

ADA COMPLIANCE

Self-Evaluation



Requirements and Barriers Overview

Snohomish County Public Works' Americans with Disabilities Act (ADA) self-evaluation study focused on curb ramps, pedestrian crossings, pedestrian signals and beacons, sidewalks, bus stops, and alternate pedestrian facilities in work zones. It not only looked at the physical requirements of these pedestrian facilities, but also the administrative requirements of the ADA.

Administrative requirements

Administrative requirements are customary or unwritten policies, procedures, or practices. There are at least 63 administrative requirements identified in the Department of Justice's (DOJ) Code of Federal Regulations (CFR) that are applicable to Public Works.

General administrative requirements include:

- Self-evaluations.
- Notification of rights and responsibilities.
- Designation of a responsible employee and adoption of grievance procedures.
- General prohibitions against discrimination.
- Maintenance of accessible features.
- Prohibitions against retaliation or coercion.
- Policies for the use of mobility devices on pedestrian facilities in the public right-of-way.
- Compliance of existing facilities.
- Compliance of newly constructed or altered facilities.
- General communications requirements.
- Transition plans.

Analysis

Public Works conducted a thorough examination of its policies, practices, and procedures and the way that it administers its pedestrian facility program to the general requirements. This included a self-created questionnaire that documented how well it is complying with the ADA.



Administrative barriers

44 administrative barriers were identified during the self-evaluation process. Example barriers include:

- Inadequate public notification of citizen rights and Public Works' responsibilities under the law.
- Lack of a review process, policy, or procedure for maximum extent feasible designs for reconstruction of existing facilities.
- Inability to effectively communicate with individuals with sensory, communication, or cognitive disabilities.
- No specific policies for the use of power-driven mobility devices on pedestrian facilities in the public right-of-way.
- No designated ADA coordinator or adoption of grievance procedures.
 - o As soon as the requirement was identified, an ADA coordinator was appointed to oversee the development of the self-evaluation and transition plan.

Public Works identified four root causes for these barriers:

- Lack of awareness.
- Lack of suitable policies and/or procedures and guidance.
- Inadequate technology.
- Insufficient training.

Physical requirements

There are more than 250 technical or physical requirements for pedestrian facilities in the public right-of-way. These requirements were identified in:

- The U.S. Access Board's 2005 Public Rights-of-Way Accessibility Guidelines (2005 PROWAG).
- The Federal Highway Administration's 2009 edition of the Manual on Uniform Traffic Control Devices (2009 MUTCD).
- The State of Washington's Revised Code of Washington (RCW).
- Snohomish County's 2012 version on its Engineering Design and Development Standards (2012 EDDS).



Analysis

Staff utilized a variety of technology and tools to complete its pedestrian facilities in the public right-of-way inventory. They also created measurement forms for each facility and its specific requirements that were relevant to Public Works' work.

From 2011 through 2015, Public Works staff conducted an extensive inventory and evaluation of pedestrian facility barriers within the public right-of-way.

Inventory

Public Works' self-evaluation included an assessment and field measurements of:

- 10,718 curb ramps locations including 8,568 existing curb ramps and 2,150 locations where one doesn't current exist but should.
- 484 pedestrian pushbuttons.
- 460 miles of sidewalk.
- More than 3,000 pedestrian crossings.
- 221 bus stops.

Physical barriers

Based on the inventory and analysis, the following were found to be non-compliant / barriers:

- 93 percent of curb ramps.
- 62 percent of sidewalks.
- 60 percent of pushbuttons.
- 90 percent of bus stops.

Of these barriers, Public Works identified four main factors for why non-compliance occurred:

- Expectations are not clearly set / lack of training.
- Standards have not been clearly defined.
- No follow-up to determine if standards have been met.
- No accountability to address non-compliant facilities or handle exceptions.

To the read the full draft self-evaluation study, visit www.SnoCoADA.org and select “Resources.”

TitleVI/ADA: Interpreter and translation services for non-English speakers and accommodations for persons with disabilities are available upon request. Please make arrangements in advance by calling Ryan Peterson, 425-388-3488, ext. 2883. For questions regarding Public Works’ Title VI Program, contact our Title VI Coordinator via email at spw-titlevi@snoco.org, or phone 425-388-6660. Hearing/speech impaired call 711.

Si los solicita, hay disponibles servicios de interpretación y traducción para personas que no hablan inglés y adaptaciones para personas con discapacidades. Le pedimos que coordine los arreglos necesarios por anticipado llamando por teléfono Ryan Peterson, 425-388-3488, ext. 2883. Si tiene preguntas sobre el Programa de Obras Públicas del Título VI, comuníquese con nuestro Coordinador del Título VI por correo electrónico a spw-titlevi@snoco.org, o por teléfono al 425-388-6660. Las personas con dificultades auditivas/del habla deben llamar al 711.