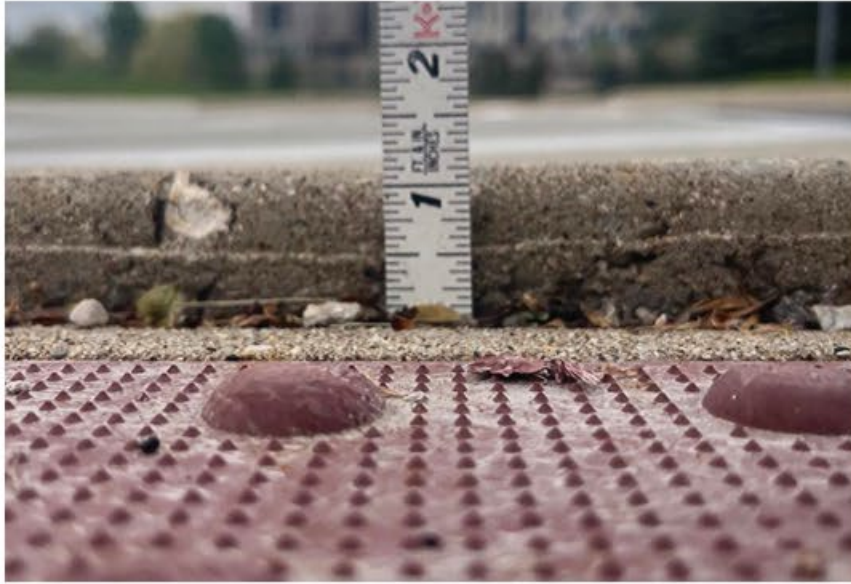


ADA Transition Plans: Latest Trends, Best Practices and Resources

—
IDOT Fall Planning Conference

September 3, 2026



Chicago Metropolitan
Agency for Planning



Illinois Department
of Transportation


CIVILTECH

Goals For Today

- › Understand **requirements** for local governments related to ADA Title II
- › Learn about the **risks** local governments face for non-compliance
- › Become familiar with **available resources** and templates from CMAP, IDOT
- › Understand how to **get started** and the **first steps** you can take towards creating an ADA Transition Plan
- › Differentiate between **what is true and what is a myth** about Transition Plans and be able to communicate to leadership



Who is here today?



What is your familiarity with ADA Transition Plans?

Accessibility in Action

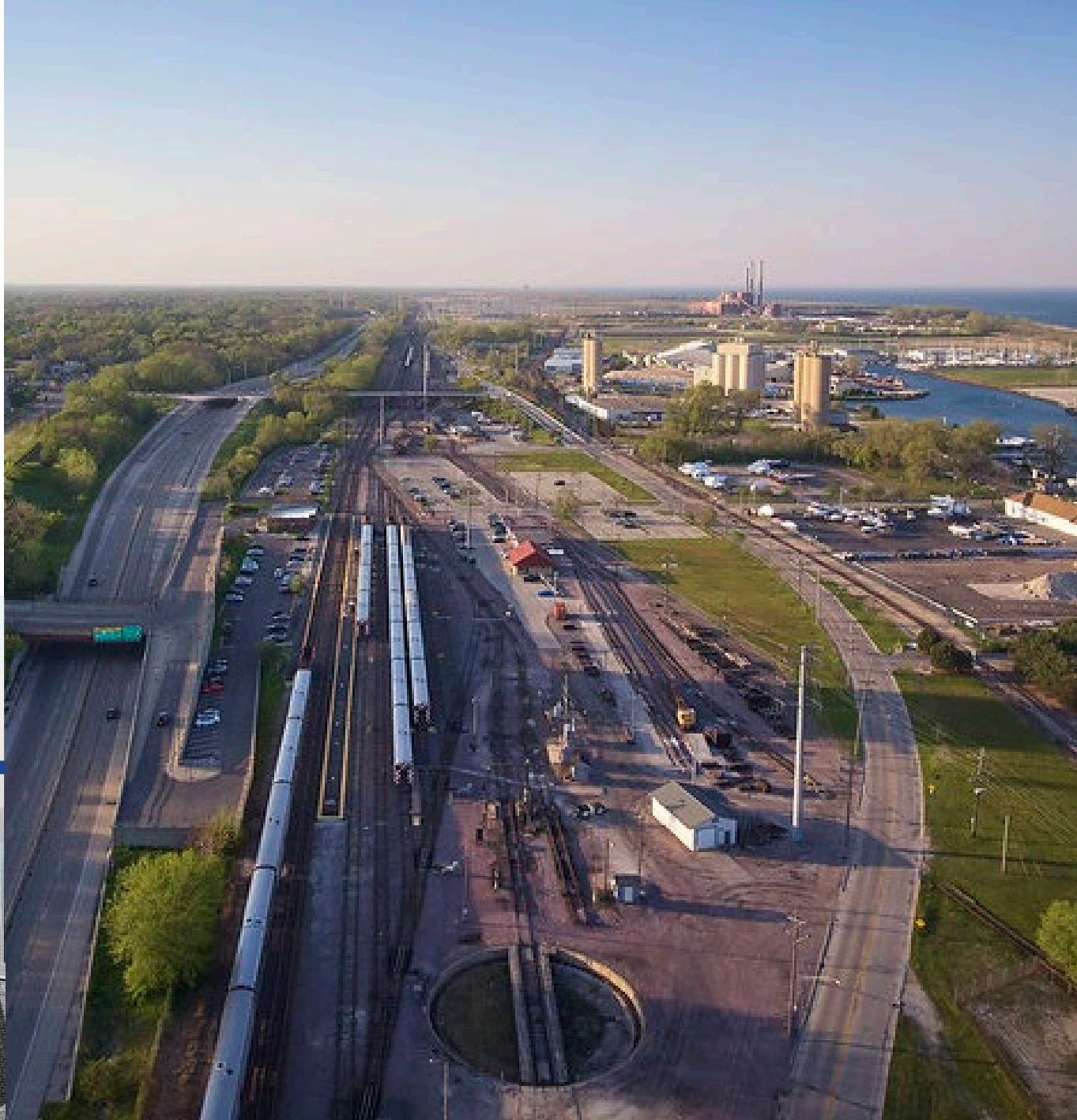
What are Local Governments Required to Do?

- **Jaemi Jackson, AICP, ADAC (she/her)**
Principal Planner
Chicago Metropolitan Agency for Planning

Who is CMAP?

**Regional planning agency for
northeastern Illinois**

7 counties and
284 municipalities





Chicago Metropolitan
Agency for Planning

Who is the disability community?



People with disabilities

- **1 in 4 people** have a disability
- 16% of people with disabilities use mobility devices (crutches, canes, wheelchairs, etc.) —very impacted by physical barriers in community
- 49% of people with disabilities have either vision or hearing impairment
- 33% of people with disabilities have major medical condition (diabetes, heart disease, HIV, seizure disorder, etc.)
- **The majority of disabilities are “invisible”**





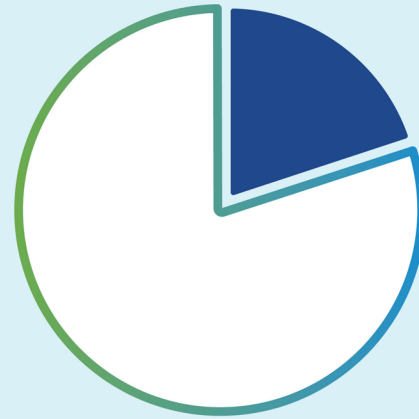
Nationally
1 in 4 people
have a disability

*Source: Centers for Disease
Control and Prevention*

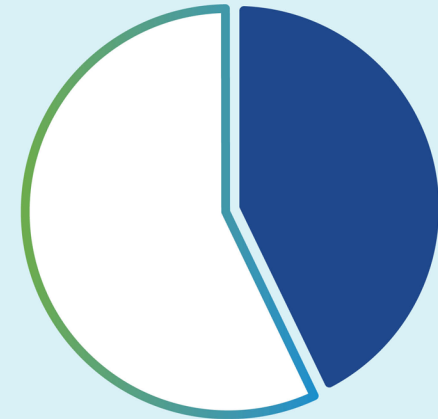
**Northeastern
Illinois**



In the CMAP region, there are
436K people (5.1%)
with a disability that affects mobility



