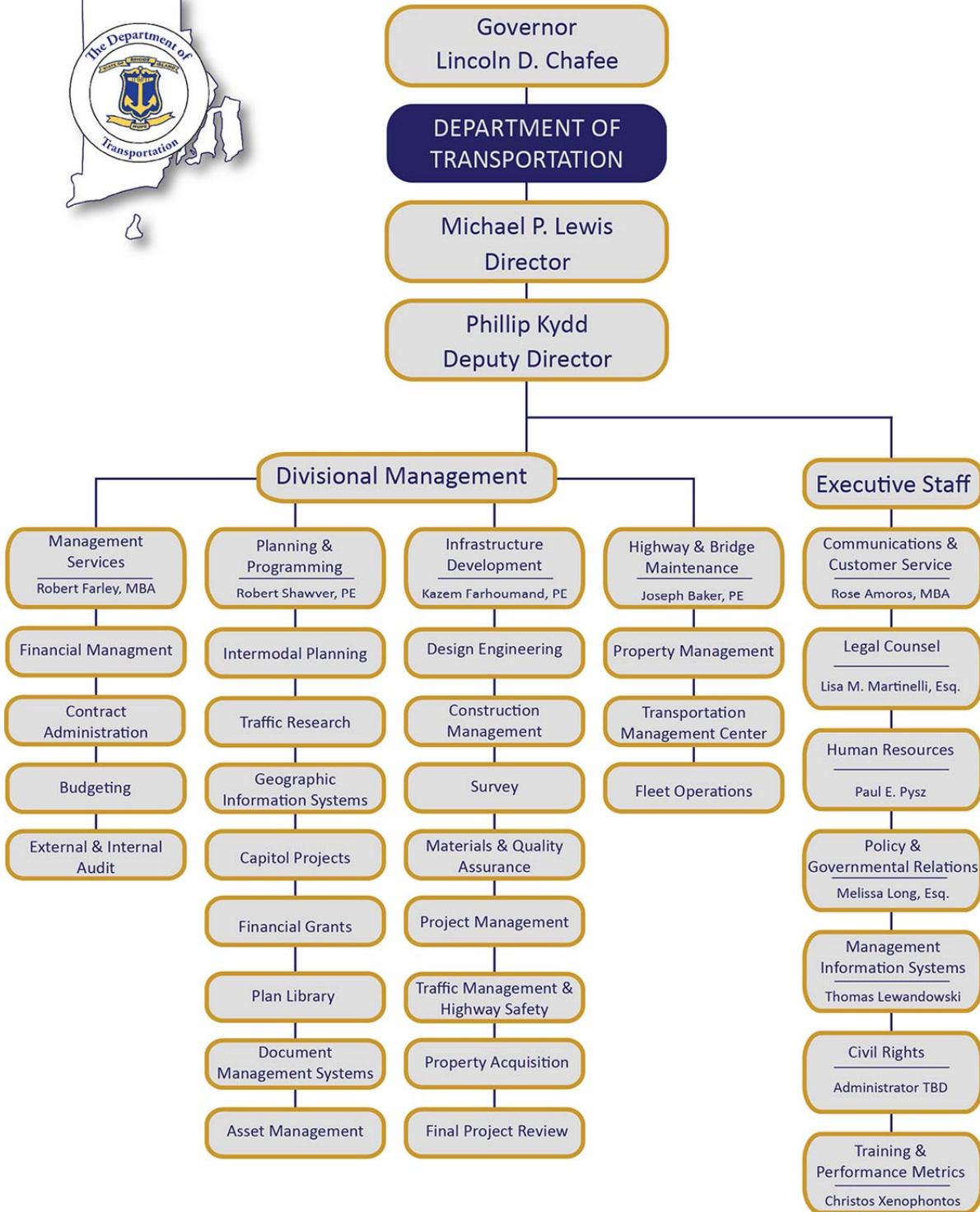


The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 are federal anti-discrimination laws that protect persons with disabilities. While Section 504 applies only to the federal government and recipients of federal funds, Title II of the ADA applies to all state and local governments, regardless of funding source. The ADA provides comprehensive civil rights protections to any qualified person with a disability; it forbids discrimination not only in government programs, benefits and services, but also in employment practices, access to public accommodations, and telecommunications.

As a state transportation agency and recipient of FHWA funds, the Department is under an obligation, pursuant to 28 C.F.R. § 35.150(d) and 49 C.F.R. § 27.11, to complete a Self-Evaluation and Transition Plan. RIDOT has prepared this document to describe its ADA Program and to fulfill its regulatory obligation.

A. ORGANIZATION

JANUARY 2014



1. ADA Program

The primary objective of RIDOT's ADA Program is to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. It is an Executive Staff-level program managed by two full-time Civil Rights professionals: RIDOT's ADA Coordinator¹ and the Department's ADA Transition Plan Manager. The ADA Coordinator and Transition Plan Manager work with RIDOT's operating units, including Highway Design and Construction Management, to implement the requirements of ADA and Section 504 of the Rehabilitation Act of 1973.

In compliance with 28 C.F.R. § 35.106, the Department provides notice about its ADA Program to interested persons.² A copy of RIDOT's Notice Under the Americans with Disabilities Act is provided as Appendix A.

Additionally, as required by 28 C.F.R. § 35.107(b), RIDOT has adopted grievance procedures for investigating discrimination complaints. A copy of RIDOT's Procedures for the Processing and Disposition of Discrimination Complaints is included as Appendix B.

2. ADA Committee

In 2008, RIDOT's ADA Transition Plan Manager assembled and began chairing the Department's ADA Committee, an advisory group that participated in conducting RIDOT's most recent Self-Evaluation and developing elements of the Department's Transition Plan. The ADA Committee includes representatives from the Department's operating units,³ as well as an Assistant State ADA Coordinator from the Rhode Island Governor's Commission on Disabilities (GCD), who provides guidance and feedback on RIDOT's progress.

B. DEVELOPMENT OF RIDOT'S ADA PROGRAM: 1992 TO 2011

Since passage of the Americans with Disabilities Act, RIDOT has been fully committed to ADA implementation as part of its program administration. RIDOT's ADA Program began in 1992 with evaluation of state-owned pedestrian facilities and construction of ADA-compliant transportation facilities on all new projects; the ADA Program continued through the 1990s with comprehensive reassessments of state roadways, initiation of a sidewalk database, and pursuit of projects dedicated solely to ADA improvements.⁴

¹ The Department's Title VI Coordinator also serves as RIDOT's ADA Coordinator.

² RIDOT posts the Notice on its website, distributes it to organizations and entities that represent the disabled community, and periodically publishes the Notice in The Interchange, RIDOT's employee newsletter.

³ ADA Committee members represent the following operating units: Infrastructure Development (Chief Engineer's Office), Highway Engineering (including Environmental Resources and Landscape Architecture), Traffic Management and Highway Safety, Construction Management, Intermodal Planning, Geographic Information System, Materials, Highway and Bridge Maintenance, Customer Service and Legislative Liaison, Public Affairs, and the Office of Final Review.

⁴ By 2002, RIDOT had constructed over 800 new wheelchair ramps, two miles of handicapped-accessible bikeways, and over 140,000 linear feet of accessible sidewalk.

Commencing in 2007, RIDOT's ADA Program expanded beyond engineering and construction to include a broad evaluation of RIDOT-specific services, policies and practices, as required by 28 C.F.R. § 35.105.

1. Americans with Disabilities Act: Self Evaluation and Compliance Plan for the State of Rhode Island and Providence Plantations.

In 1992, the GCD, then known as the Governor's Commission on the Handicapped, coordinated statutory and regulatory compliance among all state agencies, including RIDOT. The Commission's report, Americans with Disabilities Act: Self Evaluation and Compliance Plan for the State of Rhode Island and Providence Plantations, documents not only the State of Rhode Island's evaluation of all state agency services, policies and practices, but also RIDOT's initial steps towards evaluating the state's transportation infrastructure.

After completion of the report, RIDOT began to identify physical obstacles posed by curb ramp elevation, or the lack of curb ramps, in public rights-of-way. Additionally, RIDOT began installing compliant curb ramps as part of all new construction and reconstruction projects.

2. Rhode Island and Providence Plantations ADA Status Report: July 26, 1998.

In 1998, the GCD prepared an ADA Status Report concentrating on the areas statewide where state agencies, including RIDOT, were still striving to achieve compliance. At that time, RIDOT re-evaluated the State's transportation infrastructure. Specifically, RIDOT hired multiple consulting firms for the purpose of (1) revisiting all state roadways, pedestrian crosswalks, and sidewalks to assess accessibility, and (2) creating a computerized database—of conforming and nonconforming sidewalks and curb ramps—for use in project planning and design.

The re-evaluation revealed that many existing sidewalks were non-compliant, typically characterized by excessive cross-slopes, obstructions, inadequate width, and poor surface condition. In Providence County alone, 30,000 locations on over 283 miles of sidewalk were determined to be non-compliant.

RIDOT collaborated with the GCD to establish ADA priorities and addressed specific accessibility-improvement requests on a case-by-case basis. Additionally, RIDOT began to develop projects solely for the purpose of ADA compliance.

3. 2007-2011 Self-Evaluation & Program Expansion.

RIDOT's ADA Program launched yet another self-evaluation in 2007, when FHWA requested an updated Transition Plan. RIDOT expanded the ADA Program with the designation of an ADA Transition Plan Manager, who began identifying, and assessing park-and-ride lots, maintenance facilities, train stations, rest areas/welcome centers, and other miscellaneous properties under RIDOT's jurisdiction,⁵ as well as coordinating a process for reviewing state-owned sidewalks and intersections. RIDOT also reached out to the GCD for input from their client agencies.

The ADA Transition Plan Manager also initiated review of all RIDOT manuals, specifications, and technical policies, using the ADA Accessibility Guidelines (ADAAG) as well as the proposed Public Right of Way Accessibility Guidelines (PROWAG) as standards. A wide sampling of federal / state transition plan related documents were also reviewed. Some of the documents reviewed included:

- The Department of Justice's ADA Best Practices Tool Kit for State and Local Governments
- Title 49 CFR – Part 27: Nondiscrimination on the Basis of Disabilities in Programs or Activities Receiving Federal Assistance
- The ADA Standards for Accessible Design (the ADA Standards)
- Uniform Federal Accessibility Guidelines (UFAS)
- The Title II Checklist
- The ADA Coordinator – Notice and Grievance Procedure
- FHWA's Desk Reference – Access for Individuals with Disabilities under Section 504 of the Rehabilitation Act
- FHWA's Technical Assistance Tools for State Transportation Agency (STA) Responsibilities
- The Americans with Disabilities Act Title II Technical Assistance Manual
- NCHRP – Accessible Pedestrian Signals – A Guide to Best Practices 2010
- 28 CFR Part 36 – ADA Standards for Accessible Design
- Sacramento County Department of Transportation ADA Transition Plan 2004
- Barden v. City of Sacramento 2004
- Connecticut Department of Transportation ADA Interim Transition Plan for Public Right of Way along State Highways 2008
- New Jersey Department of Transportation Self-Evaluation for ADA Implementation Plan 2008
- San Francisco Unified School District ADA Transition Plan 2002
- City of Topeka, Kansas Transportation Update 2007
- The NCHRP's "ADA Transition Plans: A Guide to Best Management Practices" May 2009

⁵ During the course of this Self-Evaluation, RIDOT discovered that it owned six airport properties operated by the Rhode Island Airport Corporation (RIAC). RIDOT also identified park-and-ride lots owned and operated by the Rhode Island Public Transit Authority (RIPTA). RIAC has subsequently included the airport properties in its Transition Plan; RIDOT has evaluated RIPTA's park-and-ride lots to determine whether barriers to accessibility exist.

