



ADA Transition Plan

For:



By:

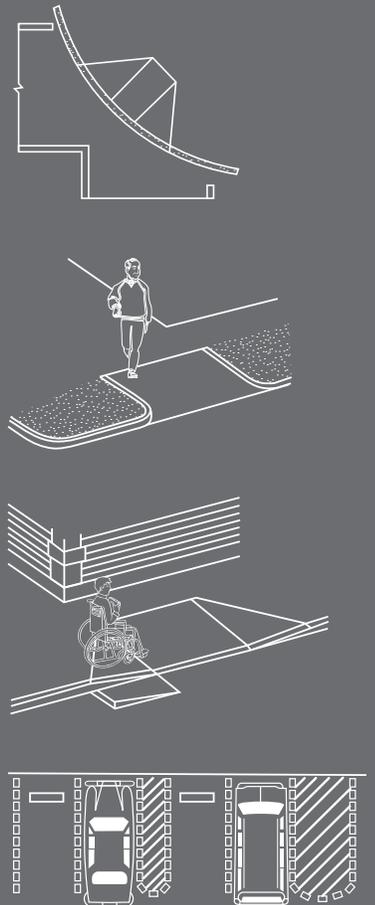


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1.0 INTRODUCTION

The Montana Department of Transportation (MDT) ADA Transition Plan (referred to as the Plan) is intended to guide the Department's efforts to provide an accessible transportation system program within the state of Montana. The purpose of the Plan is to identify deficiencies in MDT policies, procedures, and physical assets. The plan also provides guidance for removal of accessibility barriers. The Plan outlines progress to date and identifies steps necessary to bring the MDT program into compliance with ADA regulations. The Plan is intended to be a living document that will be updated regularly to track ongoing achievements toward compliance.

1.1 Regulatory Framework and Guidance Documents

1.1.1 Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by any program or activity receiving federal financial assistance. Discrimination may consist of exclusion from participation in or denial of the benefits of programs and activities operated by a department, agency, or other instrumentality of state or local government. Section 504 applies to MDT, as well as all sub-recipients of federal funds.

1.1.2 Title II of the Americans with Disabilities Act (ADA) of 1990

The Americans with Disabilities Act (ADA) of 1990 expands on the foundation laid by Section 504 by prohibiting discrimination on the basis of disability by public entities regardless of whether they receive federal financial assistance. The Act is divided into five titles describing requirements relating to (I) employment, (II) state and local government services, (III) public accommodations, (IV) telecommunications, and (V) miscellaneous provisions. Title II of the Act applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990. Titles I, III, IV, and V are not addressed further in the MDT Transition Plan.

The Code of Federal Regulations (CFR) outlines regulations implementing Title II of the ADA, which apply to MDT as a department of Montana state government. Table 1.1 summarizes relevant MDT responsibilities under Title II of the ADA.

Table 1.1 Summary of MDT Responsibilities under Title II of the ADA

Implementing Regulation	Responsibilities
28 CFR 35.105	<p>Self-Evaluation</p> <ul style="list-style-type: none"> Evaluate current services, policies, and practices and make any necessary modifications to meet ADA requirements Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments Maintain a list of interested persons consulted, a description of areas examined and any problems identified, and a description of any modifications made
28 CFR 35.106	<p>Notice</p> <ul style="list-style-type: none"> Make ADA information available to the public regarding applicability to MDT services, programs, and activities
28 CFR 35.107	<p>Responsible Employee / Grievance Procedures</p> <ul style="list-style-type: none"> Designate a responsible employee to coordinate ADA efforts (referred to in this Plan as the ADA Coordinator); provide the ADA coordinator’s name, office address, and telephone number Adopt and publish grievance procedures providing for prompt and equitable resolution of complaints
28 CFR 35.130; 28 CFR 35.149	<p>General Prohibitions Against Discrimination</p> <ul style="list-style-type: none"> Do not exclude disabled persons from participation in or deny benefits of MDT services, programs, or activities Do not discriminate on the basis of disability
28 CFR 35.133	<p>Maintenance</p> <ul style="list-style-type: none"> Maintain facilities and equipment required to be accessible to persons with disabilities in operable working condition
28 CFR 35.150	<p>Existing Facilities</p> <ul style="list-style-type: none"> Operate each service, program, or activity in a manner accessible to and usable by individuals with disabilities Alter existing facilities or construct new facilities as necessary to comply with ADA requirements Develop a transition plan outlining steps necessary to complete structural changes to facilities
28 CFR 35.151	<p>New Construction and Alterations</p> <ul style="list-style-type: none"> Design, construct, and alter public facilities in a manner readily accessible to and usable by individuals with disabilities, unless structurally impracticable Provide curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway
28 CFR 35.160; 28 CFR 35.161	<p>Communications / Telecommunications</p> <ul style="list-style-type: none"> Ensure effective communications with disabled persons Provide appropriate auxiliary aids and services to afford disabled individuals an equal opportunity to participate in and enjoy the benefits of MDT services, programs, and activities
28 CFR 35.163	<p>Information and Signage</p> <ul style="list-style-type: none"> Provide information about the existence and location of accessible services, activities, and facilities

Note: Additional responsibilities detailed in 28 CFR Section 35 (e.g., related to employment discrimination) are not discussed in the MDT Transition Plan.

