

California Department of Transportation

Caltrans Division of Local Assistance

Americans with Disabilities Act and

Section 504

Desk Assessment Compliance Review



In collaboration with



Disability Access Consultants, LLC
2862 Olive Highway, Suite D
Oroville, CA 95966

Caltrans ADA/504 Desk Assessment Compliance Review Executive Summary

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Introduction

As subrecipients of federal funding, California's local agencies are required to maintain compliance with Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 and related amendments. Local agencies include public entities such as cities, counties, universities and other special districts.

An assessment of selected local agencies that receive funding as a subrecipient of the California Department of Transportation (Caltrans) was performed from October of 2018 through December of 2019 and was conducted as a desk assessment. Disability Access Consultants, LLC (DAC) was contracted by the California Department of Transportation Division of Local Assistance (DLA) to conduct a compliance desk assessments of selected local Caltrans agencies to review and report compliance with Federal-aid Highway Program funds and federal regulations including Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA).

DAC is a woman founded California company established by Barbara Thorpe in 1998 to assist public entities to comply with civil rights and accessibility laws such as the Americans with Disabilities Act (ADA) and related standards and regulations, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and related compliance regulations such as inclusion of Disadvantaged Business Enterprise (DBE) firms on federally funded public entity projects. DAC has extensive experience in the evaluation of program and facility accessibility and provides a full continuum of Americans with Disabilities Act (ADA) and accessibility services for public entities. DAC has provided services for the past 22 years to assist public entities to comply and implement accessibility requirements in accordance with the ADA, the California Building Code, California Manual on Uniform Traffic Control Devices (CAMUTCD), Public Right-of-Way Accessibility Guidelines (PROWAG), Caltrans Standards and Specifications, Section 504, Title VI, DBE and related federal, state and local disability-related nondiscrimination laws and regulations.

Key DAC staff that were instrumental in providing Caltrans with an ADA desk assessment review program for local agencies were:

- Barbara Thorpe, DAC President and Project Manager
- Jennie Grover, Director of Operations

DAC reviewed local city and county agencies and provided reports of compliance with Federal-aid Highway Program Funds and federal regulations including Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA) to the California Department of Transportation (Caltrans).

One goal of the assessments was to identify strengths and weaknesses in the processes and practices of local government agencies in accordance with accessibility compliance standards and regulations as specified in federal laws. The assessments were designed to identify local agency practices to ensure that persons with disabilities have an equal opportunity to participate in civic life.

Assessments were performed under the following federal authorities:

- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794)
- Title II of the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C. §§ 12131-12164)
- 23 CFR, Subchapter C, Part 200, Section 200.9(b)(7),
- 28 CFR, Part 35, Section 35.172, 35.190
- 49 CFR, Part 27
- LAPM (Local Assistance Procedure Manual), Chapter 9

The assessments focused on the local agency's ADA compliance with the requirements of Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 (ADA) and its related amendments.

Background

The California Department of Transportation acts on behalf of the Federal Highway Administration regarding the stewardship and oversight of local public agencies that are subrecipients of Federal-aid Highway Program Funds and other federal and state funding. As a part of the subaward agreement between the California Department of Transportation (Caltrans) and the local public agencies, Caltrans has stewardship and oversight responsibilities to ensure that funds received by local agency subrecipients are used in a nondiscriminatory manner.

As part of the Federal Highway Administration (FHWA) regulatory requirements under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973 (504), Caltrans is to ensure that local public agencies that are subrecipients of Federal-aid Highway Program Funds that are responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in any program, activity, service or benefit they provide to the general public; and to ensure that people with disabilities have equitable opportunities to use the public rights-of-way system.

The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the ADA is to make sure that people with disabilities have the same rights and opportunities as persons without disabilities. The ADA provides civil rights protections and guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services and telecommunications.

Section 504 of the Rehabilitation Act of 1973 requires that any entity receiving federal financial assistance must ensure that persons with disabilities are not discriminated against in any and all access to the programs, services, activities, policies, facilities and public rights-of-ways that recipients of federal funds provide.

Desk Assessment Objectives

The California Department of Transportation Division of Local Assistance contracted services to conduct desk assessments focused on the local agency's ADA compliance with the requirements of Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 (ADA) and its related amendments for 2018-2019.