During this timeframe, RIDOT continued to incorporate ADA improvements on all construction and reconstruction projects under various program funding categories,⁶ as well as to pursue dedicated ADA improvement projects as a subset of the Highway Program. The State of Rhode Island's Transportation Improvement Program (TIP) 2009 – 2012 describes RIDOT's ADA Program as follows:

ADA Program: Efforts to improve the compliance of Rhode Island's roadways pursuant to the Americans with Disabilities Act (ADA) are on-going. When roadwork of any nature is undertaken, the implementing agency must also bring roadways and walkways into compliance with the Americans with Disabilities Act standards. This may require the addition of wheelchair ramps and the relocation of utility poles for example. The cost of this work is included in the cost of the projects listed in the TIP. There are places where handicap accessibility along State roadways is necessary and the work cannot or should not wait for the roadwork to be programmed. The ADA line item in the TIP represents localized projects designed to make spot areas accessible, independent of roadwork. Project requests for work on existing sidewalks were received from communities through the proposal solicitation process done for previous TIPs. RIDOT works with the Governor's Commission on Disabilities to identify areas where ADA improvements are most needed. Funding for this program averages \$2.5 million per year.⁷

In 2008, FHWA requested that RIDOT create a project-specific reporting database to provide historic data regarding the Department's past ADA initiatives. RIDOT has created two such databases: one captures ADA improvements identified within the scope of engineering design projects; the second catalogues ADA compliance information relevant to construction projects.

Engineering Design Database

- Identifies specific ADA improvements (sidewalk alterations, curb ramp installations, APS modifications, etc.) within the scope of engineering design projects on a case-by-case basis.
- Provides historic information and details for projects initiated between 2006 and 2013

Construction Project Database

- Provides the number of curb ramps installed and linear feet of sidewalks improved on every construction project awarded between FY 2000 and FY 2013
- Indicates that RIDOT has installed 5,388 curb ramps and improved approximately 1,037,397 linear feet of sidewalk between FY 2000 and FY 2013

Additionally, RIDOT has tracked ADA improvements related to its Enhancement, Bicycle and Pedestrian, Transit and Congestion Mitigation/Air Quality Programs. A copy of the Americans with Disabilities Act Considerations and Compliance Report is attached in Appendix C.

⁶ The State of Rhode Island's Transportation Improvement Program 2009 – 2012 includes the following project funding categories: Administrative, Bicycle/Pedestrian, Bridge Improvement, Congestion Mitigation/Air Quality, Enhancement, and Highway.

⁷ Rhode Island Statewide Planning Program, TRANSPORTATION IMPROVEMENT PROGRAM 2009 – 2012 at 32-33.

II. SELF-EVALUATION: REVIEW & FINDINGS

As discussed above, RIDOT began its most recent self-evaluation in 2007. This evaluation differed from RIDOT's previous self-assessments in two respects: (1) unlike the self-evaluations undertaken in 1992 and 1998, RIDOT's most recent self-evaluation was not part of a multi-agency, statewide initiative; and (2) the most recent self-evaluation encompassed a broad assessment of RIDOT-specific services, policies and practices, as required by 28 C.F.R. § 35.105. The review process and findings are summarized below.

A. TECHNICAL REVIEW

1. Specifications, Standards, Manuals and Memoranda.

RIDOT, through its consultant, Green International Affiliates (GIA), reviewed its technical documents with reference to ADAAG and PROWAG to determine whether barriers existed that would limit full participation of persons with disabilities. Specifically, GIA reviewed the following documents:

- The Standard Specifications for Road and Bridge Construction (Blue Book)
- The RIDOT Standard Details
- The RIDOT Highway Design Manual
- The LRFD Bridge Design Manual
- The Traffic Design Manual
- The Design Policy Memoranda
- The "To All Consultants" Memoranda
- The CAD Standards Manual
- The Standard Symbols and Standard Notes Drawings
- The Work Breakdown Structure (WBS)

Upon completion of the technical review, GIA recommended modifications to various technical documents. The review recommendations are attached. RIDOT engineering staff along with the Transition Plan Manager assessed the review recommendations and modified its technical documents where warranted, as further described below.

Standard Specifications for Road and Bridge Construction

RIDOT has revised its specifications for Field Offices to protect RIDOT staff, contractor personnel, and members of the public who may visit an active field office looking for information. The revisions were approved by the RIDOT Specification Review Committee and were ultimately implemented. They read as follows:

For Field Offices:

Subsection 929.02.4; ADA Considerations - The Department is committed to providing equal access and opportunity for all persons in conjunction with Federal Law under Title I of the American's with Disabilities Act (ADA).

The United States Access Board defines a reasonable accommodation as; “a modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy an equal employment opportunity.”

In keeping with these directives, the Department will ensure that construction field offices will be accessible to anyone with a disability, and will also ensure that reasonable accommodation in a manner consistent with the ADA will be made to allow Department employees to be productive and efficient members of the Department's workforce.

Personnel may contact the Department's Human Resources Office with any reasonable accommodation requests.

For Field Labs:

930.02.1 ADA Considerations -The Department is committed to providing equal access and opportunity for all persons in conjunction with Federal Law under Title I of the American's with Disabilities Act (ADA).

The United States Access Board defines a reasonable accommodation as; “a modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy an equal employment opportunity.”

In keeping with these directives, those entities that provide field material laboratories utilized by Department staff shall ensure that said facilities provide reasonable accommodation to allow Department employees to be efficient and productive in their work. Reasonable accommodations shall be provided in a manner consistent with the ADA, and as found in similar working conditions in Department-owned facilities.

Entities that provide such facilities must demonstrate to the Department in advance that reasonable accommodations consistent with the ADA have been made available.

Personnel may contact the Department's Human Resources Office with any reasonable accommodation requests.

RIDOT continues to monitor its Standard Specifications for Road and Bridge Construction for ADA conformance, especially in light of the pending PROWAG guidelines.

RIDOT Standard Details

RIDOT continues to examine its current Standard Details and will either revise or create new details to become compliant with ADA guidelines. Several of the below details are a direct result of discussions held regarding changes to curb ramps. All of the following details have been instituted.

- **STD 7.1.1 3'-0" Precast Concrete Transition Curb**

This Standard was revised to provide a uniform 1:6 transition (this is associated with STD 43.4.0 below).

- **STD 7.1.3A High Side Transition Curb Length (Wheelchair Ramp Transition Curb Chart)**

This is a new chart that was developed for the determination of transition length (high side) based on the running grade of the roadway

- **STD 7.1.9 Precast Concrete Ramp Stone**

This Standard was revised to change the ramp width to 4'-0" minimum

- **STD 7.3.9 Granite Ramp Stone**

This Standard was revised to change the ramp width to 4'-0" minimum.

- **STD 15.1.1 Setting and Mounting Dimensions for Rural Mailbox**

This is a new Standard Detail was developed to show the pedestrian access route when rural mailboxes are employed (this is associated with STD 15.1.0 – Post and Mounting for Rural Mailbox and STD 15.2.0 – Post and Multiple Mountings for Rural Mailboxes) .

- **STD 31.1.0 Chain Link Fence 3'-0" to 4'-0"**

This Standard was revised to provide a 4'-0" clear opening.

- **STD 31.2.0 Chain Link Fence 5'-0" to 6'-0"**

This Standard was revised to provide a 4'-0" clear opening.

- **STD 43.1.0 Cement Concrete Sidewalk**

This Standard was revised to supersede the sidewalk measurement from the face of curb to the back of curb. Sidewalk width is 5'-0" not including curb.

- **STD 43.2.0 Bituminous Concrete Sidewalk**

This Standard was revised to change the sidewalk measurement from the face of curb to the back of curb. Sidewalk width is 5'-0" not including curb.

- **STD. 43.3.0 Wheelchair Ramp**

This Standard was revised to include element names (ramp landing, transition, flare), and also changed ramp width to a 4'-0" minimum.

- **STD. 43.3.1 Wheelchair Ramp for Limited Right-of-Way Areas**

This Standard was revised to add curb or transitions as required for earth support, and also changed ramp width to a 4'-0" minimum.

- **STD 43.4.0 Driveway Development for 3'-0" Transition Curb**

This Standard was revised to change the detail to reflect STD 7.1.1 - 3'-0" Precast Concrete Transition Curb.

- **STD 43.5.0 Cement Concrete Driveways**

This Standard was revised to change the detail to reflect STD 7.1.1 - 3'-0" Precast Concrete Transition Curb.

- **STD. 48.1.0 Detectible Warning Panel Placement**

This new Standard was created to change its title and add a limited access wheelchair ramp.

RIDOT continues to monitor its Standard Details for ADA conformance, especially in light of the pending PROWAG guidelines.

LFRD Bridge Design Manual

This manual was reviewed by our Bridge Engineering Section for initial compliance with ADA and no revisions were required; however due to the nature of this manual and the impending PROWAG guidelines, continued assessment of this document will be required.

Design Policy Memoranda

Upon review by engineering staff, it was revealed that no initial changes were required. However, the nature this type of memo depends on design changes or innovations. In that light the proposed PROWAG guidelines are expected to impact ADA design policy guidance that may necessitate changes in the future.

“To All Consultants” Memoranda (TAC)

Upon review by engineering staff, it was revealed that no initial changes were required. However, the nature of this type of memo depends on design changes or innovations. In that light the proposed PROWAG guidelines are expected to impact ADA design policy guidance that may necessitate the issuance of TAC memos in the future

CAD Standards Manual

Upon review it was determined that the RIDOT CAD Standards could be revised to take into account the required information to determine whether the existing or proposed ADA features such as handicap ramps, sidewalks, and pedestrian poles are compliant. The revisions will be accomplished by creating unique block objects for the ADA specific features. The objects will contain attributed information such as button height, clear zones, and other data to determine whether a feature is compliant with the corresponding ADA standards. This information will be extracted and input into a database to assess areas that may require work to be done to meet the standards. The features will also be placed on unique layers to help identify where they exist. It is unclear at this moment if the implementation of PROWAG will cause any revisions to be made to this document.