1.1.3 Transition Plan Requirements

Public entities employing 50 or more persons must develop a document called a transition plan outlining the steps necessary to complete any structural changes (i.e., changes to physical assets) to achieve program compliance.

At a minimum, the plan must meet the requirements stated in 28 CFR 35.150(d)(3) as follows:

- i. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities.
- ii. Describe in detail the methods that will be used to make the facilities accessible.
- iii. Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period.
- iv. Indicate the official responsible for implementation of the plan.

As part of the transition plan, public entities responsible for streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas (23 CFR 35.150(d)(2)).

The MDT Transition Plan addresses minimum plan requirements relating to physical assets, including facilities and rights-of-way owned and maintained by MDT. For the purposes of this report, facilities are defined to include district and headquarters office buildings, rest areas, airports, maintenance buildings, and motor carrier services (MCS) scale sites. Rights-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems. In addition to minimum requirements, the MDT Transition Plan addresses other elements outlined in Title II of the ADA related to administration, communications, and maintenance.

Public entities must provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan must be made available for public inspection (28 CFR 35.150(d)(1)). Public participation and document availability are discussed in more detail in Chapter 7.

1.1.4 Best Management Practices

The 2009 National Cooperative Highway Research Program (NCHRP) Guide to Best Management Practices was created to assist state Departments of Transportation (DOTs) in the transition plan development process and ensure successful practices are recognized and shared among DOTs. The guide outlines steps necessary for ADA compliance, identifies planning challenges, and describes best practices of state DOTs relating to program administration, self-evaluation tasks, public involvement, and plan

implementation. This guidance document was consulted during preparation of the MDT Transition Plan.

Additionally, transition plans prepared by the Minnesota, New Jersey, and South Carolina DOTs were reviewed in detail during Plan development. ADA Coordinators for these state DOTs were contacted to discuss their experiences with plan development and implementation. Minnesota's ADA Coordinator provided detail on methods pertaining to data collection, plan management, funding, and public involvement.

2.0 TRANSITION PLAN DEVELOPMENT PROCESS

MDT initiated development of the MDT ADA Transition Plan in December 2011. As part of this effort, MDT contracted with the consulting firm DOWL HKM to evaluate current MDT policies and procedures relative to ADA requirements; review current facilities and rights-of-way inventory data; develop a database to store and manage inventory data; identify physical barriers and other non-compliant program elements; and provide findings and recommendations. The MDT Transition Plan documents the results of this effort.

2.1 ADA Advisory Committee

MDT established an ADA Advisory Committee in February 2012 comprised of MDT and Federal Highway Administration (FHWA) employees to aid in the development and implementation of the MDT Transition Plan. During development of the Plan, the committee was led by an MDT Studies Planner (MDT Planning Division). Following completion of the plan, the committee will be led by the MDT ADA Coordinator (MDT Civil Rights Bureau). Regular committee meetings were held during Plan development and future meetings will be scheduled to ensure continued Plan implementation and integrate ADA compliance into MDT project delivery and operations.

Table 2.1 indicates the current ADA advisory committee structure.

Table 2.1 ADA Advisory Committee

Affiliation	Committee Membership
FHWA	IT Specialist/Program Management Analyst
	Statewide Planning and Structures Engineer
MDT Civil Rights Bureau	Civil Rights Bureau Chief
	ADA Coordinator
MDT Highways and Engineering Division	Division Administrator
	Highways Bureau Chief
MDT Information Services Division	ISD Staff
MDT Maintenance Division	Division Administrator
MDT Planning Division	Multimodal Programs Bureau Chief
	Rail, Air Quality, Studies Supervisor
	Road Inventory and Mapping Supervisor
	Mapping Planner
	Studies Planner

As of June, 2012.

3.0 COMPLIANCE HISTORY & ONGOING EFFORTS

3.1 Administration

Title II of the ADA outlines administrative requirements for establishing an ADA Coordinator, providing public notice of ADA requirements, and developing a grievance procedure. MDT has initiated the minimum outlined requirements, in addition to providing non-discrimination assurances to FHWA and conducting ADA training for employees.

3.1.1 ADA Coordinator

ADA implementing regulations require public entities to designate at least one employee to coordinate efforts to comply with and carry out ADA responsibilities. MDT’s ADA Coordinator is tasked with a variety of responsibilities, some of which include tracking Plan implementation and updates, responding to grievances, leading the ADA Advisory Committee, ensuring policies and procedures are current, responding to requests for accessible materials or auxiliary aids and services, and conducting or arranging ADA training for employees throughout the Department. Contact information for the MDT ADA Coordinator is provided below.

Alice Flesch, ADA Coordinator
 P.O. Box 201001
 2701 Prospect Avenue
 Helena, MT 59620-1001
 (406) 444-9229 (voice); 1-800-335-7592 (TDD); Montana Relay – 711
 Office hours: Monday-Friday 8:00 A.M. – 5:00 P.M.