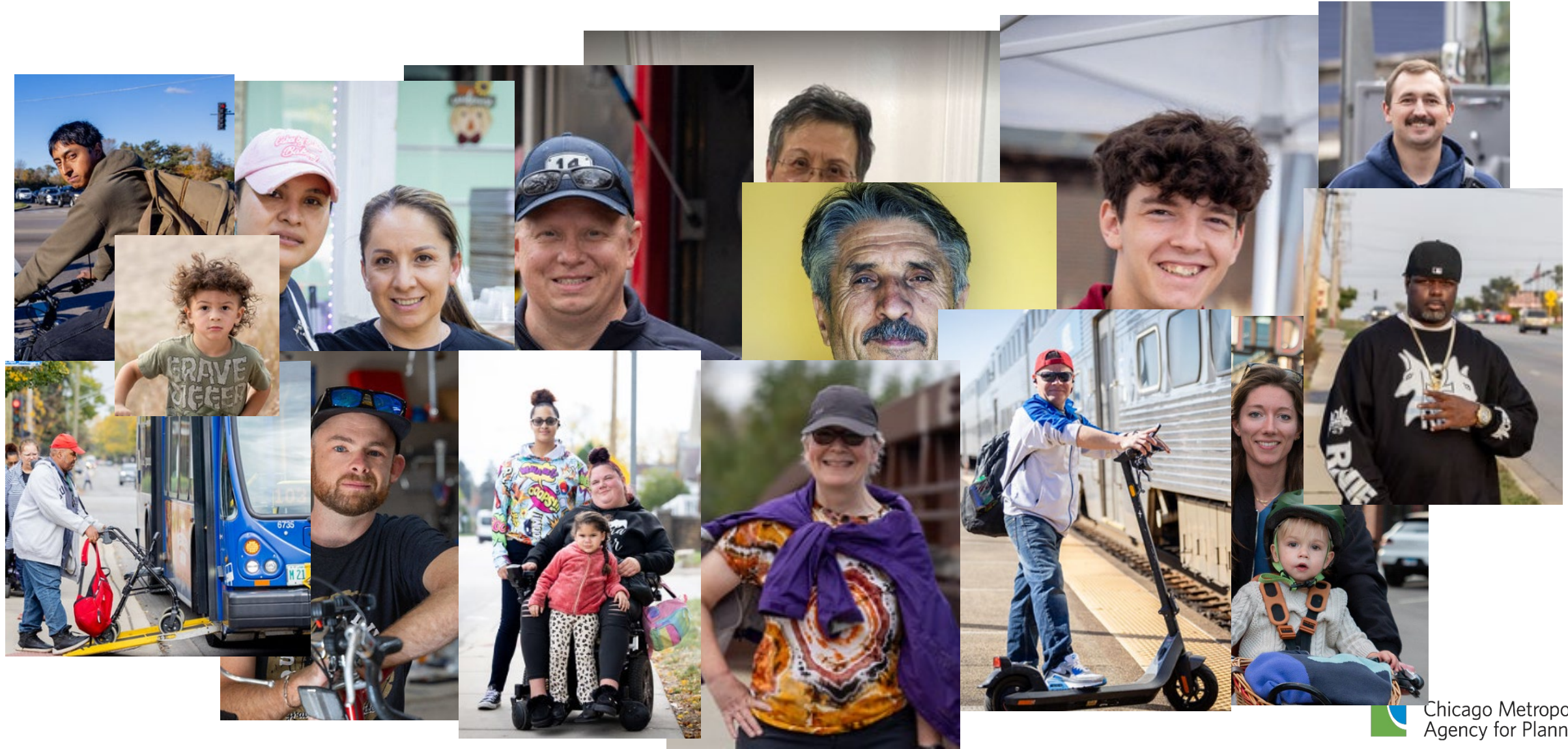
21%
of northeastern
Illinoisans aged 65-74
have at least 1 disability



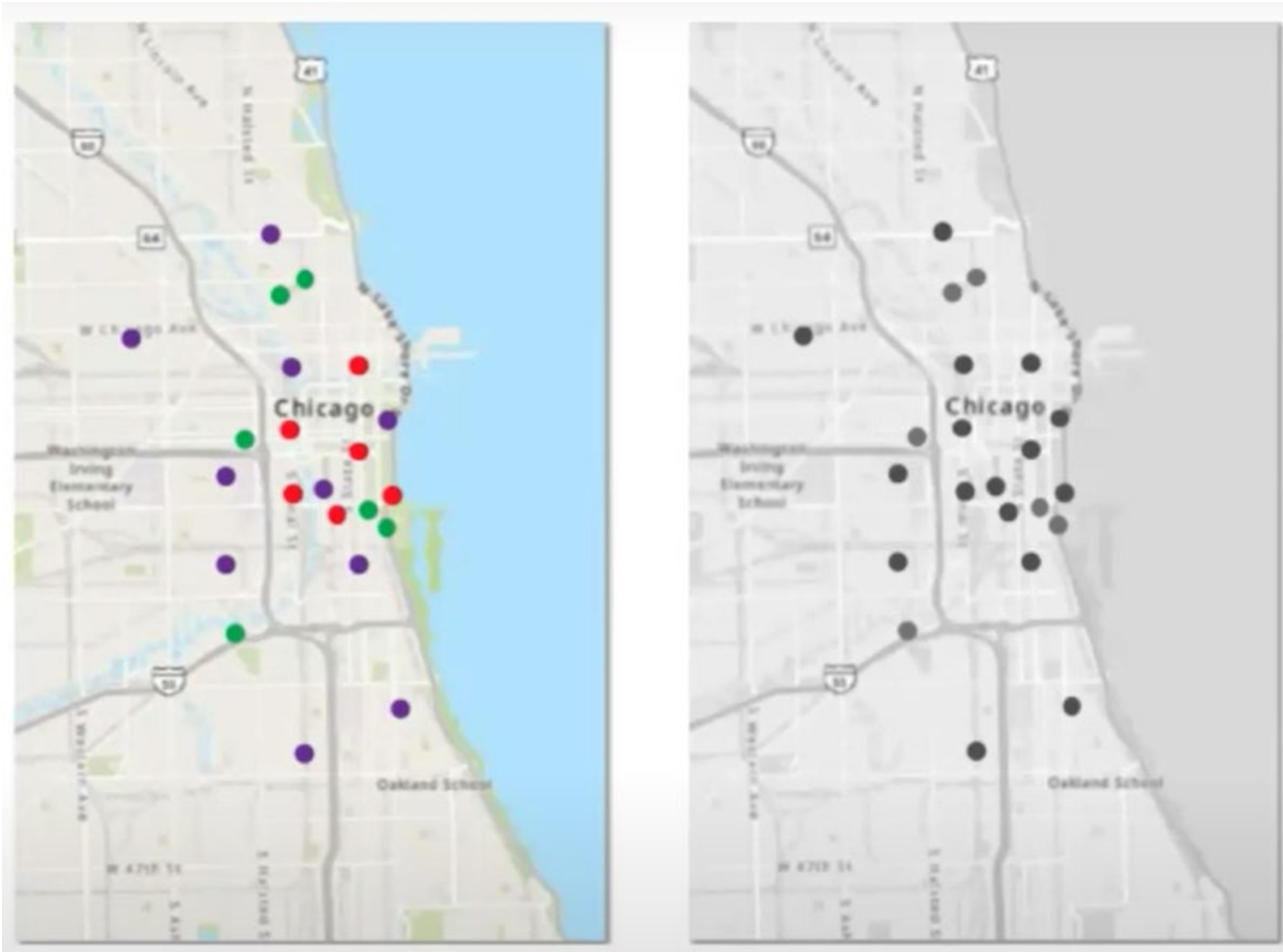
42%
of northeastern
Illinoisans aged 75+
have at least 1 disability

Source: 2019-2023 American Community Survey five-year estimates

What does disability look like?



Example: visual disabilities



Color contrast really matters!

Color contrast really matters!



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What are governments required to do?



Five administrative ADA requirements

Public entity requirements:

1. Notice to the public
2. Conduct a self-evaluation
3. Designate a responsible employee
ADA Coordinator
4. Grievance procedure
5. Develop a transition plan



Title II of the ADA: potential liabilities for non- compliance

- Possibility of harsher mandates from litigation
- Possibility of bad press
- Possibility of becoming a DOJ Project Civic Access “subject”
- Lawsuits and settlement agreements





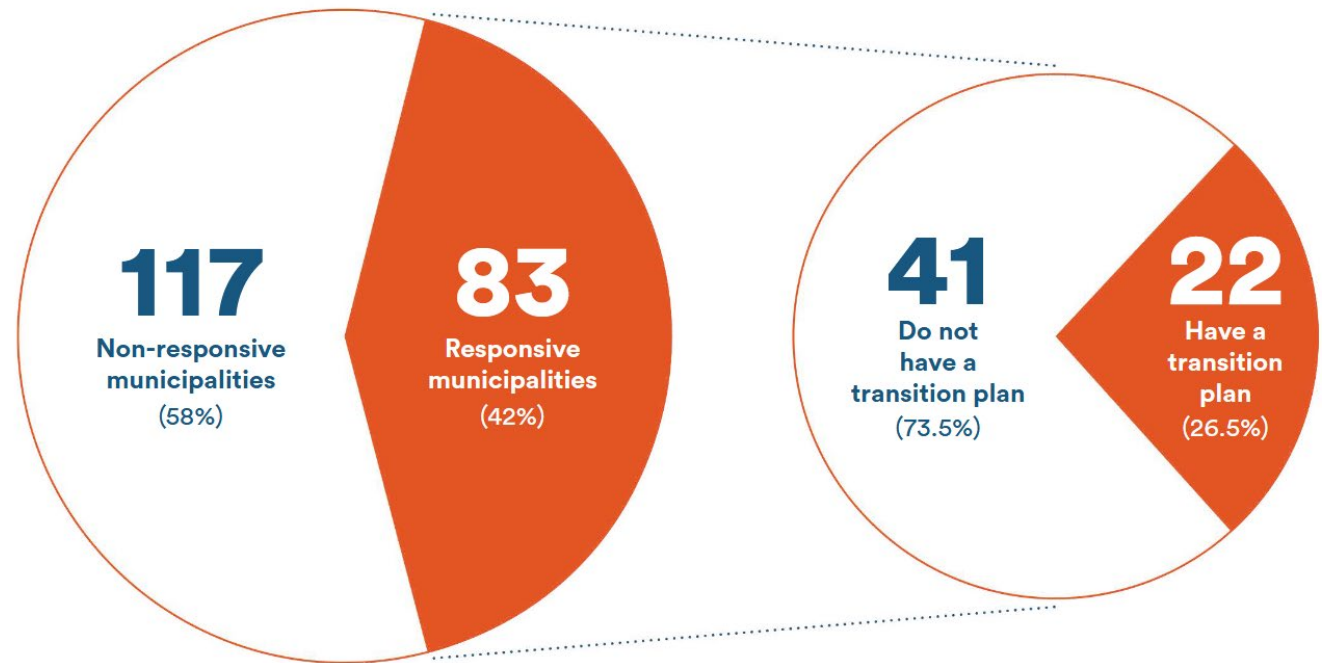
Where the sidewalk ends

The state of municipal ADA transition planning for the public right-of-way in the Chicago region

MARCH 2021

Metropolitan Planning Council

Great Lakes  Center



Metropolitan Planning Council, "Where the Sidewalk Ends"

Chicago, Illinois
TMA
Certification
Review

2022

Based on this review and ongoing oversight by the Federal Highway Administration and the Federal Transit Administration, the transportation planning process carried out in the Chicago, Illinois Transportation Management Area is certified as meeting the requirements as described in 23 Code of Federal Register. A number of commendations have been made throughout this report to acknowledge successful practices as well as several recommendations that support continued enhancement of the planning process in this region.