Standard Symbols and Standard Notes Drawings

Within the body of the CAD Standards Manual narrative above it discusses “block objects” for ADA features. These block objects can be considered as “symbols.” Our current plans already have ADA Standard Notes where applicable. It is unclear at this moment if the implementation of PROWAG will cause any future revisions to these items.

The Work Breakdown Structure (WBS)

The WBS, a spreadsheet used by prospective consultants to outline proposed work-hours associated with design tasks, is a tool that assists RIDOT in evaluating the level of effort required for each design project. Review of the WBS indicated that no ADA-related changes were necessary. It is not anticipated that the implementation of PROWAG would cause any revisions to be made to this work effort spreadsheet.

2. Policies and Practices

Technical Infeasibility Determination Policy

As part its self-evaluation it was determined that RIDOT did not have a satisfactory in-house way to handle instances when ADA design standards could not be met when they were deemed to be technically infeasible. “Technical Infeasibility” is defined with respect to an alteration of an existing element that has little likelihood of being accomplished because 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 that are necessary to provide accessibility.

An antiquated process of letter writing between project managers and their supervisors was the norm for many years. It was discovered that there were no clear, concise, guiding principals to instruct RIDOT project managers as well as our consultant partners, in a better administered procedure which outlined conditions, situations, and proper steps necessary to document a potential design waiver of ADA guidelines.

In March of 2010 following guidance from the FHWA, the Transition Plan Manager began researching the concept of preparing a technical infeasibility determination policy. During this time period, the approved policy prepared by the Maryland State Highway Administration was discovered and studied for similarities in its general project approach with that of RIDOT. Finding similar concepts, a draft RIDOT policy mimicking the Maryland document was prepared which showed examples of possible design / construction situations where ADA compliance could not be met. The draft also provided a step-by-step waiver process to be followed.

An initial committee was formed by the Transition Plan Manager in June 2010 which included representatives from our Highway, Traffic, and Bridge Engineering Sections, as well as our Intermodal Planning / Enhancement Group. The RIDOT Deputy Chief Engineer was also added to this committee. Multiple meetings were held with this core group which was later expanded to include a representative of the Environmental Unit and representatives of the Cultural Resources / Historical Unit. These meetings and subsequent document revisions continued intermittently until August of 2011 when the committee decided to stop the process in order to consider the impact of what was thought to be the imminent implementation of the PROWAG guidelines.

With the PROWAG guidelines being deferred due to an extension of the comment period, the process of drafting the RIDOT policy began again in earnest in December 2011. In late January 2012 the 5th revision of the draft policy was completed. In February the final draft was approved by the RIDOT Chief Engineer and Deputy Chief Engineer, and concurred upon by the Transition Plan Manager before being forwarded to the Director of Transportation for review and concurrence. A review by the Office of Legal Counsel produced several clarifications which were incorporated into the document before finally being signed by the Director.

It was always RIDOT's intent to hold training sessions with its project management staff once the policy was approved to ensure understanding and answer any questions. The Transition Plan Manager and Deputy Chief Engineer hosted a class for all senior managers representing Highway, Traffic, and Bridge Engineering, Construction Operations, Intermodal Planning / Enhancement Group, Materials, Maintenance, Environmental, and Cultural Resources / Historic areas. Future sessions were to be scheduled with individual groupings of each discipline, and also sessions would also be extended to RIDOT's consultant partners. This is explained further under Section III, B, and "ADA Training."

On May 14, 2012 the RIDOT Technical Infeasibility Determination Policy was officially "formalized" when distributed to our consultant partners working with the Department via "TAC 0198" ("To All Consultants"). This formal memo became effective immediately to the outside engineering community as well as all RIDOT staff on that date.

Detectible Warning Surfaces (DWS)

While reviewing neighboring state transportation agency transition plans it was discovered that the State of Vermont in 2006 had finalized a study on Detectible Warning Surfaces (DWS). The Vermont study was a multi-year effort that compared the effect of harsh winters on the various materials utilized in the manufacturing of DWS. Following a vote taken by the RIDOT ADA Committee, the Transition Plan Manager formally requested that RIDOT Highway Engineering undertake a similar study.

During the summer of 2010 and extending into the fall of that year, a team of engineering interns under the direction of a highway engineering supervisor set out to study the condition of hundreds of DWS which were installed during construction projects undertaken between 2002 and 2008. The materials studied included polyurethane and other forms of plastics and resins. The RIDOT study and its findings resulted in a newly issued Standard Specification recommending that only cast-iron DWS be utilized in the future. Implementation of the new DWS specification on several construction projects has been successful. The new DWS are now considered ADA-friendly and will not rip, tear, or lift, nor will they cause a tripping hazard to pedestrians.

Sidewalk Maintenance

Rhode Island law obligates municipalities to maintain sidewalks along state highways; this duty extends to those sidewalks constructed using federal funds, and includes responsibility for snow and ice removal. Additionally, when RIDOT constructs or funds transportation improvements, it enters into “Construction and Maintenance Agreements” (C&M Agreements) with municipalities to clarify that the municipality is responsible for maintaining federally-funded improvements upon completion of the project.

Notwithstanding these obligations imposed by law and under contract, the RIDOT Maintenance Division in 2011 hosted a series of meetings with public works officials from the 39 cities and towns to discuss items pertinent to maintenance issues. Included in these discussions was the issue of snow removal from sidewalks.

Recognizing ADA requirements, the Transition Plan Manager attended these meetings to remind the officials of their responsibilities as subrecipients, and spoke specifically on the maintenance requirements of 23 U.S.C. § 116 that apply to all transportation facilities constructed with federal funds, and 28 CFR § 35.133 which states that a public agency must maintain its walkways in accessible condition for all pedestrians, including persons with disabilities, with only isolated or temporary interruptions in accessibility. It was explained that reasonable efforts to not only remove snow but also debris from sidewalks was vital to allowing safe travel for all pedestrians. In accordance with Rhode Island Statutes § 24-8-15 entitled “Snow and ice removal –Notice of defects.” (a) Every town or city shall at its own expense keep state roads within its limits, respectively, sufficiently clear of snow and ice so the roads shall be reasonably safe for travel as now required by law, and shall at once notify in

writing the director of transportation or his or her employees of any defect or want of repair of state roads within its limits.”

Additionally RIDOT added language to its C&M Agreement boilerplate to now reflect the maintenance of pedestrian facilities. The new language states, “Upon completion of the Project, the Municipality will: (a) maintain the road altered during construction of the Project within the State Right-of-Way in conformance with Chapters 24-8, Section 24-8-15 Title 24 of the Rhode Island General Laws and maintain in conformance with 23 U.S.C. § 116 and ADA/Section 504 requirements, all pedestrian facilities built with federal funds under this Agreement. This maintenance obligation includes reasonable snow and ice removal efforts, allowing only temporary interruptions in service or access.”

B. REVIEW OF PHYSICAL AND COMMUNICATIONS BARRIERS

In addition to the review of technical barriers discussed above, the Department undertook a review of physical and communications barriers to accessibility, including utility obstructions, issues related to sidewalk maintenance, and RIDOT’s means of communicating with members of the public. Included in the guidance documents reviewed to assist with determining these barriers were The DOJ’s “ADA Best Practices Tool Kit for State and Local Governments” (Chapter 3 – General Effective Communication Requirements under the ADA) and the FHWA’s Technical Assistance Tools for State Transportation Agency (STA) Responsibilities, and the DOJ’s ADA Technical Assistance Manual – Title II (Disabilities Rights Section) 2001.

1. Location of Utility Facilities and Appurtenances / Utility Accommodation Policy

In an effort to combat the practice of placing utility facilities and appurtenances in the middle of accessible paths, the Department is drafting a *Utility Accommodation Policy (UAP) that will address accessibility issues and obligate utility companies to maintain a minimum clear passage consistent with applicable ADA guidelines.

The Draft UAP has been approved by RIDOT Legal Counsel, the Chief Engineer, Deputy Chief Engineer, and the Administrator of Highway & Bridge Maintenance. The Director approved the document in February, 2014. RIDOT is expected to convene a “summit meeting” with the local utilities to review the document prior to its implementation.

A projected timetable for implementation of this policy is as follows:

- Utility Summit Meeting Approximately April/June, 2014
- Implementation of Policy Approximately August, 2014

* The Utility Accommodation Policy is not a required element of the Interim Transition Plan, however it demonstrates the Department’s desire to include ADA provisions within every policy (if warranted).

2. www.dot.ri.gov.

The Department's website is listed as "508 Approved." All videos posted on the RIDOT website are hosted by the "You Tube Channel," with links from our site to the videos. RIDOT Communications staff has assured that our videos on You Tube are caption-enabled for the hearing impaired.

3. ADA-compliant Telephone Services

RIDOT has reviewed its ability to communicate telephonically with hearing-impaired persons. After consultation with the Rhode Island Commission for the Deaf and Hard of Hearing (RICDHH), RIDOT learned that Rhode Island Relay, also known as 7-1-1, is replacing TTY/TDD technology. Rhode Island Relay/711 is available on any RIDOT telephone. The Transition Plan Manager has met with a representative of the Rhode Island Relay to inquire on the manner in which employees should be speaking if a 7-1-1 call is received. The Transition Plan Manager discussed his findings and shared the recommendations for interfacing with a 7-1-1 caller with Customer Service staff. It is this staff that is at the forefront of phone calls generated by the public. Informal training on this form of communications has also occurred with other RIDOT staff, and will continue until all staff understands the 7-1-1 process. In addition the Transition Plan Manager remains in regular email contact with the RICDHH in order to be kept abreast of any developments which may affect RIDOT and its mission.

4. Accessible Public Meetings

As part of its self-evaluation process, RIDOT has evaluated its Public Meeting protocols to ensure that the Department (1) holds all public meetings at venues that are accessible to disabled persons, and (2) provides appropriate aids and services leading to effective communication for qualified persons with disabilities. Additionally, RIDOT has reviewed the FHWA's guidance regarding Managed Travel for Planned Special Events, which addresses the efficient movement of pedestrians near public events.

Enlisting the assistance of the GCD, RIDOT received an approved list of statewide accessible locations that would be acceptable for RIDOT to conduct future public meetings. The list included over 50 municipal sites such as Town Halls, Libraries, Middle Schools and High Schools, Senior Centers, Municipal Courtrooms, School Administration Buildings, as well as meeting rooms located within Police or Fire Departments.

Included in a second GCD list were eight (8) State of Rhode Island facilities which each had multiple spaces able to accommodate public meetings. Some of these venues included the Rhode Island State Capitol Building, Rhode Island College, the University of Rhode Island, and the Community College of Rhode Island. Also listed were conference rooms located at two Courthouses – The J. Joseph Garrahy Complex in Providence and the South County Courthouse in Kingston. Multiple spaces were also available within the large Pastore Complex in Cranston.