3.1.2 Public Notice

Under Title II, MDT must make information about ADA requirements pertaining to its services, programs, and activities available to the public. MDT has adopted an ADA / 504 Notice of Non-Discrimination statement (Appendix A) that is provided on all public notices and documents. MDT has also established an ADA website, which includes a description of the ADA program, ADA Coordinator contact information, the complaint procedure and form, and links to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and Public Right-of-Way Accessibility Guideline (PROWAG) documents. The ADA webpage provides information about MDT's ADA program and opportunity for public feedback.

State DOTs Best Practices

Key to Success

Provide a website with links to various components of the Transition Plan, including policies, opportunities for public participation, grievance procedures, and implementation schedule.

3.1.3 Grievance Procedure

Public entities employing at least 50 people are required to adopt and publish grievance procedures providing prompt and equitable resolution of complaints. MDT has developed a grievance procedure and form. The current complaint form is included in Appendix B and is posted online at the following link:

<http://www.mdt.mt.gov/publications/docs/forms/dbe/vicomplaint.pdf>

3.1.4 Assurances

In order to receive federal funding, MDT must guarantee non-discrimination and ensure new projects will be ADA compliant. Presently, MDT includes a non-discrimination agreement on all federally funded projects. The document requires MDT to comply with federal statutes, policies, and procedures. The document states no person on the grounds of race, color, national origin, sex, age, and handicap/disability may be excluded from federally funded programs. ADA compliance must also be met on all federally funded projects conducted by sub-recipients. MDT's current Non-Discrimination Agreement is provided in Appendix C and is available upon request.

3.1.5 Personnel Training

MDT currently conducts ADA training for new employees, focusing primarily on equal employment opportunity under Title I of the ADA.

3.2 Communications

Government agencies must communicate and interact effectively with the public. MDT utilizes various communication methods to aid the disabled community including auxiliary aids, services, information, and signage.

3.2.1 Auxiliary Aids and Services

MDT attempts to eliminate communication barriers by offering a variety of auxiliary aids and services to the disabled community upon request.

Communicating by telephone can be a hardship for people with hearing or speech impediments. To address this difficulty, MDT utilizes a teletypewriter (TTY) also known as a telecommunications device for the deaf (TDD). MDT's TTY device is located in the ADA Coordinator's office. MDT lists the TTY number in a variety of MDT documents, brochures, and on the MDT website. To address language barriers, the MDT website provides a list of interpreters speaking 24 languages including sign language. The list provides information regarding the interpreter's location, contact information, conversation skill, reading/writing skill, fees, and qualifications. MDT uses at least two interpreters in most languages and numerous interpreters for languages such as French, German, and Spanish. The MDT interpreter list is provided online at the following link: <http://www.mdt.mt.gov/other/civilrights/external/interpreters-list.pdf>

The three primary auxiliary aids for people with a sight disability include Braille, enlarged text, and audio documents. The majority of MDT documents can be provided in Braille or large text and are available upon request. Documents can also be converted to an audio format upon request.

In addition to commonly used auxiliary aids and services, MDT makes efforts to provide additional aids and services as needed upon request. MDT strives to provide accessible information to the public and attempts to accommodate all disability types.

3.2.2 Information and Signage

Title II requires public entities to ensure disabled persons can obtain information about the existence and location of accessible services, activities, and facilities. MDT's website is a key platform for providing information to the public. To ensure accessibility, information provided on the website must be compatible with appropriate software to accommodate specific disabilities. MDT provides appropriate software programs upon request to assist with web accessibility.

Signage is another major aid in providing public information and direction. MDT follows ADAAG and PROWAG guidelines to ensure signs are readable and accommodating to the disabled community. Sign standards include the use of large letters and symbols accompanied by Braille. The standards are the foundation for providing clear informational and directional signage to all members of the public including the disabled community.

3.3 Facilities and Rights-of-Way

Under Title II of the ADA, MDT must assure all of its physical assets are ADA compliant, including existing and newly constructed features. For ADA purposes, MDT's transportation system is divided into two broad categories. Facilities are defined to include district and headquarters office buildings, rest areas, airports, maintenance

buildings, and scale sites. Rights-of-way features include elements such as curb ramps, sidewalks, crosswalks, median crossings, and pedestrian activated signal systems.

ADA compliant facilities and rights-of-way are designed and constructed in a manner readily accessible and usable by individuals with disabilities. Examples of non-compliant accessibility barriers include steep curb ramp slopes that might hinder a person in a wheelchair, lack of handrails along stairways at a rest area, or sidewalk discontinuities that may cause trip hazards.

The following sections discuss applicable MDT policies and guidelines and previous and ongoing inventory data collection, data tracking, and methods for removing physical accessibility barriers.

3.3.1 Design Standards and Construction Procedures

MDT has established standards and policies that provide guidance for installation of accessible features on newly constructed or altered public rights-of-way and facilities. Several of the policies and procedures are highlighted in this section.

ADAAG & PROWAG

ADAAG and PROWAG are the two sets of guidelines for design of accessible features on new construction and alterations.

