

City of Madison Americans with Disabilities Act Transition Plan

Proposed Plan, September 2025



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Introduction

The Americans with Disabilities Act (ADA) of 1990 is a civil rights law that affirms and protects the rights of people with disabilities to participate in public life. Under Title II of the ADA, 28 CFR Part 35, public entities are required to provide services, programs, and activities in a manner that is readily accessible to and usable by people with disabilities. Title I of the ADA prohibits discrimination against people with disabilities in employment.

A Transition Plan includes a self-evaluation of all programs, facilities, employment policies, and the public right-of-way. The self-evaluation process generates a current state description of compliance and potential barriers to access. It is anticipated that a self-evaluation will reveal areas where a city is not fully compliant with the ADA and relevant standards. Identifying barriers to access is essential in creating a meaningful ADA Transition Plan. This plan will provide a framework for the City of Madison to work towards removing barriers to access in the years to come.

Through this plan, it is our goal to achieve compliance with the ADA and relevant standards in the following areas by these dates:

- Programs, Services and Activities: December 31, 2025
- Public-Facing Websites and Electronic Information and Technology: April 24, 2026
- Public Facilities
 - o Access barriers with identified remedies: December 31, 2040
 - Access barriers requiring further exploration to determine available remedies:
 Plan Addendum by December 31, 2030
 - Access barriers in parks and recreation facilities: December 31, 2055
- Public Right-of-Way
 - Bus stop accessibility improvements: November 30, 2025
 - Crosswalk signals, new and altered pedestrian signal heads installed at crosswalks include APS, RRFBs and other traffic safety enhancements: Ongoing system improvements through Traffic Signals and Street Safety Improvement Program Sidewalk System Improvement Program
 - Sidewalk network repair and replacement: Ongoing sidewalk system-wide improvements through Curb Ramp Repair and Replacement Programs on a 10year cycle
 - Determine feasibility of installation of 206 curb cuts and curb ramps as well as scope of project: Plan Addendum by December 31, 2027
 - Curb Ramp Repair and Replacement Programs will complete a full analysis of street reconstructions necessary in order to install compliant curb ramps: Plan Addendum by December 31, 2035.

A transition plan must, at minimum:

- Identify physical barriers in public facilities that limit the accessibility of programs or activities for people with disabilities,
- Describe the methods that will be used to make the facilities accessible,

- Make a specific schedule with steps to be taken each year that are necessary to achieve compliance; and
- Name the official responsible for implementation of the plan

(28 CFR § 35.150(d)(3)).

ADA Transition Plans are required for cities with 50 or more employees. An ADA Transition Plan is intended to be a living document that helps cities in achieving full compliance and fostering access and usability of all programs, services, activities, and facilities. Although there is no requirement that a city revitalize their ADA Transition Plan, the City of Madison is committed to improving access and inclusion for all its residents.

Madison enacted an ADA Transition Plan in the 1990s and has maintained compliance, although some of the elements of that compliance have become decentralized over time. The City of Madison has also grown and changed significantly since the 1990's. Additionally, the compliance requirements have evolved. As a result, our ADA Transition Plan needs to be updated to ensure accessibility and usability of the City's programs and facilities.

A key goal of this Plan is to center the experiences and expertise of community members and disability-led organizations. We contracted with Access to Independence, a local disability-led organization, as a consultant to assist in the process of evaluating and updating the public right-of-way portion of this Plan.

We recognize the disability community includes people of color, LGBTQIA2S+, immigrants, and people with other marginalized identities. To approach disability as a special issue or a silo diminishes the experiences and intersections of this culturally rich and diverse community. We must align and harmonize with our efforts for racial justice, gender justice, language justice, and the liberation of other marginalized communities.

Therefore, our efforts to foster access in Madison must go beyond legal compliance and involve collaborating with those most impacted to address the historic impact of ableism. We are committed to working toward access and equity in all City planning, programs, services, and facilities. We believe all residents deserve the opportunity to live, work, travel, play, and thrive.

We recognize that collaboration with residents with disabilities is an essential component of developing an effective ADA Transition Plan. We welcome and encourage comments and suggestions, especially from Disabled Madison residents/residents with disabilities and disability-led organizations.

Communication and Accommodations

Questions or Concerns about this Plan:

Rebecca Hoyt
Disability Rights and Services Specialist (ADA Coordinator)
608-266-6511
RHoyt@cityofmadison.com

Norman Davis Department of Civil Rights Director Accommodations and Alternate Formats of this Plan:

Rebecca Hoyt
Disability Rights and Services Specialist
608-266-6511
RHoyt@cityofmadison.com

City of Madison Language Access Program:

LAP@cityofmadison.com
Language Access Program
Language Access for People with Disabilities

To File a Grievance about this Plan:

- Online
- In-Person: Department of Civil Rights, 210 Martin Luther King Jr Blvd. Room 523, Madison, WI 53703- Hours: Monday Friday, 8:00am 4:30pm
- Request a form or alternative format: 608-266-4910 or dcr@cityofmadison.com
- Find a Certified Community Partner near you to help with completing the complaint form.

Who is protected by the ADA?

The ADA defines a person with a disability as someone who meets at least one of these descriptions:

- Has a physical or mental impairment that substantially limits one or more major life activities,
- Has a record or history of an impairment, or
- Is regarded as having such an impairment.

Limitations

Under the ADA, public entities are not prohibited from providing benefits, services, or advantages to individuals with disabilities, or to a particular class of individuals with disabilities (28 CFR § 35.130(c)). Nothing in this Plan will provide the basis for a claim that an individual without a disability was subject to discrimination because of a lack of disability, including a claim that an individual with a disability was granted a reasonable modification that was denied to an individual without a disability (28 CFR § 35.130(i)). A person with a disability is not required to accept an accommodation, aid, service, opportunity, or benefit which they choose not to accept (28 CFR § 35.130(e)(1)).

A public entity is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burden (28 CFR § 35.164). Public entities are not required to provide personal devices or services such as mobility devices, hearing aids, eyeglasses, or personal assistance services (28 CFR § 35.135). Public entities are also not required to include a person in benefit from the services, programs, or activities when their participation would pose a direct threat to the health or safety of others (28 CFR § 35.139). A public entity is not necessarily required to make

each of its existing facilities accessible to and usable by individuals with disabilities, to take any action that would threaten or destroy the historic significance of an historic property, or to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burden (28 CFR § 35.150). A public entity may use other methods to make its services, programs, or activities readily accessible to and useable by people with disabilities. The ADA does not provide protections for a person currently engaged in the use of illegal drugs (28 CFR § 35.131).

This Plan does not account for isolated or temporary interruptions in service or access due to maintenance or repairs (28 CFR § 35.133). It also does not include quasi-public agencies and authorities. As separate authorities which receive federal funding, they are directly responsible for maintaining compliance with federal laws and regulations governing accessibility. This plan also does not include machine shops and storage facilities which are not open to the public and have limited employee use.

Disability Rights and Services Program

In 1990, Madison's City Council adopted Madison General Ordinance 39.05 prohibiting discrimination based on disability by City programs and by City-funded agencies. The Disability Rights and Services Program is part of the City's Department of Civil Rights, Equity and Social Justice Division. The Disability Rights and Services Specialist coordinates the City's efforts to comply with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. Often known as the ADA Coordinator, at the City of Madison the Disability Rights and Services Specialist serves as a point of contact for internal staff and the general public who may have questions, comments, or concerns regarding ADA accessibility. In addition, the Disability Rights and Services Specialist responds to complaints/comments, implements and assesses the self-evaluation, and ensures that the established ADA Transition Plan is followed and updated, as needed.

The Disability Rights and Services Program also strives to:

- Advance diversity, equity, inclusion, and access throughout the city,
- Gather community input on issues including transportation, recreation, accessibility, and housing, and
- Works collaboratively with the <u>Disability Rights Commission</u>, established by <u>Madison General Ordinance 39.04</u>, and community-based organizations that advance equity and provide services to people with disabilities.

The ADA Coordinator for the City of Madison is:

Rebecca Hoyt
Disability Rights and Services Specialist
RHoyt@cityofmadison.com
608-266-6511

Complaint Process

The Department of Civil Rights is responsible for management, development and implementation of Chapter 39 of the Madison General Ordinance. The Department of Civil Rights works to ensure

the rights of all people are respected and that all people are given equal opportunities to succeed based upon their personal merits.

To this end, the Department of Civil Rights vigorously pursues the policies and principles within the City as an employer and within the City as a community of people who respect the rights and the contributions of every community member.

You have the right to file a complaint in addition to contacting the Disability Rights and Services Specialist.

Equal Opportunities Division

Madison General Ordinance 39.03 establishes an Equal Opportunities Ordinance and declares, "Discrimination against any of Madison's residents or visitors endangers the rights and privileges of all. The denial of equal opportunity intensifies group conflict, undermines the foundations of our democratic society, and adversely affects the general welfare of the community." The ordinance establishes a complaint process for residents to address complaints of discrimination in housing, employment, public accommodations and City facilities based on the following protected classes: sex, race, religion or atheism, color, national origin or ancestry, citizenship status, age, disability, marital status, source of income, arrest record, conviction record, credit history, less than honorable discharge, physical appearance, sexual orientation, gender identity, genetic identity, political beliefs, familial status, student status, domestic partner status, receipt of rental assistance, the fact that the person declines to disclose their social security number, homelessness or unemployment status. A copy of all complaints filed with EOD related to disability discrimination in city facilities and city-assistance programs and activities (under MGO 39.05) is provided to the Disability Rights and Services Program (ADA Coordinator).

How to File an Equal Opportunities Complaint

- Online
- In-person: Complaints may be filed in person Monday Friday 8:00 a.m. 4:30 p.m. at City County Building, 210 Martin Luther King Jr Blvd. Room 523, Madison, WI 53703
- Request a complaint form by mail by calling: 608-266-4910

If you need language access services or an accommodation to complete the complaint form, contact 608-266-4910 or dcr@cityofmadison.com

Affirmative Action Division

The City of Madison provides equal employment, promotional opportunities, and equal access to public services for all persons from all segments of the Madison community without regard to their race, religion, color, age, marital status, disability, sex, national origin, sexual orientation or gender identity. Madison General Ordinance 39.02 prohibits discrimination in employment practices and requires direct action to make equal employment, access to public service, and promotional opportunities a reality and correct the effects of past patterns of inequality. Entities that contract with the City of Madison must agree not to discriminate against any employee, applicant, subcontractor, or person because of race, religion, marital status, age, color, sex, disability, national origin or ancestry, income level or source of income, arrest record or conviction record, less than honorable discharge, physical appearance, sexual orientation, gender identity,

political beliefs, or student status during their contract period. Applicants and employees of the City of Madison who believe they have experienced employment discrimination by the City of Madison, or a contractor have the right to file a complaint.

How to File an Affirmative Action Complaint

- In-person: Complaints may be filed in person Monday Friday 8:00 a.m. 4:30 p.m. at City County Building, 210 Martin Luther King Jr Blvd. Room 523, Madison, WI 53703
- Email: APM3-5Complaints@cityofmadison.com
- Phone: 608-266-4910

If you need language access services or an accommodation to complete the complaint form, contact APM3-5Complaints@cityofmadison.com or 608-266-4910

Madison Metro

Madison Metro has an internal complaint process. These complaints are not processed by the Department of Civil Rights.

How to File a Complaint about Madison Metro Services

- Online
- Phone: 608-266-4466, Monday Friday: 6:15 a.m. 6:00 p.m. and weekends and holidays 8:00 a.m. 4:30 p.m.
- Email: <u>mymetrobus@cityofmadison.com</u>

If you need language access services or an accommodation to complete the complaint form, contact mymetrobus@cityofmadison.com or 608-266-4466.

Madison Police Department

Complaints and concerns related to the Madison Police Department may be submitted to the Office of the Independent Monitor.

How to File a Complaint or Report a Concern with the Office of the Independent Monitor

- Online
- Phone: 608-261-7161
- Mail or In-person: Monday Friday 10:00 a.m. 4:30 p.m. at City County Building, 210
 Martin Luther King Jr Blvd. Room 501, Madison, WI 53703

If you need language access services or an accommodation to complete the complaint form, contact the Independent Police Monitor at oim@cityofmadison.com or 608-261-7161.

The Madison Police Department also has an internal complaint process. These complaints are not processed by the Department of Civil Rights.

How to File a Complaint about a Madison Police Department Employee

- Online
- Mail: Download the <u>Complaint of Employee Conduct form (English / Español)</u> and send to Madison Police Department, Chief's Office, GR-21, City-County Building, 211 S. Carroll

Street, Madison, WI 53703. Complaint forms are also available at any District Station or Madison Public Library branch.

- Professional Standards and Internal Affairs (PSIA) Unit Phones:
 - PSIA Lieutenant: 608-266-6502
 PSIA Sergeant: 608-266-4590
 - o PSIA Detective Sergeant: 608-266-4694
 - Complaints placed after 4:00 p.m. or on weekends should be directed to the Officer-in-Charge at 608-266-4418
- In-Person: Chief's Office in GR-21 of the City-County Building, 211 S. Carroll Street, Madison, WI 53703.

You may choose to file a separate complaint with the Police and Fire Commission (PFC) to commence a disciplinary process. The PFC's Rules and Complaint Form are available online. In addition, blank PFC Complaint Forms are available at the Mayor's Office, the Clerk's Office, and at any Public Library. Questions regarding the PFC's Complaint Process may be submitted to pfc@cityofmadison.com.

If you have questions, need an accommodation or language access services to file a complaint, contact the Professional Standards & Internal Affairs Office at 608-266-6502 or 608-266-4590.

Self-Evaluation Process

The City of Madison has several centralized programs that support all other Departments and Divisions such as Human Resources, the Language Access Program, and Information Technology. These programs were evaluated through review of policies and procedures and consultation with relevant staff to evaluate compliance with Title I and Title II of the ADA.

In addition, each Department was provided with a questionnaire intended to evaluate program, service, and activity compliance with Title II of the ADA. The questionnaire included 34 questions related to program accessibility, effective communication, licensing and certification, non-discrimination in contracting with external entities, department-specific policies, and events and event ticketing where applicable (<u>Appendix I</u> and <u>II</u>).

Each Department also completed the <u>2010 ADA Design Standards Existing Facilities Checklist</u> for all relevant facilities within their jurisdiction. For some Departments this may include an office suite and for others multiple facilities throughout the city. Public Transit Facilities used the <u>Federal Transit Administration ADA Circular 4710.1</u>. Residential facilities dwelling units were evaluated based on Access Board <u>Accessibility Standards Section 233</u> and City Shelters based on <u>Accessibility Standards Section 244</u>.

Department representatives received training on how to accurately complete the questionnaire and checklist and were provided with support and assistance from the Disability Rights and Services Specialist (ADA Coordinator) throughout the process.

The Disability Rights and Services Program collected and analyzed 31 program questionnaires from 23 Departments and 119 facilities checklists not including in-person evaluations conducted at recreation facilities by the Madison Parks Division. Some departments, due to their size and complexity, submitted multiple program questionnaires. The Disability Rights and Services

Program and Engineering Staff then met with representatives from each Department to review the information provided to ensure accuracy of responses. Some responses required clarification and verification from the Department of Civil Rights and Engineering to confirm compliance through on-site evaluation.

To effectively evaluate public right-of-way facilities which cover multiple City Agencies, the Disability Rights and Services Program and Department of Civil Rights assembled a working team of diverse subject matter experts: the Disability Rights and Services Specialist and staff from Department of Civil Rights, Department of Transportation including Madison Metro, Streets, Traffic Engineering, Planning and the Office of the City Attorney. The Department of Civil Rights additionally contracted with Access to Independence, a local disability-led organization, as a consultant to assist in the process of evaluating and updating the portion of the ADA Transition Plan that relates to the accessibility and usability of the public right-of-way. Staff conducted significant due diligence to determine Madison's past efforts, key stakeholders, and potential for building upon existing resources to address barriers to access in public right-of-way facilities.

Departments with a large number of facilities, such as Madison Metro and Madison Parks, utilized geographic information system (GIS) technology to evaluate facilities. Given the thousands of facilities managed by these Departments, in-person site assessments would have been unfeasible within current resources. A description of the methods used is included in the Facilities and Public Right-of-Way sections of this plan.

Public Engagement Process

The City of Madison provides ongoing opportunities for interested people, including people with disabilities and organizations representing people with disabilities, to provide input and inform City programs, services, activities, and the design of facilities.

In July 2023, the City of Madison hosted its first **Disability Summit: Collective Visioning for a More Equitable Future.** It established a platform for residents to provide input by sharing their experiences and vision for the communities in which they live, work, learn, travel, play, and thrive. Feedback received related to City facilities, programs, and services as well as feedback related to pedestrian facilities is included in this Plan.

Community members may further inform the self-evaluation process by providing comments and suggestions related to the Proposed ADA Transition Plan and Self-Evaluation. This information will be considered when prioritizing and scheduling the removal of access barriers.

A summary of public engagement activities related to this Plan is included below. In addition, we recognize that the lived experiences of our residents are invaluable in conducting a meaningful self-evaluation. Therefore, a Proposed ADA Transition Plan was made available for public comment on June 24, 2025.

The Department of Civil Rights hosted public information sessions to share information about the self-evaluation process and findings with residents with disabilities and other stakeholders and to obtain feedback to inform the development of this plan. The information sessions were posted online and covered differed portions of the plan as follows:

Programs, Activities and Services and Employment

- Public Right of Way
- Public Facilities and Web and Digital Accessibility

In addition, residents were engaged via social media, the <u>city website</u> and through the City of Madison's news updates.

Additional comments and suggestion were sent to RHoyt@cityofmadison.com or

Department of Civil Rights
ATTN: ADA Coordinator
210 Martin Luther King Jr. Blvd., Suite 523
Madison, WI 53703

A summary of public engagement activities will be included in Appendix XV at the end of the 60-day public comment period.

Organization of this Report

This report includes four main parts.

Part I includes programs, services, and activities. This part includes a description of the City of Madison's centralized Language Access Program and web and mobile communications as well as program accessibility for all city agencies that provide services to the public.

Part II includes City facilities which are open to the public.

Part III includes the facilities in the public right-of-way. This portion of the plan was prepared in consultation with Access to Independence.

Part IV includes the City of Madison's policies related to employment and a narrative related to the accessibility of facilities used by employees of the City of Madison.

PART I: Programs, Services, and Activities

Centralized Services for People with Disabilities

As a recipient of federal funds, the City of Madison is subject to Title II and Title IV of the Americans with Disabilities Act. The Act requires public entities to ensure effective communication with people with disabilities. Under 28 CFR § 35.160 et. sq., public entities, including the City of Madison, are required to:

- Take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others.
- Provide appropriate auxiliary aids and services where necessary to afford individuals with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity.

The type of auxiliary aid or service necessary to ensure effective communication will vary based on the method of communication the person with a disability uses; the nature, length, and complexity of the communication; and where and when the communication takes place (28 CFR § 35.160(b)(2)).

In addition, <u>Madison General Ordinance 39.02</u> holds that the official policy of the City of Madison is to provide equal access to public services for all persons from all segments of the Madison community without regard to their disability, national origin, or other protective categories, and prohibits the practice of unfair discrimination in access to public services, employment and contracting. The City is required to take "affirmative and direct action... to make equal employment, access to public service, and promotional opportunities a reality and correct the effects of past patterns of inequality."

In September of 2016, the Madison Common Council adopted a resolution which directed the Department of Civil Rights to develop a comprehensive language access plan. The City of Madison Language Access Plan was adopted by the Common Council in 2017. The Language Access Plan informs City of Madison staff, leaders, elected officials, and contracted vendors on policies, procedures, and practices for meaningful access to City services.

Members of the public have a right to request accommodations, translation, and interpretation services so they can meaningfully participate in all City services, programs, and activities. Language access services are provided at no cost to the individual.

Each Department and Agency in the City of Madison provides accommodations, auxiliary aids and services directly to members of the public upon request. Programs may consult with the Disability Rights and Services Program, designated ADA Coordinator, as needed to ensure their communications with members of the public with disabilities is as effective as communications with members of the public without disabilities. These include providing:

- Materials in alternative formats such as large print, accessible electronic format, other
 effective methods of making visually delivered materials available to individuals who are
 blind or have low vision.
- Use of video remote interpretation (VRI), relay services, and other effective methods of making orally delivered information available to individuals who are d/Deaf or hard of hearing.
- Qualified notetakers and readers, and other similar services.

All other auxiliary aids and services are provided through the City of Madison's centralized Language Access Program.

Language Access Program

The City of Madison Language Access Program provides auxiliary aids and services to ensure access to City programs for people with disabilities and for people whose preferred language is one other than English.

Members of the public may request language access services directly by emailing lap@cityofmadison.com or contacting the Department of Civil Rights at 608-266-4910.

The Language Access Program coordinates the following services for all City programs:

- Qualified interpreters including in-person and remote sign language interpretation
- On-demand video remote interpreting (VRI) services and on-demand interpretation for spoken and sign languages
- Translation services
- Communication Access Realtime Translation (CART)
- Auto-generated captioning for all internal and public virtual meetings
- Assistive listening systems and devices
- Plain language consultation

All Language Access Program services are provided at no cost to the recipient.

Telecommunications

Video relay interpretation services are available through <u>Wisconsin Relay Services</u> (711), a no-cost service that enables people who are d/Deaf, hard of hearing, DeafBlind or those with a disability that effects their speech to place and receive phone calls. Services include TTY relay, voice carry-over, hearing carry-over, and speech-to-speech.

The City of Madison accepts and responds to callers who use Wisconsin Relay Services in the same manner it accepts and responds to other callers.

Braille Materials

The City of Madison produces materials in Braille upon request. Members of the public may request Braille materials from city programs or the Language Access Program directly. The City's Document Services Unit utilizes a braille printer to facilitate these requests.

Website and Electronic Information and Technology

In April of 2024, the Department of Justice made a welcome announcement to advance access for the disability community. It issued a <u>new rule</u> updating Title II of the ADA by requiring the Web Content Accessibility Guidelines (WCAG) level 2.1 AA. WCAG 2.1 AA are specific requirements to ensure web content and mobile applications are accessible and useable for people with disabilities. By April 24, 2026, all public-facing, unarchived, and new web content and mobile applications for a city Madison's size must comply with <u>WCAG 2.1 AA standards</u>. This means federal standards will now include the access needs of a wider range of people with disabilities including people with blindness and low vision, people who are d/Deaf or have hearing loss, limited movement, speech disabilities, photosensitivity, and some learning and cognitive disabilities. The new standards also consider the ways people with disabilities access information such as through desktops, laptops, tablets, and mobile devices.

The City's Information Technology (IT) Department adopted strong <u>accessibility and usability guidance</u> over the last 15 years. It's in the IT strategic plan, web content editor training, the <u>City Brand Guide</u>, and our content management system (Drupal). We have several digital accessibility and usability subject matter experts (SMEs) on staff. We also improve our website's accessibility and usability with regular monitoring and updates from a third-party vendor. We regularly update older sections of the City site to our new design system, using Web Content Accessibility Guidelines (WCAG) level 2.1 AA guidance for accessibility and usability. Information Technology continues to encourage <u>reporting of any issues</u> so we can fix problems or find the resources requested.