The Transition Plan Manager with the assistance of several interns visited each municipal locale to see if their meeting spaces were large enough to accommodate the audience size historically encountered

whenever RIDOT holds a public meeting. During these visits RIDOT also ensured that each location was equipped with assistive listening devices for the hearing impaired. The survey eliminated a number of smaller venues such as multiple fire district headquarters and small libraries.

In an effort to provide disabled members of the public full access to RIDOT public meetings, and in response to the suggestions from members of the GCD's Accessibility Committee, the Transition Plan Manager decided that RIDOT should develop an in-house "Public Meetings Catalogue" that would be based on the remaining acceptable municipal sites. *Once completed this catalogue will include detailed descriptions and marked-up photos of each location and will identify each locales accessible features such as handicapped parking, wheelchair ramps, elevators, the availability of assistive listening devices, rest rooms, etc.

The catalogue will be made available to all RIDOT Project Managers as well as our Customer Service staff to be utilized whenever a project requires a public meeting. It is anticipated that the descriptive information for each specific location will then be made part of the public meeting notice and distributed to all interested parties. It is also anticipated that the catalogue will be made available on the RIDOT website.

In addition to the catalogue, the RIDOT Customer Service staff has created a "Public Hearing Checklist" (attached) to be followed whenever a public meeting is being scheduled. The items on this comprehensive list give Project Managers an "ABC" approach to scheduling a public meeting. Included in this list are reminders such as: determining presenters, identifying the meeting location, advertisement information, public mailing list information, police and fire support, ADA compliance items, open meeting requirements, letters to appointed officials, audio visual needs, court reporting needs, signage, etc. This checklist will be utilized in conjunction with the public meetings catalogue to ensure that all public needs are accommodated.

* Below is a projected timetable as to when the in-house Public Meetings Catalogue should be completed:

- Re-visiting of selected venues: April/May, 2014
- Preparation of marked-up photos, location descriptions, etc: July, 2014
- Compilation of information on each venue and catalogue preparation: September, 2014
- Submittal of completed catalogue to RIDOT staff: November, 2014

5. Curb Ramps

The RIDOT ADA Curb Ramp Schedule will be based on a multi-year data collection effort which began in the mid-1990's with what was then described as a sidewalk inventory of state-owned roads located within the 39 cities and towns. At that time RIDOT hired three consulting firms to physically survey and ascertain the condition 1,100 miles of streets, excluding ramps and divided highways, which were located in the public right-of-way.

Several years into this effort a poor economy forced two of the three firms initially hired to go out of business, temporarily halting the inventory. Following a consultant selection process, two new firms were selected to work with the remaining original firm to continue the inventory process, but shortly thereafter economic conditions slowed the project to a point where work became intermittent, and before long all work was ultimately halted.

The FHWA requested RIDOT to prepare a Curb Ramp Schedule as a major focal-point of its Transition Plan. The goal was to produce a schedule to provide safe and usable pedestrian facilities for all people, especially those with disabilities, and to assure compliance with federal guidelines. Once completed the schedule would outline RIDOT's process for improving and/or installing curb ramps as well as other sidewalk improvements necessary to achieve programmatic accessibility for the disabled. The schedule, expected to be carried out over a series of years, would also include cost estimates.

The Transition Plan Manager believed that the requirement of a Curb Ramp Schedule could be accomplished by studying the data found in the sidewalk inventory. Following internal discussions on the subject, RIDOT engineering agreed that only upon revitalizing and completing the stalled inventory data collection and study could a schedule be created. RIDOT began meeting with the three consulting firms to assess where each firm stood with relation to completing their portion of the inventory. Those firms were Bryant Associates, Incorporated ("Bryant"), Green International Affiliates ("Green"), and the Maguire Group ("Maguire"). During the course of these meetings, RIDOT also invited the Turino Group ("Turino") to attend. Turino was the firm whose responsibility it was to "house" all of the data submitted by the inspection firms and to create a sidewalk database for RIDOT.

It was explained during these first meetings that RIDOT would like to take the data previously collected and gear the database toward ADA compliance. Numerous meetings were held between the four consulting firms and RIDOT staff from our Highway and Traffic Engineering Section's, our GIS office, and the Transition Plan Manager to decide how the data would be presented. Besides ensuring that proper ADA guidelines (ADAAG) were being followed, it was decided that we should also keep an eye toward the still pending PROWAG guidelines. One problem that needed to be rectified was that the three inspection firms did not always record the data in the same manner. This seemingly minor issue if not recognized would have been a major setback. The three firms worked with Turino to ensure that all data collected was done so in a similar manner. During this period the Transition Plan Manager kept the FHWA periodically informed as to the progress of the inventory.

RIDOT decided to include a companion database, a "Traffic Signal Inventory" to the now burgeoning sidewalk inventory. That new database includes 800+ signalized intersections in Rhode

Island. The inventory and its newly developed “Traffic Signal Inventory Form” are discussed in greater detail in the “Accessible Pedestrian Signal Policy” located in “Section III, A”.

Once RIDOT was informed that all of the reports associated with the sidewalk inventory were completed, Turino began to further elaborate on the information presented by the three inspection firms, and the database grew from “stand alone access databases” to now include “Google” and GIS mapping, as well as other interactive features never envisioned when the project initially started. This transformation from a “Microsoft Access Database” to a “SQL Database” was accomplished over a series of months.

In late 2011 the FHWA informed RIDOT that a submission date of May 31, 2012 had been set for the Transition Plan. At this time, RIDOT was in the process of conducting multiple in-house meetings to ascertain the true status of the sidewalk data to see if the curb ramp schedule could be developed on time (this was necessary due to the vast amount of data to be evaluated). Representatives from Turino also took part in these meetings. It was during this period that RIDOT learned of a new wrinkle that could further delay the establishment of the multi-year schedule. That wrinkle was a requirement by the State of Rhode Island’s technology arm, “DoIT” which had final say over any/all new “IT” software being considered by the State. Being that Turino’s database was custom made, the State did not have any comparable software to align itself to. To move any further with the project, RIDOT would first have to appear before DoIT’s “Performance Review Committee” (*PRC) to explain the project, its purpose, proposed outcome, cost, and most importantly what type of software would be required once the data was transferred and maintained by RIDOT. Compounding matters was the fact that a very detailed PRC approval request form was required before a review meeting could be scheduled.

Turino immediately began working with RIDOT Management Information staff to compile all of the technical data required for presentation, however with a May 31st deadline getting ever closer, and the new requirement of obtaining the approval of the PRC still several weeks away, RIDOT decided to take a different direction. In April, following meetings between RIDOT Planning and Finance, Engineering, and Administration staffs as well as the Transition Plan Manager, it was decided to submit an “ADA Project Schedule” based on RIDOT’s approved Transportation Improvement Plan (TIP). The TIP which listed and scheduled projects between fiscal years 2013 to 2016 was enhanced to highlight all ADA-related work that would be accomplished within each project. The expected ADA work included accessible sidewalks, curb ramps, the inclusion of detectable warning surfaces, and in some cases crosswalks and the installation of APS. It was decided that RIDOT would call this “modified TIP,” Phase I of a two-part submission. It was envisioned that Phase II would consist of the actual Curb Ramp Schedule.

The Phase I submission was enhanced by vetting it in a public forum by the Governors Commission on Disabilities Accessibility Committee. During this forum, Accessibility Committee members lauded RIDOT for its efforts to include ADA-related items in as many projects as possible.

In late May 2012 RIDOT submitted the “Interim ADA/Section 504 Transition Plan” (Interim Plan) to the FHWA for review and approval. By August the FHWA provided detailed comments on the Interim Plan, including productive dialogue on curb ramps.

In October 2012 several meetings were held between RIDOT Highway and Traffic Engineering, GIS, the Transition Plan Manager and the FHWA to discuss an outline to follow in order to produce the comprehensive curb ramp schedule. One of the fundamental ideas that came of these meetings was that RIDOT needed to provide a “methodology” on how it would decide which sidewalks and curb ramps would be eligible for inclusion in a schedule, as well as how this methodology would relate to the rest of RIDOT’s decision making process on its overall program.

During these meetings RIDOT engineering agreed with suggestions to consider the following criteria as a “starting point” for organizing, analyzing, and prioritizing its curb ramps (it is assumed that further discussion will refine the types of criteria RIDOT would ultimately utilize).

The data would be divided into groupings:

- Group 1: government facilities (including schools)
- Group 2: elderly facilities, hospitals, transportation facilities (such as bus stops, etc.)
- Group 3: emergency shelters
- Group 4: sidewalks that serve other areas (a/k/a sidewalks to “nowhere”) and curb ramps with inaccessible sidewalks
- Group 5: priorities provided by the Governor’s Commission on Disabilities and/or advocacy groups (via the public participation plan)

Suggested technical criteria to be analyzed under each grouping may include:

- pedestrian crossings at intersections with no curb ramp
- pedestrian crossings with no curb ramps
- curb ramp slopes in excess of 8.33%
- curb ramp landings in excess of 2% (cross slopes)
- curb ramps with no or inadequate level landing

RIDOT decided that the evaluation criteria should be discussed with the three ADA Consulting firms and Turino. A joint meeting was held with all parties to discuss the criteria, the curb ramp

methodology, and the curb ramp schedule. It was then deemed that this group of individuals would be known as the “ADA Team” and would meet on a regular basis until the schedule was complete.