- ADAAG: <http://www.access-board.gov/adaag>
- PROWAG: <http://www.mdt.mt.gov/business/contracting/docs/civil/prowag.pdf>

The U.S. Access Board developed ADAAG in 1991 and continues to maintain these guidelines for the design of accessible buildings and facilities. ADAAG focuses mainly on buildings and site work and generally does not address conditions unique to public rights-of-way. Due to the need for accessibility guidelines specific to the public rights-of-way, the Access Board developed the PROWAG, which was most recently updated in 2005. The 2005 version serves as the current set of guidelines for design of accessible features in public rights-of-way. These guidelines have been identified as a current best practice by the FHWA for elements not fully addressed by ADAAG.

MDT has been designing projects in accordance with the design guidelines referenced above since their adoption in 1991. MDT has officially adopted PROWAG for accessible design features on transportation projects following current best practice recommendations. MDT has specified that PROWAG be used in place of ADAAG as necessary to address elements not fully covered in ADAAG or where conflicting information between the two guidelines exists. The ADA Advisory Committee serves as a key platform for dissemination of information and Departmental coordination with respect to changing regulations and policy updates.

Detailed Drawings

MDT maintains a compilation of *Detailed Drawings* in accordance with PROWAG for use on new construction or alteration projects. The drawings include technical information with respect to sidewalk and curb ramp dimensions, slopes, materials, and installation requirements. Additionally, project specific details are commonly developed to address unique aspects of individual projects. During construction, inspectors ensure curb ramps, sidewalks, and detectable warning devices are installed according to the appropriate details.

MDT conducts regular reviews of plans and specifications during the design process. This process encompasses review of any ADA elements on the project to verify they comply with ADA criteria.

Guidelines for Nomination and Development of Pavement Projects

MDT follows guidelines set forth in this document to help define the level of usage for implementation of PROWAG on projects. The document specifies the appropriate level of ADA compliance depending on the project classification, including preventative maintenance, rehabilitation, and reconstruction projects.

In general, curb ramps are considered on a case-by-case basis wherever curb, gutter, and sidewalk are adjacent to the project for maintenance and rehabilitation classifications. Existing and potential pedestrian use is evaluated to determine potential ramp locations. These improvements are typically considered for all resurfacing projects such as overlays and mill/fill projects. Installation of ADA features is generally not considered on crack seal projects or other short-term maintenance activities. These guidelines are in general agreement with PROWAG.

Road Design Manual

MDT's *Road Design Manual* contains a section entitled Special Design Elements that discusses the importance of ADA features and explains how mobility can be affected by highway design elements. The *Road Design Manual* provides considerations and design standards to be used when designing ADA elements. The MDT *Road Design Manual* can be found online at the following link:

<http://www.mdt.mt.gov/publications/manuals.shtml>

3.3.2 Inventory Data Collection and Tracking Procedures

A self-evaluation of physical assets is necessary to indicate where physical barriers limit accessibility within MDT's transportation system. The self-evaluation provides a baseline against which progress can be measured, making the process critical to the success of the Transition Plan. Due to the extensive geographic area encompassing MDT's transportation network and the large quantity of data associated with each ADA feature, an organized, systematic tracking procedure is essential to the self-evaluation task.

Database formats are the preferred method for storing and managing large datasets. The benefits of database platforms over other methods such as paper copies or spreadsheet methods are numerous. A key advantage of a database structure is the ability to query data and summarize data sets in output reports. This feature allows MDT to conduct annual reporting on inventory tasks and identify progress toward compliance.

The following sections summarize MDT's previous efforts with respect to data collection and ongoing database development and data collection efforts.

Rights-Of-Way

In the spring of 2011, MDT began collecting curb ramp data using a handheld GPS unit. A GPS point location was established at each curb ramp with associated measurement data such as ramp running slope, cross slope, ramp width, landing dimensions, and flare slopes. Data related to detectable warning devices and Accessible Pedestrian Signal (APS) information was also recorded and tied to the curb ramp location. A photograph of each curb ramp was linked to the corresponding inventory data. Periodically, the GPS field information was downloaded into a Geographic Information System (GIS) database to spatially display the data on a map. As of the plan completion date, curb ramp inventories have been completed for four Montana cities, including Missoula, Billings, Great Falls, and Helena.

As part of the transition planning process, MDT's right-of-way inventory form was revised to comply with PROWAG and include other right-of-way features in addition to curb ramps following guidance from other state DOT best practices. The most current right-of-way inventory form is provided in Appendix D.

The rights-of-way curb ramp data was consolidated into a GIS geodatabase. The geodatabase includes feature classes for curb ramps and crosswalks and was populated with existing curb ramp data. Attribute field names were created within the feature classes to correlate to data entry fields on the rights-of-way inventory form.

Table 3.1 provides a summary of the inventory process for ADA features within the public rights-of-way. The purpose of this process is to provide a systematic approach to collect data as efficiently as possible, eliminating the need to fill out paper hard copies in the field. The process consists of programming the GPS device with appropriate data entry fields, collecting the data in the field, transferring the data to the database, and generating output reports based on the needs of the user.