As of 2024, we require a <u>Voluntary Product Accessibility Template</u> for all new vendors and digital products. This template requires all vendors to report their compliance with current accessibility standards. A vendor must provide a remediation plan if it fails to conform to WCAG 2.1 AA standards.

While WCAG 2.1 AA is our primary standard for compliance, we also strive for <u>Section 508</u> and WCAG 2.2 standards whenever possible. For example, adopting our cloud-based Microsoft 365 (M365) toolset made daily work more accessible, at higher standards. The M365 programs allow for built-in user accessibility reviews. We also incorporated accessibility learning pathways into our Learn M365 training modules. We work with Microsoft on any barriers or bugs staff encounter. We also developed a staff training plan for the most widely used M365 applications.

Beyond digital standards and toolsets, IT hired the City's first Digital Inclusion Coordinator in June 2023. The coordinator leads efforts to bridge the digital divide for members of our City workforce and the community (as appropriate). This includes initiatives, projects and consulting related to digital skills, accessibility, affordable internet and devices, comfortable and secure use, grant funding, and more. This coordination also involves representation and collaboration with community, state and federal partners.

These steps work towards ensuring that every visitor to the City of Madison's website has an equal experience and that all sites comply with state and federal regulations.

Accessibility problems or concerns of a City website or application can be <u>reported online</u> or by phone at 608-266-4506.

Self-Evaluation Findings

The following barriers to access were identified in the Self-Evaluation of Web and Electronic Information and Technology:

- Currently, auto-generated captions are available in all virtual meetings hosted by the City
 of Madison. CART services are made available upon request. Open and closed captions
 are not currently available for livestreamed meetings or automatically included in
 recordings of virtual meetings. We also plan to make transcripts more available and easily
 accessible to those who need them.
- Many, especially older, unarchived documents and videos do not conform to WCAG 2.1 AA standards.
- Legacy websites, which are websites with outdated frameworks, are pending upgrades to conform to WCAG 2.1 AA standards.
- Public-facing software, applications, and web-content offered by third-party vendors may not currently be fully compliant with WCAG 2.1 AA standards.
- Each department manages its web content. Full compliance requires extensive IT-provided training, support, and facilitation.

Overall, the City of Madison has **maintained conformance to current WCAG standards** and is on track to meet the minimum WCGA 2.1 AA standards by April 26, 2026. Further, as part of our ADA transition planning, we expect to have internal digital content and software conform to WCAG 2.1 AA and Section 508 standards by 2031.

Schedule for WCAG 2.1 AA and Section 508 Implementation

- By 2026, all public-facing digital content and technology will meet compliance requirements of WCAG 2.1 AA.
- By 2026, all software, hardware, and vendor contracts will include accessibility requirements.
- By 2031, all digital content including documents, videos, and other data/assets and software and hardware applications only used by City staff will conform to WCAG and Section 508 standards. Given current IT and other agency contracts with government/third-party vendors, this additional conformance will take time. Any digital content not compliant by 2031 will require an approved exception and a plan for remediation.

Additionally, the City should explore options for serving people with disabilities who use captioning and prefer a language other than English. City-wide translation resolution precludes automated English to other language translation (i.e. subtitles). We also note that future City Al policy development may impact effective communication options for people with disabilities and requires further exploration with engagement of impacted stakeholder groups.

See <u>Appendix III</u> for the Schedule, Cost, and Priorities for Removal of Access Barriers for Web and Electronic Information and Technology.

Programs, Services and Activities Self-Evaluation

The City of Madison has 25 Departments. Some Departments include large divisions with complex services which require individual evaluation. Each City of Madison program conducted a Self-Evaluation of program accessibility, effective communication, contracts and licenses in September - December of 2024.

Summary of Self-Evaluation Findings

In total the City of Madison evaluated 33 programs as listed below. This list also includes the person responsible for ADA compliance in each program.

- Mayor's Office Katie Crawley, Deputy Mayor and Christie Baumel, Deputy Mayor for Housing and Sustainability
- Common Council Karen Kapusta-Pofahl, Chief of Staff
- Assessor Michelle Drea, City Assessor
- Attorney Mike Haas, City Attorney
- Civil Rights Norman Davis, Civil Rights Director
- Clerk Jim Verbick, Deputy Clerk
- Engineering Jim Wolfe, City Engineer
- Finance Bradley Lovell, Safety Coordinator
- Fire Scott Bavery, Assistant Chief Personnel
- Fleet Randy Koch, Fleet Operations Manager
- Greater Madison Metropolitan Planning Organization (MPO) Alex Andros, Title VI Coordinator
- Independent Monitor Robin Copley, Independent Police Monitor
- Information Technology (IT) Amanda Lythjohan, IT Administrative, Finance and Project Portfolio Manager & Cassandra Hill, Digital Inclusion Coordinator
- Library Mark Benno, Administrative Services Manager
- Monona Terrace Bryan Cator, Operations Manager
- Municipal Court Christie Zamber, Court Administrator
- Parks Division- CJ Ryan, Assistant Superintendent
 - o Olbrich Botanical Gardens Tanya Zastrow, Olbrich Botanical Gardens Director
- Planning & Community & Economic Development
 - Building Inspection Division Amanda Hoadley, Administrative Supervisor
 - Community Development Division
 - Child Care Unit Monty Marsh, Early Care and Education Manager
 - Community Development Block Grant (CDBG) Maria Davila-Martinez,
 Community Development Specialist and Matt Frater, Community
 Development Specialist
 - Community Resources Unit (CRU) Katy Petershack, Community Development Specialist and Garrett Tusler, Community Development Specialist
 - CDA Housing Operations Division Lisa Daniels, Administrative Services Manager

- Economic Development Division Matthew Mikolajewski, Economic Development Division Director
- Planning Lisa McNabola, Planner
- Police Adela Rivera, Human Resources Coordinator
- Public Health Madison & Dane County Sarah Mattes, Interim Director Operations
 Division
- Streets & Recycling Charlie Romines, Streets Superintendent
- Transportation
 - Metro Transit and Paratransit Laura Sherrington and Justin Maki, Transit Safety Coordinator
 - Parking Division Stefanie Cox, Parking Division Manager
 - o Traffic Engineering Tom Mohr, Assistant Director
- Water Utility Dan Rodefeld, Operations Manager

Compliance

Based on the findings of the Self-Evaluation, the City of Madison is fully compliant in the following areas:

Program Access

- People with disabilities are given equal opportunity to participate in or benefit from the aid, benefit, or services. For example, people with disabilities have equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as others.
- People with disabilities are given the opportunity for equal enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving the aid, benefit, or service.
- People with disabilities are given the opportunity to participate as a member of planning or advisory boards.
- Services, aid, or benefits to people with disabilities are provided in the same location as the general public or the most integrated setting appropriate.
- Eligibility criteria for services, aid, or benefits do not disadvantage people with disabilities.
- There are no fees or charges that only apply to people with disabilities or groups of people with disabilities.
- People with relationships or associations with people with disabilities (i.e. family members, spouses, caregivers, etc.) are provided equal services, programs, or activities.
- Agencies are not aware of any safety requirements not based on actual risks, but rather on speculation, stereotypes, or generalizations about individuals with disabilities.
- Facilities are accessible for people who use service animals.
- Public meetings and events are held in locations accessible to people who use mobility devices.

Effective Communication

 Agencies accept and respond to callers who use Wisconsin Relay Services or other phone interpretation services in the same manner as other callers.

- Interested people, including people with vision or hearing impairments, can obtain information about accessible services, activities, and facilities and how to access them.
- There are no known policies or practices related to communication that may exclude or limit the participation of individuals with disabilities in programs, activities, or services.

Contracts

- Anti-disability discrimination language is included in contracts with third parties.
- Agencies are not aware of any claims of disability-related discrimination by contractors.

Licenses and Certificates

- Licenses or certificates issued by agencies are equally as accessible to people with disabilities.
- Licenses or certificates required from another entity are equally as accessible to people with disabilities.

Further Action Needed

Based on our findings, further resources and training are needed in the following areas to achieve our goal of full compliance with the ADA.

Program Access

- All agencies have a process for making reasonable modifications to policies, practices, and procedures where needed to make sure that a person with a disability can access programs, services, or activities (unless making the modifications would fundamentally alter the nature of the service, program, or activity).
- All agencies have notices about the availability of and how to request accommodations and language access services are posted in public places and on public-facing forms.
- People with disabilities are not excluded from any program or service because existing buildings and facilities are inaccessible.

Note: This was in reference to Monroe Street Library and Public Health Mobile Health Clinics. The ADA does not require that a city make each facility accessible. Rather the accessibility of services, programs, and activities are viewed in their entirety (28 CFR § 35.150 (a)). Therefore, these agencies will ensure that services, programs, and activities offered at these locations are made available at accessible locations and provide accommodations or modifications where needed and appropriate so as not to exclude any qualified person with a disability.

• All staff who interact with the public in city facilities are trained regarding the rights and responsibilities of people who use service animals.

Effective Communication

- All meeting invitations and notices include information about the availability of and how to request accommodations and language access services.
- Written materials are provided in alternative formats such as large print, Braille, and audio recording upon request
- Qualified note takers and readers are provided upon request

- All relevant staff are trained to request interpretation, translation, and other aids and services from the Language Access Program
- All staff who interact with the public have access to a phone for On-Demand Language Line Interpretation services.
- All staff who interact with the public are trained to use Language Line On-Demand Interpretation services over the phone.
- All staff who interact with the public have access to a device for Language Line On-Demand Video Interpretation services.
- All staff who interact with the public are trained to use Language Line On-Demand Video Interpretation services for communication with people who use ASL or other sign languages.
- Audio portions of videos and recorded programming provide equally effective communication for individuals with hearing impairments. For example, captioning or a written transcript.
- Other than when using a qualified interpreter, in an emergency, or at the request of the individual, staff communicate directly with people with disabilities.

A report of program evaluations is available in Appendix IV.

Ticketing

The ADA requires that entities that sell tickets to events do not discriminate against people with disabilities in relation to:

- Ticket sales,
- Ticket prices,
- Identification of available accessible seating,
- Purchasing multiple tickets,
- Ticket transfer,
- Secondary ticket market,
- Hold and release of tickets for accessible seating, and
- Prevention of fraud in the purchase of tickets for accessible seating.

Olbrich Botanical Gardens and Monona Terrace are the only City programs that sell tickets to events. Each program completed a supplemental questionnaire related to ticket sales for wheelchair accessible seating and companion seats. Based on the program self-evaluations the City of Madison is compliant with 28 CFR § 35.138 related to ticketing.

Methods and Timeline for Removing Barriers

In collaboration with the Department of Civil Rights and the Disability Rights and Services Specialist each program developed a Schedule, Cost and Priorities for Removal of Access Barriers in Programs Activities, and Services. Barriers were given a priority ranking as follows:

Priority 1: Access to Services

Priority 2: Effective Communication

Programs were instructed to identify and address barriers that were readily achievable. This means removing access barriers that can easily be accomplished and carried out without much difficulty or expense. If removal of an access barrier is not readily achievable, the program was to list the estimated cost and identify a projected timeline for removing the access barrier considering priority and achievability.

A table including a description of barriers, cost, timeline and department is available in Appendix V.

In addition, the Department of Civil Rights and the Disability Rights and Services Program will take the following action to support agencies in removing barriers to programs, services and activities:

- 1. The Disability Rights and Services Program will develop and provide annual training on the following topics beginning in the Spring of 2025:
 - a. Service and Support Animals in Places of Public Accommodation
 - b. ADA and Effective Communication

It is recommended that all relevant staff attend the trainings at least bi-annually and that recorded trainings are incorporated into the onboarding process for new staff.

- 2. By December 2025, the Disability Rights and Services Program will develop an Administrative Procedure Memorandum that provides agencies with additional guidance for making reasonable modifications to policies, practices, and procedures where needed to ensure that a person with a disability can access programs, services, or activities (unless making the modifications would fundamentally alter the nature of the service, program, or activity) including when an accommodation is needed due to an inaccessible facility.
- 3. By December 2025, the Disability Rights and Services Program and other relevant staff will update the Language Access Plan to include guidance and sample language regarding notice requirements related to the availability of and how to request accommodations and language access services. The updated Language Access Plan will include uniform language to be posted in public places and on public-facing forms that is translated into Spanish, Chinese, and Hmong as well as other guidance necessary to ensure compliance with this Plan.
- 4. Supporting the efforts of Information Technology and other relevant staff in implementing the Schedule, Cost, and Priorities for Removal of Access Barriers for Web and Electronic Information and Technology (Appendix III).

Additional Recommendations

Residents also provided the following recommendations at the Disability Summit to support the City's efforts to extend program access beyond ADA compliance:

- 1. Incorporate <u>universal design principles</u> in communications and information sharing.
- 2. Ensure information about City programs and services is easy to find and easy to use. This may include the use of plain language and readily available materials in alternative formats and languages other than English.
- 3. Work to streamline application processes and user experience for City services.
- 4. Develop multi-modal ways to engage with the community including through social media, one stop resource guides and information hubs and through community partners.

5. Programing should appeal to Disabled residents through different stages of life and from different cultural backgrounds and lived experiences, recognizing that the disability community is not a monolith.

Comments and suggestions may be sent to RHoyt@cityofmadison.com or

Department of Civil Rights ATTN: ADA Coordinator 210 Martin Luther King Jr. Blvd., Suite 523 Madison, WI 53703

PART II: Public Facilities

The ADA requires that facilities open to the public be useable and accessible for people with disabilities. This plan includes an evaluation of facilities which are open to the public. A discussion of facilities commonly used only by employees is included in Part IV of this Plan. This Plan does not include quasi-governmental facilities (facilities owned by the City but operated independently by another entity), machine shops, and storage facilities.

The City of Madison's main offices are located in the Madison Municipal Building and the City County Building located at 210 and 215 Martin Luther King Jr. Blvd. Other buildings and offices open to the public include Metro Administrative Offices, Madison Senior Center, Madison Public Libraries, Madison Police Stations, and select Madison Dane County Public Health facilities. These spaces are owned or leased by the City of Madison. Other types of facilities evaluated include 269 of our 282 parks, parking lots and garages, and facilities that offer tours to the public.

Design Standards

The ADA has different standards for buildings and facilities based on when they were constructed or altered (28 CFR § 35.151(c)). See the table below for more information:

Date of construction or alteration	Standards
Before January 26, 1992	Not required to comply
On or after January 26, 1992, and before	Uniform Federal Accessibility Standards or the
March 15, 2012	1991 ADA Design Standards
On or after September 15, 2010, and before	2010 ADA Design Standards, Uniform Federal
March 15, 2012	Accessibility Standards, or the 1991 ADA
	Design Standards (except for elevators)
On or after March 15, 2012	2010 ADA Design Standards

Summary of Facilities Self-Evaluation Findings

This section includes a summary of findings by type of facility – buildings and offices, parks and recreation facilities, parking lots and garages, and employee use facilities that offer tours to the public. A description of identified barriers by facility is available in <u>Appendix VI</u>.

Buildings and Offices

Based on the findings of the Self-Evaluation, we found that most building facilities had compliance issues. The most common issues were related to wayfinding and other informational and directional signage, door weight and proper closure speed, and protruding objects in the path of circulation. Some facility evaluations revealed greater concerns; for example, a lack of accessible parking or noncompliant accessible public restrooms. These were, however, limited considering the large number of city facilities evaluated.

We found that even buildings with newer construction and alterations had compliance issues, though most were minor. This suggests that greater quality assurance is needed to ensure that agency operations staff do not add or alter elements after construction to ensure that compliance

with ADA Design Standards is maintained. Additionally, resources must be invested in existing facilities, training and monitoring in order to achieve our goal of full compliance with the ADA.

Parks Division Facilities

Evaluations of parks facilities were completed using a combination of methods due to the volume of facilities and availability of resources. Staff reviewed all parks via satellite imagery to assess elements related to approach and entrance. Buildings, including shelters and restrooms, were evaluated in-person. We also completed a review of playgrounds installed after 2013. These playgrounds were required to pass inspection meeting the 2010 ADA standards prior to opening. Additionally, we inventoried the playgrounds older than 12 years that will be replaced. One hundred three (103) of our 162 playgrounds built after 2013 were visually verified prior to opening, and 59 of our playgrounds are scheduled to be replaced before 2033. The Parks Division has an annual Capital Improvement Plan that allocates funding for 5-10 playgrounds to be replaced annually, so that a full system replacement occurs on a 20-year cycle.

Many of the barriers identified by the evaluation are issues with the paving, curb cuts, or uneven paths of travel. The Parks Division has parking lot reconstruction integrated into its 5-year Capital Improvement Plan (CIP), and noted which lots are already included in that plan. These are listed in the table below.

Park	Planned Removal of Access Barriers included in CIP in the next five (5) years
Acacia Ridge Park	This is a new park, and it is planned to be developed
Brittingham Park	Replace the beach house and address barriers to bathrooms
Burrows Park	Parking lot repaving and restriping
Cherokee Park	Provide accessible path to water's edge to be done with bridge project.
Country Grove Park	Adding tennis/pickleball courts will make curb improvements with this project
Cypress Spray Park	Rebuilding splash pad
Door Creek Park	Will address barriers to access within scheduled trail and parkland improvements project
Duane F Bowman Park	Parking lot repaying and addition of curb cuts and accessible parking
Edna Taylor Conservation Park	Parking lot restriping
Filene Park	Pier repairs and path paving scheduled
Elver Park	Parking lot repaving
Forest Hill Cemetery	Paved access improvements
Garner Park	Parking lot repaving
Goodman Park	Parking lot repaving

Park	Planned Removal of Access Barriers included in CIP in the next five (5) years
Odana Hills Golf Course	Parking lot repaving
Owen Conservation Park	Parking lot repaving
Reindahl Park	Shelter (Imagination Center) and parking lot rebuild scheduled for 2026
Vilas Park	Some accessibility improvements included in CIP

The remaining barriers to access for parks and recreation facilities identified through the self-evaluation process have been assigned an estimated cost so that they can be removed through the 5-year Capital Improvement Plan over time. For a full list of access barriers and anticipated costs see: Parks ADA Self-Evaluation Master Spreadsheet. We anticipate that access barriers in parks and recreation facilities will be incorporated into our Capital Improvement Plan, and that as park facilities are replaced or upgraded, they will be brought into compliance with modern ADA standards. We expect that by identifying which barriers can be removed through existing projects and which must be addressed independent of other projects, we will have a plan that brings our parks facilities into compliance by 2055.

Some of our parks have shoreline areas that cannot feasibly be made fully accessible to people using mobility devices due to the existing landscape. However, when viewed in its entirety the parks system is readily accessible and usable to people with disabilities (28 CFR § 35.150 (a)). We have locations throughout the City, such as Vilas Park and Bernies Beach that have mats designed to facilitate access to the shoreline for people using mobility devices. The City has partnered with the Madison Parks Foundation to identify potential funding sources and locations for more of these beach mats to be installed in the future.

The City has also partnered with the Madison Parks Foundation to build four inclusive playgrounds at strategically located parks: Elver Park, Brittingham Park, Rennebohm Park, and Warner Park with plans to build a fifth at Reindahl Park. While all of our playgrounds meet the 2010 ADA Standards, these four playgrounds go above and beyond the standards to create an even more inclusive experience for a wide range of playground users. These playgrounds have poured rubber surfacing for greater wheelchair access, ramps to different levels of the playgrounds, and features that can be enjoyed by people of all ages and abilities.

Finally, it should be noted that our self-assessment was not entirely comprehensive, as the staff and time resources did not allow a full inspection of all park paths, playgrounds, buildings, and property in our 282 parks. Going forward, we must rely on the public to inform us of any elements that present barriers to access in our parks. We welcome this information and will include additional barriers identified in planned accessibility improvements.

To report a barrier to access related to parks and recreation facilities, contact 408-266-4711 or parks@cityofmadison.com. Language access services are available.

Parking Lots and Garages

Based on the Self-Assessment findings, the Blair Lot is fully compliant. Other parking facilities, including the Buckeye Lot, Evergreen Lot, South Livingston Street Garage, and State Street Capital Garage have a small number of compliance issues such as incorrect signage or sign height, door weight and closing speed, or require additional accessible parking stalls to meet the required standards. More resource-intensive compliance issues were identified at the Wingra Lot which needs to be regraded in order to provide a slope and cross slope for accessible parking that is no more than 1:48 (1 inch rise for 48 inches of length). Additionally, the door weight and closing speed of the doors at the Wilson Street Garage are not compliant. Due to the design of this garage and the number of doors involved, this facility requires significant resource investment in order to be accessible and useable for people with disabilities.

Some parking facilities such as the Capitol Square North Garage, Overture Center Garage and State Street Campus (Frances) Garage predate the ADA Design Standards. Due to their design and structure, it is not feasible to address barriers related to the vertical clearance provided for van accessible parking or the slope of parking spaces, access aisles, and some areas of the accessible routes. For these facilities, the agency will remove any barriers to access that are readily achievable.

Facilities Offering Public Tours

Some agencies such as the Madison Fire Department and Madison Water Utility offer tours of employee facilities to the public. Facilities that are not open to the public are not required to meet the 2010 ADA Design Standards. However, public tours may be considered an activity provided by these agencies. Therefore, the City will take steps to ensure the accessibility of services, programs, and activities as viewed in their entirety (28 CFR § 35.150 (a)), even though not all facilities where public tours are provided can be feasibly made fully accessible.

The Fire Department will prioritize bringing the tour route at Fire Stations 1, 7, 11, 12, 13, and 14 into compliance with relevant standards so that tours of fire stations are readily accessible to people with disabilities at a variety of locations even if it is not feasible to offer them at each facility. These Fire Stations were selected because Stations 2, 3, 4, and 5 are multilevel facilities where it would not be feasible to add an elevator or lift. The original design and construction of Stations 8, 9 and 10 predate the ADA standards. These stations have numerous barriers that would require larger renovation or reconstruction projects to make tour routes accessible and usable for people with disabilities. Fire Station 6 is scheduled for temporary relocation in 2025. Information about the availability of accessible tour locations will be made available on the Fire Department website and any other materials related to the availability of public tours.

Regarding tours of Water Utility facilities such as wells, Water Utility will prioritize achieving full compliance on tour routes at Unit Well 7 and Unit Well 31 under the ADA Transition Plan. In addition, it will work with the Disability Rights and Services Program over the next three years to identify and evaluate other well facilities where accessibility is readily achievable or can be achieved within available resources over the next ten years. When considering where to invest resources, we consider ensuring that a proportional number of facilities where public tours are offered are accessible and that there may be some facilities where accessibility and usability is

more readily achievable than others. For information about planning a tour and the availability of accessible locations, contact water@madisonwater.org.