During deliberations the ADA Team decided that the evaluation criteria initially suggested by the FHWA would be revised and a series of evaluation “weights” would be assigned in order to provide a priority ranking system. As a result of multiple meetings the following criteria, weights, and location identifiers were established:

| WEIGHTS FOR THIS ANALYSIS | |
|-------------------------------------|----|
| 1 - Curb Ramp | 20 |
| 2 - Obstructions | 11 |
| 3 - Landing Area | 7 |
| 4 - Slope (8.33%) | 6 |
| 5 - Grade Change at Joint (> 0.25") | 3 |
| 6 - Detectable Warning System | 3 |

| RATINGS |
|---|
| 0 represents clear failure to meet the standard |
| 1 represents a near compliance, serviceable to a portion of the target user group |
| 2 represents compliance to the standard |

| | Category/Rating | 0 | 1 | 2 |
|---|-----------------------------------|---|---|---|
| 1 | Curb ramp | not present | | present |
| 2 | Obstructions | vertical (pole, hydrant, etc.) in landing or ramp | “at grade” (manhole cover, etc.); vertical in flare | none |
| 3 | Landing Area | The shorter dimension of the landing depth or width less than 3 feet. | The shorter dimension of the landing depth or width between 3 and 4 feet. | The shorter dimension of the landing depth or width 4 feet or higher. |
| 4 | Slope (ramp running slope) | over 10% | 8.34 to 10% | 8.33% or less |
| | (cross slopes) | over 3 % | Between 2% and 3% | 2% or less |
| 5 | Grade Change at Joint | present | | none |
| 6 | Detectable Warning System | none | present, but damaged | present |

| LOCATION MULTIPLIER | EXAMPLES | | | CODE | WEIGHT |
|---------------------|----------|--|--|------|--------|
|---------------------|----------|--|--|------|--------|

| | | | |
|--|--|---|------|
| Busy Pedestrian Area | Government facilities, Transportation nodes (bus stops, etc.), Employment and Business centers | A | 0.9 |
| Moderate Pedestrian Area | Elderly facilities, Some suburban retail areas | B | 0.94 |
| Light Pedestrian Area | Rural but developed areas, with few trip origins | C | 0.98 |
| Rural Pedestrian Area or Other Unspecified Factors | Areas with limited connectivity and sparse trip generators | D | 1.0 |

Based on the above indicators only a score of 100 would deem a location to be fully compliant. Evidence of no curb ramps at a location would automatically earn the site a score of “0.” The above “formula” was “beta tested” by all three firms and found to be acceptable. It was then approved by RIDOT engineering. Although some of the possible scoring numbers may change, the format will remain the same. It was felt that public input would be solicited once a priority listing was completed. Revisions to this listing would then follow.

Please see Section III, C, “Curb Ramp Schedule Methodology” for further explanation of the curb ramp process and further explanation of the PRC review process. See Section III, D, “Placeholder for Curb Ramp Schedule” for a projected curb ramp schedule timeline.

6. Survey of RIDOT Facilities

When the Department launched its most recent self-evaluation in 2007, the ADA Transition Plan Manager began identifying and assessing ADA accessibility of transportation facilities under RIDOT’s jurisdiction.

The Transition Plan Manager initially identified 52 facilities, including park-and-ride lots, maintenance facilities, train stations, rest areas/welcome centers, and other miscellaneous properties. However, upon further investigation RIDOT determined that it no longer operated several facilities, such as six airport properties and the Newport Gateway Transportation and Visitors Center.

RIDOT thereafter inspected the remaining facilities, including eight Rhode Island Public Transit Authority (RIPTA) Park-and-Ride Lots, using the ADAAG Checklist for Buildings and Facilities. Architects hired by the GCD also inspected fifteen RIDOT-owned Park-and-Ride lots and prepared engineering and construction estimates for those facilities. This was done because the GCD intended on issuing an ADA Bond that would ask voters to approve funding solely to make ADA-related repairs to state-owned facilities statewide. RIDOT was proactive and decided to make improvements to its park-n-ride lots without waiting for voter approval.

It was the initial intent to add work to existing contracts that were in the vicinity of each of the lots. Efforts were undertaken by RIDOT engineers to do just that however in February 2013 RIDOT applied for a Federal Transit Administration (FTA) New Freedom Grant through a RIPTA solicitation with an eye toward being able to make ADA improvements to several of the neediest lots. One of the criteria for being eligible for this FTA grant was that any ADA improvements would have to be associated with public transportation. RIDOT was recently informed that our grant application was successful and plans are currently being made to make ADA improvements to twelve of the park-n-ride lots. It is expected that work on these lots will begin during either the 2014 / 2015 construction seasons. The lots that to receive improvements are:

- Taunton Avenue Park and Ride (Route 44), East Providence
- Richmond Park and Ride (Route 138) Exit 3, Richmond
- Franklin Street Park and Ride, Warren
- Fish Road Park and Ride, Tiverton
- Route 3 and I-95 Park and Ride (Main Street), Hopkinton
- Route 138 and Route 1A Park and Ride, North Kingstown
- Hopkins Hill Road Park and Ride, Exit 6a, West Greenwich
- New London Turnpike Park and Ride, West Greenwich
- Route 117 Park and Ride, Warwick.
- Grace and George Streets Park and Ride, Pawtucket
- Grace and Pine Streets Park and Ride, Pawtucket
- Barrington Congressional Church Park And Ride, (County Road), Barrington

It should be noted that a priority order determining which lots will be repaired first will be discussed with RIPTA and will also be based on environmental justice guidelines.

With regard to rail, Amtrak representatives and their architects accompanied by RIDOT staff inspected the state's two active historic train stations—Kingston Station and Westerly Station. The available inspection records and accompanying photographs and documents are included.

7. Process for verifying ADA Alterations

RIDOT's process for verifying that ADA alterations have been made is the long-time practice of conducting a final inspection of each construction project. This process, coordinated by the RIDOT Monitoring & Finalization Unit, involves a team of RIDOT staff from various disciplines physically "walking" each project and documenting any deficiencies encountered. Following each inspection, a report is obtained from each participating discipline, with all reports being compiled and distributed by the Resident Engineer to the Contractor. (The Unit was created in December of 2008 by merging the Office of the Inspector General and the Finals Section and it assumed the responsibilities granted RIDOT under the Oversight Agreement for Federal-Aid Projects entered into by the two agencies, RIDOT and the FHWA, dated August 30, 2006).

The Monitoring & Finalization Unit is responsible to review and verify all financial payment documentation as well as other specified contractual submissions on ongoing construction projects.

Closeouts, final inspections, and project finalization also fall under the jurisdiction of the Unit. Additionally, where project oversight has been delegated to RIDOT, this Unit assesses accountability, performs reviews and interim field inspections of ongoing construction projects (including ADA alterations), and accompanies FHWA on field reviews of construction operations when appropriate and agreeable.

If any deficiencies are found, the general contractor will be notified in writing to address any and all irregularities to ensure ADA compliance. The Resident Engineer must then ensure that all of the deficiencies have been corrected satisfactorily before any final payments can be made. This Resident Engineer will then document that all items have been corrected. The initial report as well as the follow-up report is then distributed department-wide by the Monitoring & Finalization Unit. It is by this process that RIDOT will be able to verify that each instance where further ADA work was required was in fact corrected. This information will then be placed into a database.

III. Plan to Modify and Implement Compliant Procedures, Policies & Specifications

Based on the findings of RIDOT's most recent self-evaluation, RIDOT plans continued modifications to technical documents to address potential barriers to accessibility. The Department also plans to conduct ADA trainings for agency staff on a regular basis.

A. REVISIONS TO TECHNICAL DOCUMENTS

1. Specifications, Standards, Manuals and Memoranda

As discussed in Section II above, RIDOT's consultant recommended modifications to various technical documents. The Department plans to revise the RIDOT Standard Details, the RIDOT Highway Design Manual, and the Traffic Design Manual as described below.

RIDOT Standard Details

RIDOT is currently designing a new Standard Detail with the working title, "Pedestrian Channelizing Device" that will allow sight-impaired individuals that utilize white canes to be "channeled" around hazards / construction work. The new Detail is expected to call for interlocking panels that will be low enough to the pavement to allow detection by walking sticks. The top of these panels will be smooth and act as a non-weight bearing rail. As a companion to this Detail, RIDOT will also be creating a new specification. Both documents must be presented and approved through the RIDOT Specifications Review process and also concurred upon by the FHWA before implementation.

A projected time frame encompassing the design, review, and implementation process should have this new Standard Detail (and Specification) become effective by September, 2014.

RIDOT Highway Design Manual

RIDOT added the language below to its Highway Design Manual as it relates to critically evaluating sidewalks at all stages in development. The new language is included in all scopes of work by reference:

“All projects shall be critically examined at all stages of development (DSR through PS&E) for the opportunity to provide new or improved pedestrian access. The designer must comply with the most current Americans with Disability Act Accessibility Guidelines for Public Rights-of-Ways to the greatest extent possible, unless an exception is warranted, requested and approved. All exceptions shall be in accordance with the RIDOT Technical Infeasibility Policy. A pedestrian access route (PAR) is defined as a continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility. Deviation from the above is not acceptable.”

Sidewalks shall be designed to meet or exceed the following standards:

Clearance Width: Minimum ADAAG clearance of 36 inches, excluding the curb width, shall be maintained to provide an accessible route. Sidewalks constructed as part of a new road or road reconstruction shall follow best practice and strive for a minimum clearance of 48 inches.

Cross slope: Cross slopes on sidewalks shall be 2 percent maximum.

Surface: The surface of the pedestrian access route shall be firm, stable, and slip resistant. Castings for access to hand holes or other underground structures shall also have a slip resistant surface.

Surface Discontinuities: Surface discontinuities shall not exceed ½-inch maximum. Discontinuities between ¼ and ½ inch shall be beveled at a rate of 1:2 minimum. Greater differences shall be treated as a ramp.

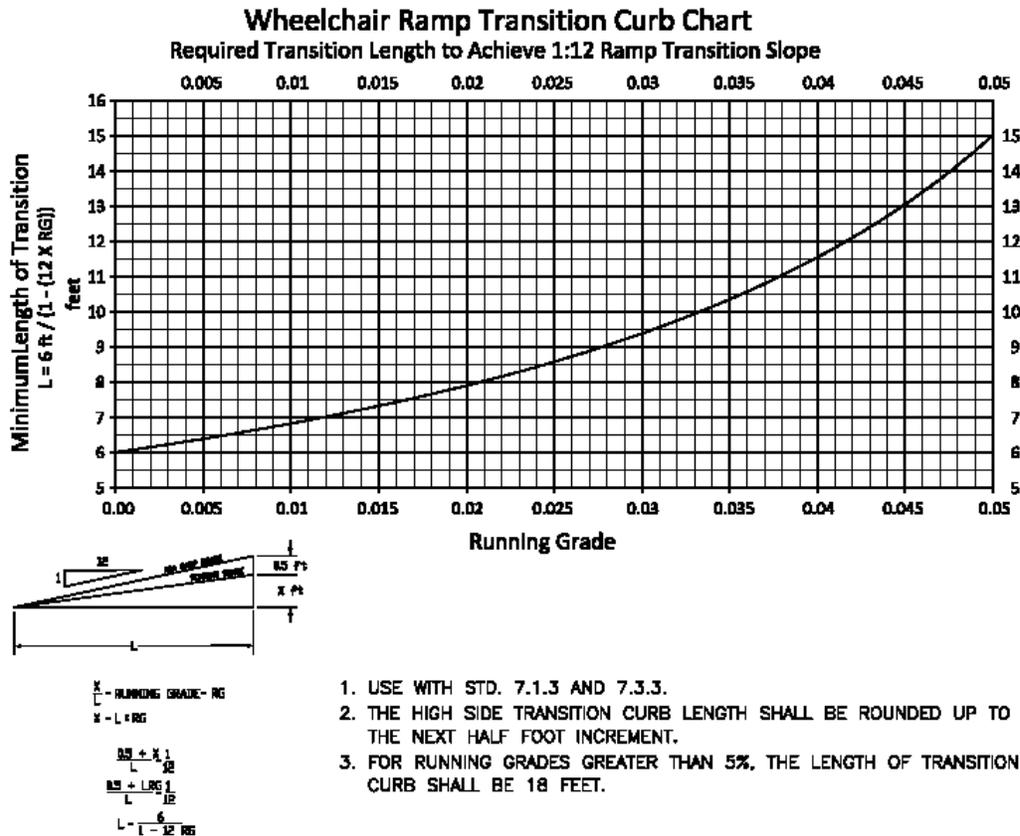
Accessible sidewalks shall be provided with curb ramps at all cross walks. Curb ramps shall meet the following standards:

Running Slope: The running slope shall be 5 percent minimum and 8.3 percent maximum; provided however, it shall not require the high side transition length to exceed 15 feet.