Table 3.1 Rights-of-Way Inventory Process

Component	Rights-of-Way Inventory Process
Field Inventory Forms	Users program the GPS device using the rights-of-way inventory form as a template (provided in Appendix D). The GPS device displays appropriate data entry fields as GPS location points are recorded.
Data Entry	The GPS device enables users to type measurements or select options from a drop-down menu.
Data Transfer	After collecting data in the field, users download data from the GPS device into the GIS geodatabase.
Reporting Mechanism	Users query data in the GIS geodatabase similar to the example output reports included in Appendix E.

Facilities

Rest area inventories were conducted in 2008 based on ADAAG guidelines. The data was collected by hand on print forms in the field and was stored in an excel spreadsheet. A general inventory was conducted in 2009 for MCS scale sites. MCS sites were rated on a “good, ok, very poor” ranking system and ADA issues were noted for each facility. The MCS inventory also noted whether each facility was scheduled for removal, rehabilitation, or reconstruction. As part of the ADA transition planning process, MDT’s facility inventory form was updated to comply with PROWAG, and is provided in Appendix D. Table 3.2 provides a summary of the inventory process for ADA features at facilities.

Table 3.2 Facilities Inventory Process

Component	Facility Inventory Process
Field Inventory Forms	The facility inventory form (provided in Appendix D) is designed to be used as excel spreadsheets on a tablet device. Each page of the form is formatted as a separate worksheet (or tab) in the excel file. Multiple copies of certain worksheets may be needed in the field, depending on the number of elements at the site (e.g. parking spaces, restroom stalls, etc.). Worksheets may be copied and inserted in the excel file as needed to accommodate each site. Users mark site and element diagrams on the tablet device. Alternately, print copies may be used to hand-write notes on the diagrams. Site diagrams can be hand-sketched or scanned and inserted into the forms prior to field data collection.
Data Entry	The tablet device enables the user to type or select entries for each line item.
Data Transfer	After collecting data in the field, users export data from excel to MDT’s existing Oracle database.
Reporting Mechanism	Users query data in the Oracle database similar to the example output reports included in Appendix E.

Output reports can be produced from the databases to easily view inventory data. Various types of reports can be produced depending on the type of information desired. Example summary reports for right-of-way corridors, rest areas, and MCS scale sites are provided in Appendix E.

3.3.3 Barrier Removal

ADA deficiencies have been detected in the inventory data collected to date. Various barriers have since been removed as new projects have been implemented. All new construction provides ADA compliant features unless such features are technically infeasible due to site constraints. MDT has reconstructed rest area and MCS scale site facilities since the 2008-2009 inventory. Similarly, MDT has constructed ADA compliant right-of-way features as part of recent projects since the 2011 inventory.

3.4 Maintenance

The MDT Maintenance Division is generally responsible for physical maintenance of MDT owned rights-of-way and facilities. Maintenance personnel have updated select public building facility features to improve ADA compliance. The MDT maintenance manual does not currently address ADA.

4.0 GAP ANALYSIS

The transition planning team conducted an analysis to identify gaps between ADA requirements and MDT's current, policies, procedures, and physical assets. As part of this task, the team identified missing self-evaluation information and inventory data, as well as physical barriers to accessibility and other non-compliant program elements.

The planning team conducted a literature review of MDT's current policies and procedures to identify compliance deficiencies. Existing inventory forms and data were compared against ADAAG and PROWAG to determine outdated and missing information. A summary list of all reviewed MDT policies and procedures is provided in Appendix F. The team also conducted interviews with various MDT personnel to aid in developing a thorough understanding of current MDT policies pertaining to ADA compliance.

A gap analysis table (Appendix G) was developed based on information gathered during the document review and interview process. The table summarizes ADA requirement categories; associated MDT policies and procedures; compliance status and deficiency descriptions; and suggested improvements. The sections below provide an overview of gap analysis findings.

Administration

In general, MDT is currently complying with the majority of the administrative requirements of the ADA. MDT has designated an ADA coordinator, provides public notice of ADA requirements through a Notice of Non-Discrimination, has developed a grievance procedure and Transition Plan, and provides written assurance to FHWA that federal funds are used in compliance with ADA requirements. MDT has not yet developed an assurance policy for sub-recipients.

Communications

MDT attempts to accommodate all disability types by providing auxiliary aids and services upon request. MDT also provides information about the existence and location of accessible services, activities, and facilities. There are no identified gaps in MDT's policies and procedures related to communications.

Facilities and Rights-of-Way

MDT complies with current ADA criteria when designing ADA features for facilities and rights-of-way. MDT also complies with the requirement to remove barriers on an ongoing basis as part of all new construction and reconstruction / rehabilitation projects.

MDT has initiated the self-evaluation process for its existing physical assets. Inventories have been initiated for curb ramps, rest areas, and MCS scale sites, although the facilities and public rights-of-way inventories are currently incomplete.

Maintenance

MDT has developed procedures to maintain ADA features within the transportation network that it manages. No gaps in maintenance policies or procedures were identified.

5.0 BARRIER PRIORITIZATION

Prioritization is an important step in addressing physical barriers that do not comply with ADA requirements. The barrier prioritization process identifies the most critical ADA needs and assists in implementing the Transition Plan in future years. The NCHRP Guide to Best Management Practices and other state DOT transition plans consider relative demand and degree of compliance in characterizing priority for barrier removal at individual sites. Borrowing from methodology described in the Idaho ADA Transition Plan 2012 Update, a composite scoring system is utilized in this Plan, with points assigned based on demand and non-compliant features. A higher score indicates a non-compliant feature that is frequently used, while a lower score indicates a compliant site receiving infrequent use. Sites are ranked based on their composite score, with higher scores representing sites with higher priority.