Methods and Timeline for Removing Barriers

In collaboration with the Department of Civil Rights, Engineering, and the Disability Rights and Services Specialist each program developed a Schedule, Cost and Priorities for Removal of Access Barriers in Facilities. Barriers were given a priority ranking as follows:

Priority 1: Approach and Entrance - elements needed to get into the building like parking, accessible route, curb ramps, ramps, entrance, elevators, etc.

Priority 2: Access to Goods and Services - elements needed to access areas of the building like seating areas, rooms and spaces, wayfinding signs, service counters, elevators, and more.

Priority 3: Toilet Rooms - all aspects of an ADA compliant public restroom.

Priority 4: Additional Services - additional elements like water fountains, public telephones, audible and visual fire alarms, etc.

Programs were instructed to identify and address barriers that were readily achievable. This means removing access barriers that can be easily accomplished and carried out without much difficulty or expense. Those barriers which could be immediately remedied were addressed prior to the development of this Plan. If removal of an access barrier is not readily achievable, the program was to list the estimated cost and identify a projected timeline for removing the access barrier considering priority and achievability.

A full description of barriers, cost, timeline, and department for each facility is available in <u>Appendix VI.</u>

To implement the ADA Transition Plan, it will be necessary for the City of Madison to develop an ADA Transition Project in the Capital Budget beginning 2026, see <u>Appendix VII</u>.

In addition, the Department of Civil Rights will take the following actions to support agencies in removing barriers to access in City facilities.

- By end of year 2025, the relevant Engineering and other City staff will receive training from Access to Independence related to the <u>2010 ADA Design Standards Existing Facilities</u> <u>Checklist</u>, Access Board <u>Accessibility Standards Section 233</u> and <u>Accessibility Standards Section 244</u>.
- 2. Beginning in September 2025, all newly constructed, altered, or acquired facilities will be evaluated for ADA compliance using the above tools and standards (or current standards) and a schedule, cost, and priorities for removing barriers to access identified in the evaluation process will be developed. The evaluation and the schedule will be submitted to the Disability Rights and Services Program and progress towards removing barriers to access will be monitored in conjunction with this Plan.
- By September 2025, the City will commit to changing leasing practices to only acquire leased spaces that are compliant with 2010 ADA Design Standards and/or are able to be modified to address non-compliance issues that are readily achievable.

4. By December 2025, the Disability Rights and Services Program in collaboration with Engineering will develop an Administrative Procedure Memorandum that provides agencies with additional guidance to ensure that wayfinding and other identification and directional signage throughout city buildings is uniform and compliant with Sections 216 and 703 of the 2010 ADA Design Standards.

Additional Recommendations

Residents also provided the following recommendations at the 2023 Disability Summit to support the City's efforts to enhance the accessibility and usability of City facilities beyond ADA compliance:

- Provide learning opportunities for City planners and engineers related to <u>universal design</u> and incorporate universal design principles in new construction and renovations where feasible.
- 2. Explore opportunities to incorporate the lived experiences and expertise of Disabled consultants, residents, and/or Disability Rights Commissioners with the support of the Disability Rights and Services Specialist in developing planning strategies that center inclusion in public facilities.

Comments and suggestions may be sent to RHoyt@cityofmadison.com or

Department of Civil Rights
ATTN: ADA Coordinator
210 Martin Luther King Jr. Blvd., Suite 523
Madison, WI 53703

PART III: Public Right-of-Way Facilities

The City of Madison Transition Plan is required by the Americans with Disabilities Act (ADA) of 1990 and is intended to guide the City's efforts to provide accessible and useable public facilities for people with disabilities. The ADA Transition Plan addresses accessibility within public right-of-way within the City of Madison.

The purpose of this portion of the Plan is to create a working document that identifies barriers to access within public right-of-way in Madison and to outline a schedule and estimated cost for their removal. This may include necessary changes to ordinances or policies. The Plan also identifies opportunities to go beyond compliance, fostering greater inclusion for Madison residents with disabilities. The Plan is intended to be a living document that will be updated regularly to track progress toward compliance.

The minimum scope of the ADA Transition Plan includes ensuring inventorying accessibility for all sidewalks, bike and multi-use paths, curb ramps and ancillary facilities within the right-of-way, such as bus stops and pedestrian push buttons and signals and documenting any barriers to accessibility. In addition to permanent infrastructure, other barriers to accessibility within public right-of-way—such as sidewalk obstructions, driveway approaches, and areas in disrepair—must also be addressed to create a fully functional and accessible pedestrian system. See Appendix VIII for a list of Acronyms and Abbreviations related to Public Right-of-Way Facilities.

Regulatory Framework and Guidance

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 the City.

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

The ADA expands on the foundation laid by Section 504 by prohibiting discrimination based on disability by public entities regardless of whether they receive federal financial assistance. Title II of the ADA applies specifically to state and local government services and the programs and activities they administer, including features built before and after 1990.

ADA and Architectural Barriers Act (ABA) Accessibility Guidelines for the Public Right-of-Way

The guidelines set by the ADA and the Architectural Barriers Act (ABA) include both scoping and technical requirements to ensure that pedestrian facilities in public right-of-way are readily accessible to and usable by pedestrians with disabilities. These requirements apply to public right-of-way that may form the boundary of a property or lie within a site's property line. For more information see the Public Right-of-Way Accessibility Guidelines (PROWAG).

Madison General Ordinances

The following city ordinances provide standards related to public right-of-way:

- City of Madison Traffic Engineering Department's Pedestrian Transportation Plan
- City of Madison Standard Specifications Engineering Division's Design Standards
 - o For more information review the <u>City of Madison Guidelines for Installing ADA</u> Compliant Sidewalk Ramps.
- Greater Madison MPO Bicycle Plan Path Design Standards

Evaluation

Under Title II of the ADA (28 CFR § 35.105), public entities must conduct a self-evaluation of their current services, policies and practices to ensure accessibility. The goal is to verify that the agency's policies, programs and facilities are accessible and do not hinder the full participation of individuals with disabilities. The process involves reviewing the agency's entire public program, including all facilities on public property and within public right-of-way, to identify and address any barriers to accessibility. The self-evaluation will identify what policies and practices impact accessibility and examine how Madison implements these policies. The goal of the self-evaluation is to verify that in implementing Madison's policies and practices, the City is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

In 1990, the City created section 3.72 of the Madison General Ordinances mandating compliance with the applicable standards, guidelines, and requirements issued by the US Access Board. These include the ADA Accessibility Standards, which set the standards for buses and vans, as well as the 2023 Public Right-of-Way Accessibility Guidelines (PROWAG). Evaluations of existing facilities were conducted using legacy PROWAG guidelines. The 2024 PROWAG, which was formally adopted by the U.S. Department of Transportation in December 2024, is required for new construction and alterations of transit stops in the public right-of-way beginning January 17, 2025. The City of Madison's goal is to continue to provide accessible pedestrian design features as part of Capital Improvement Projects. The City has established Standard Specifications for Public Works Construction, which are updated annually. These standards and procedures will be kept up to date with nationwide and local best management practices.

Process of Evaluation

The City of Madison partnered with the Greater Madison MPO to develop an inventory of facilities within public right-of-way. This review used a combination of existing data sets analyzed with ArcGIS, supplemented by spot-verifications using aerial photography, Google Street View imagery, and in-person site visits.

The evaluation reviewed pedestrian facilities including:

- 1,121 miles of sidewalk
- 149 miles of crosswalks
- 51 miles of pedestrian and shared-use paths
- 2,558 pedestrian-bicycle signals
- 140 Rectangular Rapid Flash Beacons (RRFBs)

- 23,785 curb cuts (note: a corner curb cut that serves two crosswalks is counted twice)
- 412 driveway aprons used to access the pedestrian network
- 134 sites with stairs within the pedestrian network
- 1,320 signed bus stops and 44 bus rapid transit (BRT) stations

Findings

The findings of this self-evaluation are based on a review of available data supported by mapping tools and supplemental verification methods as described above. As a result, certain compliance features, such as slope and grade, are not included in the analysis, and not all facilities within the inventory have been individually verified with on-site assessments. The findings are based only on those compliance elements which are measurable given available resources and information.

Where appropriate, maps, including both static and interactive web maps, and tables are included to provide more details about the location and nature of barriers to accessibility. For assistance using interactive web maps or alternative formats, please refer to the <u>Communications and Accommodations</u> section of this document.

Curb Cuts and Ramps

The Greater Madison MPO developed an inventory of transition points, sidewalks, crosswalks, and multi-use paths using a combination of existing data and aerial imagery (Wisconsin NAD 1983 HARN US feet coordinate system). Categories for transition points include Curb Cut, Accessible; No Curb Cut, Accessible; Driveway Apron, Accessible; Driveway Apron, Inaccessible; and Steps, Inaccessible.

The dataset was last updated in 2023. See the <u>Pedestrian Facilities</u> interactive web map for more details.

The legend represents each element as follows:

Icon	Element
•	Dark green circle: Curb Cut, Accessible
•	Light green circle: No Curb Cut, Accessible
•	Yellow circle: Driveway Apron, Accessible
8	Yellow circle with an "x": Inaccessible
_	Yellow triangle: Steps, Inaccessible
_	Black lines indicate a sidewalk
	Red dashes indicate a crosswalk
_	Light blue lines indicate a pedestrian path

New construction and alterations of curb ramps and blended transitions in the public right-of-way beginning January 17, 2025, will comply with the following PROWAG standards except where existing physical constraints make compliance with applicable requirements technically

infeasible, compliance with these requirements is required to the maximum extent feasible. Existing physical constraints include, but are not limited to, underlying terrain, underground structures, adjacent developed facilities, drainage, or the presence of a significant natural or historic feature.

- R205.2.1 Curb Ramps
- R203.6 Curb Ramps and Blended Transitions
- R303.5 Curb Ramp or Blended Transition
- R304 Curb Ramps and Blended Transitions

Bus Stops

Metro Transit tracks bus stop data and makes it publicly available via the City of Madison Open Data portal. Bus stop accessibility data is also included in Metro's General Transit Feed Specification (GTFS). GTFS is an open data format for public transportation schedules and related information. Making transit route, stop, and schedule information available in this format allows third party entities, such as Google Maps, to provide information about bus stop accessibility to passengers in more ways. See the Metro Transit Bus Stops interactive web map for more details.

Operators can safely deploy accessible ramps at all bus stop locations within the City of Madison public right-of-way. However, there are bus stops that are not fully compliant with accessibility requirements because they do not have a bus pad or accessible route to access the bus pad. The requirements include the presence of an 8-foot by 6-foot firm and stable surface area with minimal slope, connected to either a pedestrian circulation path or pedestrian route. ADA and PROWAG standards allow this stable surface to be located at street level, if it is outside the vehicle travel way. Also see PROWAG R21 and 309 Transit Stops and Transit Shelters.

The table in <u>Appendix IX</u> identifies 10 bus stops without a compliant transit boarding area, including a description of improvements needed and a date of estimated completion. In these locations, bus operators deploy their accessible ramp onto the edge of the roadway to allow a passenger who needs to use the ramp to board.

Sidewalk Accessibility Map

The sidewalk accessibility map (Appendix X) shows sidewalks that are accessible via curb cuts and driveways. It also highlights areas where sidewalks are isolated and where users would be forced to go into the road for travel. The sidewalk accessibility map dataset is a snapshot of October 10, 2024.

Sidewalk System Map

The Greater Madison MPO created a dataset that shows areas in Madison with sidewalks, as well as areas without sidewalks (<u>Appendix XI</u>). This map identifies potential routes that could improve the overall pedestrian network. When used alongside the other maps, it can serve as a tool to prioritize areas for improvement. The sidewalk system map dataset is a snapshot of September 20, 2024.

Methods and Timeline for Removing Barriers

Prioritization

The City of Madison will prioritize addressing inaccessible features that are achievable within current resources. For example, it is within the scope of available resources to address accessibility improvements at **bus stop locations by the end of 2025** (Appendix IX). Crosswalk signals, rectangular rapid flash beacons (RRFBs) and other traffic safety enhancements as such speed limits, enhancing crosswalk visibility, improving lighting and adding traffic calming safety improvements are addressed on an ongoing basis through the Traffic Signals and Street Safety Improvement Program (Appendix XII). This program also ensures that all new and altered pedestrian signal heads installed at crosswalks include "accessible pedestrian signals" (APS), which have audibled and vibrotactile features indicating the walk interval so that a pedestrian who is blind or has low vision will know when to cross the street. Pedestrian push buttons are located within a reach range such that a person seated in a wheelchair can reach them. The walk speed used to calculate the crossing time allows pedestrians with disabilities sufficient time to cross.

Other efforts toward achieving accessibility and usability of the public right-of-way, such as installing additional sidewalks, curb cuts and curb ramps, require long-term planning and further resource allocation. There are numerous locations within the public right-of-way that either have no sidewalks or have existing sidewalks without curb cuts and curb ramps. The absence of curb ramps is usually due to steep grades in the vicinity or other mitigating factors. The City of Madison has two types of primary programs that aim to address these deficiencies over time.

First, the Sidewalk and Curb Ramp Repair and Replacement Programs (<u>Appendix XIII</u>) may address curb cut and ramp installations that can be completed with a reasonable amount of grade adjustment along the sidewalk (maximum of 30' in either direction from the landing), minimal street work required, and no other impacts, such as private property impacts, including driveways, as this program has no funding for easement acquisition.

Additionally, the City of Madison has Street Repairs and Reconstruction, Street Resurfacing, and WisDOT funded programs. Within these programs, streets are fully reconstructed, including pavement, base course, curb and gutter, and sidewalks, as needed, including replacement and installation of new curb cuts and ramps where none previously existed but are necessary, desired, or required. These programs are utilized for more significant work and more complicated ramp installations than the Sidewalk and Curb Ramp Repair and Replacement Programs. Work completed within these programs may also include grade adjustments on the streets, geometric changes to the street, and at times include acquisition of easements from adjacent private properties, when necessary. Due to grade issues, some locations where curb ramps currently do not exist require full street reconstruction. This can cost \$200,000 or more, per block. Each year, the City has funding to reconstruct approximately 1.5-3 miles of street, depending on the types of projects selected. Additionally, some existing physical constraints such as underlying terrain, underground structures, adjacent developed facilities, drainage, or the presence of a significant natural or historic feature, make compliance with applicable requirements technically infeasible.

The City of Madison takes a holistic approach to prioritizing and programming street reconstruction projects. As such, each year the City analyzes a variety of data to select projects based on a number of factors to develop the <u>Transportation Improvement Plan</u>. These factors include, but are not limited to:

- Safety improvements needed such as crash history,
- Gaps in the sidewalk network,
- Gaps in the bicycle facility network,
- Other transportation operational needs such as public transit,
- Condition of street infrastructure,
- Condition or capacity needs of the underground infrastructure (City water mains, sanitary sewer, and storm sewer), and
- Equity and accessibility need.

Beginning in 2024, City of Madison sidewalk inspectors began collecting data on locations where street reconstructions are necessary in order to install compliant curb ramps. This data will be used every year as part of the analysis for prioritizing projects within the street reconstruction program. Due to limitations of staff, the specific location analysis is completed within the Sidewalk and Curb Ramp Repair and Replacement Program review cycles. A full analysis will be completed city-wide within the next 10 years. However, using the data set collected in the self-evaluation process, 206 locations have been mapped where curb cuts and ramps are likely not present (Appendix XIV). The City will review each of these locations by December 31, 2027, to verify barriers to access and identify which program will address the need.

The following prioritization schedule will continue to be incorporated into evaluations of equity and accessibility needs, with ongoing input from community members with disabilities and other stakeholders.

Priority 1: Addressing facilities that are not accessible, including those with public complaints

Priority 2: Addressing facilities with existing accessibility features that are still receiving public complaints

Priority 3: Focusing on ongoing repairs and remediation to make facilities accessible in accordance with:

- Traffic Signals and Street Safety Improvements (<u>Appendix XII</u>)
- Sidewalk and Curb Ramp Repair and Replacement Programs, including private development (<u>Appendix XIII</u>)

Priority 4: Prioritizing high-use areas over lower-use areas, and those that connect to public transit (See Appendix XI)

Schedule and Costs

Based on the findings of the evaluation, the following barriers to access will be addressed to meet minimum compliance with the applicable PROWAG and other relevant standards.

- 1. By November 30, 2025, install accessibility improvements at 10 bus stops within the City of Madison right-of-way (for details related to location, description of improvements, and schedule for completion see Appendix IX).
 - **Cost:** Approximately \$2,000 for an 800 square ft bus pad; cost varies for improvements to accessible routes.
 - Individual Responsible: Timothy Sobota, Capital Project Coordinator
- By December 31, 2025, the Disability Rights and Services Specialist and Engineering will review the standard drawings for contracted sidewalk repair and construction and make recommendations for updates as needed. These revisions will be reflected in the 2026 Standards.
- 3. By December 31, 2027, Engineering will verify barriers to access related to curb cuts in the public right-of-way (See Appendix XIV for a map of curb cuts) and identify which program Sidewalk and Curb Ramp Repair and Replacement Programs, City Street Reconstruction Program, or WISDOT funded projects that require full reconstruction will meet the need.
 - Individual Responsible: Bill McGlynn, Sidewalk Program Supervisor
- 4. By 2035, the Sidewalk and Curb Ramp Repair and Replacement Programs will complete a full analysis of street reconstructions necessary in order to install compliant curb ramps. When complete, the analysis will be included as an addendum to this plan.
 - Individual Responsible: Bill McGlynn, Sidewalk Program Supervisor
- 5. Ongoing Traffic Signals and Street Safety Improvements (Appendix XII).
 - Annual Cost: In 2025, the budget for Traffic Signal Installation is \$2,060,500. The 2025 budget for Traffic Safety Infrastructure is \$78,750 with an additional \$1,152,200 in our Safe Streets Madison program which is where we make many of our pedestrian improvements.
 - Individual Responsible: Tom Mohr, Assistant Director of Traffic Engineering
- 6. Ongoing Sidewalk and Curb Ramp Repair and Replacement Programs (Appendix XIII).
 - Cost: \$5,000,000 budget for construction in 2025. Actual costs depend on bids received for public works contract. Ramp installations under these guidelines typically cost \$5,000 or less, per ramp, or \$10,000 per corner. Curb ramp installation may vary considerably depending on the site conditions. Estimated \$3,250 for a site with average terrace width (7 ft) and standard sidewalk and curb. City staff may be available to do the work for select sites, which may reduce the cost of additional contacted labor. Staff time is not included in cost estimates.
 - Individual Responsible: Bill McGlynn, Sidewalk Program Supervisor

Recommendations

The City of Madison recognizes that an accessible public right-of-way is both accessible and useable for people with disabilities. For Madison residents and visitors with disabilities the usability of the sidewalk network must go beyond infrastructure to include the continuous availability of unobstructed walkways, accessible bus stops, curb ramps, and crosswalks. These

elements must be maintained at all times to ensure full participation in community life and access to essential services and destinations.

To achieve this, the City of Madison will continue to work with stakeholders to improve pedestrian access within the public right-of-way for people with disabilities, focusing on the following areas:

1. Improving compliance with existing requirements for temporary pedestrian facilities and elements in the public right-of-way during construction projects.

PROWAG R204 Alternate Pedestrian Access Routes, Transit Stops, and Passenger Loading Zones requires that when a circulation path, transit stop, or loading zone is temporarily not accessible due to construction, maintenance operations, closure, or other similar conditions, an alternate pedestrian access route, transit stop, or loading zone with appropriate signage must be provided. If it is technically infeasible due to site conditions or existing physical constraints, an alternate means of providing access for pedestrians with disabilities is permitted. Alternate Pedestrian Access Routes must comply with PROWAG R303.

Any construction or maintenance projects that impact the circulation path, transit stops, or loading zones must provide alterative accessible access for people with disabilities. The City of Madison Standard Specifications for Public Works Construction, Sec. 107.1 require at least one side of the sidewalk to remain open during construction when a sidewalk is present on both sides of a block. Sidewalk closures are required to be signed at the crosswalk prior to the closure. The contractor may propose alternatives such as sidewalk ramps and constructing temporary ramps. All City contracts also include a general requirement to maintain sidewalks on one side at all times as part of our Special Provisions for the contract or must otherwise have a more detailed plan included. However, more detailed specifications should be developed in order to ensure that alternate pedestrian access routes are available during construction projects and conform to PROWAG standards. Therefore, the City will review the Standard Specifications for Public Works Construction, Sec. 107.1 Public Convenience & Safety, 107.7 – Maintenance of Traffic, and other relevant specifications, and make needed revisions. The Standard Specifications for Public Works Construction is updated annually. These revisions will be reflected in the 2026 Standards.

 Increasing accessibility and useability of pedestrian facilities and elements in the public right-of-way as they relate to snow clearance. In particular, during snowplows, snow is pushed back in front of curb cuts and needs to be cleared after roads plowed to ensure pedestrian access.

The U.S. Department of Transportation Federal Highway Administration issued <u>guidance</u> related the state and local governments obligations under the ADA and Section 504. This includes "reasonable snow removal efforts" in walkways with only temporary interruptions in accessibility.

Following a weather event, the City clears snow and ice from bus stops, City-owned sidewalks, school and crosswalks. <u>Madison General Ordinance 10.28</u> requires private sidewalks, curb ramps to crosswalks and driveways to be cleared by noon the day after

the snow stops. Seniors and people with disabilities are <u>eligible</u> for extensions and shoveling assistance.

Concerns about snow clearance can be reported to the City of Madison.

Public Input

- 2024-2028 Transit Development Plan Disability Focus Group Survey (Relevant Highlights):
 - Nearly 40% of respondents reported transit barriers due to inaccessible stops
 - Feedback on transit maps included feedback that:
 - The sidewalk network requires completion and maintenance (buckled segments and snow/ice removal)
 - Crossings and intersections require upgrades
 - Uneven sidewalks on Williamson Street, no sidewalks on portions of Broadway, and a need for better crossings on Milwaukee Street
 - No sidewalk and a lack of a bus stop pad at Darwin Road and Packers Avenue
 - Improved pedestrian crossings at East Washington Avenue and Independence Lane are needed.
 - Missing sidewalks near Regent Street
 - Unsafe crossings near North Town Plaza
- Let's Talk Streets Community Engagement Sessions
- 2023 Disability Summit: The City of Madison Disability Summit: Collective Visioning for a More Equitable Future

The Disability Summit was held on July 27 and 28, 2023. The event established a platform for residents to provide input for the development of a plan for the City of Madison. This feedback was obtained via breakout room discussions at the summit, in-person feedback from the Disability Pride Madison Festival and correspondence shared with the Disability Rights and Services Specialist. Some of the information is summarized for brevity and other information is provided as direct quotes from residents.

Streets

- The City becomes inaccessible in the winter. Snow plowing by the city is insufficient.
- Greater enforcement of ordinances related to snow clearance by residents and businesses is needed.
- Construction zones must include a safe and accessible path of travel.
- Prioritize repair of sidewalks and curb cuts in areas with high pedestrian traffic like the Square, the Overture Center, State Street, and the Capitol Square.
- Need for greater enforcement of unauthorized/illegal use of accessible parking spaces.