Data collection methodologies

- Manual collection
 - LiDAR – Vehicle-based
 - LiDAR – Smartphone-based
 - Ecopia
 - Project Sidewalk



Manual



LidAR



Photo: DeepWalk



Photo: Daxbot

Ecopia



Project Sidewalk



Search

Drawing Order

☒ All Transportation

☒ Light Gray Reference

☒ Yellow, Jctns, Lemont

☒ Center Lines

☒ Roads, Line, Lemont

☒ Sidewalks, Line, Lemont

☒ Railways, Line, Lemont

☒ Crosswalks, Line, Lemont

☐ Traffic-Related Features

☒ Intersections, Lemont

Type

☒ road_railway

☒ signal_controlled

☒ stop_controlled

☒ uncontrolled

☒ Stop Lines, Lemont

☒ Painted, Bike, Lines, Lemont

☒ Road, Lines, Line, Lemont

☒ Polygons

☒ Light Gray Base

Explore

Curb Ramp

Missing Curb Ramp

Obstacle in Path

Surface Problem

No Sidewalk

Marked Crosswalk

Pedestrian Signal

Other

0 labels

N/A accuracy

0 miles

Now you can rate the quality of the curb ramp. Because it is wide enough and has a tactile warning, let's rate the quality as Good.

Passable

1

2

3

4

5

Not Passable

Description (optional)

Add tags:

no snow

goes into traffic

missing friction strip

speed

not enough parking space

☐ Temporary (e.g., construction, trash)

OK

Badges

Labeler I

58

0 / 50

Explorer I

0 / 0.5 mi

[See all badges >](#)

Current Mission

Complete the onboarding tutorial!

7%

Neighborhood progress

Turn 360 degrees to make sure nothing is missed.

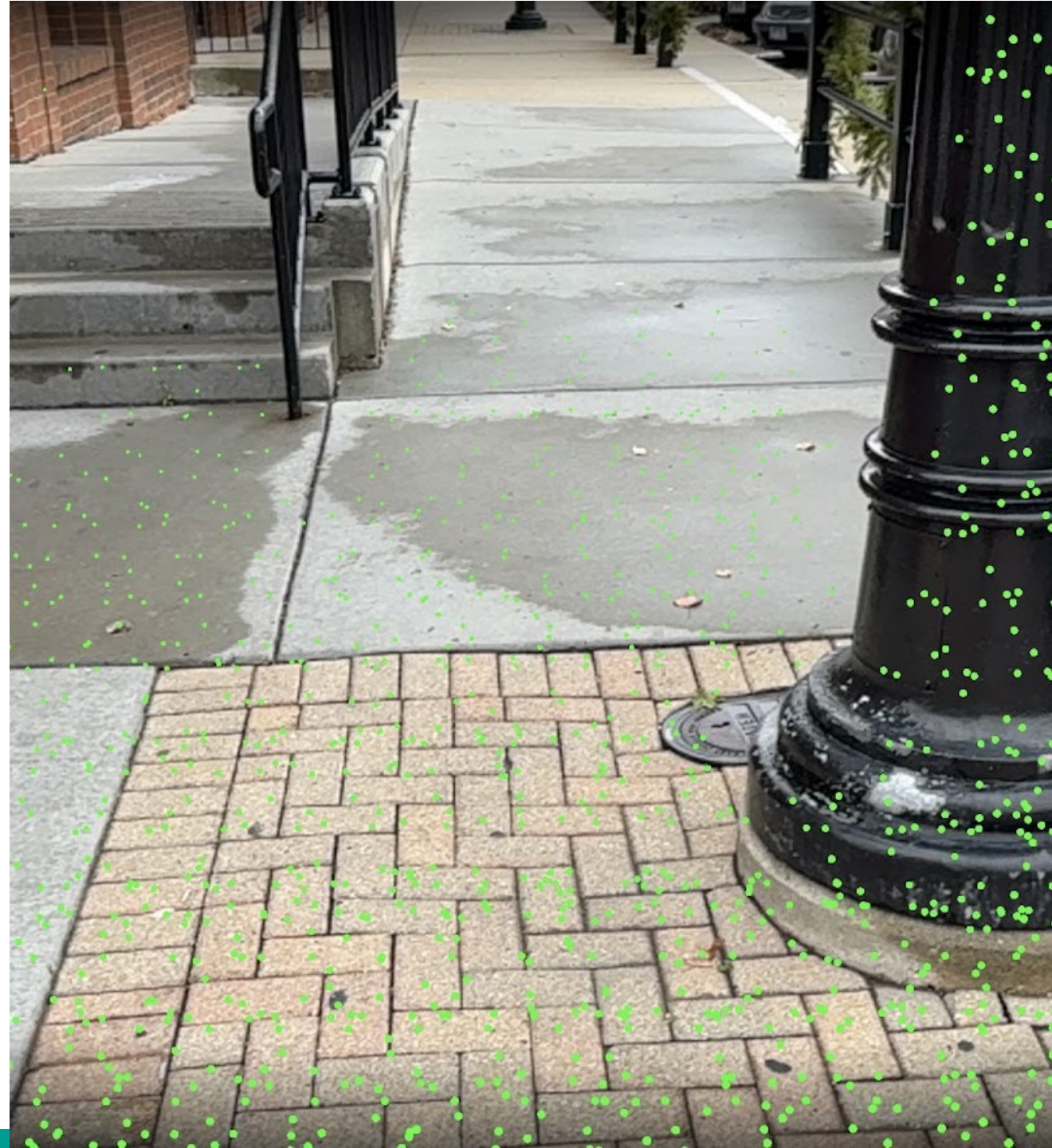
57%

Data collection

methodologies

There is no single 100% accurate method for collecting the data

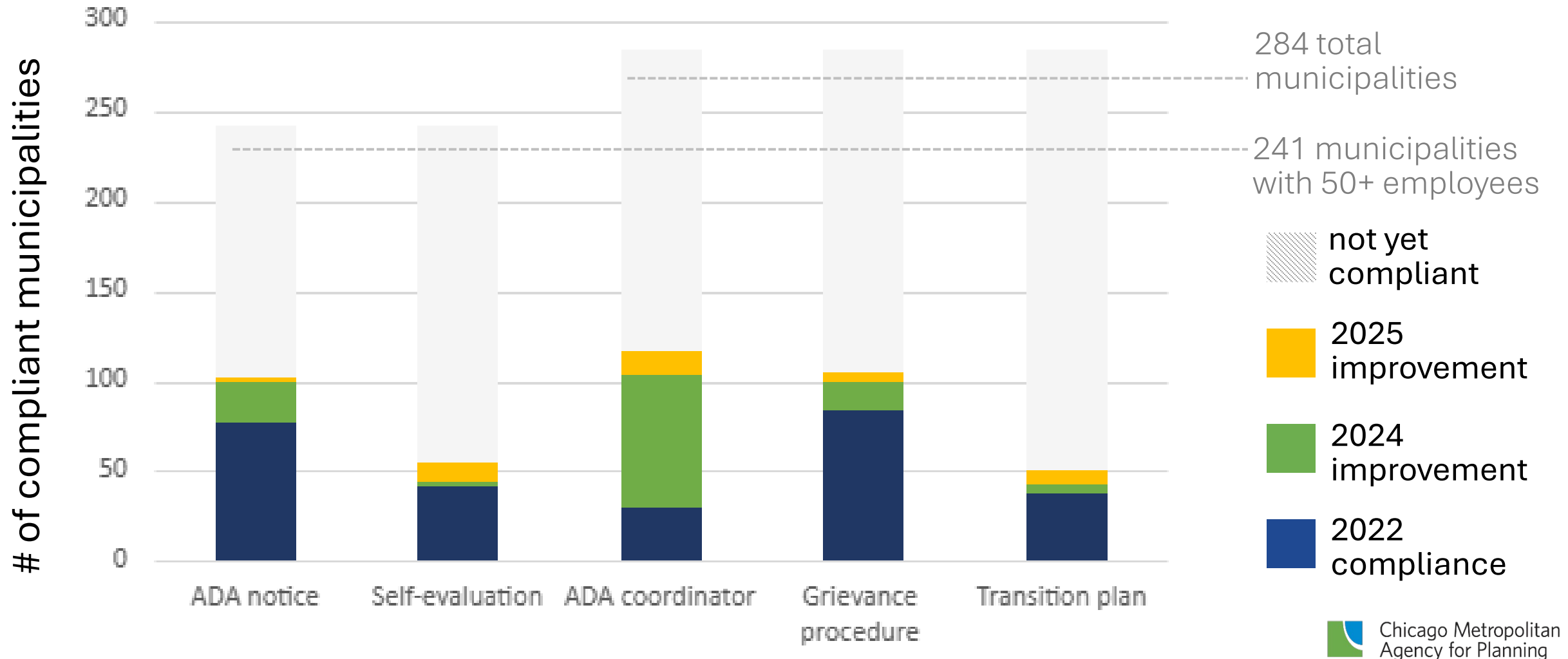
- Imagery that is only a few years old may be outdated when identifying detailed compliance issues (e.g. weathering)
- Critical to document your method, age of data, and limitations inherent with the chosen method