**State DOTs Best Practices
Key to Success**

A detailed prioritization approach for curb ramps and other non-conformities can aid successful Plan implementation. Criteria can include both physical characteristics and location considerations.

ADA implementing regulations (28 CFR 35.150(d)(2)) note transition plans should give priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas. The Montana Structures Framework is a statewide spatial database of structure and address points in the state of Montana that was used to assign demand scoring for rights-of-way features. A score

of 1 is assigned to features within 0.0 to 0.25 miles of a demand generator. Similarly, a score of 0.5 is assigned to features within 0.25 to 0.5 miles of a demand generator. The Montana Structures Framework database is maintained by the Montana State Library and can be accessed online at the following link:

<http://giscoordination.mt.gov/data.asp#Structures>

Compliance scores are calculated by assigning a value of one for each non-compliant right-of-way feature (curb ramps and crosswalks), and a score of zero for fully compliant features. Future considerations may include applying a point value for each non-compliant element per feature. This would create a more detailed prioritization mechanism than is currently being used. MDT could also assign a range of point values for demand generator categories or specific sites based on input provided through public outreach efforts. Citizen requests or complaints regarding inaccessible locations could be logged and assigned points to indicate higher priority. These points would either be included as part of the demand score or would be recorded as an independent third score category.

State DOTs Best Practices

Key to Success

Working closely with advocacy groups to establish barrier prioritization can be beneficial. These groups can help the Department identify critical needs so funds are spent on areas providing the greatest benefit.

A demand score for rest areas and MCS facilities is determined using Annual Average Daily Traffic (AADT) volumes. As with right-of-way sites, a higher number of points is awarded for higher demand indicated by AADT. Compliance scores are calculated by assigning a single point value to each non-compliant feature within the facility, including pedestrian access routes, curb ramps and blended transitions, detectable warning devices, pedestrian crossings, parking and passenger loading zones, protruding objects, pedestrian ramps, stairways, handrails, doorways and entrances, tables and counters, drinking fountains, sinks, water closets, telephones, and signage.

Composite scores for right-of-way and facilities sites are calculated by multiplying the demand score by the compliance score. Sites are ranked with higher composite scores representing higher priorities. The ranking system is applied to all existing right-of-way inventory data by highway system (e.g., NHS, NINHS, Primary). Similarly, facilities are ranked according to type, with separate priority lists for rest areas (higher priority) and other facilities (lower priority). Only inventoried sites are included in the priority ranking.

The database output reports provided in Appendix E indicate the most current demand, compliance, and composite scores for each rest area, MCS scale site, and corridor. MDT will generate reports annually to incorporate new data.

Table 5.1 and Table 5.2 summarize the top five highest priorities in each category. All inventoried undeveloped curb ramps were assumed to be noncompliant to provide a conservative assessment since no compliance distinction was noted in the inventory data.

Table 5.1 Rights-of-Way Prioritization Summary

Rights-of-Way Feature	Total Inventoried	Non-Compliant*	Highest Priorities				
			Rank	Corridor ID	Highway System	City	Major Street Name
Curb Ramps	5,567	3,184	1	C000007N	Primary	Missoula	Brooks St.
			2	C008107N	Urban	Missoula	Stephens Ave.
			3	C001030E	Urban	Billings	1st Ave. N.
			4	C008128E	Urban	Missoula	W. Broadway
			5	C005210E	Urban	Great Falls	1st Ave. N.

*Undeveloped (treated as non-compliant – no distinction provided in data) = 1,195; Unknown (empty value treated as non-compliant) = 405

Source: MDT, June 2012.

Table 5.2 Facility Prioritization Summary

Facility	Total Inventoried	Non-Compliant	Highest Priorities*
Rest Areas	64	57	<ol style="list-style-type: none"> 1. Columbus WB 2. Gold Creek EB 3. Greycliff EB 4. Bearmouth EB & WB 5. Gold Creek WB
MCS Facilities	27	23	<ol style="list-style-type: none"> 1. Rocker (Butte) EB 2. Mossman EB 3. Gore Hill NB (Great Falls) 4. Kalispell 5. Four Corners (Bozeman)

Source: MDT, June 2012.

*Note: All rest area facilities are considered higher priority compared to lower priority MCS sites and maintenance facilities.

Table 5.3 summarizes rights-of-way inventory data collected to date by intersection according to the nearest demand generator. There are approximately 15,500 intersections on routes for which MDT is responsible. Of these intersections, approximately 1,500 have been inventoried, roughly 10 percent of the total. As shown, MDT is currently focusing inventory efforts at sites closest to demand generators (i.e., cities). Summaries are based on inventory data collected to date.