Pedestrians

• Automated and audio walk signals are needed.

- More consideration of access needs and traffic enforcement at busy or large intersections.
- Intersections with more than two streets are problematic and poorly designed for people with disabilities.
- People with disabilities need to feel safe to travel in their community.

Buses

- Every aspect of transportation must be considered in design and planning path of travel and distance to stops, stops, buses, routes, behavior of drivers, route planning tools, information about schedules, etc.
- Accessibility features need to be consistent on all buses and routes.

Comments and suggestions may be sent to RHoyt@cityofmadison.com or

Department of Civil Rights
ATTN: ADA Coordinator
210 Martin Luther King Jr. Blvd., Suite 523
Madison, WI 53703

PART IV: Employment

The City of Madison is committed to the spirit and intent of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Wisconsin Fair Employment Act, the Madison General Ordinances, and other relevant laws promoting the rights of individuals with disabilities to enjoy equal opportunity in the workforce. The City of Madison's policies and procedures set forth in the Administrative Procedure Memoranda (APM) create assurances that employment-related activities, do not disadvantage, subject or discriminate against applicants or employees with disabilities with regard to:

- Employment criteria
- Preemployment inquiries
- Recruitment, advertising, and application processing
- Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff and rehiring
- Pay and any other forms of compensation and changes in compensation, including fringe benefits available by virtue of employment, whether or not administered by the recipient
- Job assignments, job classifications, organizational structures, position descriptions, lines
 of progression, and seniority lists
- Leaves of absence, sick leave, or any other leave
- Selection and financial support for training, including apprenticeship, professional meetings, conferences, and selection for leaves of absence to pursue training
- Employer-sponsored activities, including those that are social or recreational, and
- Any other term, condition, or privilege of employment.

Prohibitions Against Discrimination

APM 3-5 Prohibited Harassment and/or Discrimination Policy sets forth the City of Madison's commitment to equity, diversity, inclusion, and equal employment for all. It is the policy of the City of Madison to foster a workforce free of bullying, discrimination, harassment, intimidation, micro-aggressions, and retaliation. It also establishes a complaint and investigation process for employees experiencing or witnessing harassment and/or discrimination in the workplace. The Department of Civil Rights is the lead administrative unit with representatives functioning as a resource for all City employees, including managers and supervisors. The Department of Civil Rights provides training and education programs for all employees, including specialized training for mandatory reporters. Under APM 3-5 Department Heads, Managers, Supervisors, Lead Workers and all Department of Civil Rights staff are mandatory reporters of acts prohibited by this policy.

APM 2-33 Standard Expectations and Rules of Conduct directs all employees of the City of Madison to create and maintain a welcoming, respectful, and inclusive work environment. All employees are strictly prohibited from engaging in harassment or discrimination on the basis of a person's race, sex, gender, gender identity (how an individual defines their gender), gender expression (how an individual expresses their gender), religion, creed, color, age, disability, marital status, HIV status, source of income, familial status, ancestry or national origin, sexual

orientation, arrest record, conviction record, current or past military service, less than honorable discharge, use or non-use of lawful products off the employer's premises during non-work hours (notwithstanding the exceptions noted in Sec. 111.35, Wis. Stats.), physical appearance, political beliefs, or the fact that a person is a student. This includes not only the workplace, while attending City functions, and performing work-related activities, but also social media, direct texts, or the internet off work duty if the conduct has a connection to or severe impact on the workplace.

Reasonable Accommodations

The City of Madison established <u>APM 2-22, Workplace Accommodations</u> in 1994 (updated August 2023) and developed subsequent <u>Policy Guidance</u> which prohibit discrimination on the basis of disability and codifies the reasonable accommodations process available to qualified people with disabilities and ensure facilities are accessible and useable to employees with disabilities. The City is committed to celebrating diversity and fostering an inclusive workforce. It has been a long-standing policy and practice of the City of Madison to provide employees with disabilities accommodations so they can perform their duties safely, efficiently, and effectively. In addition to accommodating current employees, the Human Resources Department also provides accommodations to applicants for city positions to ensure people with disabilities have an equal opportunity to compete for employment and advancement within the City's workforce.

As part of new employee orientation, employees are asked if they wish to complete the Voluntary Self-Identification of Disability Form. This form complies with federal and state law voluntary disability disclosure requirements. This form also offers employees the opportunity to identify if they wish to receive assistance from the City's Accommodation Specialist right away in their employment with the City of Madison.

Applicants and employees seeking reasonable accommodations may contact:

Leah Reinardy
Occupational Accommodations Specialist
LReinardy@cityofmadison.com
608-267-1156

If the applicant or employee disagrees with a decision to deny a reasonable accommodation, they have the right to file an appeal with the Human Resources Director. Further appeals may be made through the Affirmative Action Division.

Equitable Employment Opportunities

The City of Madison works to establish racial equity and social justice as core principles in all decisions, policies and functions of the City of Madison. The Racial Equity and Social Justice Equitable Hiring Tool 2.0 is used to identify and address potential inequities in the position description, minimum qualifications, exam requirements, recruitment tools, and application process for vacant City of Madison positions. The Equitable Hiring Tool is a checklist and guide to ensure each hiring decision for the City of Madison is as equitable as possible. This may be achieved through relationships between the hiring department, Human Resources, Civil Rights, and community members within the specific field that are built and sustained over time.

The City of Madison adopted <u>APM 5-1 Requiring a Driver's License for City Employment</u> in 2022. The purpose of this policy is to provide guidance to hiring managers about when a driver's license is appropriate as a condition of employment for City of Madison employees and to ensure unnecessary barriers are not being created for applicants. The City only requires the possession of a driver's license when required to complete essential job functions such as operating a city vehicle, transporting people from one place to another, or when other forms of travel are not feasible.

In addition, the City of Madison provides notice to applicants of protections from discrimination and their right to request reasonable accommodations in the application process. Standard language is included in all City of Madison job applications, and job postings. Job applications ask applicants if they wish to disclose a disability, if they need accommodations through the application process, and notifies candidates of the Occupational Accommodations Specialist's contact information. Additionally, when the application for employment is submitted a confirmation pop up is seen by the candidate that is a reminder that disability related accommodations are available and the contact information for the Occupational Accommodation Specialist is provided. For City of Madison job postings, the following language is included:

The City of Madison is an equal opportunity employer functioning under an affirmative action plan. We value diversity, equity, inclusion, and belonging. Black, Indigenous, people of color, women, trans, nonbinary, and individuals with disabilities are encouraged to apply!

APM 2-8, Job Vacancy Advance Notices and Certification Requests states it is the City of Madison policy to provide equal employment opportunities without regard to race, color, sex, disability, age, religion or national origin. Further it acknowledges that the prohibition of discrimination is not sufficient to effectuate the principle of equal opportunity in employment. Artificial barriers continue to produce underutilization for women, members of racial/ethnic affirmative action groups and individuals with disabilities in their chosen career areas. In order to identify and correct continuing patterns of inequality and to make equal employment and promotional opportunities a reality, it establishes an Affirmative Action Ordinance and Program to identify and eliminate discriminatory preferences and thereby improve opportunities and representation for individuals who are members of affirmative action groups. The Affirmative Action Department will analyze vacant positions based on the job family, the specific occupational classification, the organizational unit, and any other equal opportunity/affirmative action considerations, in order to provide feedback to the department or division.

The City of Madison also has long-standing partnerships with disability-related non-profits and employment-related agencies with the goal of increasing employment access for people with disabilities. Specifically, the City works with Community Work Services to offer supported employment opportunities at various City agencies. The City also works with agencies like the Veterans Administration, AchieveAbilities, and the Department of Vocational Rehabilitation.

The Department of Civil Rights and Human Resources in partnership with the Disability Rights and Services Program also hosts the <u>Inspiring Student Professionals in Residence (INSPIRE) program</u> annually. This provides high school and technical college, and university students the opportunity to shadow various positions throughout the City in order to learn more about public sector work,

build employment connections, learn how to apply for jobs, and learn more about disability in the workplace.

Pay and Benefits

The City of Madison follows civil service systems practices to help ensure employee selection is transparent and fair. The City Council has adopted <u>Personnel Rules</u> recommended by the City's Personnel Board that outlines hiring practices, rules related to promotional processes, and performance management guidelines. The City also has established <u>Employee Handbooks and long-standing contractual agreements</u> with unions that impact various aspects of employment. The city also has established compensation structure of employment classifications and ranges with associated <u>salary schedules</u> that includes step and longevity increases. This assists with creating a consistent, transparent, and fair compensation system for City of Madison employees.

The City of Madison Employee Assistance Program (EAP) is a benefit available to employees and their family members (in the household) and significant others, as well as retirees. EAP provides 24-hour personalized and culturally inclusive counseling, management consultation, resource referral, education, and trauma response for both work and personal challenges. The services are free and always voluntary.

AMP 2-21 Family and Medical Leaves of Absence describes the City of Madison's flexible leaves of absence available to qualified employees for a wide range of reasons including disability and providing care for a family member with a disability. The policies are intended to outline an employee's leave entitlements under the Wisconsin and Federal Family Medical Leave Acts, to comply with all applicable State and Federal Laws concerning unpaid family or medical leave. Copies of postings for the Acts, which prescribe eligibility and other issues, have been distributed to all departments and are available on EmployeeNet (Agency Information, Human Resources, Workplace Poster Requirements). A training for supervisors regarding FMLA is also provided by Human Resources staff twice a year and additional training support is offered individually based on need.

In addition to paid leave options, <u>APM 2-45 Disability Leave/Layoff</u> provides for qualified employees with disabilities to use up to six months of unpaid disability leave and upon exhausting all other disability leave. Employees with disabilities may be placed into disability layoff status for up to an additional 18 months while maintaining their position.

<u>APM 2-7 Temporary Transitional Assignments</u> allows for departments to offer light duty for employees with non-work-related physical injuries for up to 60 days. When offered, this allows injured employees to maintain paid employment without needing to exhaust leave balances. It also helps some employees reduce and/or avoid the need to utilize other leave options noted above.

The City of Madison Police Department offers more extensive light-duty options for both commissioned and non-commissioned staff through their Restricted Duty policy. This allows staff with non-work-related injuries to potentially qualify for light duty work for up to 8 months with a possible extension of up to 4 months. This policy also allows light duty assignments that assist employees with mental health conditions as well.

<u>APM 2-30 Donation of Earned Vacation Time</u> allows employees to donate vacation balances to a specific employee, their agency pool, or to employees the Occupational Accommodation Specialist works with. This is a policy that is regularly used to assist employees who have no leave balances left and frequently assists employees who need additional time off during times of family crisis and/or for disability related reasons.

APM 2-34 and 2-35 assists all employees including employees with disabilities with the ability to have flexible scheduling and/or the ability to telework. These policies often work in conjunction with related accommodation processes and have helped broaden the ability for employees to work remotely and within a flexible schedule. Continued conversations are needed surrounding the ability to utilize these options across the City, defining in-person essential functions, and the impacts these options have on people with disabilities. Since the pandemic, employment of people with disabilities has expanded and much of the research points towards the increase of remote work as a contributing factor. There is concern that if these options continue to reduce nationally, it will negatively impact the increasing numbers of people with disabilities who gained employment.

<u>Wage/Disability Insurance</u> is offered to employees during new employee orientation. Employees who opt into wage insurance are insured up to 65 percent of their regular salary for a qualifying claim. This program covers employees with non-work-related illnesses and injuries that prevent an employee from working. Employees must use available sick leave prior to being eligible for the program. An equity analysis of our wage and life insurance programs was recently conducted at the request of employee affinity groups. Participants in this analysis expressed concerns related to how sick leave is used in the premium calculation and discussed several other recommendations. More work is needed in order to incorporate recommendations into programming.

<u>Wisconsin Retirement System-Disability Retirement</u> allows employees to retire early if an employee becomes disabled and is unable to work due to the disability. This benefit allows for a life-time annuity payment.

Training & Development

The City of Madison internally offers a robust calendar of training opportunities for all City staff. During training registration staff have the opportunity to define disability status and identify access needs. Organizational Development staff work with City course trainers, the impacted employee, and the Occupational Accommodation Specialist to ensure training is accessible to diverse learning needs. Organizational Development staff also provide City trainers with information and feedback related to creating and leading effective and accessible trainings. Additionally, Human Resources staff provide accommodation training to City managers and supervisors as well as provide online guidance on Human Resources informational pages for supervisors. Additionally, Organizational Development co-leads efforts with DCR to support affinity groups including the Disability Resource Group. They also regularly solicit feedback from affinity groups to develop training and development opportunities.

Notice to Contractors and Grantees

<u>APM 1-1</u> establishes that all contractors are notified of their obligations under the ADA and other relevant laws through mandatory contract language set forth by ordinance or resolution. Contracts are reviewed by the Department of Civil Rights for Madison General Ordinance Chapter 39 requirements, including language for nondiscrimination, Affirmative Action, and nondiscrimination based on disability when applicable. See:

- Standard Terms and Conditions City of Madison
- Standard Terms and Conditions Public Health Madison & Dane County
- Federal Transit Authority (FTA) Requirements Metro Transit

Under <u>APM 3-5 Prohibited Harassment and/or Discrimination Policy</u>, contractors that engage in behaviors that violate this policy will be subject to action which protect the City of Madison employee and may result in ending the contract.

Employee Facilities

Employee facilities are common use spaces such as paths off circulation, breakrooms, restrooms, etc. These do not include individual offices or workstations. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity receiving Federal financial assistance. Under 29 CFR § 32.6 recipients of federal funds, like the City of Madison, were directed to conduct a self-evaluation within one year of the Act and take remedial action within three years of the Act to make changes to policies and facilities necessary to overcome the effects of discrimination and monitor thereafter. The City of Madison completed such a self-evaluation, but monitoring efforts have become decentralized over time. Therefore, we included employee facilities in the self-evaluation process and will take steps to make these facilities accessible and useable where feasible to current and future employees with disabilities wherever possible.

Numerous City facilities were constructed before the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973. Due to the structural and design elements of these facilities it would be infeasible to remove certain access barriers without complete facility replacement or major renovation. In these facilities, staff accommodations and readily achievable items will be completed as budget approvals and staff resources allow.

As resources permit, we will use the same prioritization used for facilities that are open to the public:

- Priority 1: Approach and Entrance elements needed to get into the building like parking, accessible route, curb ramps, ramps, entrance, elevators, etc.
- Priority 2: Access to Goods & Services elements needed to access areas of the building like seating areas, rooms and spaces, wayfinding signs, service counters, elevators, and more.
- Priority 3: Toilet Rooms all aspects of an ADA compliant restroom.
- Priority 4: Additional Services additional elements like water fountains, audible and visual fire alarms, etc.

The Act does not require that all employee facilities comply with the 2010 ADA Design Standards for public facilities. Rather it encourages entities to take voluntary action to "overcome the effects of conditions that resulted in limited participation in the recipient's program or activity" by qualified individuals with disabilities (29 CFR 32.6 (b)). We welcome and expect that qualified, talented, and skilled people with disabilities will become part of the Madison workforce in all City agencies and commit to making our facilities accessible wherever possible. Where facilities cannot be made accessible, we will work with current and future employees through the reasonable accommodation process.

Findings and Recommendations

Based on a review of existing policy, we find that the City of Madison is compliant with the requirements of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act where employment practices are concerned. We continue to strive to be a model employer for qualified people with disabilities.

The following actions are recommended to maintain compliance:

- 1. Continue to work to remove barriers to access in employee facilities. The Disability Rights and Services Specialist, Engineering, and other relevant staff will monitor efforts as part of this ADA Transition Plan.
- Create City-wide criteria for employee demographic access within MUNIS and develop an annual auditing mechanism to ensure compliance with the developed criteria. This process should balance meeting the needs of the City with employee confidentiality rights.
- 3. Distribute the Employee Self Disclosure to all employees every 5 years to allow employees the ability to update their disability status, to ensure compliance with federal regulations, and provide regular notice to employees of the accommodation process. As part of this process, it is recommended that existing technology is leveraged where possible to aid in the ease of updating and to protect confidentiality.
- 4. Include disability status in the Department of Civil Rights job family utilization charts. This will assist with increasing the employment of people with disabilities at the City of Madison by giving department specific goals to reach. It will also help ensure that a disability perspective is included in the Equitable Hiring Tool process.

Additional Recommendations

Residents also provided the following recommendations at the Disability Summit to support the City's efforts to support staff diversity and the retention of qualified employees with disabilities beyond ADA compliance:

- Continue to support programs and initiatives that increase the diversity of City staff at all levels of the organization, ensuring that people with disabilities are included as a target population in these efforts.
- Continue to support programs and initiatives that provide work experience, internships, and apprenticeships and ensure that people with disabilities are included as a target population in these programs.

- 3. Develop an array of opportunities for applicants to demonstrate their skills and talents in the hiring process.
- 4. Continue to support programs and initiatives that increase the retention of City staff with disabilities.
- 5. Include Disability-owned businesses in targeted business programs and disability representation in contractor requirements.

Comments and suggestions may be sent to RHoyt@cityofmadison.com or

Department of Civil Rights
ATTN: ADA Coordinator
210 Martin Luther King Jr. Blvd., Suite 523
Madison, WI 53703

Appendix I - Self-Evaluation: Programs, Services and Activities

Department:

Person responsible for ADA compliance in your Department: Briefly describe the services and activities provided by your agency:

Program Access

- 1. Are people with disabilities given equal opportunity to participate in or benefit from the aid, benefit, or services provided by your agency? For example, people with disabilities have equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as others.
 - a. If no, please describe.
- 2. Are people with disabilities given the opportunity to participate as a member of planning or advisory boards?
- 3. Are any services, aid, or benefits to people with disabilities provided in a separate location than those available to the general public?
- 4. Do any eligibility criteria for services, aid, or benefits offered by your agency disadvantage people with disabilities?
- 5. Are there any fees or charges that only apply to people with disabilities or groups of people with disabilities?
- 6. Are people with relationships or associations with people with disabilities (family members, spouses, caregivers, etc.) provided equal services, programs, or activities?
- 7. Are you aware of any safety requirements not based on actual risks, but rather on speculation, stereotypes, or generalizations about individuals with disabilities?
- 8. Does your agency have a process for making reasonable modifications to policies, practices, and procedures where needed to make sure that a person with a disability can access programs, services, or activities (unless making the modifications would fundamentally alter the nature of the service, program, or activity)?
 - a. If your agency has a specific policy or protocol, please provide a link.
- 9. Do you have notices about the availability of and how to request accommodations and language access services?
 - a. Where are these notices posted or published?
- 10. Are people with disabilities excluded from any program or service because existing buildings and facilities are inaccessible?
 - a. Please describe.
 - b. What accommodations or modifications, if any, do you offer to address the access barrier?
- 11. Are your facilities accessible for people who use service animals?
- 12. Are staff trained about the rights and responsibilities of people with service animals?
- 13. Are public meetings and events held in locations accessible to people who use mobility devices?

Effective Communication

- 14. Do all meeting invitations and notices include information about the availability of and how to request accommodations and language access services?
- 15. Does your agency provide written materials in alternative formats such as large print, Braille, and audio recording upon request?
- 16. A qualified notetaker/reader is someone able to read and write effectively, accurately, and impartially using any necessary specialized vocabulary. Does your agency provide qualified note takers and readers upon request?
- 17. Does your agency accept and respond to callers who use Wisconsin Relay Services or other phone interpretation services in the same manner as other callers?
- 18. Are relevant staff trained to request interpretation, translation, and other aids and services from the Language Access Program?
- 19. Do staff who interact with the public have access to a phone for On-Demand Language Line Interpretation services?
- 20. Are staff who interact with the public trained to use Language Line On-Demand Interpretation services over the phone?
- 21. Do staff who interact with the public have access to a device for Language Line On-Demand Video Interpretation services? These services are used to communicate with people who use sign language. The device must be activated and have a screen that can be positioned to face the sign language user, a microphone, and audio.
- 22. Are staff who interact with the public trained to use Language Line On-Demand Video Interpretation services for communication with people who use ASL or other sign languages?
- 23. Do audio portions of videos and recorded programming produced by your agency provide equally effective communication for individuals with hearing impairments? For example, captioning or a written transcript.
- 24. Other than when using a qualified interpreter or at the request of the individual, are there times when staff are not able to communicate directly with people with disabilities? For example, using a family member to interpret in a non-emergency situation.
 - a. If yes, please describe:
- 25. How do you ensure that interested persons, including persons with vision or hearing impairments, can obtain information about accessible services, activities, and facilities and how to access them?
- 26. What, if any, practices not discussed here are used to ensure equally effective communication with people with disabilities?
- 27. Are you aware of any policies or practices related to communication that may exclude or limit the participation of individuals with disabilities in your agency's programs, activities, or services?
 - a. If yes, please describe:

Contracts

- 28. If your agency contracts with other entities, do you include anti-disability discrimination language in your contracts?
- 29. If your agency contracts with other entities, are you aware of any claims of disability-related discrimination by contractors?

Licenses and Certificates

- 30. If your agency issues licenses or certificates, are these equally as accessible to people with disabilities?
- 31. If your agency requires licenses or certificates from another entity, are these equally as accessible to people with disabilities?

If your agency sells tickets to events, complete <u>Self-Evaluation Supplemental</u>: <u>Ticketing</u>

Appendix II - Self-Evaluation Supplemental: Ticketing

Department:

Person responsible for ADA compliance in your Department:

"Accessible seating" is defined as wheelchair spaces and companion seats.

- 1. Are ticket sales for people with disabilities during the same hours, same number and types of ticketing outlets, same stages of ticket sales (i.e. pre-sales, promotions, lotteries, waitlists, and general sales) and distributed in the same manner as other ticket sales?
- 2. Are there any special terms and conditions that only apply to tickets sold to people with disabilities?
- 3. Does ticket sale information include information about the availability of accessible seating?
- 4. When requested, do staff provide information to people with disabilities, their companions, and third parties purchasing tickets about accessible seating including the location and accessibility features?
- 5. Do materials, such as seating maps, plans, brochures, pricing charts, or other information available to the public identify accessible seating?
- 6. Are tickets for accessible seating the same price or less than tickets for other equivalent seating?
- 7. Are tickets for accessible seating available at all price levels?
- 8. For each ticket for a wheelchair space purchased, are at least three additional tickets for neighboring seats in the same row available for purchase upon request?
- 9. For group sales, are seats provided so that a person who uses a wheelchair is seated with their group?
- 10. If a person with a disability obtains a ticket in the secondary ticket market, are they provided with an accessible seat upon request?
- 11. If you have an agency-specific policy related to accommodations or ticket sales for people with disabilities, please provide a link.

Appendix III - Schedule, Cost, and Priorities for Removal of Access Barriers for Web and Electronic Information and Technology

Based on the self-evaluation findings, the following barriers to access will be addressed to meet and maintain compliance with applicable WCAG 2.1 AA, Section 508 and other relevant standards by April 24, 2026.