The overall objective of the desk assessment project is to evaluate the existing levels of compliance with the requirements of the Americans with Disabilities Act (ADA) and Section 504 for each of the local agencies. The assessment is designed to identify the areas and levels of compliance support needed by subrecipients from the Caltrans Division of Local Assistance (DLA). The results of the assessment will assist Caltrans to develop effective monitoring, training programs and guidance materials that will be offered to the local agencies to support their compliance efforts.

Compliance areas reviewed included General Requirements (Subpart A and B), Program and Facility Accessibility (Subpart D) and Communication (Subpart E). Detailed responses and findings are contained in a separate project excel workbook with findings for each local public agency (LPA). Project workbooks contain detailed information for Subpart A, B, D and E:

General Requirements (Subpart A and B)

- ADA/504 Coordinator
- Grievance Procedures
- Complaint Log
- Nondiscrimination Policy
- Self-Evaluation
- Public Participation

Program and Facility Accessibility (Subpart D)

- Transition Plan
- Curb Ramp Schedule
- Public Participation
- Undue Burden Process
- Accessibility Standards
- Detectable Warnings

Communication (Subpart E)

- Requesting and Obtaining Auxiliary Aids
- Website Accessibility
- Communicating with persons with Hearing Difficulties

To prepare the executive summary in a condensed format, the compliance areas examined were compiled into eleven (11) compliance areas for reporting purposes:

1. ADA/504 Coordinator
2. Grievance Policy and Procedure
3. ADA Nondiscrimination Statement
4. Self-Evaluation
5. Transition Plan
6. Public Participation
7. System for Periodic Updates
8. Maintenance of Accessible Features
9. Accessibility Standards Used
10. Reasonable Accommodation Procedures
11. Website Accessibility

Approach and Methodology

DAC worked with the Caltrans DLA to compile the list of agencies that would be included in the 2018-2019 assessment project. A selection of agencies was made from each of the twelve (12) Caltrans Districts to ensure a broad and inclusive assessment sample. A monthly schedule was developed for each District's agencies to be contacted over the course of approximately eight (8) months.

A select list of local public agencies to be included in the desk assessment compliance review project was compiled in collaboration with Caltrans and DAC. The agencies selected were designed to be a representative sample from each of the 12 Caltrans Districts and do not include all Caltrans local public agencies in each District.

To collect the information needed to assemble the compliance report, a questionnaire comprised of approximately thirty (30) questions and requests for documents was developed by Caltrans and provided to Disability Access Consultants, LLC (DAC) to be sent to each subrecipient agency. The questionnaire was designed to ensure that details for specific compliance topics were requested. In addition to providing a text response for each question, agencies were also asked to provide attachments that verified responses to selected questions, such as including a copy of the self-evaluation and transition plan, examples of public notices and backup documentation for resolution of complaints.

Using an established schedule, each agency received an initial notice letter from DAC describing DAC's consultant relationship with Caltrans and the purpose for the Desk Compliance Review Project. The letter also included a summary of the compliance requirements of Caltrans subrecipients and the purpose of the desk assessment project. The initial notice letters were provided to the agency approximately one month in advance of the response questionnaire being sent. The method for

sending the initial notice letter and questionnaire was by email when the contact information for the ADA Coordinator was known, or by mail when the direct contact information could not be confirmed.

Following the notice letters about the upcoming desk assessment, letters requesting information (questionnaires) were sent to the agencies selected for the desk assessment. The transmittal letters that were sent to the agencies along with the questionnaire included options for returning the responses to DAC. Although completed questionnaires and attachments were requested to be directed to DAC, a few agencies provided the response packet directly to Caltrans.

An initial goal was the identification of the ADA/504 Coordinator for each agency as a list was not available. Several methods were initiated to determine if agencies had identified either an ADA Coordinator, a 504 Coordinator or both. DAC made phone calls to the agencies, sent emails to executive management and searched the agency's websites.

The responding agencies used a variety of methods to provide documents and files including:

- Emailing documents to primarily to DAC or Caltrans in a few cases
- Uploading documents to DAC's online file sharing account if needed due to size
- Granting DAC temporary access to the agency's FTP site
- Providing links to agency website locations where documents are stored or otherwise available
- Mailing flash drives with documents and files to DAC and in some cases to Caltrans
- Mailing hard copies and binders with documents and files to DAC and in some cases Caltrans

Securing the information regarding the designated ADA and 504 Coordinator or a contact person was one of the challenges. If two or three emails were issued and the agency did not respond, DAC also called the agencies and asked for the ADA and 504 Coordinator. A search of the agency's website and the website from the related county for the identity of the ADA and 504 Coordinator was also conducted by DAC. In many cases, the agency did not know who was designated the ADA or 504 Coordinator or who was responsible for ADA compliance.