Width: The minimum width where the ramp meets the gutter grade shall be 48 inches exclusive of the flared sides. Ramp width should consider the anticipated pedestrian volume. The ramp stone call out shall denote the ramp stone width.

Landing: A landing area shall be provided at the top of the curb ramp. The landing shall be a minimum of 48 inches deep (to back of sidewalk) and shall be as wide as the curb ramp exclusive of the flared sides.

Transitions: The low side curb transition will not exceed 8.3% (1:12); the high side curb transition length shall be up to 15 feet as determined by the roadway running grade.



Detectable Warning Surfaces: Detectable warning devices shall be provided at all curb ramps. The detectable warning devices are to have color contrasting to the color of the sidewalk.

Ramps should be located to ensure that proper sight distance is provided for a motorist to see someone waiting to cross, particularly a person confined to a wheelchair.

The Designer shall layout curb ramps, including landing areas and approach sidewalk transitions to ensure the PAR is clear of all obstructions that may create an accessibility issue or reduce the sight distance of the motorist. These obstructions include but are not limited to utility poles, light poles, traffic signal poles, controller cabinets, fire hydrants and bus shelters, etc.

Curb ramps should be placed to avoid low gutter points. Catch basins should be placed on the up-gradient side of all curb ramps.

Contract plans shall address the employment of alternate circulation paths with a Temporary Pedestrian Access Routes (TPAR) to allow for ADA continuity during construction or construction phasing. TPARs should incorporate temporary ramps within the road when a TPAR is of a short duration that would not warrant constructing a ramp within the curb and sidewalk.”

The following was taken from “Appendix HDM9A” of the Highway Design Manual:

“When a jurisdiction (city, town, utility, etc.) alters an existing facility or part of a facility, the altered area must be accessible to and usable by people with disabilities to the maximum extent practical.

Alteration is described as a change that affects or could affect access to or the usability of a facility or part of a facility. These include roadways, park-n-ride lots, rest areas, buildings, sidewalks and curb ramps.

That is, if a jurisdiction alters an existing facility or a part of a facility, the altered area must be accessible to and usable by people with disabilities to the maximum extent practical. If a roadway, for example, is widened and the existing sidewalks are impacted, the sidewalks and other appropriate pedestrian facilities must be replaced and must meet full ADA compliance.

What is an alteration? What is an activity? Why are they different when viewed through ADA accessibility? The DOJ and DOT (FHWA) met during 2012-2013 to clarify the work associated with each activity. This was done in a “desire to provide clarity and consistency.” The lists that follow are based on “feedback (comments/questions) from States, local governments, disability rights advocates, citizens” and “educated by public perception of scale of road work (i.e., heavy equipment, truck numbers, crew sizes, time)”.

1. Maintenance type of work activities do not typically require addressing non-compliant ADA accessibility. **However, no work shall reduce existing ADA compliance.**

Examples of maintenance type of work are:

| | | |
|---------------------------|-------------------|-------------------------------|
| Chip Seals | Fog Seals | Scrub Sealing |
| Crack Filling and Sealing | Joint Crack Seals | Slurry Seals |
| Diamond Grinding | Joint Repairs | Spot High-Friction Treatments |
| Dowel Bar Retrofit | Pavement Patching | Surface Sealing |

2. Alteration activities will trigger the need: to include new curb cuts and/or curb ramps where any pedestrian route crosses a curb; to upgrade existing curb ramps to RIDOT’s standards for ADA compliance; and to provide detectible warning panels at all street crossings and signalized entrances within or adjacent to the limits of the project.

However, no work shall reduce existing ADA Compliance.

Examples of alteration activities are:

| | |
|------------------------------------|-----------------------------------|
| Addition of New Layer of Asphalt | Mill and Fill/Mill and Overlay |
| Cape Seals | New Construction |
| Hot In-Place Recycling | Open-Graded Surface Course |
| Microsurfacing / Thin-Lift Overlay | Rehabilitation and Reconstruction |

3. Designers shall address ADA compliance in laying out handicap curb ramp locations, ramp, landing, flare and transition lengths, widths, and grades. Designers shall take care not to have

objects, poles, or castings in the ramp, landing, flare, or transition. Drainage inlets, curb or gutter shall not be at the foot of the ramp.

4. Sidewalk widths may vary, RIDLO24-8-7 states the sidewalk “shall not be less than four feet (4’) wide from the inside top edge of the curb.” RIDOT has adopted a minimum sidewalk width of five feet (5’) as shown on RI Standard Details 43.1.0 and 43.2.0. However, sidewalks should be designed to accommodate the anticipated pedestrian volume, i.e. downtown business areas may justify widths greater than 8 feet, local suburban neighborhood may be 4 feet wide as allowed by jurisdiction.

Within the paved sidewalk is a clear travel area called the Pedestrian Access Route (PAR). The PAR has a minimum width of and height free of obstructions.

Ramps shall be:

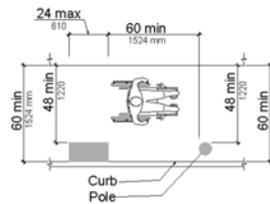
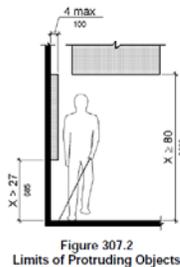
- Width - 4 ft minimum
- Grade - 8.33% maximum (1 ft rise in 12 ft)
- Cross Slope - 2% maximum (2 ft rise in 100 ft)

Landings shall be:

- Width - 4 ft minimum
- Length - 4 ft minimum (must match ramp width)
- Grade - 2% maximum (2 ft rise in 100 ft)
- Cross Slope - 2% maximum (2 ft rise in 100 ft)

Sidewalks shall be:

- Width – 5 ft minimum measured from back of curb, RIDOT Standard Details 43.1.0 and 43.2.0
- PAR width (best practice) 4 ft minimum (may be reduced to 3 ft at a point(s) with a run not to exceed 24 inches; must be 5 ft minimum every 200 feet to allow for accessible passing)
- PAR height 80 inch minimum
- Grade – not to exceed the running grade of the adjacent parallel road
- Cross Slope – 2% maximum (2 ft rise in 100 ft)



A dedicated team of traffic engineers has been revising the Traffic Design Manual to incorporate current and proposed ADA guidelines. Included in this work is new language on appropriate treatments for locations where existing pedestrian facilities are being temporarily closed as well as updated language regarding Accessible Pedestrian Signals (APS). All language will be in accordance with the Manual for Uniform Traffic Control Devices (MUTCD). Additionally, RIDOT will consider the draft PROWAG guidelines whenever feasible. RIDOT estimates this manual will be completed by April, 2014.

Accessible Pedestrian Signals (APS)

Accessible Pedestrian Signals are a vital component of any pedestrian safety program for people who are blind or have low vision. Accessible Pedestrian Signals, commonly referred to as APS, provide both an audible and a vibrotactile method of informing pedestrians when the visual “WALK” signal is displayed.

In June of 2002, the U.S. Access Board released a draft document entitled “Draft Guidelines for Public Rights-Of-Way.” These draft guidelines required APS systems at all new signalized intersections where pedestrian signals are installed. In November 2005, new draft guidelines were issued. The 2005 guidelines also include requirements for APS to be installed on new construction where pedestrian signals are installed. The guidelines state: “The Board’s aim is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. The guidelines would not require alterations to existing public rights-of-way, but would apply where a pedestrian route or facility is altered as part of a planned project to improve existing public rights-of-way.”

The ADA requires that when pedestrian facilities are provided, they must be usable by all pedestrians. With that in mind, among the key elements included in the ADA Transition Plan Scope of Work was the development of an APS Policy.

Beginning in May of 2010 the Transition Plan Manager initiated dialogue with the Traffic Engineering Section to begin looking into the development of an APS Policy. During this dialogue it was discovered that Traffic Engineering had already begun including provisions for APS in its drafting of a new Traffic Design Manual. During discussion and in an effort to further enhance the use of APS it was decided to also initiate an Intersection Inspection Database which would fuel the Transition Plan required “Intersection Schedule.” This schedule would be a companion to the required “Sidewalk / Curb Ramp Schedule.”

During this time period it was also decided to create an intersection inspection form / protocol first before creating the APS Policy. One of RIDOT’s three ADA design consulting firms, Green International Affiliates (GIA) was enlisted to help with this task. It was also decided that RIDOT would inspect only the 800+ signalized intersections under its purview which could then be considered for APS in the future

GIA met numerous times with a RIDOT team consisting of representatives of Traffic and Highway Engineering, ADA, and GIS staff. Also recruited to participate in these meetings were RIDOT's remaining other two ADA design consulting firms, Bryant Associates and the Maguire Group, who assisted with the fine-tuning of the new inspection form. The Turino Group, the firm that is responsible for the development of the sidewalk / curb ramp database, also participated in these meetings. It was RIDOT's intent to include the new intersection database in with the sidewalk data.

A very detailed inspection form was completed, and it was given a "test-drive" by a team consisting of staff from the three engineering firms, RIDOT Traffic and Highway Engineering, and ADA. Following a 4-hour test inspection, the form was deemed "up to the task." The final form was completed and given to the three engineering firms in September to begin inspecting the 800+ intersections.

Attention was then turned toward the creation of the APS Policy. An APS Committee was formed by the Transition Plan Manager with the task of creating the policy. The Committee included senior staff from Traffic Engineering, the Construction Operations / Electrical Unit and Traffic Maintenance.

This RIDOT collection of professionals met on a regular basis, and was aided in their task by obtaining a draft of the Mass Highway APS Policy. Coordination between the two states' Traffic Engineering and Maintenance staffs was initiated, and it continued throughout the drafting process. Careful attention was taken while crafting the document that took into consideration PROWAG, the MUTCD, the Administrative Rules and Practice and Procedure for the Rhode Island State Traffic Commission (STC), the National Cooperative Highway Research Program Prioritization Tool, and RIDOT's newly implemented Technical Infeasibility Determination Policy. The draft policy also included an "APS Request Form" whereby the general public would be able to submit a request for this technology directly to RIDOT via our website. The request form provides instruction on how to make a request, and states that RIDOT will acknowledge all requests within a 30-day window.