- 1. Information Technology and other relevant staff and stakeholders will train staff, add captions to non-archived videos, and provide transcripts or captions of archived videos upon request to ensure audio portions of videos and recorded programming provide equally effective communication for individuals with hearing impairments.
 - Cost: With use of automated captions, the estimated costs include \$5,000 for one-time staff training. It also includes \$400,000 to add captions to the existing catalog, based on subscription estimates provided by hardware/software manufacturers. The annual cost of subscription services for a video library of our scale is roughly \$107,500 thereafter. If manual captions are requested/required, these costs increase exponentially. Additional costs may include limited term employee staffing or vendors to support manual captioning requests.
 - Individuals Responsible: Cassandra Hill, Digital Inclusion Coordinator and Boyce Johnson, Digital Media Supervisor
- Information Technology, the City Attorney's Office, and other relevant staff will add compliance standards to contracts and procurement. This will uphold City standards for public-facing digital content, apps, and all new vendors/products. It will also ensure standards are incorporated in contracts and procurement.
 - **Cost:** No additional costs at this time. IT will review operating costs in the 2026 & 2027 budget process and update accordingly.
 - Individuals Responsible: Amanda Lythjohan, IT Administrative, Finance and Project Portfolio Manager, and Cassandra Hill, Digital Inclusion Coordinator.
- 3. The Digital Inclusion Coordinator, Web Team, and other relevant staff and stakeholders will develop a training plan and budget to support uniformity and conformance with WCAG 2.1 AA and Section 508 standards. The plan and budget will be included as an addendum to the ADA Transition Plan.
 - Cost: \$100,000 consultant fees.
 - Individuals Responsible: Cassandra Hill, Digital Inclusion Coordinator and Eric Olson, Web Team Manager.
- 4. Information Technology, department digital/web content editors, and other relevant staff and stakeholders will perform the digital content remediation and monitoring. This will ensure compliance with WCAG 2.1 AA and Section 508 standards.
 - **Cost:** \$500,000 estimate based on current costs for:
 - Hiring of limited term employees (LTEs), vendors, and/or contractors to support audits and digital content remediation.
 - Purchasing/procuring software that incorporates ADA standards.

- Costs to transition from on-premises digital systems to cloud-based (more compliant) systems.
- o Termination or transitioning of contracts with non-compliant vendors.
- Individuals responsible: Eric Olson, Web Team Manager, Cassandra Hill, Digital Inclusion Coordinator, and/or agency contact.
- 5. Information Technology and other relevant staff and stakeholders will work with a consultant to develop a plan and budget to conform with WCAG 2.1 AA and Section 508 standards for digital content, software, applications, and hardware used only by City staff by December 31, 2031. The plan and budget will be included as an addendum to this ADA Transition Plan.
 - Individual Responsible: Cassandra Hill, Digital Inclusion Coordinator, Sarah Edgerton, IT Director, and/or agency contact.

Appendix IV- Summary Self-Evaluation Report: Programs, Services and Activities

This is a report of the Self-Evaluation: Programs, Services and Activities offering services to the public questionnaire responses and follow-up with the Disability Rights and Services Specialist and Department of Civil Rights. The table below includes the main questions included in Self-Evaluation: Programs, Services and Activities questionnaire. An "N" means the self-evaluation indicated *Non-Compliance* with the Americans with Disabilities Act (ADA) and other relevant standards. All other areas were found to comply with ADA or were outside of the scope of the programs, services, and activities provided by the particular agency. For example, not all agencies issue licenses or produce videos.

If you need this information in an alternative format or have questions about this report, please contact: Rebecca Hoyt, Disability Rights and Services Specialist (ADA Coordinator) at 608-266-6511 or RHoyt@cityofmadison.com. For language access services, please contact Madison Language Access Program at LAP@cityofmadison.com.

Self-Evaluation	Mayor	Common Council	Assessor	Attorney	Clerk	Civil Rights	Engineering	Finance	Fire	Fleet	Information Technology	Greater Madison MPO	Library	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	Parks	Building Inspection	CDD-Child Care	CDD – CDBG	CDD – CRU	CDA	Economic Development	Planning	Police	Public Health MDC	Streets and Recycling	Metro /Paratransit	Parking	Traffic Engineering	Water Utility
People with disabilities given equal opportunity to participate in or benefit from the aid, benefit, or services																																
People with disabilities are given the opportunity to participate as a member of planning or advisory boards																																
Services, aid, or benefits to people with disabilities are not provided in a separate location than those available to the general public																																
Eligibility criteria for services, aid, or benefits offered by your agency do not disadvantage people with disabilities																																

Self-Evaluation	Mayor	Common Council	Assessor	Attorney	Clerk	Civil Rights	Engineering	Finance	Fire	Fleet	Information Technology	Greater Madison MPO	Library	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	Parks	Building Inspection	CDD-Child Care	CDD - CDBG	CDD – CRU	CDA	Economic Development	Planning	Police	Public Health MDC	Streets and Recycling	Metro /Paratransit	Parking	Traffic Engineering	Water Utility
There are no fees or charges that only apply to people with disabilities or groups of people with disabilities																																
People with relationships or associations with people with disabilities (family members, spouses, caregivers, etc.) are provided equal services, programs, or activities.																																
No known safety requirements are not based on actual risks, but rather on speculation, stereotypes, or generalizations about individuals with disabilities																																
Agency has a process for making reasonable modifications to policies, practices, and procedures where needed to make sure that a person with a disability can access programs, services, or activities (unless making the modifications would fundamentally alter the nature of the service, program, or activity)								N														N			N						N	

	or	Common Council	Assessor	Attorney		Civil Rights	Engineering	nce			Information Technology	Greater Madison MPO	ıry	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	S	Building Inspection	CDD-Child Care	-CDBG	- CRU		Economic Development	Planning	ø,	Public Health MDC	Streets and Recycling	Metro /Paratransit	gui	Traffic Engineering	Water Utility
Self-Evaluation	Mayor	Com	Asse	Atto	Clerk	Civil	Engi	Finance	Fire	Fleet	Infor	Grea	Library	Mon	Mun	Inde	Olbr	Parks	Builc	CDD	CDD	CDD	CDA	Econ	Plan	Police	Publ	Stre	Met	Parking	Traff	Wat
Notices about the availability																																
of and how to request																																
accommodations and						١.,						N																				
language access services are						N						.,			N		N					N			N							
available in public spaces																																
and on public-facing forms																																
People with disabilities are																																
not excluded from any																																
program or service because													N														N					
existing buildings and facilities are inaccessible*																																
Facilities are accessible for																																
people who use service																																
animals																																
Relevant staff trained about																																
the rights and		N.	N.							N.		N				N.					N.	N.			N.	N.	N.			N.	N.	N.
responsibilities of people		N	N	N			N	N	N	N		.,				N					N	N			N	N	N			N	N	N
with service animals																																
Public meetings and events																																
are held in locations																																
accessible to people who use																																
mobility devices																																
Meeting invitations and notices include information																																
about the availability of and																																
how to request		N							N				N						N	N		N			N						N	
accommodations and																																
language access services																																
Written materials are																																
provided in alternative																																
formats such as large print,													N				N															
Braille, audio recording upon																																
request																																

Self-Evaluation	Mayor	Common Council	Assessor	Attorney	Clerk	Civil Rights	Engineering	Finance	Fire	Fleet	Information Technology	Greater Madison MPO	Library	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	Parks	Building Inspection	CDD-Child Care	CDD – CDBG	CDD – CRU	CDA	Economic Development	Planning	Police	Public Health MDC	Streets and Recycling	Metro /Paratransit	Parking	Traffic Engineering	Water Utility
Qualified note takers and readers are provided upon request			N		N			N	N				N	N	N		N				N	N								N		
Agency accepts and responds to callers who use Wisconsin Relay Services or other phone interpretation services in the same manner as other callers																																
Relevant staff are trained to request interpretation, translation, and other aids and services from the Language Access Program																			N			N										
Staff who interact with the public have access to a phone for On-Demand Language Line Interpretation services																N																N
Staff who interact with the public are trained to use Language Line On-Demand Interpretation services over the phone																N																N
Staff who interact with the public have access to a device for Language Line On-Demand Video Interpretation services		N		N												N	N	N	N		N	N				N	N		N	N	N	N

Self-Evaluation	Mayor	Common Council	Assessor	Attorney	Clerk	Civil Rights	Engineering	Finance	Fire	Fleet	Information Technology	Greater Madison MPO	Library	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	Parks	Building Inspection	CDD-Child Care	CDD – CDBG	CDD – CRU	CDA	Economic Development	Planning	Police	Public Health MDC	Streets and Recycling	Metro /Paratransit	Parking	Traffic Engineering	Water Utility
Staff who interact with the public are trained to use Language Line On-Demand Video Interpretation services for communication with people who use ASL or other sign languages		N		N	N		N	N	N			N				N	N	N	N		N	N		N	N	N	N		N	N	N	N
Audio portions of videos and recorded programming produced by your agency provide equally effective communication for individuals with hearing impairments											N		N									N			N			N				
Other than when using a qualified interpreter or at the request of the individual, staff communicate directly with people with disabilities								N					N	N			N		N	N		N		N	N		N			N		N
Interested persons, including persons with vision or hearing impairments, can obtain information about accessible services, activities, and facilities and how to access them																																
Other practices used to ensure equally effective communication with people with disabilities were reviewed																																

	Mayor	Common Council	Assessor	Attorney	Clerk	Civil Rights	Engineering	Finance	a	Fleet	Information Technology	Greater Madison MPO	Library	Monona Terrace	Municipal Court	Independent Monitor	Olbrich Gardens	Parks	Building Inspection	CDD-Child Care	D – CDBG	D – CRU	Ą	Economic Development	Planning	Police	Public Health MDC	Streets and Recycling	Metro /Paratransit	Parking	Traffic Engineering	Water Utility
Self-Evaluation	ž	Ŝ	As	Att	ဗီ	<u>.</u> ⋛	Eng	뜶	Fire	문	ī	ē	음	Ĕ	≥	2	ð	Pal	Bu	8	CDD	СОО	CDA	E	믑	Po	Pu	Str	ž	Pal	Ī	×
There are no known policies or practices related to communication that may exclude or limit the participation of individuals with disabilities in programs, activities, or services If the agency contracts with other entities, it includes anti-disability discrimination language in contracts If the agency contracts with other entities, there are no known claims of disability-																																
related discrimination by																																
contractors If the agency issues licenses or certificates, these are equally as accessible to people with disabilities																																
If the agency requires licenses or certificates from another entity, are these are equally as accessible to people with disabilities																																

^{*}Responses related to inaccessible facilities refer to Monroe Street Library and Mobile Health Clinics. The ADA does not require that a city make each facility accessible. Rather the accessibility of services, programs, and activities are viewed in their entirety (28 CFR § 35.150 (a)). Therefore, these agencies will ensure that services, programs, and activities offered at these locations are made available at accessible locations and provide accommodations where needed and appropriate as not to exclude any qualified person with a disability.

Appendix V - Schedule, Cost, and Priorities for Removal of Access Barriers in Programs, Services and Activities

Based on the self-evaluation findings, the following barriers to access will be addressed to ensure ADA compliance and the accessibility and useability of all programs offering services to the public by end of year 2025.

A list of the person(s) responsible for ADA compliance for each Department is included in the <u>Programs, Services and Activities Self-Evaluation</u> section of this report.

Priority 1 – Program Access

- By end of 2025, Finance, Community Development Community Resource Unit, Planning, and Traffic Engineering will receive training and guidance from the Department of Civil rights regarding reasonable modifications to policies, practices, and procedures where needed to make sure that a person with a disability can access programs, services, or activities (unless making the modifications would fundamentally alter the nature of the service, program, or activity).
- 2. By end of 2025, all agencies will include uniform language provided by the Department of Civil Rights Disability Rights and Services Program in English, Spanish, Chinese, Hmong, and ASL letter sign to be posted in public places and on public-facing forms regarding notices about the availability of and how to request accommodations and language access services are posted in public places and on public-facing forms.
- 3. By end of 2025, Office of the Common Council, Assessor, Attorney, Engineering, Finance, Fire, Greater Madison MPO, Independent Monitor, Planning, Community Development Community Block Grant and Community Resource Unity, Public Health, Police, Parking, Traffic Engineering, and Water Utility will ensure all staff who interact with the public at city facilities receive training regarding the rights and responsibilities of people who use service animals. This training will be offered city-wide by the Department of Civil Rights Disability Rights and Services Program. It is recommended that all relevant staff attend the trainings at least bi-annually and that recorded trainings are incorporated into the onboarding process for new staff.

Priority 2 - Effective Communication

- 1. By end of 2025, all meeting invitations and notices will include information about the availability of and how to request accommodations and language access services in multiple languages. Uniform notice language will be provided by the Department of Civil Rights Disability Rights and Services Program.
- 2. Beginning Spring 2025, the Disability Rights and Services Program will provide a city-wide annual training on ADA and Effective Communication. It is recommended that all relevant staff attend the trainings at least bi-annually and that recorded trainings are incorporated into the onboarding process for new staff thereafter. The training will include removing access barriers related to:

- Agency responsibility and process for providing written materials are provided in alternative formats such as large print, Braille, and audio recording upon request
- Agency responsibility to provide qualified note takers and readers upon request
- Agency responsibility to provide audio portions of videos and recorded programming provide equally effective communication for individuals with hearing impairments. For example, captioning or a written transcript.
- Agency responsibility to communicate directly with people with disabilities (except when using a qualified interpreter, in an emergency, or at the request of the individual).
- Process for requesting interpretation, translation, and other aids and services from the Language Access Program.
- 3. By end of 2025, Water Utility and the Office of the Independent Monitor will ensure all staff who interact with the public have access to a phone for On-Demand Language Line Interpretation services and are trained to use Language Line On-Demand Interpretation services over the phone.
 - **Estimated Cost**: Phones may vary by Department. City issued IP landline phone: \$300 each. City issued mobile phone: \$0 500 and \$40 per month for service per phone.
- 4. By end of 2025, Office of the Common Council, Attorney, Independent Monitor, Olbrich Botanical Gardens, Parks, Building Inspection, Community Development CDBG and CRU, Police, Public Health Madison Dane County, Metro Transit, Parking, Traffic Engineering, and Water Utility will ensure that staff who interact with the public have access to a device for Language Line On-Demand Video Interpretation services.
 - **Estimated Cost**: Devices may vary by Department. City issued mobile phone: \$0 500 and \$40 per month for service per phone. City tablet: \$500+. Some tablets have a \$40 per month for service per device.
- 5. By end of 2025, Office of the Common Council, Clerk, Attorney, Economic Development, Engineering, Finance, Fire, Greater Madison MPO, Independent Monitor, Olbrich Botanical Gardens, Parks, Planning, Building Inspection, Community Development CDBG and CRU, Police, Public Health Madison Dane County, Metro Transit, Parking, Traffic Engineering, and Water Utility will ensure all staff who interact with the public are trained to use Language Line On-Demand Video Interpretation services for communication with people who use ASL or other sign languages. It is recommended that all relevant staff attend the trainings at least bi-annually and that recorded trainings are incorporated into the onboarding process for new staff thereafter.

Appendix VI - Schedule, Cost, and Priorities for Removal of Access Barriers in Public Facilities

This appendix includes a description of City of Madison facilities open to the public and the applicable design standards for each facility. The tables below include a description of the access barriers identified in the self-evaluation process. Each access barrier has been assigned a priority number as follows:

Priority 1: Accessible approach and entrance

Priority 2: Access to goods and services

Priority 3: Access to public restrooms

Priority 4: Access to other items such as water fountains and public telephones

The tables also include a description of how the barrier to access will be removed, estimated cost, and a projected timeline for removing the barrier to access.

The budget numbers and schedules included here are estimates. The sites that need parking lot, curb and ramp slopes reworked will have civil engineering scopes not able to be quantified or understood at this level of review. Some restroom and floor clearance issues can only be addressed through more significant renovations. To address minor work scopes related to door closure adjustments, insulating lavatory pipes, installing hardware on toilet partitions, installing new signage, relocating existing signage/mirrors and patching walls, relocating wall controls and patching walls, replacing door closers, replacing door hardware, relocating flush valves, installing auto door openers, reworking grab bars, replacing drinking fountains, parking lot striping, installing handrails at ramps, and elevator issues, the work may be grouped into larger City-wide contracts. There are some barriers to access that require further exploration and planning to be determined, but in total these projects could reach millions of dollars in costs. The remedies, estimated cost, and schedule to remove access barriers will be included in an addendum to this Plan by 2030.

The City of Madison anticipates that it will remove the barriers to access in public facilities as outlined in this Plan by 2040 pending budget approvals and staff resources.

Public Facilities

Madison Municipal Building, 215 Martin Luther King Jr. Blvd

Applicable Design Standards: The Madison Municipal Building was built in 1929 with some suites having been altered in the 1980s and as recently as 2018. This is a designated historic building. Some areas of this building predate the ADA Design Standards. Other areas must comply with either the 1991 or 2010 design standards. Only those that are required to comply with either the 1991 or 2010 design standards are listed below.

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible entrance at Doty Street does not include a landing at least 60X60 at the top of the ramp (405.7) (Doty Street is an accessible entrance)	1	Available remedies, scope and cost require further exploration.	Available remedies, scope and cost require further exploration.	To be included as an addendum to this plan 2030
Signs indicating the location of the nearest accessible entrance (216.6)	1	Install signs directing to Doty Street entrance	\$1000/sign	City-wide contract 2027 - 2029
Exterior door closing speed (404.2.8.1)	1	Adjust/replace closer	\$0/\$1000- 5000 /location	City-wide contract 2027 - 2029
Interior door weight and closing speed (404.2.8.1 and 404.2.9)	2	Adjust/replace closers (Ste 017)	\$1000-5000 /location	City-wide contract 2027 - 2029
Signs including contrast, tactical characters, Braille mounted on the latch side of the door, with clear floor space and at the appropriate height (216.2 and 703)	2	Relocate compliant signs and replace noncompliant signs (Ste 017, 215)	\$100 - 1000/sign	City-wide contract 2027 - 2029
Pipes under sink are not insulated (606.5)	3	Install insulation or cover panel	\$500/sink	2027
Clearance provided around water closet not 60 inches from the side wall (604.3.1)	3	Confirm condition. May require major renovation (Level 2)	Available remedies, scope and cost require further exploration.	To be included as an addendum to this plan 2030
Accessible restroom stalls do not have self- closing doors (604.8.1.2)	3	Install closer or hinge on existing doors	\$100- 1000/door depending on scope	City-wide contract 2027 - 2029

City County Building, 210 Martin Luther King Jr Blvd

Applicable Design Standards: The City County Building was built in 1957 with some suites having been remodeled as recently as 2024. This is a historic building. Some areas of this building predate the ADA Design Standards. Other areas must comply with either the 1991 or 2010 Design Standards. Only those that are required to comply with either the 1991 or 2010 Design Standards are listed below.

Dane County is responsible for the maintenance and repair of the building's approach and entrance, elevators, paths of circulation, public restrooms, and other building items such as water fountains. Therefore "County" is listed in the column of estimated cost and some of the associated schedule dates are approximated since the City of Madison will need to work in collaboration with the Dane County to remove the barrier to access.

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Exterior accessible route (302.1)	1	Repair small breaks and cracks that need repair including ramp at Wilson Street entrance	County	2030
Handrails (405.8, 505.4, 505.10.1)	1	Install handrails at Wilson Street entrance	County	2030
Signs indicating the location of the nearest accessible entrance (216.6)	1	Install signs directing to MLK entrance	County \$1000/sign	2028
Exterior door closes from a 90-position to a 12-degree position in less than 5 seconds (404.2.8.1)	1	Adjust closer	County \$1000-5000/location	2028
Signs including contrast, tactical characters, Braille mounted on the latch side of the door, with clear floor space and at the appropriate height (216.2 and 703)	2	Relocate compliant signs and replace noncompliant signs (Ste 101, 103, 105, Room 201, 203, 401, 403, and 501)	County and City \$1000/sign	2028
Interior door weight and closing speed (404.2.8.1 and 404.2.9)	2	Adjust/replace closers (Ste 401 and 505, Room 201)	County and City \$1000-5000/location	2028

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible service counter (904.4 and 904.1)	2	Lengthen service counter (Ste 101)	City \$2000	2027
Accessible service counter (904.4 and 904.1)	2	Remodel (Ste 403)	City included in renovation plan	2027
Door hardware not operable without grasping or twisting (404.2.7)	2	Replace hardware (Ste 401 conference room)	County and City \$1000	2027
Assembly seating in Room 201 does not provide adequate wheelchair spaces (221.2.1) and does not provide complaint companion seats (221.3, 802.3.1, 802.3.1, 802.3.1, folding or retractable armrests are not provided on the aisle side of the seat where armrests are provided in the immediate area (802.4.1)	2	Replace/Install existing seating and include adequate wheelchair spaces	County and City \$50,000 – 70,000	2028
Podium ramp in Room 201 does not include a landing at least 60X60 at the top of the ramp (405.7.2, 405.7.3)	2	Install accessible podium	County and city \$30,000-50,0000	2030
Restroom sign(s) not located on the latch side of the door (703.4.2)	3	Relocate signs in main hallway	County \$100-1000/location depending on scope	2027
Restroom doors require more than 5 pounds of force to open (404.2.9)	3	Adjust closer/replace door (first floor)	County \$1000-5000/location	2028

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Restroom mirrors are	3	Adjust	County \$100-	2028
more than 40 inches		mirror/install	1000/mirror	
above the floor (603.3)		additional mirror	depending on scope	
Pipes under sink are	3	Install insulation	County \$500/sink	2027
not insulated (606.5)		or cover panel		
Drinking fountain	4	Replace drinking	County	2030
protrudes more than 4		fountain with	\$3000-8000/location	
inches into the path of		potential for	depending on	
travel (211.2)		minor renovation	renovation and repair	
		and wall repair	requirements	
		(fifth floor)		

Metro Administrative Offices, 1245 E Washington Ave

Applicable Design Standards: This building was built in 1911 and 1946 with some areas of the leased space having been altered more recently. This is a designated historic building. Some areas of this building predate the ADA Design Standards. Other areas must comply with either the 1991 or 2010 design standards.