Comparisons

Right-of-Way Feature	LiDAR – Vehicle-mounted	LiDAR - Smartphone	Manual measurement	Ecopia	Project Sidewalk – Streetview
On-street parking	✓	✗	✓	✗	✓
Curb ramps	✓	✓	✓	✗	✓
Intersections	✓	✓	✓	✓	✓
Railroad crossings	✓	✓	✓	✗	✓
Shared use path	✓/✗	✓	✓	✓	✓/✗
Sidewalks	✓	✓	✓	✓	✓
Street crossings	✓	✓	✓	✓	✓
Transit stops	✓	✗	✓	✗	✓
Pushbuttons	✓*	✗	✓	✗	✗
Protruding objects	✓*	✗	✓	✗	✗

ADA compliance among municipalities in the CMAP region: 2022, 2024, and 2025





ADA Title II Requirements and Obligations for State & Local Agencies



ADA Requirements for Local Public

<50
Employees

ADA Compliance Item	Description	Public Entity (50+ Employees)	Public Entity (<50 Employees)
General ADA Compliance	Provision of accessibility to public services, programs and activities	✓	✓
Provide Public Notice	Make information publicly available regarding the ADA provisions and their applicability to the agency's services, programs and activities	✓	✓
Conduct a Self-Evaluation	Evaluate current services, policies and practices for ADA compliance; and provide an opportunity for interested persons to participate	✓	✓
Documentation of Self-Evaluation	Maintain documentation of Self-Evaluations on file and make them available for public inspection for at least 3 years	✓	Recommended
Designate an ADA Coordinator	Designate a responsible employee to be your ADA coordinator	✓	
Adopt a Grievance Procedure	Post in public locations and on website	✓	
Develop a Transition Plan	Include schedule for barrier removal and if agency has responsibility over streets, roads or walkways, include the curb ramp schedule	✓	

Employee Count Calculation:

Does the part time or temporary employee receive benefit (i.e. W-2) from the Agency?

- ✓ If yes, add to employee count

Remember:

- ✓ Need to consider entire Agency, not just a department
- ✓ Obligation is to ensure that individuals with disabilities are not excluded from programs, services, and activities

regardless of community size

BLRS Manual Chapter 8

Oct 2013	BUREAU OF LOCAL ROADS & STREETS TRANSITION PLAN	8(1)
Chapter Eight PUBLIC RIGHT-OF-WAY ACCESSIBILITY TRANSITION PLAN		
8-1	PUBLIC RIGHT-OF-WAY ACCESSIBILITY TRANSITION PLAN	

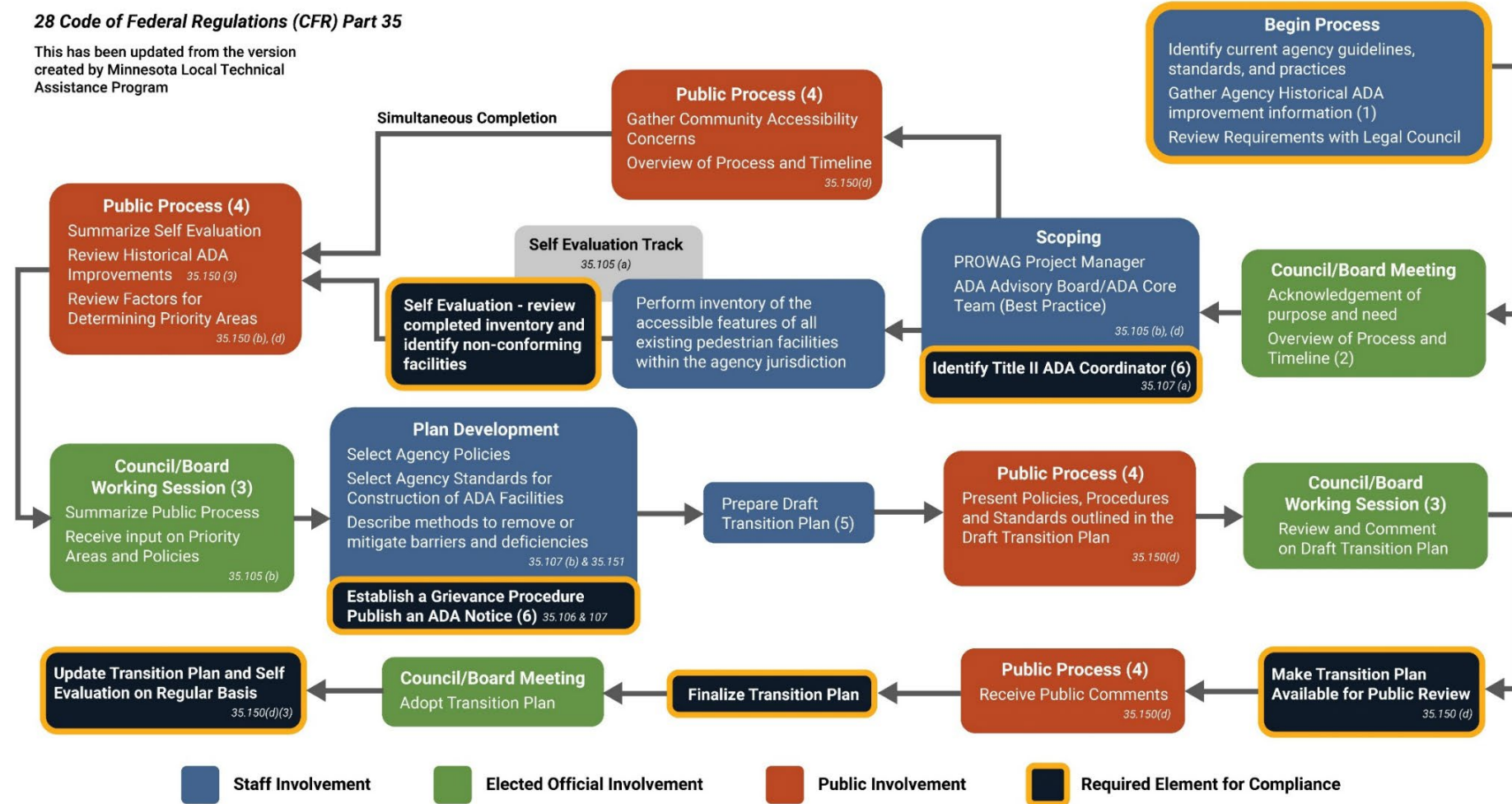
The Americans with Disabilities Act (ADA) is a civil rights statute that protects qualified individuals with disabilities from discrimination on the basis of disability. Title II of the ADA prohibits discrimination in all services, programs, and activities provided to persons with disabilities by State and local governments, including public transportation. The ADA applies to all facilities built before and after 1990. Local public agencies (LPA) are required to perform self-evaluations of their current facilities, relative to the accessibility requirements of the ADA. **LPAs are required to correct any deficiencies identified through the self-evaluation.** Only LPAs with more than 50 employees (including both full and part-time employees) are required to have a public right-of-way (PROW) accessibility transition plan detailing how and the deficiencies will be corrected is recommended. **However, a public right-of-way (PROW) accessibility transition plan is recommended for all LPAs.**

Self-Evaluation and Transition Plan Process Flow

A Process of Complying with ADA Title II for Facilities Within the Public Right of Way | Transition Plan Process

28 Code of Federal Regulations (CFR) Part 35

This has been updated from the version created by Minnesota Local Technical Assistance Program



<https://idot.illinois.gov/content/dam/soi/en/web/idot/images/programs-and-projects/multimodal-transportation/IDOT ADA Website Graphics 20260303.pdf>

1. Review information as to how projects constructed since January 26, 1992 included ADA elements. This includes Mill and Overlay projects.

2. This Council/Board packet and presentation should include an overview of the ADA Title II requirements and a summary of the existing agency policies.

3. Intermediate Council/Board involvement is not a requirement. These meetings represent only one possible scenario.

4. Title II of the ADA requires targeted outreach to the disabled community. This can be accomplished in many different ways and can be customized by each individual agency. The public process identified in the guide map (above) represents one possible scenario.

5. A model self-evaluation and transition plan is in development for use as a starting template and will be posted to the website when available.

6. A Title II ADA Coordinator and grievance procedure are needed for all of the agency's facilities, programs and services. These elements are required for more public accessibility areas beyond public right-of-way.

Getting Started: ADA Title II Administrative Requirements Compliance Review Checklist

- Gather Available information
- Self-assess your existing ADA Title II documentation
- Answer the questions in the 5 sections
 - 1. Applicable Administrative Requirements**
 - ADA Notice, ADA Coordinator, Grievance Procedure, Self-Evaluation, Transition Plan
 - 2. Effective Communications – Website**
 - 3. Self-Evaluation Components**
 - 4. Transition Plan Components**
 - 5. Staff Training**
 - Internal ADA training and etiquette
 - Front Line Staff or those who work with public
- Tally your results and summarize notes and recommendations

“Scoring”

- No = 0
- Partial = 0.5
- Yes = 1



- Any score at all is an indicator that your Agency is trying
- A low score means your agency likely needs additional resources, documentation improvements, and/or training

ADA Title II Administrative Requirements Compliance Review Checklist



Local Agency Name:

Number of Employees from U.S. Census: ☐ Greater than 50 ☐ Less than 50

Name, title, email of person who completes the form: Date:

Name: Title: Email:

Note: Answers informed through review of the Agency's website and Self-Evaluation and/or Transition Plan of the public right-of-way.

No - Needs training/limited or no documentation.
Partial - Needs training/documentation may be incomplete or available but not enough to be compliant.
Yes - Doesn't need training/information documented and compliant.