In April 2012 the Draft APS Policy was vetted in a public forum by the Governor's Commission on Disabilities' Accessibility Committee (GCD), which represents over 200 advocacy groups including institutions for the elderly and the disabled. The GCD had forwarded the draft to all of its clients for feedback. Following a 30-day comment period no comments were received. It was decided to allow extra time for comment and in late July the GCD reported that they did not receive any feedback on the policy and recommended that we move forward.

RIDOT then turned its attention on refining the policy and began creating an internal work policy and flow-chart (critical path) that would spell out how public requests would be handled. A sub-committee of the larger APS Committee was tasked with the job of creating the internal policy and subsequent flow-chart. The RIDOT Customer Service Unit was also involved in these meetings since that office would be the initial recipient of each request.

Over the course of several months and numerous meetings, and following the approval of both the RIDOT Chief Engineer and the Deputy Chief Engineer, all documents were made ready to be forwarded to RIDOT Legal Counsel for review and comment.

Traffic Engineering received a formal response from Legal Counsel that included a request for editorial revisions as well as questions to be clarified. A meeting was then held between all parties to discuss the needed clarifications which were incorporated into the final document. The Policy was forwarded to the Director for review and final approval; and this was ultimately received.

Traffic Engineering and RIDOT Communications / Customer Service have continued discussion to finalize the public component portion of the policy and determine an official date when the document will appear on the Department's website. It is anticipated that the policy will become part of RIDOT's new website expected to be rolled-out in March/April 2014.

Additionally, On February 3, 2014 Traffic Engineering issued "TAC-0247 Accessible Pedestrian Signal Policy" (effective immediately) to all RIDOT in-house and consultant staffs informing and instructing on the use of the policy.

B. ADA TRAINING

In 2011, the ADA Transition Plan Manager and an Assistant State ADA Coordinator from the GCD conducted ADA training for over 50 percent of the Department's staff, as well as several representatives from one of the Department's ADA consulting firms. This type of "awareness" training has continued informally on a regular basis.

With the implementation of the Department's Technical Infeasibility Determination Policy, the Transition Plan Manager began training senior staff in the policies use. In January and February of 2013 training on this policy was given to all Construction Operations field staff. Assisting with this training was a representative of the GCD and a supervising highway design engineer.

On May 1, 2013 training was provided for all RIDOT project management staff. This training included staff for Highway, Traffic, and Bridge Engineering, Intermodal Planning and Enhancements, Environmental and Cultural / Historical staff, as well as engineering staff from the Maintenance Division. Training on this policy included a PowerPoint presentation showing actual ADA-related issues identified in the field from recent construction contracts. There were other ADA-related issues submitted by the GCD which were also discussed.

On May 9, 2013 the Transition Plan Manager hosted an ADA training session for members of Rhode Island Consulting Engineers (RICE), a statewide professional association of independent consulting engineering firms that provide professional engineering services to Federal, State and municipal agencies and the general public. This training included ADA awareness videos produced by the United States Access Board, a PowerPoint presentation on design / construction issues found in the field, and training on the use of the RIDOT Technical Infeasibility Determination Policy.

Joining the Transition Plan Manager in the May 2013 training efforts were the Deputy Chief Engineer, the Managing Engineers of Highway, Traffic, and Bridge Engineering, a supervising highway design engineer, and a representative of the GCD.

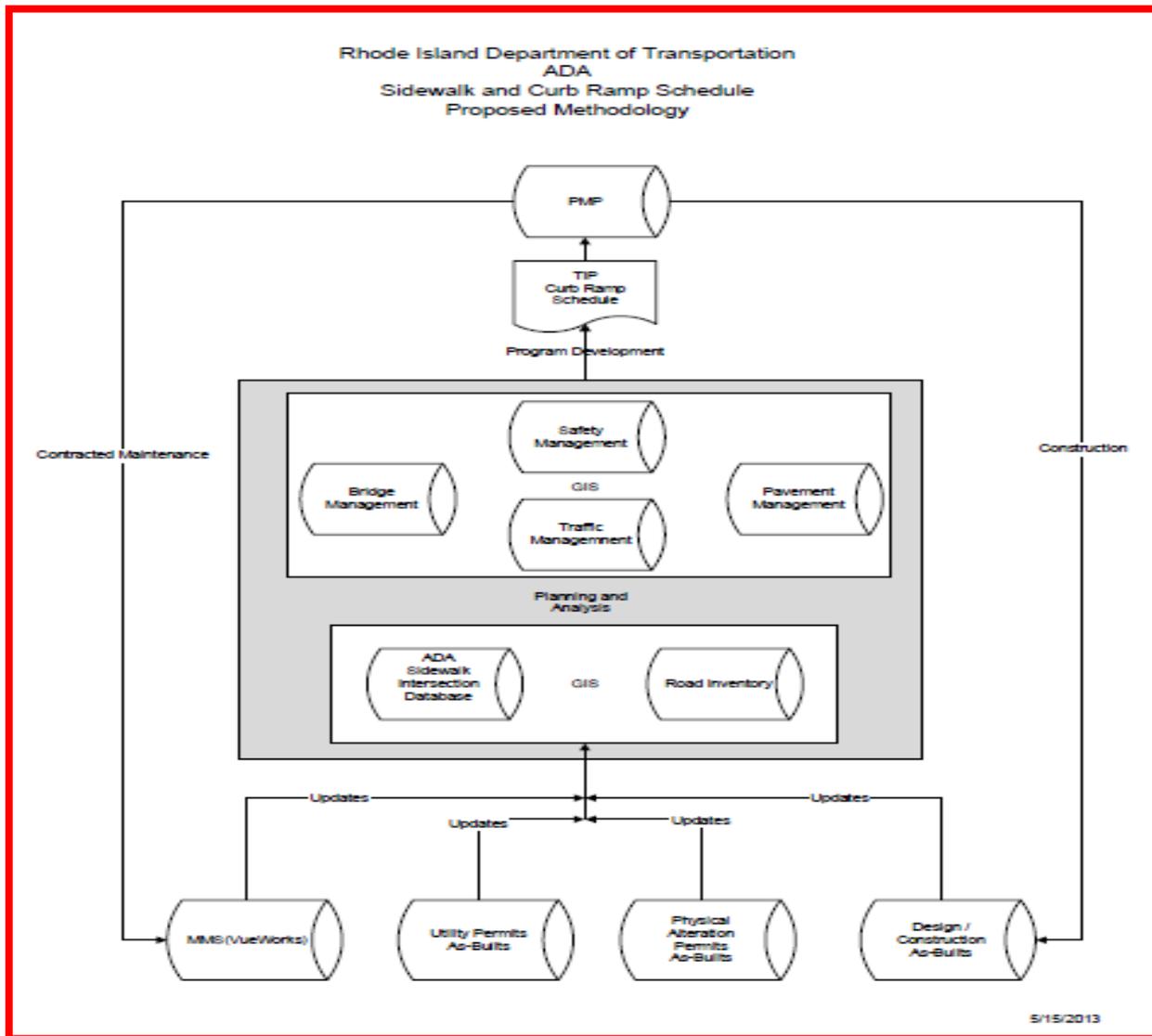
Further ADA training opportunities will be instituted upon the implementation of PROWAG.

C. Curb Ramp Schedule Methodology

As a continuance of Section II, B, 5 “Curb Ramps”, in-house discussions continued on the possibility of obtaining staffing, and the creation of a curb ramp methodology. In 2013 the Transition Plan Manager met with members of RIDOT staff, primarily the GIS Manager and the manager of the Pavement Management Plan to see if the multiple databases being utilized by RIDOT were similar in anyway to the sidewalk database. It was realized that the Pavement Management database, as well as the databases being utilized for Bridge Management, Safety Management, Traffic Management, the Road Inventory, and the sidewalk database all had similar concepts and included multiple overlapping features such as road/sidewalk conditions, signage, obstructions on sidewalks, traffic signals, etc.

Further discussion found that each of the databases were actually connected to each other, and that changes in conditions in any one of the databases could directly reflect to changes within each database. It was also quickly determined that improvements reported in the RIDOT Maintenance database (VueWorks), changes made as a result of physical alteration permits, utility permits, or design/construction as-builds, would all have a direct impact on each of the multiple reporting instruments. This connectivity is all considered “asset management.”

Discussion between RIDOT staff has determined that the connectivity of all of the Department’s “systems” have resulted in the actual methodology of the ADA sidewalk and curb ramp schedule. The workflow diagram on the next page illustrates the connection of all systems that ultimately result in construction projects including those dealing with curb ramps.



By following the workflow diagram one can see that it describes a continuous process of improvements. The process begins at the bottom where improvements to assets such as sidewalks, etc. are made as a direct result of maintenance activities, utility permit/as-builds, physical alteration permits, and/or as-builds from design/construction projects. These improvements are funneled up into the RIDOT databases or systems that track Sidewalks/Intersections (this database will be the primary resource for the curb ramp schedule); Bridge Maintenance, Safety Management, Traffic Management, the Road Inventory, and Pavement Management improvements.

As improvements are made they will be inputted into a “central database” which will update each of the systems. Part of this process will include locating each improvement using GIS technology. It is

envisioned that all of the systems will integrate with each other and provide an accurate and up-to-date snapshot of RIDOT's assets. This integration will also serve as a tracking mechanism that will allow RIDOT to view any/all improvements made. This type of "asset history" will prove to be an invaluable tool for future projects.

Once information is logged into the databases, it will be the responsibility of specialized staff to analyze the data before working with engineering staff to plan and develop projects which will ultimately be placed in the Transportation Improvement Plan (TIP). Per standard practice, the public participation process will take place prior to projects being included in the TIP. Projects will be "tracked" in the Project Management Portal (PMP), which will also provide multiple updates of events and milestones leading up to project advertisement and a bid opening. When projects are awarded and put out to construction, the process will begin once again; however through the entire process as improvements are made, the systems will continue to be updated.

The above methodology and chart was first presented to the RIDOT ADA Committee and then the RIDOT Asset Management Counsel. Both groups gave it a positive response. On July 26th the Transition Plan Manager and the GIS Manager made a presentation to the RIDOT Director and the Executive Staff. The methodology was then officially approved.

Outcome of PRC Review Process as it relates to Methodology and Curb Ramp Schedule

RIDOT made a presentation before the PRC on May 22, 2013. RIDOT staff was joined by representatives of Turino in explaining the purpose, proposed outcome, cost, and type of software required to ultimately bring the database in-house. Members of the PRC decided that RIDOT would have to re-appear before their Committee once the database is ready to be transferred into the Department. Until that time, the PRC will allow RIDOT to continue developing its database.