Madison Metro Transit leases office space at 1245 E Washington Ave. As a tenant in the building, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
For a parking lot with 144 parking spaces, at least 5 spaces must be accessible,	1
and one must be van accessible (208.2)	
Accessible parking signs are at least 60 inches above ground (502.6)	1
Elevator door does not remain open for at least 20 seconds when activated (403.3.2)	2
Elevator does not have audible car position signals (407.4.8)	2
Elevator signs on door jambs do not have contrasting text and background	2
(407.2.3 and 408.2.3)	_
Signs are not compliant with Section 703	2
Door(s) closes from a 90-degree angle to a 12-degree angle in less than 5 seconds (404.2.8.1)	2
No signs at inaccessible restrooms providing directions to accessible restrooms (216.8)	3
Accessible restrooms do not have a sign with international symbol of accessibility (216.8)	3
Restroom signs are not compliant with Section 703	3
Pipes under sink are not insulated (606.5)	3

Barrier to Access	Priority
(If constructed or altered after 2012) Toilet paper dispenser is less than 7 inches	3
from the front of the water closet (604.7)	
Drinking fountain has less than 17 inches of clear floor space for forward approach	4
(306.2.3)	

Monona Terrace, 1 John Nolen Drive

Applicable Design Standards: The building was built in 1997 with some areas of the leased space having been altered more recently. Some areas of this building must comply with the 1991 design standards while the majority of the building must comply with the 2010 design standards.

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Top of the curb ramp landing has a slope steeper than 1:48 (406.1 and 405.3)	1	Reconfigure/ad d ramp flares (3 West curb ramp)	Cannot provide estimate	To be included as an addendum to this plan in 2030
Mirrors are more than 40 inches above the floor (603.3)	3	Adjust mirrors/install additional mirrors and repair walls in gender neutral and rooftop restrooms	\$1000/location	City-wide contract 2027 - 2028
No accessible coat hooks in restrooms (where coat hooks are provided) (603.4)	3	Adjust coat hooks/install additional coat hooks in accessible restrooms and repair wall	\$100/location	City-wide contract 2027 - 2029
Grab bar height/location is inconsistent 2010 Design Standards in public restrooms (604.5, 609)	3	Adjust/install compliant grab bars and repair walls	\$1000/location	2027 City-wide contract
Toilet paper dispenser (604.7)	3	Relocate and repair wall West women's restroom	\$1000	City-wide contract 2027 – 2029

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Drinking fountain	4	Option 1:	Option 1:	Option 1: 2027
placement and dimensions		Adjust drinking	\$1000	Option 2: City-
(306.2.2, 306.2.3, 308.2)		fountain	Option 2:	wide contract
		Option 2: Install	\$3000-5000	2027 – 2029
		new drinking		
		fountain and		
		repair wall (2		
		West, 4 West)		

Greater Madison MPO Office, 100 State Street, Ste 400

Note: This facility is open to the public by appointment only.

Applicable Design Standard: This facility was built in 1900 and predates ADA Design Standards. This facility is also a historic building and may be exempt from some requirements under Safe Harbor. The Greater Madison MPO is a tenet in the building and is encouraged to request accessibility improvements as part of the terms of its lease (so long as those do not threaten or destroy the historic nature of the building). In the interim, the MPO offers meetings virtually at other accessible locations where needed to ensure access to services.

Senior Center, 330 W Mifflin Street

Applicable Design Standards: The Madison Senior Center was built in 1983. This facility predates the ADA Design Standards. However, given the population served at this facility, the agency is encouraged to make the facility as accessible and useable for people with disabilities as possible even if not required by law.

Parks Division Facilities

For a full list of access barriers and anticipated costs see: <u>Parks ADA Self-Evaluation Master</u> Spreadsheet.

Libraries

Notes about "Estimated Cost": The Madison Public Library system has 10 facilities throughout the City. To preserve resources, Priority 2 projects related to way-finding and directional signs as well as Priority 3 projects related to accessible restrooms will be consolidated into a system-wide Capital Improvement Project (CIP) with an estimated cost of \$200,000 to address these access barriers in all library facilities. For this reason, "CIP" is included in the estimated cost column in the table below rather than as an estimated cost for individual items. Additionally, many library facilities are located in leased spaces where the property manager is responsible for maintenance and repair of the building's approach and entrance, or other elements. As a tenant in the building, we have notified the property management of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Alicia Ashman Library, 733 N High Point Rd

Date Built/Altered: 2000

Applicable Design Standard:1991

The Alicia Ashman Library is leased from the MidAmerican Management Company. As a tenant, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
No signs reading "van accessible" at van accessible parking (502.6)	1
Clear floor space under restroom sign is less than 18x18 inches (703.42)	3
Accessible toilet stall door is not self-closing (604.8.1.2)	3

Central Library, 201 W Mifflin St

Date Built/Altered: 2013

Applicable Design Standard: 2010

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Interior ramp handrails do	2	Add	Include in 2025	2028
not include barrier to		curb/add	design process	
prevent wheelchair casters		barrier/exte	for scheduled	
and crutch tips from falling		nd ramp	renovations	
(405.9.1 and 405.9.2)		width		

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible toilet stall grab bar does not extend at least 54 inches from the rear wall (604.5.1)	3	Relocate grab bar	CIP	2027
Accessible toilet stall door is not self-closing (604.8.1.2)	3	Replace hinges/door	CIP	2027
Accessible toilet stall door does not have door pulls on both sides of the door (604.8.1.2)	3	Install door pulls	CIP	2027

Goodman South Library, 2222 S Park St

Date Built/Altered: 2010

Applicable Design Standard: 2010

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
No signs reading "van accessible" at van accessible parking (502.6)	1	Install sign	Part of parking lot reconstruction project 2025	Part of parking lot reconstruction project 2025
Signs are not compliant with Section 703	2	Install tactile signs	CIP	2027
No accessible coat hooks in restrooms (where coat hooks are provided) (603.4)	3	Adjust hook/install additional hook	\$100/location	2025
Accessible toilet stall door does not have door pulls on both sides of the door (604.8.1.2)	3	Install door pulls	CIP	2027

Hawthorne Library, 2707 E Washington Ave

Date Built/Altered: 2000

Applicable Design Standard: 1991

The Hawthorne Library is leased from the MESC LLC. As a tenant, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
No van accessible parking (208.2.4)	1
No wayfinding signs (703)	2
Accessible toilet stall door is not self-closing (604.8.1.2)	3

Lakeview Library, 2845 N Sherman Ave

Date Built/Altered: 1971

Applicable Design Standard: This facility predates ADA Design Standards. Where future alterations occur, the 2010 or other current design standards should apply to ensure the facility is accessible and useable to people with disabilities. In the interim, the Department is encouraged to remove access barriers that are readily achievable. For example, accessible parking spaces could be reconfigured/repainted to provide van accessible parking.

Meadowridge Library, 5726 Raymond Rd

Date Built/Altered: 2014

Applicable Design Standard: 2010

The Meadowridge Library is leased from Chabaneko Oksana. As a tenant, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
Slope of accessible parking spaces exceeds 1:48 (502.4)	1
Accessible parking signs are less than 60 inches above the ground (502.6)	1
No signs reading "van accessible" at van accessible parking (502.6)	1
Signs do not include raised text or braille (703)	2
Toilet room grab bar does not extend 54 inches from the rear wall (604.5.1)	3
Accessible toilet stall door is not self-closing (604.8.1.2)	3
Accessible toilet stall door does not have door pulls on both sides of the door	3
(604.8.1.2)	

Monroe Street Library, 1705 Monroe St

Date Built/Altered: 1961

Applicable Design Standard: This facility predates ADA Design Standards. Where future alterations occur, the 2010 or other current design standards should apply to ensure the facility is accessible and useable to people with disabilities. In the interim, the Department is encouraged to remove access barriers that are readily achievable. It may consider making curb-side services available at this location.

Pinney Library, 516 Cottage Grove Rd

Date Built/Altered: 2020

Applicable Design Standard: 2021

Based on the self-evaluation, this facility is compliant with the 2010 ADA Design Standards.

Sequoya Library, 4340 Tokay Blvd

Date Built/Altered: 2008

Applicable Design Standard: 1991

The Sequoya Library is leased from the Sequoya Commons Board. As a tenant, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
No van accessible parking (208.2.4)	1
Accessible parking signs are less than 60 inches above ground (502.6)	1
Ramp does not have handrails on both sides or barrier (405.8, 405.9.1, 405.9.2)	1
Accessible toilet stall door is not self-closing (604.8.1.2)	3

Library Support Center, 1301 W Badger Rd

Date Built/Altered: 2017

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
No signs reading "van accessible" at van accessible parking (502.6)	1	Install sign	\$100	2025
Exterior accessible route has a slope that exceeds 1:20 and a cross-slope that exceeds 1:48 (403.3)	1	Available remedies require further exploration	Available remedies, scope and cost require further exploration	To be included as an addendum to this plan 2030
Signs do not include braille (703)	2	Install signs	CIP	2027

Parking Lots and Garages

Blair Lot, 401 S Blair St

Date Built/Altered: unknown

Applicable Design Standard: unknown

Based on the self-evaluation, this facility is compliant with the 2010 ADA Design Standards.

Buckeye Lot, 214 W Gorham St Date Built/Altered: 1962/1992 Applicable Design Standard: 1991

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Standards parking	1	Reconfigure/repaint	Available	To be included
lots with 51 – 75		to add additional	remedies,	as an
spaces must have at		accessible parking	scope and cost	addendum to
least 3 accessible		space	require further	this plan by
parking stalls (208.2)			exploration	2030
Openings larger than	1	Option 1: Repair/fill	Option 1: \$1000	Option 1: 2025
½ inch parallel to the		pavement	Option 2:	Option 2: City-
path of travel (302.3)		separation at joints	\$5000-10000	wide contract
		Option 2: Remove		2028
		and replace		
		concrete		

Evergreen Lot, 1802 Monroe St

Date Built/Altered: 2005

Applicable Design Standard: 1991

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Separation in	1	Option 1: Repair/fill	Option 1: \$1000	Option 1: 2025
pavement exceeds ¼		pavement	Option 2:	Option 2: City-
inch (404.2.5, 303.2)		separation at joints	\$5000-10000	wide contract
		Option 2: Remove		2028
		and replace		
		concrete (Monroe		
		entrance)		

Capital Square North Garage, 218 E Mifflin St

Date Built/Altered: 1971

Applicable Design Standard: This facility predates the ADA Design Standards. Due to the design and structure, it is not feasible to address barriers related to the vertical clearance provided for van accessible parking or the slope of parking spaces, access aisles and some areas of the accessible routes. It is recommended that the agency remove any barriers to access that are

readily achievable. This may include improving signage and continued maintenance and repair of pavement at entrances to ensure a smooth and stable path of travel.

State Street Campus (Frances) Garage, 430 N Frances St

Date Built/Altered: 1982

Applicable Design Standard: This facility predates the ADA Design Standards. Due to the design and structure, it is not feasible to address barriers related to the vertical clearance provided for van accessible parking. It is recommended that the agency remove any barriers to access that are readily achievable. This may include ensuring that an appropriate number of accessible parking stalls are available consistent with 208.2 and replacing doors that require more than five pounds of pull force to open with doors and door hardware consistent with more current design standards.

South Livingston St Garage, 111 S Livingston

Date Built/Altered: 2018

Applicable Design Standard: 2010

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust/install signs	\$100- \$1000/sign depending on scope	2027
Protruding objects in the path of circulation (307.2)	2	Option 1: Relocate fire extinguisher Option 2: Add tactile warning such as permanent planter or partial walls	Option 1: \$0 Option 2: Available remedies, scope and cost require further exploration if construction is required	Option 1: 2025 Option 2: To be included as an addendum to this plan by 2030

Overture Center Garage, 318 W Mifflin St

Date Built/Altered: 1982

Applicable Design Standard: This facility predates the ADA Design Standards. Due to the design and structure, it is not feasible to address barriers related to the vertical clearance provided at for van accessible parking or the slope of parking spaces, access aisles, and some areas of the accessible routes. It is recommended that the agency remove any barriers to access that are readily achievable. This may include improving signage, designating accessible parking and wayfinding signage as well as replacing doors and door closers with equipment that are consistent with more current design standards.

State Street Capital Garage, 214 N Carrol St

Date Built/Altered: 1995

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
		· · · · · · · · · · · · · · · · · · ·		
Accessible parking	1	On each floor, the 1st	Available	To be included
spaces are not at least		stall on the Carroll	remedies, scope	as an
8 feet wide (502.2)		Street side is slightly	and cost require	addendum to
		narrower than 8 feet.	further	this plan by
		Potential remedies	exploration	2030
		may vary depending		
		on construction		
		elements.		
Accessible parking	1	Adjust relocate signs	\$100-\$1000/sign	2027
signs are less than 60			depending on	
inches above ground			scope	
(502.6)				
Protruding objects in	2	Option 1: Relocate	Option 1: \$0	Option 1:
the path of circulation		fire extinguisher	Option 2:	2025
(307.2)		Option 2: Add tactile	Available	Option 2: To
		warning such as	remedies, scope	be included as
		permanent planter or	and cost require	an addendum
		partial walls	further	to this plan by
			exploration	2030
			if construction is	
			required	
Door closing speed	2	Option 1: Adjust	Option 1: \$0	Option 1:
(404.2.8)		closer	Option 2: \$1000-	2025
, ,		Option 2: Replace	5000/location	Option 2: City-
		closer		wide contract
				2027
				2021

Wilson Street Garage, 20 E Wilson St

Date Built/Altered: 2020

Applicable Design Standard: 2010

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Door weight and	2	Option 1: Adjust	Option 1: \$0	Option 1: 2025
closing speed		closer	Option 1: \$1000-	Option 2: City-
(404.2.8.1 and		Option 2: Install	5000/location	wide contract
404.2.9)		lighter doors,		2027
		power assisted or		
		automatic doors		
Protruding objects in	2	Option 1: Relocate	Option 1: \$0	Option 1: 2025
the path of circulation		fire extinguishers	Option 2: Available	Option 2: To be
(307.2)		Option 2: Add	remedies, scope	included as an
		tactile warning	and cost require	addendum to
		such as permanent	further exploration	this plan by
		planter or partial	if construction is	2030
		walls	required	

Wingra Lot, 800 Garfield St Date Built/Altered: 2005

Applicable Design Standard: 1991

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Slope and cross slope	1	Regrade	Available remedies,	City-wide contract
of accessible parking			scope and cost	2028
exceeds 1:48 (502.4)			require further	To be included as an
			exploration	addendum to this
				plan by 2030

Police Stations

Central District, 211 S Carrol St Date Built/Altered: unknown

Applicable Design Standard: 2010 standards noted below

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible service	2	Alter or replace	\$1000-5000	City-wide
counter (904.4 and		counter		contract 2027 -
904.1)				2029

East District, 809 S Thompson Dr

Date Built/Altered: 2006

Applicable Design Standard: 1991

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust or replace sign	\$100-\$1000/ sign depending on scope	2027
Interior door weight and closing speed (404.2.8.1 and 404.2.9)	2	Option 1: Adjust closers Option 2: Replace closer	Option 1: \$0 Option 2: \$1000-5000	City-wide contract 2027 - 2029
Accessible restroom stall door not self closing (604.8.1.2)	3	Add closer/replace hinge	\$1000/door	City-wide contract 2027 - 2029
Public telephone operable parts are higher than 48 inches above the floor (704.2.2)	3	Relocate phone and repair wall	\$1000/ location	City-wide contract 2027 - 2029

Midtown District, 4020 Mineral Point Rd

Date Built/Altered: 2018

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Protruding objects in the path of circulation (307.2)	2	Option 1: Relocate fire extinguishers Option 2: Add tactile warning such as permanent planter or partial walls	Option 1: \$0 Option 2: Available remedies, scope and cost require further exploration if construction is required	Option 1: 2025 Option 2: To be included as an addendum to this plan by 2030
Elevator door closing speed (403.3.2)	2	Adjust	Cannot provide estimate	City-wide contract 2027 - 2029

North District, 2033 Londonderry Dr

Date Built/Altered: 1996

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust or replace sign	\$100-\$1000/ sign depending on scope	City-wide contract 2027 - 2029
Vestibule door clearance (404.2.6)	1	Renovation needed	Available remedies, scope and cost require further exploration if construction is required	To be included as an addendum to this plan by 2030
Protruding objects in the path of circulation (307.2)	2	Option 1: Relocate fire extinguishers Option 2: Add tactile warning such as permanent planter or partial walls	Option 1: \$0 Option 2: Available remedies, scope and cost require further exploration if construction is required	Option 1: 2025 Option 2: To be included as an addendum to this plan by 2030
Community Room sign does not include tactile charters or Braille (703.2 and 703.3)	2	Install sign	\$1000/sign	City-wide contract 2027 - 2029
Community Room table knee clearance (306.2 and 306.3)	2	Replace furniture	TBD	2027
General seating areas (802.1.2 and 802.1.3)	2	Remove furniture	\$0	2025
Public telephone operable parts are higher than 48 inches above the floor (704.2.2)	4	Relocate phone and repair wall	\$1000/location	City-wide contract 2027 - 2029

South District, 825 Hughes Place

Date Built/Altered: 2023

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule			
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust or replace sign	\$100-\$1000/ sign depending on scope	City-wide contract 2027 - 2029			
Automatic doors not working	1	Option 1: Repair closer Option 2: Replace closer	closer Option 2: Option 2: Replace \$1000-5000				
Protruding objects in the path of circulation (307.2)	2	Replace water fountain. Requires renovation	\$1000-3000	City-wide contract 2027 - 2029			
Accessible service counter (904.4 and 904.1)	2	Alter/replace counter	\$1000-5000	City-wide contract 2027 - 2029			
Grab bars not compliant with 604 and 609	3		\$100/location	City-wide contract 2027 - 2029			
Restroom stalls do not have pull on both sides of the door (604.8.1.2)	3	Relocating DF and constructing low walls	\$1000-3000	City-wide contract 2027 - 2029			
Public telephone operable parts are higher than 48 inches above the floor (704.2.2)	4	Replace phone and repair wall	\$1000/location	City-wide contract 2027 - 2029			
Telephones do not have volume control	4	Replace phone	TBD	City-wide contract 2027 - 2029			

West District, 1710 McKenna Blvd

Date Built/Altered: 2001

Applicable Design Standard: 1991

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust or replace sign	\$100-\$1000/ sign depending on scope	City-wide contract 2027 - 2029
Entrance doors closing speed (404.2.8.1)	1	Option 1: Adjust closer Option 2: Replace closer	Option 1: \$0 Option 2: \$1000-5000	Option 1: 2025 Option 2: City- wide contract 2027 - 2029
Interior door(s) closing speed (404.2.8)	2	Option 1: Adjust closer Option 2: Replace closer	Option 1: \$0 Option 2: \$1000-5000	City-wide contract 2027 – 2029

Training Center, 5702 Femrite Dr

Date Built/Altered: 1997

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above the ground (502.6)	1	Adjust or replace sign	\$100-\$1000/ sign depending on scope	City-wide contract 2027 - 2029
Protruding objects in the path of circulation (307.2)	2	Replace water fountain- Requires renovation	\$1000-3000	City-wide contract 2027 - 2029
Accessible work areas (305.3 and 306.2)	2	Replace furniture	TBD	City-wide contract 2027 - 2029
Men's locker room bench (903)	2	Remove bench and repair finishes	\$1000-3000	City-wide contract 2027 - 2029
No signs at inaccessible restrooms providing directions to accessible restrooms (216.8)	3	Install signs	\$1000/sign	2027 City-wide contract

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible restrooms not located on accessible route (behind locked doors)	3	Further Available remedies, scope and cost require further		To be included as an addendum to this plan 2030
			exploration	
Lavatory (sink) counter surface height (606.3)	3	Option 1: Lower lavatory Option 2: Install new lavatory and repair wall finishes	Option 1: \$1000 Option 2: \$3000-5000	City-wide contract 2027 - 2029

Public Health Madison Dane County

Village on Park - Atrium and South Madison Offices, 2230 and 2300 South Park Street PHMCD leases this facility from the Madison Community Development Authority. The facility was built in 1960-1965. The date of more recent renovations to the interior of the building is unknown. The parking lot was constructed in 2023. This facility was evaluated using the 2010 ADA Design Standards.

This facility is scheduled for relocation in 2027. Therefore, it is recommended that the PHMCD ensure that the newly designed space is compliant with the 2010 ADA Design Standards and remove barriers to the existing facility that are readily achievable within the time period in which PHMDC will occupy the facility. Based on our self-evaluation, those include the following:

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Accessible parking signs are less than 60 inches above ground (502.6)	1	Adjust signs/install signs	\$100- \$1000/sign depending on scope	2027
No signs reading "van accessible" at van accessible parking (502.6)	1	Install signs	\$100- \$1000/sign depending on scope	2027
Protruding objects in the path of circulation (307.2) <i>Option 1</i>	2	Adjust drinking fountain	\$50-100	2027

Barrier to Access	Priority	Remedy	Remedy Estimated Cost			
Protruding objects in the path of circulation (307.2) <i>Option 2</i>	2	Relocate fire extinguisher/add tactile warning such as permanent planter or partial walls	\$100-3000 depending on scope	City-wide contract 2027		
Sign locations	2	Adjust signs	\$100- 1000/sign depending on scope	2027 Or as part of city-wide contract 2027		
Accessible toilet stall door is not self-closing (604.8.1.2)	3	Replace hinges/door	\$1000/location	2027		
No accessible coat hooks in restrooms (where coat hooks are provided) (603.4)	3	Adjust hook/install additional hook	\$100/location	2027		

East Washington Offices, 2705 E Washington Ave

Date Built/Altered: 2000

Applicable Design Standard: 1991

PHMDC leases this facility from MESC LLC. As a tenant, we have notified the property manager of our self-evaluation findings and will work to address these barriers to access. The remedies, estimated cost, and associated schedule are not available and will be determined as part of future lease agreements.

Barrier to Access	Priority
No van accessible parking (208.2.4)	1
Accessible parking spaces are inconstant heights and worn (502.6)	1
Elevator does not have audible car position signals (407.4.8)	2
Elevator does have tactile star at jambs main level (407.2.3 and 408.2.3)	2
Signs including contrast, tactical characters, Braille mounted on the latch side of the door, with clear floor space and at the appropriate height (216.2 and 703)	2
Accessible restroom signs are not located at the latch side of the door at the appropriate height (703)	3
Accessible restroom maneuverable floor clearance (404.2.3)	3
Lavatory (sink) toe clearance (306.3.3)	3
Left side single-user restroom – center line of the water closet is greater than 18 inches from the side wall or partition	3

Fish Hatchery Offices, 2120 Fish Hatchery Road

Date Built/Altered: 1957

Applicable Design Standard: The PHMDC Fish Hatchery Offices were built in 1957. This facility predates the ADA Design standards. Only portions of this facility are used by the public. Currently restrooms and parking areas could present barriers to access for people who use mobility devices. Where renovations or alternations take place in the future, the City of Madison should work to bring the facility into compliance with the 2010 ADA Design Standards or other current design standards. In the interim services will be made available at other more accessible locations throughout the city when in-person meetings are required.

Facilities with Public Tours - Madison Fire Department and Madison Water Utility

Madison Fire Department will prioritize achieving full compliance for the tour route at Fire Stations 1, 7, 11, 12, 13, and 14 into compliance with relevant standards so that tours of fire stations are readily accessible to people with disabilities at a variety of locations even if it is not feasible to offer them at each facility.

Water Utility will prioritize achieving full compliance for the tour route at Unit Well 7 and Unit Well 31 under the ADA Transition Plan.