Self-Evaluation and/or Transition Plan Components	• No (N) • Partial (P) • Yes (Y)			ADA Program Components; ADA Title II Self-Evaluation (SE) and/or Transition Plan (TP) Review Questions	Requirement Threshold (Number of Employees or Best Practice)	Code of Federal Regulation (CFR) or State Regulation Reference
	N	P	Y			
	0	0.5	1			

“Scoring”

- Tally Scores for blue, green, and orange sections
- Questions are color-coded
- Scores are subjective
 - › Use as a baseline to measure future updates against
 - › Don’t focus on the number
 - › Focus on areas of improvement
- Provide honest notes/recommendations
- Revisit recommendations when updating your transition plan or self-evaluation

Directions: Agency should self-score based on No (0.0), Partial (0.5), and Yes (1.0) responses to questions on pages 1 through 3 and total their scores per category in the left column below. Agency should type Recommendations/Notes in the right column below as needed. Recommendations can be applied as your Agency works to update their ADA Programs and Transition Plans.

1. Applicable Administrative Requirements

Score: of 2; of 6

All: Sum of questions 1.1 and 1.6;

>50: Sum of questions 1.1, 1.2, 1.4, 1.5, 1.6, and 1.9.

Recommendations/Notes:

2. Effective Communication/Public Involvement

Score: None

Recommendations/Notes:

3. Self-Evaluation Components

Score: of 9

All: Sum of question 1.8 and all section 3 questions except 3.4, 3.7, 3.9, and 3.10.

Recommendations/Notes:

4. Transition Plan Components

Score: of 9

All: Sum of questions 1.11 and 1.13 and all section 4 questions except 4.5, 4.7, 4.10, and 4.11.

Is a Transition Plan required for this agency? ☐ Y ☐ N

Are Transition Plan edits recommended? ☐ Y ☐ N

Recommendations/Notes:

Scoring

Comprised of three score categories:

■ Administrative Requirements Score

- For agencies < 50 employees – 2 total points
- For agencies > 50 employees – 6 total points

■ Self-Evaluation Components Score

- All agencies – 9 total points

■ Transition Plan Components Score

- For agencies > 50 employees – 9 total points

1

Applicable Administrative Requirements (Blue)

ADA Title II Administrative Requirements Compliance Review Checklist



Local Agency Name: _____

Number of Employees from U.S. Census: ☐ Greater than 50 ☐ Less than 50

Name, title, email of person who completes the form: _____ Date: _____

Name: _____ Title: _____ Email: _____

Note: Answers informed through review of the Agency's website and Self-Evaluation and/or Transition Plan of the public right-of-way.

No = Needs training/limited or no documentation.
Partial = Needs training/documentation may be incomplete or available but not enough to be compliant.
Yes = Doesn't need training/information documented and compliant.

Self-Evaluation and/or Transition Plan Components	No (N) Partial (P) Yes (Y)			ADA Program Components; ADA Title II Self-Evaluation (SE) and/or Transition Plan (TP) Review Questions	Requirement Threshold (Number of Employees or Best Practice)	Code of Federal Regulation (CFR) or State Regulation Reference
	N	P	Y			
1. Applicable Administrative Requirements	☐	☐	☐	1.1 – Does the Agency have a publicly-posted ADA Notice?	All	28 CFR 35.106
	☐	☐	☐	1.2 – Is there a publicly-available ADA Grievance Procedure?	50+	28 CFR 35.105
	☐	☐	☐	1.3 – Is there a publicly-available complaint form that can be filled out?		
	☐	☐	☐	1.4 – Does the Agency designate an ADA Coordinator or Responsible Employee?	50+	28 CFR 35.107 PA 98-0650 (65 ILCS 5, 65 ILCS 6, or 60 ILCS 1)
	☐	☐	☐	1.5 – Is the contact information for the Coordinator available to the public?		
	☐	☐	☐	1.6 – Does the Agency have a Self-Evaluation Plan?		
	☐	☐	☐	1.7 – When was the Self-Evaluation Plan created or most recently updated?	All	28 CFR 35.105
	☐	☐	☐	1.8 – Was the public/disability community given the opportunity to participate in the Self-Evaluation process by submitting comments (such as on barriers, process, priorities)?		
	☐	☐	☐	1.9 – Does the community have a Transition Plan?		
	☐	☐	☐	1.10 – When was the Transition Plan created or most recently updated?		
	☐	☐	☐	1.11 – Was/is the Transition Plan available for public inspection?	50+	28 CFR 35.150(d)
	☐	☐	☐	1.12 – Was the public/disability community given the opportunity to participate in the development of the Transition Plan by submitting comments?		

For Administrative Purposes Only: IDOT reviews will be entered into a comprehensive database to help identify what agencies need assistance with (i.e. developing a successful ADA Self-Evaluation and/or Transition Plan). Some Agencies will need some correction, while others will need full assistance in all areas. Due to budgetary constraints questions 2.3 and 4.1 were not assessed during IDOT reviews.

Directions: Agency should self-score based on **No (0.0)**, **Partial (0.5)**, and **Yes (1.0)** responses to questions on pages 1 through 3 and total their scores per category in the left column below. Agency should type **Recommendations/Notes** in the right column below as needed. *Recommendations can be applied as your Agency works to update their ADA Programs and Transition Plans.*

1. Applicable Administrative Requirements Score: of 2; of 6 All: Sum of questions 1.1 and 1.6; >50: Sum of questions 1.1, 1.2, 1.4, 1.5, 1.6, and 1.9.	Recommendations/Notes:
2. Effective Communication-Website Score: None	Recommendations/Notes:
3. Self-Evaluation Components Score: of 9 All: Sum of question 1.8 and all section 3 questions except 3.4, 3.7, 3.9, and 3.10.	Recommendations/Notes:
4. Transition Plan Components Score: of 9 All: Sum of questions 1.11 and 1.12 and all section 4 questions except 4.5, 4.7, 4.10, and 4.11. Is a Transition Plan required for this agency? ☐ Y ☐ N Are Transition Plan edits recommended? ☐ Y ☐ N	Recommendations/Notes:
5. Staff Training Is training recommended? ☐ Y ☐ N	Recommendations/Notes:

3

Self-Evaluation Components (Green)

For Administrative Purposes Only: IDOT reviews will be entered into a comprehensive database to help identify what agencies need assistance with (i.e. developing a successful ADA Self-Evaluation and/or Transition Plan). Some Agencies will need some correction, while others will need full assistance in all areas. Due to budgetary constraints questions 2.3 and 4.1 were not assessed during IDOT reviews.

Directions: Agency should self-score based on **No (0.0)**, **Partial (0.5)**, and **Yes (1.0)** responses to questions on pages 1 through 3 and total their scores per category in the left column below. Agency should type **Recommendations/Notes** in the right column below as needed. *Recommendations can be applied as your Agency works to update their ADA Programs and Transition Plans.*



2	Effective Communication - Website	☐	☐	☐	2.1 – Does the Agency have a website?	All	28 CFR 35.160(a)(1)
		☐	☐	☐	2.2 – If answer to 2.1 is no, does the Agency post, publish, or mail (newsletter or newspaper) the ADA Grievance Procedure and ADA Coordinator Information to the public every other year (per Illinois State Statute applicable to counties, municipalities, and townships)?	All	PA 96-0650 (65 ILCS 5/1-1-12 for municipalities)
		☐	☐	☐	2.3 – Is the Agency's website accessible based on Web Content Accessibility Guidelines (WCAG) to individuals with vision impairments? (Using WAVE accessibility checker or other comparable software with no errors)	All	28 CFR 35.160(a)(1)
3	Self-Evaluation Components	☒	☒	☒	3.1 – Did the Agency complete a Self-Evaluation of accessibility compliance of their facilities, programs, services, and activities including their policies, practices, and procedures?	All	28 CFR 35.105
		☒	☒	☒	3.2 – Does the Self-Evaluation have an ADA Background/History and Purpose in an introduction for the reader?		Best Practice
		☒	☒	☒	3.3 – Does the Self-Evaluation identify which ADA standards/guidelines the Agency uses for pedestrian features within the public right-of-way?		28 CFR 35.151
		☒	☒	☒	3.4 – If yes to 3.3, check all that apply: ☐ IDOT Standards ☐ ADAAG/2010 ADA Standards ☐ Other ☐ Public Right-of-Way Accessibility Guidelines (PROWAG)		28 CFR 35.151
		☒	☒	☒	3.5 – Does the Self-Evaluation identify both structural and communication barriers that limit access to the Agency's programs, services, and activities including their policies, practices, and procedures?		28 CFR 35.105
		☒	☒	☒	3.6 – Does the Self-Evaluation identify both existing and non-existent pedestrian facilities in the public right-of-way (gaps in sidewalk, missing curb ramps, lack of accessible path of travel, lack of access to an amenity)?		28 CFR 35.105
		☐	☐	☐	3.7 – Does the Self-Evaluation identify changes that are necessary to become compliant (can be policy/procedure, and/or structural changes should be considered)?		28 CFR 35.105
		☒	☒	☒	3.8 – Was an inventory of pedestrian facilities within the public right-of-way completed?		28 CFR 35.105
		☐	☐	☐	3.9 – What pedestrian facilities were included in the inventory? Check all that apply: ☐ Curb Ramp ☐ Signals ☐ Crosswalks ☐ Sidewalks ☐ Push Buttons		
		☐	☐	☐	3.10 – Is there a pedestrian facility type that does not exist within your jurisdiction? Check all that apply: ☐ Curb Ramp ☐ Signals ☐ Crosswalks ☐ Sidewalks ☐ Push Buttons		
		☒	☒	☒	3.11 – Does the Inventory assess compliance based on your answer(s) to 3.3 and 3.4?		28 CFR 35.105
		☒	☒	☒	3.12 – Does the Agency quantify total numbers/percentages of non-compliant or inaccessible pedestrian facilities by feature such as sidewalks, curb ramps, crosswalks, traffic signals, driveways, parking, others (to include barriers such as mailboxes, vegetation, etc.)?		28 CFR 35.105

1. Applicable Administrative Requirements

Recommendations/Notes:

Score: of 2; of 6

All: Sum of questions 1.1 and 1.6;

>50: Sum of questions 1.1, 1.2, 1.4, 1.5, 1.6, and 1.9.