Table 5.3 Rights-of-Way Inventory Summary by Intersection

Nearest Demand Generator	Not Inventoried	Inventoried	Total
<= 0.25 mi	7,164	1,193	8,357
0.25 to 0.50 mi	1,345	108	1,453
0.50 to 1 mi	1,418	88	1,506
1 to 5 mi	3,383	99	3,482
5 to 10 mi	671	8	679
10 to 15 mi	74	0	74
15 to 20 mi	2	0	2
Total	14,057	1,496	15,553

Note: An additional 16 intersections were inventoried but are not included above (14 intersections do not have a geonode point and 2 intersections are not on routes for which MDT is responsible)

Source: MDT, June 2012.

6.0 IMPLEMENTATION PLAN AND SCHEDULE

An implementation plan and schedule provides a timeline for addressing deficiencies in policies and procedures, augmenting missing or incomplete inventory data, and remediating physical barriers identified in existing inventories. Tasks listed in the implementation plan correspond to deficiencies identified in the gap analysis. The following sections highlight some of the key implementation steps based on recommended implementation timeframes. The complete implementation plan and schedule are provided in Appendix H.

6.1 Implementation Summary

The following sections provide information on tasks to be accomplished in the designated time periods. Ongoing tasks include identifying funding sources, constructing and upgrading ADA features, conducting ADA Advisory Committee meetings, and providing training to employees. MDT will continue to address ADA barriers through its established prioritization process based on MDT's asset management system. During construction projects MDT's infrastructure will be brought up to current ADA standards, regardless of its priority, in conformity with federal and state guidelines. In the future, MDT may consider stand-alone ADA projects to target high priorities identified through the barrier prioritization process described above, as funding and other Department priorities allow.

Immediate (2012-2013)

MDT will finalize the Transition Plan in the immediate-term based on feedback from the public and establish a method for management and future Plan updates. A key element for this effort will be perpetuating the ADA Advisory Committee and further developing internal roles and responsibilities within the group. Input from the disability community through participation in the committee will also be an important immediate step.

In collaboration with District Administrators, the Civil Rights Bureau will create an ADA network to coordinate Plan implementation. The network will consist of District Engineers, Preconstruction Bureau staff, the ADA Coordinator, the MDT/MSU Design Unit Supervisor, and ADA Specialists within each District.

ADA Specialists will receive training from FHWA on current ADA guidelines and will work closely with the ADA Coordinator to resolve any questions that may arise in relation to ADA access and construction of ADA compliant facilities on MDT's public rights-of-way. The ADA network will be responsible for working with the ADA Coordinator on a project by project basis. The ADA Coordinator will be included in each phase of the planning, implementation, and construction of ADA upgrades on projects let and awarded by MDT.

Other key administrative tasks include finalizing language on notices and forms and developing a plan and schedule to implement regular Department-wide ADA training.

Immediate-term activities associated with the inventory tracking system and data collection process will be important to establish an efficient system and approach for future data collection and use of data. MDT will assign specific personnel to manage the ADA databases, establish an overall data maintenance strategy, develop QA/QC process for data input, and refine the database and reporting mechanism structure as needed to meet needs throughout the Department. It will be crucial for the ADA Advisory Committee to continue to include members from MDT's data management team. Once database development is complete, a sample inventory will be conducted to pilot test the new database system. MDT will make any adjustments to the data inventory process based on the outcomes of the pilot test. MDT will also allocate personnel for the data collection task and provide necessary ADA training to these individuals. As the data collection process moves forward, MDT will begin to use the data as part of the project development process. It is anticipated physical barriers associated with facilities and rights-of-way will be addressed as projects are programmed.

Short-Term (2014-2016)

Short-term activities consist of further development of the ADA webpage to include links to all notices and forms regarding ADA administrative tasks as well as providing regular updates on the transition planning process and self-evaluations. MDT will review maintenance procedures during this period and refine policies to further comply with ADA regulations.

The inventory collection process will be further refined during this period to include a method for tracking ADA updates through new construction projects. This will include a method for importing the as-built information from recent projects into the database to further track compliance efforts and reduce redundancy in inventory efforts. A goal for data collection during this period is to complete inventories on all rest areas and office

buildings as these facilities receive the highest amount of public use. MDT will continue to collect rights-of-way data giving priority to intersections with the highest demand.

Mid-Term (2017-2019)

Mid-term activities will build upon the tasks previously discussed. MDT will continue to involve the public through webpage updates on the transition planning process and continue to utilize the ADA database and tracking system to track compliance, prioritize barriers, and assist with the project development process. MDT will continue conducting inventories on public rights-of-way focusing on sites with lower demand scores. Completing inventories on all airport facilities is also a goal for the mid-term.

Long-Term (2020 and Beyond)

Long-term goals include making routine updates to the Plan as needed, continuation of public outreach efforts and further incorporation of ADA considerations into project planning and development. At this time, MDT could also consider conducting inventory on additional right-of-way elements such as sidewalks. Inventories on facilities with low or no public access such as MCS facilities and maintenance facilities could also be initiated, as appropriate.

6.2 Annual Update Report

The annual update report is a worksheet summarizing tasks completed pertaining to the ADA Transition Plan. The MDT ADA Coordinator will submit an Annual Update Report to FHWA at the end of each fiscal year. The report will facilitate progress tracking and aid in Plan management. For consistency, the worksheet was created with numbering corresponding to the implementation plan and schedule. The annual update report form is provided in Appendix I.