In light of the PRC's response, the remaining steps necessary to move toward obtaining the data for evaluation for the curb ramp schedule are as follows:

1. geo-referencing of the inventory
2. identification of past projects to eliminate curb ramps already completed
3. identification of projects currently in the TIP (submitted in May 2012)
4. remainder of projects not already accounted for

Once those steps have been completed, the remaining "locations" will be subject to the evaluation criteria discussed in Section II, B, 5 "Curb Ramps" and then analyzed for prioritization and placed in a multi-year plan before finally assigning a dollar figure to them.

It is anticipated that some locations will not become part of the multi-year plan, but will be added to the scopes of work of existing projects that fall within the general boundaries of a prioritized location. This added work will be “tracked” by the PMP.

It should be noted that in an attempt to satisfy the new federal guidance regarding resurfacing and curb ramps, RIDOT is re-evaluating its micro-surfacing program. The current thinking is that for the next two construction seasons, these types of projects will only be instituted in rural locations where sidewalks do not exist. Future projects will include the requirement for curb ramps, which may be included in the pending curb ramp schedule.

D. Placeholder for the RIDOT Curb Ramp Schedule

Based on the work of the ADA Team and the new curb ramp evaluation criteria, please find below a projected schedule for completion of the prioritization of the curb ramp schedule and multi-year plan (subject to change):

1. ADA Team creates “criteria, ratings, and weights” for curb ramp evaluation **Completed November 2013**

This task included the creation of a scoring algorithm consisting of location identifiers, weights, and rating evaluation criteria as described on pages 22 and 23 of the Interim Plan.

2. Completion of ADA Consultants field work **March/May 2014**

This task requires each of the ADA Consultants to revisit site conditions to ensure that locations without existing curb ramps are identified within the database.

3. Submission of all data to Turino (including all Intersection data) **On-Going**

This task requires the ADA Consultants to manually input all collected sidewalk and intersection data into the database hosted by Turino. The database will then analyze each location utilizing the approved scoring algorithm.

4. Scored data submitted by Turino to RIDOT for further evaluation **July – December 2014**

This task entails the transmission of a prioritized list of curb ramps, including locations where curb ramps do not exist. At this stage, the prioritization will be based solely on the rating algorithm that scores locations on a scale of 0 to 100. This list will also identify locations to be addressed through projects in the current TIP, regardless of scoring ranking. This list will allow RIDOT to further evaluate and program locations over multiple years.

5. Analyze Data and creation of initial priority listing **TBD**

This task constitutes RIDOT's first "hand's-on" involvement in the process, and will involve the compiling and analysis of all scored curb ramp data. This analysis will take a broader look to determine which curb ramps will be incorporated into future resurfacing projects, on-going design scopes-of-work, current or planned construction projects and/or future enhancement projects. Curb ramp locations not accounted for under any of the above projects/programs will constitute the final prioritized list to be funded under a multi-year statewide contract(s), running concurrently with locations altered through planned projects. Funding projections will be made as part of this step.

6. Public outreach / input from Governor's Commission on Disabilities (GCD) **TBD**

In this task RIDOT will reach out to all stakeholders, including the GCD to obtain input on the prioritized list and multi-year plan. See "Public Participation Plan" located below for further details on how RIDOT will conduct public outreach.

7. Review of public / GCD input; including possible revisions **TBD**

This task will allow RIDOT to consider and re-analyze any stakeholder input received for revisions to the prioritized list and multi-year plan.

8. Response back to public / GCD **TBD**

If necessary RIDOT will repeat the steps in #6 above if revisions were necessary to the prioritized list.

9. Establishment of the Multi-Year Plan ***TBD (*target date Dec. 2015)**

This step includes final revisions to the prioritized list and multi-year plan. RIDOT will also develop and conduct internal training to ensure a uniform understanding of business protocols for tracking and implementation of the plan. Upon completion of this step, RIDOT's plan published and updates will be made consistent with future TIPS.

E. PUBLIC PARTICIPATION PLAN

A robust and inclusive Public Participation Plan satisfies the National Environmental Policy Act (NEPA) and is vital to meeting RIDOT's obligations under federal nondiscrimination authorities, including ADA. An effective Public Participation Plan is essential to identifying potential problems and barriers, as well as possible solutions.

In 1991, the Department adopted the Rhode Island Department of Transportation Rules and Regulations Regarding Public Participation for Federal Aid Highway Projects (Public Participation Rules). The Department promulgated the regulations to satisfy NEPA; the Public Participation Rules identify requirements and outline a process for public involvement whenever projects have significant social, economic, environmental, or other effects.

RIDOT is currently in the process of improving its implementation of the Public Participation Rules to enhance coordination and communication with the public beyond the minimum requirements of the regulations. An example of such enhanced coordination—within the context of the Department's ADA Program—is RIDOT's coordination with the GCD not only concerning projects included in the TIP, but also with respect to RIDOT's most recent Self-Evaluation.

As discussed above, RIDOT's ADA Committee, which assisted in the most recent Self-Evaluation, includes an Assistant State ADA Coordinator from the GCD. Additionally, on April 30, 2012, RIDOT presented the ADA Project Schedule based on the TIP at a public meeting hosted by the Accessibility Committee of the GCD. Also presented at that forum was RIDOT's draft APS Policy which the GCD distributed to its client agencies. As discussed above, following a lengthily comment period, no public comments were received and the GCD recommended that we move forward with the further development of the policy. In addition to the two items above, RIDOT informed those in attendance of the many other RIDOT initiatives that impact the disabled community. The entire presentation was met with enthusiasm and received the approval of those present.

RIDOT representatives also attended GCD-sponsored Public Forums to Identify the Concerns of People with Disabilities and their Families, held between May and August of 2011. The forums were held in public libraries that encompassed the state from Woonsocket in the north to South Kingstown in the south to Barrington in the east bay and to Middletown on Aquidneck Island. During these forums RIDOT's ADA initiatives were discussed and feedback was encouraged, however other than questions regarding upcoming work, no public ADA-related complaints or suggestions were recorded.

Also as part of our public participation RIDOT contacted multiple public service and private agencies that service the disabled, minority, and the elderly populations. With an assist from the GCD, the Transition Plan Manager was put in contact with over 200 entities to share RIDOT's ADA efforts. Some of these entities included sister state agencies such as the Rhode Island Department of Health's Office of Special Needs, the Rhode Island Department of Human Services, the Department of Children, Youth and Families, and the Special Needs Working Services Group of the Office of Lieutenant Governor. Among the private agencies that were interfaced with were the Ocean State Center for Independent Living, the RI Health Care Association (which serves as the state's association of nursing homes), the Hope Alzheimer's

Center, the Tri-Town Community Action Agency, the PARI Independent Living Center Program, the Brain Injury Association of Rhode Island, the Northern Rhode Island Collaborative, and the Sherlock Center on Disabilities at Rhode Island College.

The Transition Plan Manager made personal contact with representatives of each entity that responded to email seeking contact information, agency purpose, etc. As part of this personal contact RIDOT's ADA efforts were discussed. No negative feedback was received regarding present RIDOT efforts and the Transition Plan Manager related that each entity in the future would receive a questionnaire asking specific questions regarding our sidewalks, crosswalks, intersections/traffic signals, and park-n-ride lots, as well as RIDOT's ability to communicate gains made for the disabled community. RIDOT will be seeking the assistance of the GCD with the survey before it is distributed.

In December 2012 the Transition Plan Manager was contacted by the United States Veterans Administration (VA) and asked if RIDOT could make a presentation at the VA Hospital in Providence to members of their Blind Support Group and others to inform them about RIDOT's efforts on behalf of the disabled community. The Transition Plan Manager joined by representatives of our Highway and Traffic Engineering staffs, and the Assistant State ADA Coordinator from the GCD made a two-hour presentation / open discussion with the veterans and their spouses. RIDOT received significant positive feedback for its efforts and the VA has asked if we could make periodic visits to provide updates on our ADA initiatives and engage in further discussion regarding the disabled veteran's issues.

The Transition Plan Manager is working with the RIDOT Communications Office's Outreach Coordinator to plan additional public participation events to obtain input into the Transition Plan. Some or all of the following efforts will be undertaken:

- use of the RIDOT Web site
- regional public forums with municipal officials / general public
- regional forums with local senior centers
- presentation to the GCD's Accessibility Committee (public meeting)
- mailing of the draft Transition Plan to the members of the GCD's client listing

IV. PLACEHOLDER FOR BUDGET AND MULTI-YEAR PLAN

This section will describe RIDOT's plan for the funding and scheduling of its Curb Ramp Schedule, (CRS) and how the schedule will be incorporated as part of the Department's regular transportation program. With the understanding that curb ramps are considered to be assets, the RIDOT Asset Management Council (AMC) will assist in the evaluation and determination of an estimated budget to be utilized for the anticipated multi-year effort. The AMC will also be looking at how the CRS integrates with other RIDOT initiatives as it continues to evaluate all of its assets.

This section cannot be completed until the prioritized CRS has been completed.

V. SURVEY FORMS

The Department has attached sample facility and intersection inspection survey forms (see 2012 submission).

VI. APPROACH TO ACCESSIBILITY

As described above, the Department has pursued a programmatic approach to ADA accessibility since its initial evaluation the state's transportation infrastructure in the early 1990s. RIDOT has a long history of working with the GCD to identify areas statewide where ADA improvements are most needed. Nevertheless, the framework for its ADA Program has been the TIP: the Department brings all roadways and sidewalks into compliance with ADA standards as part of its regular program, and it works with the GCD to prioritize critical projects for acceleration apart from the regular program.

RIDOT is beginning to shift its focus beyond the TIP framework; the Curb Ramp Schedule reflects the Department's shifting focus with respect to its ADA Program. Following guidance contained in the FHWA Handbook Access for Individuals with Disabilities Under Section 504 of the Rehabilitation Act and Title II of the ADA, RIDOT has used Rhode Island's Transportation Improvement Program 2013 – 2016 to develop Phase I of its Interim Transition Plan.

Using the Department's computerized database of conforming and nonconforming sidewalks and curb ramps that dates back to the mid-1990s, RIDOT referred to its historic project information to eliminate projects already constructed or currently in construction. RIDOT then categorized the remaining inventory of nonconforming sidewalks and curb ramps as projects for fiscal years 2013 to 2016—upcoming TIP projects—or future projects. All projects included in the Curb Ramp Schedule highlight ADA work to be accomplished, such as accessible sidewalks, curb ramps, inclusion of detectible warning surfaces, and in some cases crosswalks or the installation APS. Additionally, each project includes a cost estimate. In addition to working with the GCD for input on which ADA projects to include in the TIP, the Department also presented the Curb Ramp Schedule to the Accessibility Committee of the GCD for further feedback.

RIDOT will work with the Rhode Island Statewide Planning Program, as it develops Rhode Island's Long Range Transportation Plan, with awareness of the remaining inventory of nonconforming sidewalks and curb ramps.