2. Effective Communication-Website

Recommendations/Notes:

Score: None

3. Self-Evaluation Components

Recommendations/Notes:

Score: of 9

All: Sum of question 1.8 and all section 3 questions except 3.4, 3.7, 3.9, and 3.10.

4. Transition Plan Components

Recommendations/Notes:

Score: of 9

All: Sum of questions 1.11 and 1.12 and all section 4 questions except 4.5, 4.7, 4.10, and 4.11.

Is a Transition Plan required for this agency? ☐ Y ☐ N

Are Transition Plan edits recommended? ☐ Y ☐ N

5. Staff Training

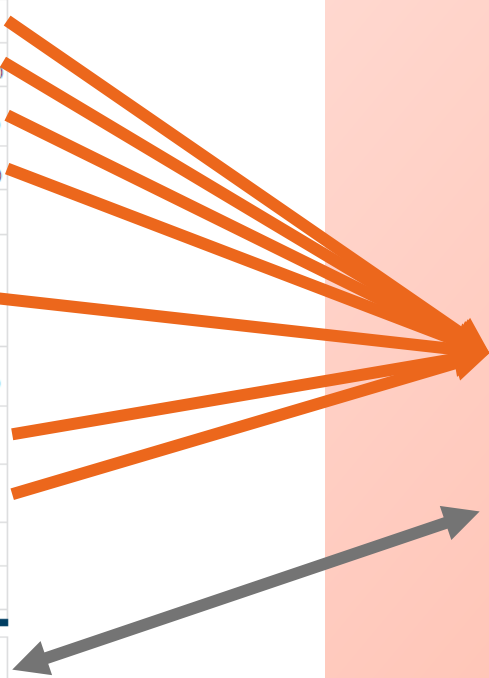
Recommendations/Notes:

Is training recommended? ☐ Y ☐ N

4 Transition Plan Components (Orange)



4 Transition Plan Components	☐	☐	4.1 – Is the Transition Plan document itself accessible? (See: https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html)	50+	28 CFR 35.150(d)
	☐	☐	4.2 – Does the Transition Plan indicate the official(s) responsible for implementation of the Plan?		28 CFR 35.150(d)(3)(iv)
	☐	☐	4.3 – Does the plan identify physical barriers in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities?		28 CFR 35.150(d)(3)(i)
	☐	☐	4.4 – Does the Transition Plan describe in detail the methods that will be used to remove barriers and make the facilities accessible?		28 CFR 35.150(d)(3)(i)
	☐	☐	4.5 – Does the Agency have responsibility or authority over streets, roads, or walkways?		28 CFR 35.150(d)(2)
	☐	☐	4.6 – If yes to 4.5, does the Transition Plan specify a schedule for taking the steps necessary to achieve compliance and, if the time period of the Transition Plan is longer than one year, identify steps that will be taken during each year of the transition period? (DOJ recommends priority given to State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas?)		28 CFR 35.150(d)(2)
	☐	☐	4.7 – If yes to 4.5, which of the following pedestrian facility features are included in your schedule of barrier removal? Check all that apply: ☐ Curb Ramps ☐ Signals ☐ Crosswalks ☐ Sidewalks		28 CFR 35.150(d)(3)(i)
	☐	☐	4.8 – Does the Transition Plan include a description of how the Agency will prioritize barrier removal (public comment, scheduled projects, budget, timeline, etc.)?		28 CFR 35.150(d)
	☐	☐	4.9 – Does the Agency regularly update and monitor their Transition Plan on the status of the barriers in the Self-Evaluation highlighting improvements to infrastructure, as well as any other areas outlined in their findings?		28 CFR 35.150(d)(3)
	☐	☐	4.10 – Is the Agency allocating funds or identifying funding mechanisms to improve accessibility in the public right-of-way?		Best Practice
	☐	☐	4.11 – Does the Transition Plan incorporate documentation that supports removal of barriers within the document or as appendices?		Best Practice
5 Staff Training	☐	☐	5.1 – Does the Self-Evaluation and/or Transition Plan discuss/offer training of internal staff to understand ADA basics and etiquette including working with persons with disabilities?	All	Best Practice



Six Steps to an ADA Transition Plan

Step	Template / Resource
Step 1: Begin the Process	IDOT ADA Title II Administrative Requirements Compliance Review Checklist https://idot.illinois.gov/content/dam/soi/en/web/idot/documents/programs-and-projects/multimodal-transportation/americans-with-disabilities-act-(ada)---title-ii/IDOT_ADAtitle2ComplianceAssessmentChecklist_251201.pdf
Step 2: Identify your ADA Coordinator	
Step 3: Conduct a Self-Evaluation	IDOT PROWAG Inspection Sheet https://idot.illinois.gov/content/dam/soi/en/web/idot/documents/idot-forms/d1/d1-pd0031.docx
Step 4: Establish and publish ADA public notice and grievance procedure	New England ADA Center templates CMAP ADA Templates https://www.adaactionguide.org/ https://cmap.illinois.gov/focus-areas/planning/accessibility-and-ada/ada-templates/
Step 5: Develop and Share a Transition Plan	IDOT Transition Plan Template and Companion Guide https://idot.illinois.gov/programs-and-projects/multimodal-transportation/title-ii-compliance-assessment-and-support.html
Step 6: Finalize and keep your plan updated	

Living Documents

- Transition Plans and Self-Evaluations are living documents
 - › Conditions Change
 - › Budgets Change
 - › Priorities Change
- Transition Plans do not tie communities to fixed schedules or spending amounts
- Best practice is to review and update every 2 to 3 years until all barriers are removed or mitigated to maximum extent feasible
- **Something is much better than nothing**
 - › Having them will put your community in a much better position
 - › Failing to have them puts your community at risk



Templates & Resources

ADA Notice

Free Templates for Download

>> <https://www.adaactionguide.org/>

>> [Cmap.is/ADAtemplates](https://cmap.is/ADAtemplates)



All State and local government agencies must...

Publish an ADA Notice

“We will not discriminate against people based on their disability”



Sample notice (long)

Americans with Disabilities Act

(Name of public entity) does not discriminate on the basis of disability in its services, programs, or activities.

Employment: (Name of public entity) does not discriminate on the basis of disability in its hiring or employment practices and complies with the ADA title I employment regulations.

Effective Communication: (Name of public entity) will, upon request, provide auxiliary aids and services leading to effective communication for people with disabilities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: (Name of public entity) will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in (name of public entity) offices, even where pets and other animals are prohibited.

Requests: To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact [ADA Coordinator name and contact information] as soon as possible, preferably XX days before the activity or event.

Complaints: Send complaints to [ADA Coordinator name and contact information].

Sample notice (short)

Americans with Disabilities Act

The [Name of public entity] does not discriminate on the basis of disability in its programs, services, activities and employment practices.

If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device or print material in digital format) or a reasonable modification in programs, services or activities contact the ADA Coordinator as soon as possible, preferably XX days before the activity or event.

A grievance procedure is available to resolve complaints.

Upon request, this notice is available in alternative formats such as large print or Braille.

[ADA Coordinator name and contact information]

ADA Grievance Procedure

Free Templates for Download

>> <https://www.adaactionguide.org/>

>> Cmap.is/ADAtemplates



- Best practice regardless of agency size
- Complaint form available on website or
- Identifies point of contact
- Provides timeline(s) for complaint process
 - › Appeal process



Sample Grievance Procedures

Long

Americans with Disabilities Act Grievance Procedure

This grievance procedure is established to meet the requirements of the ADA. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the (Name of Public Entity).

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number, email address of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted as soon as possible, preferably within 60 calendar days of the alleged violation to:

(ADA Coordinator name and contact information).

Within 15 calendar days after receipt of the complaint, (name of ADA Coordinator) will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, (name of ADA Coordinator) will respond in writing, and where appropriate, in format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the (Name of Public Entity) and offer options for substantive resolution of the complaint.

If the response by (name of ADA Coordinator) does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the (Head of Public Entity) or designee.

Within 15 calendar days after receipt of the appeal, the (Head of the Public Entity) or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the (Head of the Public Entity) or designee will respond in writing, and, where appropriate, in a format that is accessible to the complainant, with a final resolution of the complaint.

Short

Americans with Disabilities Act Grievance Procedure

Complaints concerning discrimination on the basis of disability by the (Name of Public Entity) may be sent to (ADA Coordinator name and contact information). (Name of ADA Coordinator) will contact the complainant within 15 calendar days after receipt of the complaint to discuss the complaint and will respond in writing within 15 days of the discussion.