7.0 PUBLIC AND STAKEHOLDER OUTREACH

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementing regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).

7.1 Draft Plan Availability

The Draft MDT Transition Plan was made available for public review and comment for a 30-day period beginning July 16, 2012 and ending August 14, 2012. A link to the Draft MDT Transition Plan was provided on MDT's ADA webpage at the following link:
<http://www.mdt.mt.gov/business/contracting/civil/ada.shtml>

MDT also distributed seventy-five copies of the Draft MDT Transition Plan to viewing locations around the state. Alternate accessible formats of the document were made

available upon request, including Braille, large font, or audible versions. MDT issued a statewide press release announcing the availability of the document.

A letter was sent to disability groups, cities, and counties announcing the availability of the Draft MDT Transition Plan and directing interested stakeholders to the MDT website and viewing locations.

Table 7.1 summarizes the stakeholder mailing list. No public comments were received on the Draft Transition Plan. Public and stakeholder documentation is provided in Appendix J.

Table 7.1 Stakeholder Mailing List

Organization	Program Description
Areas I - XI Agencies on Aging	Addresses needs and concerns of the elderly and disabled.
Consumer Direct Personal Care	Provides programs intended to allow the elderly and disabled to direct their own care.
Department of Public Health and Human Services (DPHHS)	Protects health and provides essential human services to Americans.
Developmental Disabilities Program	Supports choices and opportunities for people with developmental disabilities in their communities.
Disability Employment and Transitions	Provides disabled citizens with services to overcome the barriers of employment, independence, and transitions.
Disability Rights Montana	Provides advocacy and legal services to people with disabilities.
Disabled American Veterans	Provides a variety of free services to disabled veterans.
Disabled American Veterans Transportation Network	Provides disabled veterans transportation to medical and treatment facilities.
Economic Security Services Branch	Protects health and provides essential human services to Americans.
Helena Industries	Provides work options for persons with disabilities to help obtain their vocational objectives.
Living Independently for Today and Tomorrow (LIFTT)	Provides services that promote independence for people with disabilities.
Met Special Transit	Provides transportation services to the elderly and disabled.
Montana Association of Community Disability Services (MACDS)	Provides residential services, employment, and day activities to people with developmental disabilities.
Montana Development Center	Provides residential facilities for people with disabilities.
Montana Disability and Health Program	Develops services to reduce unnecessary medical expenditures and promotes the health of people with disabilities.
Montana Independent Living Center (MILP)	Provides services that promote independence for people with disabilities.
Montana Office of Public Instruction	Provides vision, advocacy, support, and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities.
North Central Independent Living Center (NCILS)	Provides services that promote independence for people with disabilities.
Parents, Let's Unite for Kids (PLUK)	Provides parents information, support, training, and assistance to aid their children.
Research and Training Center on Disability in Rural Communities	Develops rural community infrastructure to enhance opportunities for people with disabilities.
Rural Institute on Disabilities	Provides resources on a variety of disability related topics.
Summit Independent Living Center, Inc.	Promotes community awareness, equal access, and the independence of people with disabilities.
Support and Techniques for Empowering People (STEP)	Provides services that promote independence for people with disabilities.
Vocational Rehabilitation	Promotes work and independence for Montanan's with disabilities.

8.0 NEXT STEPS

8.1 Future Compliance Efforts

MDT will continue collecting inventory data as staffing and funding sources are identified. Facilities and rights-of-way databases will be updated as new data is collected and inventory data will be used to assist in prioritizing projects. Policies and procedures will be updated along with design and construction documents, as needed. A training module and schedule will be developed, with training prioritized for employees conducting inventories. The ADA Advisory Committee and ADA network will establish more defined roles and continue to coordinate regularly. An annual update report will be completed yearly and submitted to FHWA to track progress.

State DOTs Best Practices
Key to Success

When staffing or funding for inventory efforts is a challenge, many Departments are creative. Several states reported using summer interns for self-evaluation activities on public rights-of-way. Others prioritize the inventory process by concentrating on high pedestrian areas first.

8.2 Transition Plan Management and Updates

The ADA Coordinator is the lead point of contact for the MDT Transition Plan. The Plan will be re-evaluated and updated on a yearly basis for the first eight years. Annual updates to the Plan will be completed in collaboration with the ADA Coordinator, MDT Planning Division staff, and ADA Specialists. Starting in 2020, the Plan will be re-evaluated and updated every five years.

Future inventory staffing and funding is yet to be determined and will be an initial task to be addressed by the ADA Advisory Committee. MDT will assign personnel to manage the ADA database. As inventories are completed, data will be uploaded to the corresponding right-of-way or facility database. MDT personnel will generate output reports as needed to meet Department-wide needs for ADA compliance data.

State DOTs Best Practices
Key to Success

Many Departments have designated a Transition Plan Manager. While the ADA Coordinator may be involved in public outreach and oversight of ADA compliance, the Transition Plan Manager may be better equipped to handle technical aspects of self-evaluation activities and Transition Plan updates.

9.0 REFERENCES

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