Appendix VII – ADA Transition Plan Capital Improvement Projects

2026 Capital Improvement Plan

Program Budget Proposal

Identifying Informa	ation		
Agency	Engineering - Facilities Management	New	
Proposal Name	ADA Transition Plan Implementation	Project Type	Program
Project Number	15751 2026 Project Number N/A		
Project Description			
Department of Civil Rights in barriers to access currently approach and entrance - incetc.; Priority 2) Access to go spaces, wayfinding signs, se complaint public restroom; telephones, and audible and by 2040 and in Parks by 205 requests until 2040 or until	n and construction to address the compliance issues identified in the ADA T n 2025 and 2026. The transition plan lists the City of Madison facilities that present for each facility. The access barriers are then further prioritized as folludes elements needed to get into the building like parking, accessible rout each sand services - includes elements needed to access areas of the building rivice counters, elevators and more; Priority 3) Access to public restrooms and, Priority 4) Access to Additional Services - includes additional elements divisual fire alarms. The City of Madison anticipates that it will remove the biful pending budget approvals and staff resources. This funding request contempliance issues have been addressed. It should be noted that the annual ope identification. The items in City parks and libraries will be covered by se	are open to the p follows: Priority 1 te, curb ramps, en glike seating areas includes all aspec such as water fou parriers to access in emplates reoccuri	ublic and the) Accessible utrance, elevators, s, rooms and ts of an ADA untains, public in public facilities ring annual budget mates require
Alignment with Str	rategic Plans and Citywide Priorities		
	nt and Strategy from the Imagine Madison Comprehensive Plan that is mos	t relevant to your	proposal.
Citywide Element	Health and Safety		1
Strategy	Support policies and services that foster healthy and safe living environment	ents.	
Is this project related to a ci Forward, Metro Forward, Vi	ity agenda or strategic plan other than Imagine Madison (e.g. Climate Forwa ision Zero)?	ard, Housing	Yes
	mprove the city's climate resilience or sustainability by addressing climate of the city's climate resilience or sustainability by addressing climate of the city's climate of the city's climate resilience or sustainability by addressing climate of the city's climate resilience or sustainability by addressing climate of the city's climate resilience or sustainability by addressing climate of the city's climate resilience or sustainability by addressing climate of the city's climate of the city's climate resilience or sustainability by addressing climate of the city's climate resilience or sustainability by addressing climate of the city's climate of the	:hange impacts,	No
Does this project/program or reducing utility expenses, or	create operational efficiencies or cost savings? For example, by reducing star other operational change?	ff travel time,	No
	advances the selected Imagine Madison Element. In addition, if you answer low the proposal advances these other citywide priorities.	ed "Yes" to any o	f the three
disabilities. The Americans we disabilities to participate in and activities in a manner the Transition Plan in the 1990s over time and compliance re-	vance the health and safety of Madison residents and vistors by removing be with Disabilities Act (ADA) of 1990 is a civil rights law that affirms and protect public life. Under Title II of the ADA, 28 CFR Part 35, public entities are requirant is readily accessible to and usable by people with disabilities. The City of stand has maintined compliance, although some of the elements of that come equirements have evolved. The City's ADA Transition Plan is in the process of the City's programs and facilities.	cts the rights of p uired to provide s f Madison enacted npliance have bec	eople with ervices, programs, d an ADA ome decentralized

Describe how this proposal considers equity and quality of life for residents. (For example, does this project address specific inequities, is it based on equity-related data/ prioritization, or is it from a Neighborhood Resource Team (NRT) recommendation?)

The Americans with Disabilities Act (ADA) of 1990 is a civil rights law that affirms and protects the rights of people with disabilities to participate in public life. Under Title II of the ADA, 28 CFR Part 35, public entities are required to provide services, programs, and activities in a manner that is readily accessible to and usable by people with disabilities. The disability community includes people of color, LGBTQIA2S+, immigrants, and people with other marginalized identities. The efforts to foster access in Madison must go beyond legal compliance so that all residents have the opportunity to live, work, travel, play, and thrive.

Project Information

Agency: Engineering - Facilities Management

Project/Program: ADA Transition Plan Implementation

Budget Information

Agencies may submit requests for new projects under the following circumstances: 1) Project is primarily funded by non-general obligation borrowing funding sources, 2) the project meets an emergency need not anticipated in 2025, 3) the project is currently on the Horizon List and is ready to be advanced, or 4) the project is planned for the last year of the CIP (2031).

What "New Project" criteria does your proposal meet? Select "Yes" for all that apply.

, , , ,	
1) Primarily funded by non- GO sources	No
2) Meets emergency need	No
3) Currently on horizon list	No
4) Proposed for last year of CIP	No

Describe how the proposal meets the criteria above. Why is this project needed in the 2026 CIP?

The ADA Transition Plan seeks to address compliance issues and reduce access barriers. The scope of the work to address the issues will require numerous years to implement and should commence once the ADA Transition Plan has been approved by the Common Council.

Requested 2026 Budget by Funding Source

Funding Source		2026		2027		2028		2029		2030	2031
Borrowing - GF GO	\$	-	\$	200,000	\$	225,000	\$	250,000	\$	275,000	\$ 300,000
Total	\$	-	\$	200,000	\$	225,000	\$	250,000	\$	275,000	\$ 300,000

Requested 2026 Budget by Expense Type

Expense Type	2026	2027	2028	2029	2030	2031
Non-Capitalized Expense	\$ -	\$ 200,000	\$ 225,000	\$ 250,000	\$ 275,000	\$ 300,000
Total	\$ -	\$ 200,000	\$ 225,000	\$ 250,000	\$ 275,000	\$ 300,000

TIF funding is included in this request:	No
Impact Fees are included in this request:	No

Request does not include TIF or Impact Fees. Skip Supplemental Budget Info.

Project Information

Agency: Engineering - Facilities Management

Project/Program: ADA Transition Plan Implementation

Project Schedule and Location

Complete the table below for each year of requested funding. If detailed project plans are not available, explain why and when this information will be available.

- For programs, detail the minor projects that will occur and provide location detail when necessary.
- For projects, detail costs across the major project phases (planning, design, or construction/implementation).

Year	Phase/Project Name	Cost		Location	Alder District
2027	ADA Transition Plan Implementation 2027	\$	200,000	City-wide	TBD
	ADA Transition Plan Implementation 2028	\$	225,000	City-wide	TBD
2029	ADA Transition Plan Implementation 2029	\$	250,000	City-wide	TBD
	ADA Transition Plan Implementation 2030	\$		City-wide	TBD
2031	ADA Transition Plan Implementation 2031	\$	300,000	City-wide	TBD

Additional Information

Facility Expenses

Does the proposal include facility expenses?

Yes

Technology

Does the proposal include a technology component (e.g. electronic hardware, upgrades or migrations of existing systems, website changes, technology-related operating costs such as software licenses)?

No

Over the next six years, will the project/program require any of the following operating expenses:

Facilities or land maintenance?

Software or software licenses?

Vehicle setup or maintenance costs?

External management or consulting contracts?

Additional FTE positions for ongoing operations of this project/program?

Yes No No Yes

No

Is this project/program required to meet the Percent for Arts ordinance?

Percent for Art requirements detailed in MGO Section 4.30

Please provide additional information in the following section.

Project Information

Agency: Engineering - Facilities Management

Project/Program: ADA Transition Plan Implementation

Additional Information (Continued)

If you answered "Yes" to any of the "Additional Information" questions above, please provide additional details in the next section. If a specific section is not relevant, you can enter "N/A"

Facility Expenses

If the proposal includes City site/building/facility expenses, has the proposal been reviewed by City Engineering Facilities?

Yes			

Explain how you developed the facilities cost estimate for the budget request.

Engineering Facilites Management provided cost estimates for items in Appendix IV of the ADA Transition Plan. The projects in Apendix IV will be grouped and phased to provide efficiency. While the projects will likely be designed in house, it may be possible that professional consultants will be needed for scopes that cannot be addressed in house.

Technology

Technology components may include:

- Electronic hardware that will be connected to a City device (e.g. wireless, bluetooth, cable, NFC)
- A new website or changes to an existing website
- Changes to existing software or processes, including upgrades or additional modules
- Technology-related operating costs (e.g. software licenses, Software as a Service subscriptions)

If the proposal includes a technology component, have you worked with your IT Project Portfolio Manager to discuss the project?

No

If no, please reach out to your Project Portfolio Manager so that their business analysis can be included in the request.

Do you believe any of the hardware or software to be considered surveillance technology? Surveillance technology is defined in MGO Sec. 23.63(2).



If yes, please reach out to Sarah Edgerton prior to submitting your budget request.

The Government Accounting Standards Board (GASB) recently issued a statement (GASB 96) for subscription-based information technology arrangements (SBITAs). Per GASB 96, ongoing licensing and subscription costs, including software as a service (SaaS) expenses should be budgeted as an operating expense. Software costs should **not** be requested in your capital budget. Answer the questions below so the Finance Department is aware of your software needs for the operating budget request process.

Does your project or program require purchasing software licenses?

No
No

Does your project or program require purchasing implementation services or other one-time costs?

Operating Expenses

Estimate the project/program annual operating costs. Include software costs if applicable.

25th late the project, program annual operating costs. Include software costs if applicable.				
Description - please detail operating costs by major where available	Annual Costs			
N/A	N/A			

Percent for Art

If your project is required to meet the Percent for Art ordinance, is this expense included in the expense table on the "Project Information" tab?

N/A

Appendix VIII - Acronyms and Abbreviations for Public Right-of-Way Facilities

ADA Transition Plan: City of Madison's Plan to identify accessibility needs, integrate accessibility improvements into the Capital Improvement Program (CIP), and ensure that all transportation facilities, services, programs, and activities are accessible to all individuals.

Accessible: A facility that provides access to people with disabilities using the design requirements of the ADA.

Accessible Pedestrian Signal (APS): A device that communicates information about the WALK phase in audible and vibrotactile formats.

Alteration: A change to a facility in the public right-of-way that affects or could affect access, circulation, or use. An alteration must not decrease or have the effect of decreasing the accessibility of a facility or an accessible connection to an adjacent building or site.

Americans with Disabilities Act (ADA): The Americans with Disabilities Act; Civil rights legislation passed in 1990 and effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

Americans with Disabilities Act Accessibility Guidelines (ADAAG): Scope and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990.

Architectural Barriers Act (ABA): Federal law requires facilities designed, built, altered or leased with federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Capital Improvement Program (CIP): The CIP for the City includes an annual capital budget and a five-year plan for funding the new construction and reconstruction projects on the city's transportation system.

Detectable Warning: A surface feature with bumpy, raised patterns (truncated domes) placed on sidewalks or ramps. These patterns help individuals with visual impairments recognize a transition from a pedestrian walkway to a street or other vehicular areas, providing a tactile cue for safety.

Federal Highway Administration (FHWA): A branch of the US Department of Transportation that administers the Federal-Aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges.

High Accuracy Reference Network (HARN): A statewide or regional upgrade in the accuracy of coordinates using Global Positioning System (GPS) observations.

Pedestrian Access Route (PAR): A continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility.

Pedestrian Circulation Route (PCR): A designated interior or exterior pathway specifically designed and prepared to facilitate safe pedestrian travel.

PROWAG: An acronym for the Public Right-of-Way Accessibility Guidelines, issued in 2005 by the U.S. Access Board. These guidelines cover design practices for roads, slopes, and terrain to ensure accessible pedestrian pathways, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other features in public right-of-way.

Right-of-Way: A term referring to land or property, typically in the form of a strip, that is used for streets, sidewalks, and trails, providing public pedestrian access within a public entity's jurisdiction.

Rectangular Rapid Flash Beacons (RRFBs): A traffic control device that uses flashing amber LED lights, typically in a rectangular shape, to alert drivers of pedestrians crossing at a crosswalk, particularly at mid-block locations or uncontrolled intersections.

Section 504: The section of the Rehabilitation Act that prohibits discrimination by any program or activity conducted by the federal government.

Uniform Accessibility Standards (UFAS): Accessibility standards that all federal agencies are required to meet, including scoping and technical specifications.

United States Access Board: An independent federal agency that develops and maintains design criteria for buildings and other improvements, transit vehicles, telecommunications equipment, and electronic and information technology. It also enforces accessibility standards that cover federally funded facilities.

United States Department of Justice (DOJ): The federal agency responsible for enforcing the law and ensuring the administration of justice in the United States. It is commonly referred to as the Justice Department or DOJ.

WGS World Geodetic System (1984): A three-dimensional coordinate system that's used for navigation, positioning, and targeting. It's the reference coordinate system for the Global Positioning System (GPS) used in phones, vehicles, etc.

Appendix IX - Bus Stop Accessibility Improvements

Metro Transit redesigned its transit system in 2023 and launched the Bus Rapid Transit system in 2024. With these changes now in effect, some bus stops require accessibility improvements, such as the installation of concrete boarding pads. Additionally, improvements may be needed to ensure accessible routes to bus stops, including curb ramps, pedestrian crossings, sidewalk installations, and traffic signal upgrades.

The table below provides details about planned accessibility improvements of bus stops within the City of Madison right-of-way, including descriptions of the work and estimated dates of completion.

Members of the public may provide feedback about bus stop accessibility for review by the City of Madison Transportation Department and City of Madison Transportation Commission. This coordination will help the City identify barriers to access and priorities for a schedule for barrier removal. You can report access concerns related bus stops at 608-266-4466 or mymetrobus@cityofmadison.com

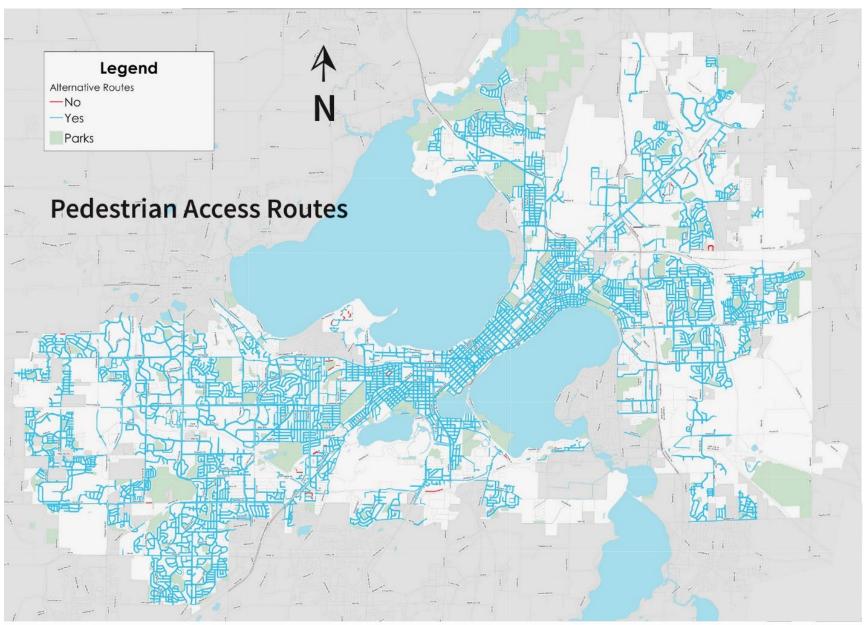
Bus Stop Accessibility Improvements: Locations, Details, Estimated Completion Date

Bus Stop Code	Location Description	Description of Planned Accessibility Improvement(s)	Estimated Date of Completion
9914	This stop (#9914) is westbound on the 2698 block of Darwin after International	City of Madison to design and contract for installation of new sidewalk and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
9260	This stop (#9260) is westbound on the 5200 block of High Crossing before Crossroads	City of Madison to design and contract for installation of new curb ramp, sidewalk, and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
7867	This stop (#7867) is northbound on the 221 block of Wyalusing after Summertown	Private development to contract for installation of approved design for bus boarding pad area (LNDSPP-2023-00006)	Not scheduled - anticipated by November 2025
3150	This stop (#3150) is westbound on the 4600 block of E Broadway opposite Park And Ride	City of Madison to design and contract for installation of new curb ramp, sidewalk, and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025

Bus Stop Code	Location Description	Description of Planned Accessibility Improvement(s)	Estimated Date of Completion
7668	This stop (#7668) is westbound on the 4420 block of Pflaum before Seiferth	City of Madison to design and contract for installation of new curb ramp, sidewalk, and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
1129	This stop (#1129) is eastbound on the 1327 block of Sherman after Marston	City of Madison to design and contract for installation of new sidewalk and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
4139	This stop (#4139) is eastbound on the 3399 block of Beltline S after Grandview	City of Madison to design and contract for installation of new curb ramp, sidewalk, and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
4412	This stop (#4412) is westbound on the 3398 block of Beltline S before Grandview	City of Madison to design and contract for installation of new bus boarding area (Project 14817)	Not scheduled - anticipated by November 2025
8427	This stop (#8427) is eastbound on the 5999 block of Schroeder before White Oaks	City of Madison to design and contract for installation of new curb ramp and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025
8862	This stop (#8862) is westbound on the 6000 block of Schroeder before White Oaks	City of Madison to design and contract for installation of new curb ramp and bus boarding pad area (Project 14817)	Not scheduled - anticipated by November 2025

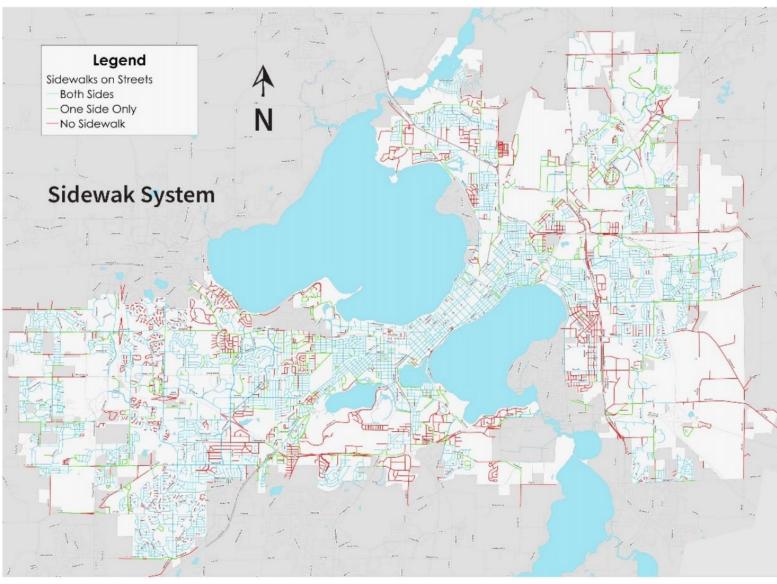
Appendix X - Sidewalk Accessibility Map

A digital map is <u>available online</u>



Appendix XI - Sidewalk System Map

A digital map is <u>available online</u>.



Appendix XII - Traffic Signals and Street Safety Improvements

City of Madison traffic engineers create plans to account for pedestrians, cyclists, motorists and people using public transportation. Using the Safe System approach, the <u>Traffic Safety</u> program prioritizes proven safety countermeasures such as setting appropriate speed limits, enhancing crosswalk visibility, improving lighting and adding traffic calming safety improvements.

Residents request safety improvements in the public right-of-way including audible pedestrian signals, street lighting, street signs, pavement markings, and report concerns related to biking or walking, speeding issues, and traffic signals through the <u>Request a Safety Improvement</u> form on our website or by contacting Traffic Safety at <u>traffic@cityofmadison.com</u> or 608-266-4761.

Appendix XIII - Sidewalk and Curb Ramp Repair and Replacement Programs

The Engineering department incorporates ADA Design Standards when designing street reconstruction projects so that all new construction is compliant. The design engineers also strive to comply with PROWAG standards whenever doing so would not present a financial burden.

Inspections are carried out during the construction process to ensure compliance is maintained in the final product. Whether streets have a missing, or incomplete sidewalk routes is considered when determining which city streets to prioritize for public works projects.

Sidewalk repairs are conducted outside of street reconstructions through the <u>Sidewalk Repair</u> <u>Program</u>. These repairs do not address large scale barriers like grade or cross-slope but instead fix barriers like uneven surfaces or raised edges.

The <u>Annual Sidewalk Replacement Program</u> was created to identify and repair defects (cracks, broken sections, offsets creating trip hazards, ponding/icing issues) throughout the City, rotating through the alder districts on a 10-year cycle. The <u>criteria for replacement</u> of public sidewalk and curb and gutter and <u>ADA ramp replacement guidelines</u> are established by the City of Madison Engineering Division.

Sidewalk repair and replacement are identified in one of two ways:

- Every year, the sidewalks in two of the City's Aldermanic Districts are surveyed by city staff
 to identify areas of non-compliance that can be addressed by replacement or grinding
 down sidewalk squares. The <u>Sidewalk Repair Schedule by Alder District</u> is available on our
 website.
- Members of the public may also report sidewalk areas that are in need of repair anywhere
 in the city at any point in time by submitting a <u>Sidewalk Concern</u> through our website or
 by contacting Bill McGlynn, Sidewalk Program Supervisor at 608-266-4537 or
 <u>wmcglynn@cityofmadison.com</u>.

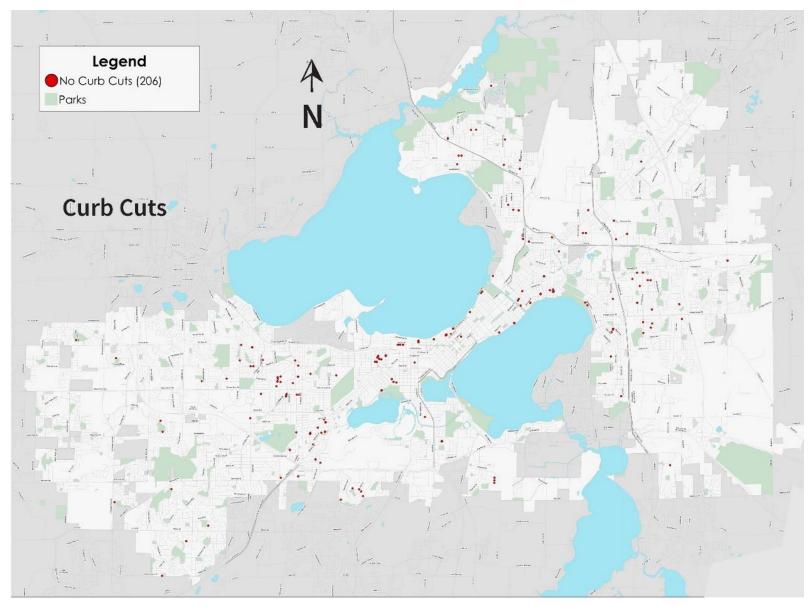
Once a year, all the identified sidewalk squares in need of repair or replacement are reviewed by the Board of Public Works and the Common Council. Approved repairs are bid out to outside contractors as public work contracts. At present, the curb ramp replacement program does not include curb ramps that are intact but are non-complaint.