Template

Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan for
Pedestrian Facilities in the Public Right-of-
Way

Agency Name

Agency Picture and/or seal here

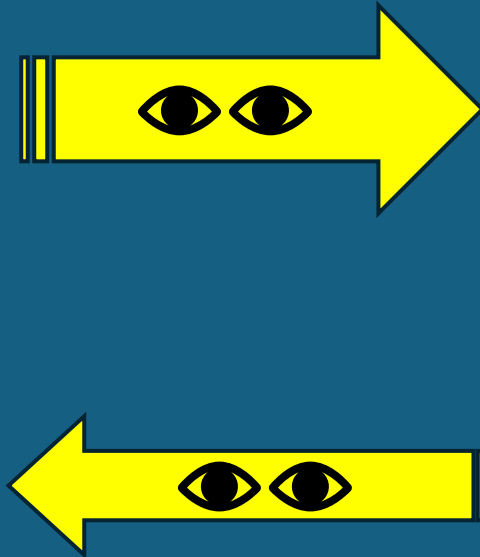
Agency Name, Illinois

Agency Phone Number and Email Address

Agency Web Address (if applicable)

Month Day, 20XX

Revision x



Companion Guide

For use with the Americans with
Disabilities Act (ADA) Self-Evaluation and
Transition Plan for Pedestrian Facilities in
the Public Right-of-Way Template

April 2026 Revision



ADA Self-Evaluation and Transition Plan for Pedestrian Facilities in the
PROW **Template** and **Companion Guide**

How to use the Template and Companion Guide

- **Template provides plan structure and base narrative specific to pedestrian facilities in the public right-of-way**
- Template highlights areas in gray that need to be completed by your agency such as:
 - › Status of the existing pedestrian facilities in your public right-of-way (e.g., sidewalks, curb ramps, pedestrian signals, crosswalks)
 - › Methods your agency will use to remove or mitigate barriers
 - › The schedule (or steps that will be taken) for each year of your transition plan
 - › Public involvement methods and results

Download the template from IDOT's website:

<https://idot.illinois.gov/programs-and-projects/multimodal-transportation/title-ii-compliance-assessment-and-support.html>

- The **Companion Guide** Overview Section provides general guidance for use
- The Table of Contents in the **Companion Guide** mirrors the **Template** for ease of use
- The **Companion Guide** provides direction, extra content, and best practices
 - › Provides topics to think about, add, and/or update/expand upon in the Template (Your Plan)
 - › It is like having an ADA representative that offers advice and/or best practices while you are filling out the Template

Template Example

Agency Name stored the self-evaluation results in a [Inventory Storage Method]. This inventory database documents the Agency Name-maintained ADA pedestrian facilities within the PROW and maintains records of continued compliance towards implementing barrier removal over time. ADA pedestrian facilities within the studied area were identified by location, condition, and feature-specific attributes as described in Table 4-1. A more detailed description of the database structure and definitions of each pedestrian facility attribute are included in Appendix E.

Table 4-1. Summary of ADA Pedestrian Facilities Identified

Facilities Inventoried	Number of Compliant Inventoried Facilities	Number of Noncompliant Inventoried Facilities	Total Facilities Inventoried
Curb Ramps/Crosswalks	X	X	X
Sidewalks (miles of)	X miles	X miles	X miles
Sidewalk Gaps	X	X	X
Signalized Intersections	X	X	X
Shared-/Multi-use Paths	X miles	X miles	X miles
Trails	X miles	X miles	X miles
Other (e.g., transit stops, on-street parking, pedestrian railing)	X	X	X

In Month or Timeframe of Year, Agency Name completed a self-evaluation for the following specific pedestrian facilities in the PROW:

- Curb Ramps/crosswalks: Sloped part of the sidewalk that transitions from the curb height (typically 6 inches) to the elevation of the roadway.
- Sidewalks: Sidewalks are corridors or pedestrian access routes (PAR) that constitute the portion of the pedestrian system typically located within the PROW

Template Example

6.4 ADA Compliance Improvement Schedule

Agency Name is required to have an implementation schedule for completion of the removal/mitigation of ADA barriers within the PROW that are identified in this plan ([28 CFR Part 35.150.D\(2\)\(3\)](#)). The schedule identified spans multiple fiscal years and includes installation, repair, and replacement of the identified ADA barriers from the self-evaluation. A summary of the implementation schedule is below:

- Within 5 years (20XX to 20XX), 100% of the pedestrian facilities constructed after January 26, 1991, are to be ADA compliant.
- Within 10 years (20XX to 20XX), 80% of all pedestrian facilities (including those constructed on or before January 26, 1991) within the priority areas identified by Agency Name staff are to be ADA compliant.
- Within 20 years (20XX to 20XX), 80% of all pedestrian facilities (including those constructed on or before January 26, 1991) within the entire jurisdiction of Agency Name are to be ADA compliant.

The schedule included in this plan will be updated on a [number – annual, biennial, etc.] basis.

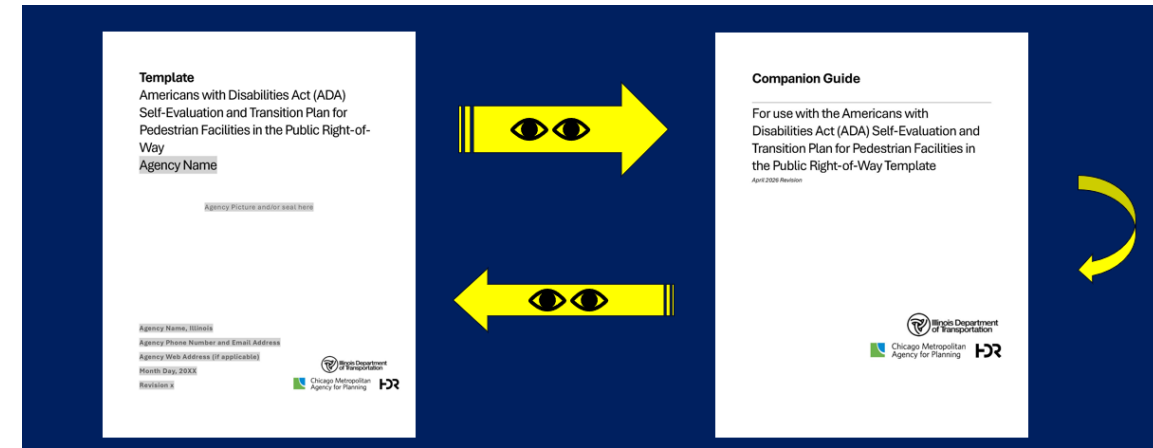
- Applicable Ordinance language and code number here

7 Next Steps and Monitoring

Pursuant to [28 CFR Part 35.150 \(d\)](#), the Agency Name ADA Transition Plan for PROW is a living document that will continue to be updated and modified every x years to document new barriers, changes in standards and guidelines, priorities, priority areas, cost estimates, the compliance schedule, funding levels and sources, alterations to pedestrian facilities, barrier removal and barrier mitigation progress. The initial schedule is to formally review the complete document (main body and appendices) at least [timeframe - once per year or other timeframe]. The [timeframe- annual] review will be used to identify any need for

The **Companion Guide** and **Template** are organized into nine mirrored chapters:

1. Introduction
2. ADA Mandate & Background
3. Policies, Plans, and Standards/Guideline
4. Self-Evaluation
5. Prioritization
6. Funding & Compliance Improvement Schedule
7. Next Steps and Monitoring
8. Public Involvement and Outreach
9. Appendices



Within each chapter of the **Companion Guide** specific guidance is provided for using that information into the **Template**.

Some chapters in the **Companion Guide** also contain a sub-section titled **Supplemental ADA Information** that provide the user with general ADA information relevant to the Chapter or Section subject matter.

Template Sample: Table of Contents

Table of Contents

Executive Summary	1
1 Introduction.....	1
2 ADA Mandate and Background	2
2.1 ADA Title II Administrative Requirements.....	2
2.2 ADA Transition Plan Legal Requirements	3
2.3 Designation of a Responsible Employee/Official (ADA Coordinator).....	3
3 Policies, Plans, Procedures, Standards, and Guidelines	4
3.1 ADA in Comprehensive Planning.....	4
3.2 ADA in Zoning and Land Development.....	5
3.3 ADA Design Standards and Guidelines.....	5
4 Self-Evaluation	7
4.1 Approach to Self-Evaluation	7
4.2 Data Collection and Inventory	8
4.3 Evaluation of Pedestrian Facilities	9
4.3.1 Inventory Summary.....	10
4.4 Evaluation of Pedestrian Facilities for Transition Planning	10
4.4.1 Demographics	10
4.4.2 Modifications Completed to Improve Accessibility	11
4.4.3 ADA Barrier Removal/Mitigation Strategies	11
4.4.4 ADA Barrier Removal/Mitigation Cost Assessment.....	13
5 Prioritization	14
6 Funding and Compliance Improvement Schedule	15
6.1 Capital Improvement Program and Annual Operating Budget	15
6.2 Private Development.....	16
6.3 Existing and Additional Funding Sources	16
6.3.1 Federal.....	16
6.3.2 State	16

6.3.3 Local.....	17
6.4 ADA Compliance Improvement Schedule	17
7 Next Steps and Monitoring	17
8 Public Involvement and Outreach.....	19
8.1 Public Comment Period and Review	19
8.2 Ongoing Public Engagement.....	20
8.2.1 Publishing the ADA Transition Plan.....	20
8.2.2 Agency Name Website	20
8.2.3 Notice Under the Americans with Disabilities Act	21
8.3 Grievance Procedure	21
Appendices.....	21

List of Tables

Table 4-1. Summary of ADA Pedestrian Facilities Identified	8
Table 4-2. ADA Barriers and Removal/Mitigation Strategies	12
Table 4-3. Barrier Removal/Mitigation Unit Costs by Barrier Type	14
Table 7-1. ADA Core Team Roles and Responsibilities	18

List of Figures

Figure 4-1. ADA Self-Evaluation Prioritization Map	8
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List of Appendices

Appendix A. Abbreviations
Appendix B. Glossary of Terms
Appendix C. Compliance with the ADA
Appendix D. Design Standards and Guidelines
Appendix E. Self-Evaluation and Maps
Appendix F. Public Involvement and Outreach
Appendix G. ADA Resources References
Appendix H. Transition Plan Updates

IDOT initiated an ADA Coordinators Group

Group intended for idea sharing and collaboration

- Meeting topics are based on group feedback and cover an assortment of ADA issues
- Meetings scheduled every other month (6x per year)
 - › 5 meetings held to date
 - › Intended for ADA Coordinators or designees
 - › Meetings are not recorded to encourage participation
 - › **NEXT MEETING: September 24th 9:30 to 11:00am**
 - › Copies of past presentations with presenter notes are available on IDOT's website:
<https://idot.illinois.gov/programs-and-projects/multimodal-transportation/title-ii-compliance-assessment-and-support.html>

IDOT Standards vs. PROWAG Final Rule: Perpendicular Curb Ramps Std 424001-12

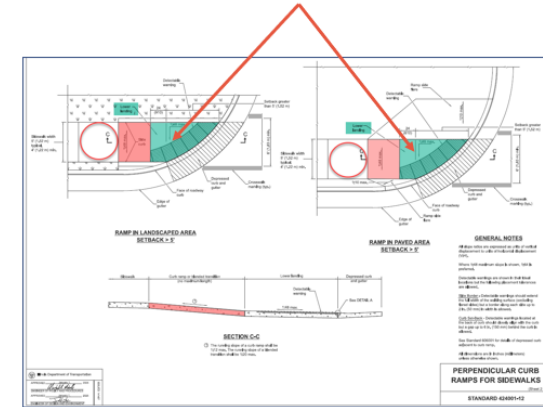
IDOT - Landings are required at the top of curb ramps AND Lower Landings required for setbacks greater than 5 feet

PROWAG Final Rule R304.2.5 Landings

When a change in direction is necessary to access a curb ramp from a pedestrian access route, a landing shall be provided at the top of the curb ramp.

- PROWAG does not consider the green area a landing

IDOT IS MORE STRINGENT in this case requiring a "Lower Landing"



Questions

Send email to:

DOT.LocalAssistance.ADA@illinois.gov



Myth Busting

COMMON CONCERN

I have to complete a manual survey of the entire public right-of-way immediately

TRUTH OR MYTH?

MYTH!

I have to complete a **manual survey** of the entire public right-of-way immediately

- No specific method required to complete the self-evaluation
- Tradeoffs exist between various potential methodologies (LiDar, manual, Ecopia)
- Communities should evaluate options based on budget and how you will use this data after completion

Table 1: Summary comparison of LiDAR, manual measurement, and Ecopia

Self-evaluation collection method	Public right-of-way features captured	Accuracy	Direct cost
LiDAR	High ~300	High	High direct expense (final cost is dependent on size of the area)
Ecopia	Low ~20	Low	Free to use but will need to be supplemented with additional method(s)
Project Sidewalk	Low ~20	Low	Free to use, but requires manual surveying personnel costs, and supplemented with additional method(s)
Manual	Medium ~100	High	Low direct costs, requires manual surveying personnel costs

<https://cmap.illinois.gov/news-updates/measuring-sidewalk-accessibility/>

MYTH!

I have to complete a manual survey of the **entire public right-of-way immediately**

- › Combine survey methodologies
- › Survey priority areas first – agency priorities, community priorities from engagement, facilities by schools, parks, etc.
- › Spread survey over a few years



COMMON CONCERN

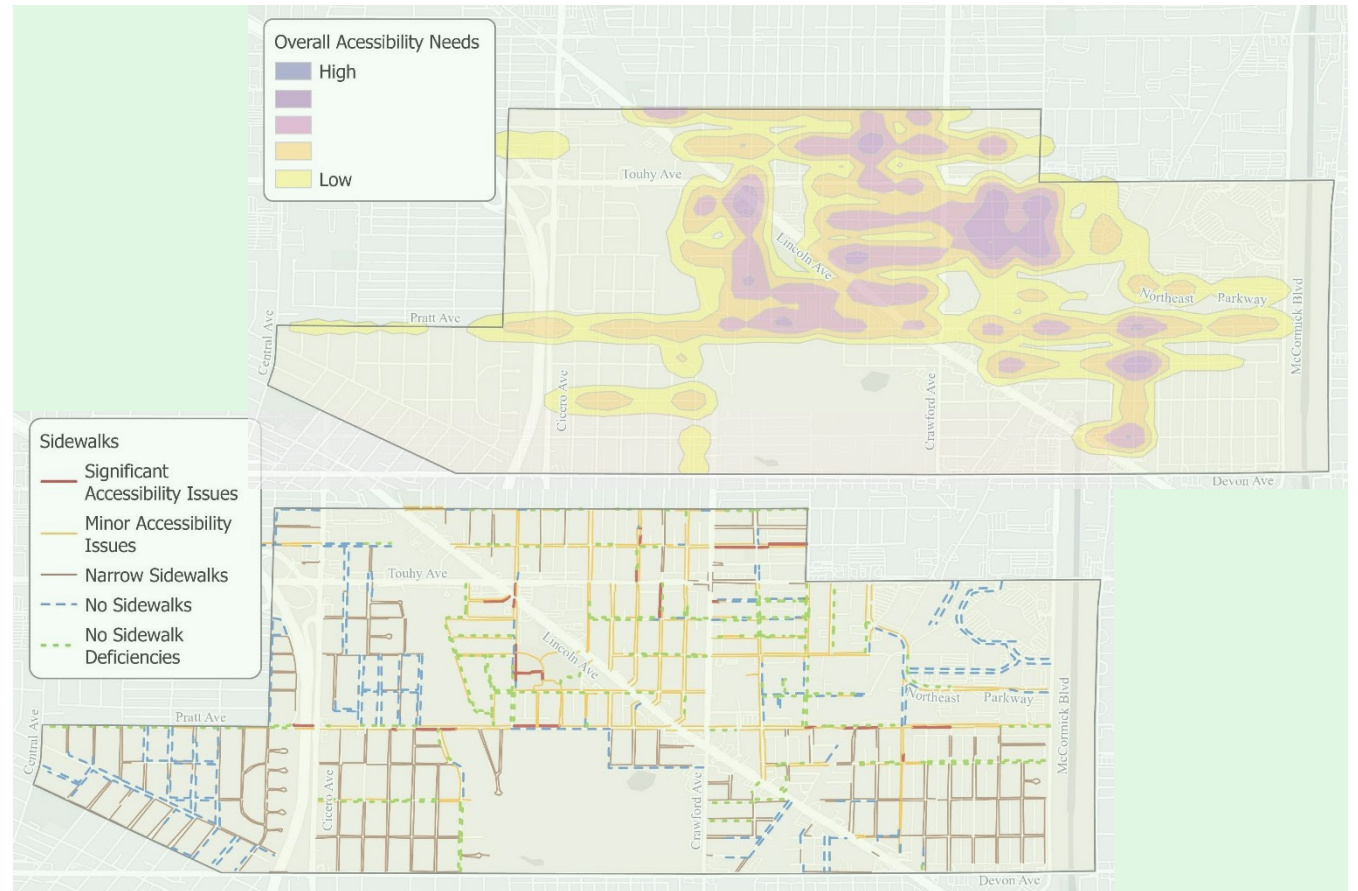
I have to fully fund construction of all deficiencies immediately

TRUTH OR MYTH?

MYTH!

I have to **fully fund** construction of **all deficiencies** immediately

- Transition Plan outlines prioritization plan and timeframe for improvements
- This should be realistic and coordinate with how your agency operates – integration with CIP, resurfacing schedule, sidewalk improvement program, etc.



COMMON CONCERN

I have to create a whole new system and process to track and address grievances

TRUTH OR MYTH?

MYTH!

I have to create a whole new system and process to track and address grievances

- Yes, grievances need to be tracked and responded to/discussed with the complainant in a timely manner
- Grievance procedures can be built into existing agency systems and tools

 Village of La Grange Park Grievance Procedures Under The Americans with Disabilities Act	 Village of La Grange Park ADA Grievance Form
This Grievance Procedure is established to meet the requirements of the American with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Village of La Grange Park. The Village's Personnel Policy governs employment-related complaints of disability discrimination. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made for persons with disabilities upon request. The complaint should be submitted by the complainant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to: Name of ADA Coordinator: Maggie Jarr, Deputy Village Manager Address: 447 N. Catherine, La Grange Park, IL 60526-2099 Email: mjarr@lagrangepark.org Phone: (708) 354-0225 x108 Within 15 calendar days after receipt of the complaint, the ADA Coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, ADA Coordinator or his/her designee will respond in writing, and where reasonable accommodations are requested, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Village of La Grange Park and offer options for substantive resolution of the complaint. If the response by the ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Village Manager or his/her designee. Within 15 calendar days after receipt of the appeal, the Village Manager or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Village Manager or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant with a final resolution of the complaint. All written complaints received by the ADA Coordinator or his/her designee, appeals to the Village Manager or his/her designee, and responses from these two offices will be retained by the Village of La Grange Park for at least three years.	Name: _____ Date of Occurrence: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone: (____) _____ Email: _____ Please provide a <u>complete</u> description of your grievance: _____ _____ _____ Please specify the location of your grievance: _____ _____ _____ Please state what you think should be done to resolve the grievance: _____ _____ _____ Please attach additional pages or photo(s) as needed. Signature: _____ Date: _____ Please return to: ADA Coordinator Name: Maggie Jarr, Deputy Village Manager Address: 447 N. Catherine, La Grange Park, IL 60526-2099 Email: mjarr@lagrangepark.org Upon request, reasonable accommodations will be provided in completing this form. Contact Maggie Jarr, Deputy Village Manager, (708) 354-0225 x108, mjarr@lagrangepark.org
Grievance Procedure	ADA Grievance Form

COMMON CONCERN

I am more at risk for lawsuits if I publish
noncompliant locations

TRUTH OR MYTH?

MYTH!

I am more at risk for lawsuits if I publish noncompliant locations

- › Transition Plans and Self-Evaluations are living documents and do not tie communities to fixed schedules or spending amounts
- › **Something is much better than nothing**



This presentation is for informational purposes only and does not constitute legal advice. Please consult a licensed attorney regarding ADA compliance or other legal matters.

Thank You!



Free Templates and Resources

>> <https://idot.illinois.gov/programs-and-projects/multimodal-transportation/title-ii-compliance-assessment-and-support.html>
>> <https://www.adaactionguide.org/>
>> Cmap.is/ADAtemplates



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