Private development that impacts the public right-of-way is reviewed to ensure compliance standards are met. Utilities and other private contractors working in the right-of-way are required to take out permits to ensure accessible pedestrian routes are maintained or appropriate signage is used for detours. Restoration of disturbed surfaces is required to meet original conditions or better them. All costs for the restoration or improvement of right-of-way facilities are borne by the developer. Occasionally private development projects will overlap with a sidewalk that has a slope or grade outside of ADA compliance. In those cases, any sidewalk within the project limits will be brought into compliance. However, any adjoining non-compliant sidewalk not included in the scope of the project may retain existing access barriers.

The City's current tracking mechanisms are not sophisticated enough to identify locations with non-compliant slope or grade. However, there is the potential in the prioritization scheme for staff inspectors to account for things not covered by the standardized weights and give an area with a known sever cross slope priority.

Appendix XIV – Curb Cut Map

A digital map is <u>available online</u>.



Appendix XV – Summary of Public Engagement Activities and Input

Public Engagement

The <u>Proposed ADA Transition Plan</u> was open for public comment June 26, 2025 – August 23, 2025.

The proposed plan was made available to the public on the City of Madison Department of Civil Rights website on Jun 26, 2025. A <u>summary</u> was also published in English, Spanish, Chinese, and Hmong. The City issued a <u>press release</u> and email blast to over two hundred community partners on the same date notifying the public of upcoming public information sessions and the ability to submit public comment related to the plan. The City also posted a short video in American Sign Language on its website and social media.

The Department of Civil Rights and the City of Madison engaged with residents through social media throughout the public comment period. As well as at in-person community events such as the annual Disability Pride Madison Festival and City of Madison Disability Pride Flag Raising Ceremony. Information about the Plan, public engagement sessions, and the ability to submit public comment was also shared on *LaMovida Radio's Conectando con tu Ciudad* radio show and WORT 89.9 FM *Hmong Radio Show*. Subsequent news stories were published in the Isthmus and aired WKOK 27.

Public information sessions were held as follows:

- <u>Program, Services, Activities, and Employment recording</u>, <u>Slides</u> July 9, 2025, 6:00 8:00 p.m.
- Public Right of Way recording Slides July 16, 2025, 6:00 8:00 p.m.
- <u>Public Facilities and Web and Digital Accessibility recording</u>, <u>Slides</u> July 23, 2025, 6:00 -8:00 p.m.

All public information sessions included ASL interpretation and captioning. Spoken language interpretation was available upon request. Recordings of the public information sessions and the materials were posted to the City of Madison website following each session.

A summary of public comments and responses are included.

Public Comments

General

Comment:

The ADA transition plan is greatly needed in order to create a more accessible and equitable Madison for residents, employees, and visitors. I hope that the City uses it an opportunity for growth and development with an openness to change. Ongoing training for all city employees is a crucial component of any plans to improve the City of Madison.

Response:

Thank you for your comment and support of the proposed ADA Transition Plan. Trainings related to program compliance are already underway and are expected to be completed by the end of 2025. They will be offered annually for new employees, and it is recommended that all employees that interference with the public participate at least bi-annually.

Comment:

I feel that Madison is an inclusive City, but I like the way the ADA transition plan gives goals to work on to make the city more inclusive and accessible to everyone.

Response:

Thank you for your comment and support of the proposed ADA Transition Plan. We strive for a Madison that is Inclusive Innovative and Thriving for all.

Programs, Services and Activities

Comment:

A few updates the city of Madison could implement are related to COVID-19 mitigation and reducing community spread. 1. Install high quality air purifiers in all city funded spaces 2. Provide masks and C-19 tests to all employees 3. Expand sick leave so that when people do fall ill, they are not having to choose between losing income or spreading their illness to others. 4. A mask-required time once a week at public libraries to increase access to these spaces for high risk individuals

Response:

We recognize that concerns related to COVID-19 and other airborne illnesses can create barriers to access for residents and visitors. Many of our programs offer online services or curb-side options where needed for immunocompromised individuals. If a resident needs a disability-related accommodation, they may contact the agency to request the accommodation.

1. Most City Owned Buildings that have "staff occupancy" use air filtration that meets or exceeds MERV-11. In many cases, in particular if it's a LEED certified facility, the filtration is MERV-13. MERV is a filter efficiency rating and the higher the number means it filters smaller and smaller particles at certain percentage. A portion of the air is from outside and a portion is recirculated in most spaces, so at every pass particles are removed from the air that makes it to the occupied space. Above MERV-13 it starts to get into HEPA filtration which isn't used in the vast majority of commercial spaces, other than hospitals typically. In addition, our LEED Certified facilities also increase ventilation rates from WI code minimum to ASHRAE Standard 62.1 rates. For many spaces this is doubling the ventilation rates.

In addition, in most City Owned Buildings that have staff occupancy we also include Needle Point Bipolar Ionization which further enhances air quality by removing/neutralizing airborne contaminants. This technology effectively eliminates VOC, PM-10 and PM-2.5 particles from the air. It also doesn't produce Ozone byproduct.

We standardized on using this manufacturer, GPS For more information, see <u>How Ionization Works.</u>

Note: The City County Building is managed by Dane County and may have different air filtration requirements.

- 2. Each City of Madison agency purchases masks as requested for employees, public meetings and events. The City's Engineering Department also provides agencies with masks upon request. Additionally, it may be provided as part of an approved reasonable accommodation. Regarding COVID-19 tests, unfortunately, the Federal government has ended or defunded most free testing programs. The Wisconsin Department of Health Services does not currently supply free COVID-19 self-tests. The City of Madison is continuing to explore coverage options for employees participating in health benefits. Thank you for your suggestion.
- 3. The City of Madison provides sick leave to employees to be used for the employee's own illness or injury or for the illness or injury of an immediate family member, including a domestic partner or designated family partner. For more information about sick leave for hourly/seasonal employees, please refer to the hourly/seasonal page of the Human Resources Benefits website.
- 4. For permanent employees, Sick leave is earned at the rate of one-half (1/2) day per biweekly pay period, prorated based on an employee's FTE (full-time equivalent) percentage of employment. Additionally, an employee must be in paid status for 60% of the given pay period in order to earn sick leave of that pay period. Employees earn sick leave immediately upon starting employment with the City and may accumulate up to a total of 163 days of sick leave. (Sick leave rules may vary by contracts/handbooks.) The City of Madison also offers an optional wage insurance program (short-term and long-term disability insurance) to permanent employees. The only opportunity to enroll in wage insurance without medical underwriting is during an employee's first 30 calendar days of employment in a position eligible for wage insurance. If an enrolled employee exhausts their available sick leave, they may file a claim and may be eligible for income continuation payments while in an absent without pay status from the City. Employees who have an approved wage insurance claim will receive up to 65 percent of their regular salary (\$1,875 maximum weekly benefit.)
- 5. In addition, on July 26, 2021, the U.S. Department of Health and Human Services and the U.S. Department of Justice issued joint <u>Guidance on "Long COVID as a Disability Under the ADA, Section 504, and Section 1557</u>. This guidance explains that long COVID can be a disability under Titles II (state and local government) and III (public accommodations) of the Americans with Disabilities Act (ADA),3 Section 504 of the Rehabilitation Act of 1973 (Section 504), and Section 1557 of the Patient Protection and Affordable Care Act (Section 1557). A person with a qualifying disability is eligible for disability-related benefits from the City of Madison as described on page 46 and 47 of this Plan.
- 6. Although not currently required by the ADA, we understand the value of mask-required hours and programing for people who are immunocompromised or who have other health

conditions that increase their risk for contracting COVID-19. We have shared this suggestion with the Madison Public Library. Please note, wherever hours or programing requires patrons mask, an exception would be made for a person who is not able to put on, wear or remove a face covering because of a disability.

Comment:

[...] the City of Madison should consider creating a position of Sign Language Interpreter and employ a small team of both Deaf and hearing interpreters. The City could utilize their own staff to provide services for events such as meetings, recreational events, employee training, press conferences, virtual needs, etc. There are many benefits of having a dedicated staff.

Response:

We agree there are many benefits to having dedicated staff available to interpret and bring their experience to the City of Madison. Currently, ASL is the second most requested language for interpretation at the City (Spanish is the first). We currently have <u>Bilingual Community Connectors for Spanish, Chinese, and Hmong</u>. The Department of Civil Rights has been exploring expanding our Language Access Program to include an ASL Community Connector. We believe this is an important step toward making City of Madison programs and services more accessible and building meaningful relationships with our Deaf residents. We will continue to explore opportunities to pursue this position when resources are available. In the interim, we will utilize qualified interpreters through our Language Access Program for events, meetings, press conferences, and more. Employees of the City of Madison also have access to interpretation services through the accommodations process.

Public Facilities

Comment:

Thank you for offering public meeting options for community members. The session I attended was informative and I'm excited to learn about the steps Madison has and will take to become a more inclusive and accessible city.

Please consider implementing visually accessible safety alerts as a standard in public spaces moving forward. Active shootings and other emergency events are becoming more common place in our society. Emergency notifications tend to be auditory in nature, an alarm, a PA system, etc. Auditory notifications are not accessible to all of our community members. Things like lights, scrollers, and mass messages to the devices connected to a buildings wi-fi will add a layer of safety and can buy precious time for all of our community members while in public spaces [...].

Response:

Thank you for your support of the Proposed ADA Transition Plan.

Section 702.1 of the 2010 ADA Design Standards requires that fire alarm systems include both flashing lights and audible signals. We evaluated all City of Madison facilities open to the public. Based on our evaluation, all of our facilities required to have fire alarm systems have both flashing and audible signals.

Madison and Dane County Emergency Management work together with the first responders to issue a Wireless Emergency Alerts via cellular phones, but this information is not as timely as on-site alarm systems. The <u>City of Madison Emergency Management Plan</u> (EMP) provides guidance for the response and recovery to emergency situations. Based on your feedback, Emergency Management will recommend future City projects include a voice evacuation fire alarm system (audible) and/or message boards (visual) as additional ways to share emergency information to the public. In addition, the Madison Police Department provides <u>Civilian Response to Active Shooter Events</u> trainings that are open to the public.

Comment:

[Regarding City County Building, Room 201, Common Council meeting assembly seating area for members of the public] There have been several people who have needed adequate seating and what's installed is not supportive of larger bodies. What it appears we're doing is attempting to find a chair and then that person would sit away from the two gallery areas, which can also be very embarrassing and make someone feel out of place. Most recently someone decided to stand which of course led to them also visibly trying to shrink themself so they weren't in the way of anyone who would be walking by. I don't believe that's an acceptable way for us to create space for folks. We're doing a disservice to folks who would benefit from seating that would benefit different body types and abilities.

Response:

Thank you for bringing this issue to our attention. The City County Building, Room 201 is used by the Common Council and members of the public. Dane County is responsible for the maintenance and repair of many common areas of the building. We agree this room is an important part of residents' ability to engage in City government and should be welcoming, useable and accessible to people with disabilities and people with all body types.

This room contains elements that are historic in nature and the public seating area predates the ADA Design Standards. However, in response to your comment we have completed an evaluation and will be adding a schedule to remove identified access barriers to the ADA Transition Plan as included below and incorporated into Appendix VI.

We found the assembly seating currently available in Room 201 is 17.5 inches across, 18 inches from floor to seat, 17.5 inches deep, and has a back height of 19 inches. The ADA Design Standards do not require a specific chair or seat dimensions for accessibility. When standards are not available, we seek out other sources of reliable information to inform best practices for inclusion. Based on a 2023 study, a minimum seat width of 22 - 26 inches would accommodate the 99th percentile of the population (400-600 lb users). (Sydor M, Hitka M. Chair Size Design Based Height. **Biomimetics** (Basel). 2023 Jan on User 31; 8(1):57. 10.3390/biomimetics8010057.) The Center for Universal Design also recommends providing a variety of seating options. Therefore, we recommend new seating incorporate options, such as individual seats and benches and at least one of those options be at least 22 - 26 inches wide, for a diverse range of users and body types.

Barrier to Access	Priority	Remedy	Estimated Cost	Schedule
Podium ramp does not include a landing at least 60X60 at the top of the ramp (405.7.2, 405.7.3)	2	!	County and city \$30,000- 50,0000	2030
Signs including contrast, tactical characters, Braille mounted on the latch side of the door, with clear floor space and at the appropriate height (703)	2	Install ADA compliant sign (Rm 201)	County \$1000/sign	2028
Interior door weight and closing speed (404.2.8.1 and 404.2.9)	2	Adjust/replace closers (Rm 201)	County and City \$1000	2028
Assembly seating does not provide adequate wheelchair spaces (221.2.1) and does not provide complaint companion seats (221.3, 802.3.1, 802.3.2); folding or retractable armrests are not provided on the aisle side of the seat where armrests are provided in the immediate area (802.4.1)	2	Replace/Install existing seating and include adequate wheelchair spaces	County and City \$50,000 – 70,000	2028

Comment:

Swapping out signage is a waste of our money & isn't beneficial. What we have now already functions.

Response:

Ensuring that signage in public facilities is compliant with the ADA makes public building safer and creates access to information, services, restrooms, and parking for people with disabilities. We disagree that replacing non-compliant signs with compliant signs is wasteful or not beneficial. Signs that are not compliant with the ADA are not considered to be "functional" under the law. Through the self-evaluation process we identified wayfinding or signage that is not compliant with

one or more of the requirements of $\underline{216}$ and $\underline{703}$ of the 2010 or other applicable ADA Design Standards. This means that installing or relocating the sign is necessary for legal compliance and, more importantly, to ensure our facilities are accessible and useable for people with disabilities.

Comment: (non-resident)

I saw that City of Madison is updating the ADA Transition plan. I don't live in Madison but am part of a national group, Changing Spaces Campaign. <u>Inclusion | Changing Spaces Campaign</u>. I lead Changing Spaces Wisconsin. We advocate for the installation of powered, height adjustable adult size changing tables in public. This resolution was passed in 2022 for Dane County. <u>2022 RES-130</u> - 2022 RES-130.

These tables became part of the 2024 building code for new buildings and renovations, although Wisconsin didn't adopt this code, and is still using 2015 code. However, municipalities can choose to adopt the code and if you are updating accessibility, this would be a great step towards Universal Design. <u>Building Code | Changes Spaces Campaign</u>

This is our map Universal Changing Table Map | Changing Spaces USA

I don't know if you had this on your radar, but as parent to a 25-year-old man who needs somewhere to change when outside of home, lack of accommodations keeps us isolated at home much of the time. For families like ours access to a save, private, hygienic place to change is a game changer, is life changing and is the single most important accommodation that enables us to be part of our community.

Response:

Although not currently required by the ADA, we recognize that adult changing tables make public spaces more accessible and inclusive and create greater access to the community. The City will explore and strive to implement adult changing tables in new construction and renovations of public spaces such as libraries, park shelters and community centers wherever feasible.

Public Right of Way

Comment:

The City frequently permits out the downtown ADA parking to able bodied construction workers and events leaving people with mobility issues no where to park to attend medical appointments or events. This needs to stop. There is never substitute parking available when the city gives these ADA spots up for other use.

Response:

Under the Public Right of Way Guidelines, a public entity must provide accessible alternative pedestrian access routes, transit stops, and loading zones wherever feasible due to construction, maintenance operations, closure, or other similar conditions (PROWAG R204). Although the same is not expressly required for accessible reserved on-street parking, the City of Madison relocates reserved accessible on-street parking whenever there is a practical alternative. Therefore, we find that substitute parking is made available and the City of Madison is currently in compliance.

In addition to accessible on-street parking with no posted time limits or meters, a person with a "Parking for people with disabilities" hangtag or license may park in:

- Accessible parking spaces in all <u>City lots</u> and <u>City parking garages</u>. Standard fees apply and are payable at Pay Stations, Exit Stations, or with a Parking Fee Notice (for overnight parking).
- Accessible parking next to the elevator on every level of the State Street Capitol Garage.
- A metered space on-street with a posted limit of 30 minutes or longer (for longer than the time limit) without getting a ticket. Payment is not required at these meters.
- Any non-designated, general use, stalls (without payment) for up to 48 hours at any 30-minute limit or longer metered space or signed area, other restrictions such as part time (e.g. NO STOPPING STANDING OR PARKING 3-6 PM) restrictions for traffic, or loading zones, or alternate side parking, must be complied with.

The <u>Madison Parking Utility</u> has more information on accessible parking. Also see <u>Parking for Persons with Disabilities</u>. For enforcement related concerns, contact the <u>Madison Parking Enforcement</u> at 608-266-4622 or <u>parkingenforcement@cityofmadison.com</u>

Comment:

There needs to be an initial assessment and then regular review of the conditions at every place that railroad tracks intersect roads or sidewalks or multiuse paths. These intersections can be extremely dangerous to not only bicycles but also any other person needing to use mobility aids of any kind, whether wheelchairs, walkers, crutches, scooters or baby strollers.

Response:

Rail Roads are outside of the jurisdiction of the City of Madison. Follow this link for more information about the Federal Railroad Administration Office of Civil Rights and ADA Complaints or email them at civil.rights@dot.gov or call 202-493-0669. In addition, the Office of the Commissioner of Railroads (OCR) is tasked with ensuring safety of the public at railroad crossings in the State of Wisconsin. When the City of Madison proposes projects or improvements, many of them must go through an OCR approval process. More information on OCR is available at https://ocr.wi.gov/

The City of Madison's <u>Annual Sidewalk Replacement Program</u> conducts regular review of the sidewalk, curb ramp, and gutter conditions. Each year they conduct in-person assessments of the sidewalks in two of the City's Aldermanic Districts and rotate through the alder districts on a 10-year cycle. The <u>Sidewalk Repair Schedule by Alder District</u> is available on our website. Additionally, members of the public may also report sidewalk areas that are in need of repair anywhere in the city at any point in time by submitting a <u>Sidewalk Concern</u> through our website or by contacting Bill McGlynn, Sidewalk Program Supervisor at 608-266-4537 or <u>wmcglynn@cityofmadison.com</u>. See Appendix XIII for more information.

We have also noted your request for a safety improvement. Other requests for safety improvements in the public right-of-way including audible pedestrian signals, street lighting, street signs, pavement markings, and concerns related to biking or walking, speeding issues, and

traffic signals can be reported through the <u>Request a Safety Improvement</u> form on our website or by contacting Traffic Safety at <u>traffic@cityofmadison.com</u> or 608-266-4761. See Appendix XII for more information.

Comment:

- 1. Diagonal Curb Ramps Create Hazards for Wheelchair Users. A single diagonal curb ramp crossing an arterial or collector street creates unsafe crossing conditions.
 - hard for pedestrians to signal which street they're crossing
 - most effective signal requires entering the street corner, creating clash with right-onred turns
 - snow clearance makes all these even harder
- 2. Dangerous Curb Ramps. A wheelchair-using resident should have a reasonable expectation that sidewalks and curb ramps are safely designed. Curb ramps are being created that wildly exceed the running and cross slope requirements: they are attractive nuisances. Sadly, in addition to legacy (pre-ADA) examples, there are brand new creations with these issues. This is why it's crucial that your process includes updating the standard drawings for contracted sidewalk repair and construction. I'm very familiar with four near my house:
 - 43°02'47.4"N 89°26'43.5"W
 - south east corner of Hiawatha Dr and Chippewa Dr (Legacy ramp Michael McBurney lived 2 blocks away) On the third day I used my powerchair back in 1993, I tipped over sidewise on this one.
 - 43°02'41.6"N 89°26'42.3"W (two ramps)
 - o northwest of the intersection of Yuma Dr and Cherokee Dr. This paired crosswalk is significantly uphill from the street intersection. This pair was added ca 2008; the cross slope is unnavigable in wet or icy conditions.
 - 43°02'41.5"N 89°26'42.1"W
 - o entry to the northern sidewalk of Yuma Dr at Cherokee Dr. The gutter and slope are unnavigable, period.
- 3. I'm Available As A Sounding Board. I've got many years' experience serving on city commissions/committees/boards, as well as decades as a disability rights advocate in the community. In addition to using a powerchair for 30 years, I've worked with blind and Deaf people as well as folks with intellectual disability labels. I retired in 2019, and no longer know alders or city staff. I have professional experience in keeping secrets. If I can be helpful, please reach out.

Response:

 Thank you for your comments regarding the accessibility and usability of perpendicular curb ramps in comparison to diagonal curb ramps. For compliance with PROWAG <u>R304</u>, wherever

- existing conditions do not restrict the feasibility, perpendicular curb ramps will be installed going forward.
- 2. Safety is a top priority in Madison's <u>Transportation Improvement Plan</u>. We will include a review of the standard drawings for contracted sidewalk repair and construction in the Plan. In addition, any new construction and alterations of curb ramps and blended transitions in the public right-of-way beginning January 17, 2025, will comply with the PROWAG standards except where existing physical constraints make compliance technically infeasible. Compliance with these requirements is required to the maximum extent feasible. Existing physical constraints include, but are not limited to, underlying terrain, underground structures, adjacent developed facilities, drainage, or the presence of a significant natural or historic feature.

We recommend that anyone aware of similar problematic ramps report them via the <u>reporta-problem site</u> as a sidewalk issue to bring them to the attention of our Sidewalk and Curb Ramp Repair and Replacement Programs (See Appendix XIII for more information). We reported the curb ramps you listed and a surveyor confirmed and documented the excessive ramp slopes. These ramps will require considerable changes to be made to the surrounding sidewalk, curb, terrace, and/or street to reduce the slope or otherwise make ADA compliant so they will need to wait for a street reconstruction project.

3. Thank you for sharing your experience. We look forward to collaborating with you. Please also consider applying for a City of Madison Board, Commission or Committee.

Comment:

I would like to give a little bit of feedback particularly in relation to APSs or accessible pedestrian signals. I'm pleased to see that Madison has started using Polara equipment which is much cheaper to install. I think that given how much less expensive it is, it might be possible, or certainly seems reasonable, to put in more APS in various places around town, particularly downtown around the square and so on. I do particularly appreciate the signal lights they have at Blair and Gorham where there is a press light, and you get a flashing light to cross the street. You also find those at Pickney and Gorham and Gorham and Henry. I would like to see them along all the busy intersections around Johnson, Gorham, University, Washinton, Regent and the Square. It would life much easier and certainly safer for those of us who rely on such.

Response:

Thank you for your comments and feedback. The City of Madison uses various methods to improve pedestrian safety including <u>Flashing Beacon Crosswalk Lights</u> and accessible pedestrian signals (APS). Residents can submit an <u>Accessible Pedestrian Signal Request</u> to request an APS be installed at a crosswalk or intersection within the City. City Staff are evaluating options for signal improvements in many of the areas you mentioned. Significant projects, like John Nolen Drive Reconstruction and North-South BRT will allow for additional improvements. The City has currently proposed upgrading some RRFBs to full signals, which may further increase pedestrian safety. For more information regarding upgrading RRFBs to full signals at the West Washington Avenue Crossing and North Shore Drive Crossing, see <u>March 26, 2025</u>, City of Madison Response to Order and Plans, Office of the Commissioner of Railroads, Docket 9170-RX-346.