In many cases, DAC issued additional reminders to agencies to send the requested information or mailed letters to agencies to solicit a response. Some agencies requested extensions, and a few did not respond to any of the requests.

Methods and strategies were developed to quantify the findings for each agency and District. Each agency received an "accessibility rating" based upon the information received and the results are contained in an accessibility matrix. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from each District that were found to be at the indicated level compared to the other agencies within the same District.

The level of compliance was assigned a rating of compliant, partially compliant, or not compliant. A numeric value was assigned according to the level of compliance for each agency within each District.

Following the compliance rating for each local agency in each District, the ratings for each District were compiled again to produce an overall for each District. For further analysis of all the Districts overall, the ratings for each of the 12 Districts was compiled to provide an average compliance rating for all the Districts.

Appendix B contains the detailed analysis by each of the 12 Districts. The average District rating overall is contained in Appendix C.

Caltrans Districts

Statewide, Caltrans is comprised of twelve (12) service areas or Districts, each with its own District Office to support the region’s cities, towns, counties and special districts (agencies). A District map and information on the city or county governments that comprise each District is included as Appendix A. A list of agencies from each District that responded to the assessment information request is also included in Appendix A.

Summary of Responses Reported by Districts

The following chart indicates the number of agencies contacted by District and the number of agencies that responded, followed by a corresponding percentage of the number of responding agencies. Numbers reported are percentages.

Summary of Agency Responses			
	Number of Agencies Contacted from the Caltrans Representative Sample List for Each District	Number of Agencies that Responded	Response Percentage
District 1	15	7	47
District 2	17	10	59
District 3	17	14	82
District 4	39	21	54
District 5	14	10	71
District 6	31	12	39
District 7	28	11	39
District 8	24	7	29
District 9	3	3	100
District 10	24	12	50
District 11	17	11	65
District 12	12	8	67
TOTALS	241	126	52

Analysis of Responses

The analysis of the data collection and assessment for compliance described key areas of compliance and deficiencies or noncompliance by District. The following matrix summarizes the levels of compliance with ADA/504 requirements of responding agencies from each District. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from each District that were found to be at the indicated level compared to the other agencies within the same District.

To create the summary rating, a numeric value was assigned to the level of compliance for each agency within each District. The rating summarized the compilation of compliance levels by each agency that were compiled to provide an overall level of compliance for all responding agencies for the entire District, with a percentage rating score out of a possible 100%.

Level of Compliance Legend:

- Compliant - items met compliance requirements
- Partially Compliant - some met compliance
- Not Compliant - did not meet compliance requirements or were not submitted

A detailed matrix of the levels of compliance for agencies in each District is included as Appendix B. A summary matrix of all agencies reviewed is included as Appendix C. Detailed information from the questionnaires and documents sent by each agency was used for the analysis of strength and weaknesses related to the ADA and Section 504.

District Average Areas of Compliance

In a review of the responses provided by each agency, as well as review of additional relevant information that is publicly available, review of agency websites and other search tools, the following percentages of all agencies reviewed were found to be compliant for specific selected criteria.

ADA/504 Coordinator.....	85%
Grievance Policy and Procedure.....	72%
ADA Nondiscrimination Statement.....	58%
Self-Evaluation.....	32%
Transition Plan.....	24%
Public Participation.....	43%
System for Periodic Updates.....	32%
Maintenance of Accessible Features.....	26%
Accessibility Standards Used.....	16%
Reasonable Accommodation Procedures.....	54%
Website Accessibility.....	17%

General Discussion of Findings and Trends

In general, most responding agencies provided evidence of varying degrees of accessibility efforts and demonstrated that they were providing or attempting to provide accessible programs, services and activities for persons with disabilities. Although other areas of noncompliance existed, the most frequent areas of deficiency and noncompliance included:

1. Lack of a comprehensive transition plan that includes the required components of a transition plan. An area that is found to need improvement is keeping a complete and updated transition plan. Of the one hundred and twenty-six (126) agencies that responded, only twenty-four percent (24%) were able to provide a transition plan that showed the details of the noncompliant elements (barriers), a method for removal of the barrier and a schedule of projected dates of barrier removal over time for all of the agency’s assets, including facilities and public rights-of-way if applicable. An additional fifty-eight percent (58%) of agencies were able to provide partial or incomplete transition plans. The transition plans were noted as partial or incomplete when the provided plans were either missing the implementation schedule for barrier removal, included details of noncompliant elements for facilities but not public rights-of-way, or in some cases noncompliant details for public rights-of-way but not facilities.
2. A transition plan that was included but is incomplete. Incomplete or partial transition plans were found in fifty-eight percent (58%) of the agencies reviewed. The plans were incomplete for reasons such as a missing schedule for implementation, data collected for facilities but not public rights-of-way, or for public rights-of-way but not facilities.
3. A transition plan that includes only portions of facilities or portions of the public right-of-way that may also be in different formats, at different dates and sometimes in different departments. For example, the transition plan includes curb ramps but not sidewalks or other areas in the pedestrian access route. Many of the agencies developed a transition plan as multiple projects or phases over different budget years and using different formats and levels of detail. Examples include an assessment of facilities as a separate project from public rights-of-way. Although an integrated plan is not required, having different portions of a transition

plan in different formats in different years presents a challenge to agencies to implement and update the plan. While the phasing of the overall project is reasonable when necessary due to staffing and budget constraints, it seems to make it difficult for the agency to keep an updated implementation schedule for barrier removal as information collected for each phase may be located in different databases or software programs, different departments or only in hard copy form.

4. A transition plan that does not include detailed information regarding the identified barriers in facilities and the public right-of-way and includes only general or cursory information and does not include the required areas. For example; no path of travel is identified to get into the building or to a path of travel throughout the building. Another example is a general statement for noncompliant findings, for example, that the restroom is not accessible with no description as to why it is not accessible.
5. The ADA/504 Plan was outdated, not current and did not have regular updates. A current and complete self-evaluation was found for thirty-two percent (32%) of the responding agencies. While an additional fifty-five percent (55%) of agencies were able to provide documentation of a self-evaluation, the date of the evaluation was shown to be in the early to mid-1990's which would contain a large amount of outdated information, and in many cases the evaluation did not include all of the services that the agency provides, such as access to programs of both facilities and public rights-of-way. Several agencies were also only able to provide records from transition plans that were created from data collected around 1992, which would likely include a large amount of outdated information if the agency has performed remodeling projects, acquired new facilities, demolished nonoperational facilities, and installed new sidewalks and curb ramps. Furthermore, using the "outdated" transition plan to remove barriers may result in an invalid plan due to changes in accessibility codes and standards.
6. A self-evaluation that does not include a review of policies, procedures, programs, services and activities and public participation. For example, public participation was not included during the agencies review of programs and services, or grievance policies were not available.
7. A procedure or system was not in place for periodic updates. Many respondents were vague, or the respondents stated that the updates are made "when needed". About one third of agencies did explain the methods used to verify updates. Some agencies did not understand that compliance with the ADA and Section 504 require ongoing efforts to develop, maintain and document compliance, which includes a regular schedule for the process to update the ADA/504 Plan. Understanding that the ADA/504 Self-evaluation and Transition Plan is a "road map" or "framework" to meet or exceed required compliance will assist the agency to document barrier removal efforts.
8. Policies or procedures were not evident for the maintenance of accessible features in many cases. Some agencies had practices of maintenance of accessible features, but procedures were not formalized or regularly scheduled.
9. Lack of clarity of accessibility standards or regulations to be utilized and knowledge of standards for application. Some agencies reported the use of only federal codes and other reported the use of state codes. Some agencies appropriately applied the standard that provided the greater level of accessibility as required by the ADA and California Building Code.
10. Opportunities for input by the public into the development of the plan was reported by fifty-five percent (55%) of respondents. However, some agencies interpreted the question to

apply to regularly scheduled public meetings and stated that they provided opportunities for public input, instead of targeted opportunities for input by the public to help in the development of the plan.

11. Procedures for the agency website to be accessible and monitored for accessibility. Websites were reviewed for accessibility as a part of the project and eighty-three percent (83%) of the agency websites that were given a cursory review were found to have accessibility errors when tested for compliance with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and Section 508 standards.
12. A compliant statement regarding the rights afforded to persons with disabilities as an ADA nondiscrimination statement is not noticed and posted on selected public-facing documents and on the agency website. A compliant statement of ADA nondiscrimination was found in only fifty-eight percent (58%) of the agencies.
13. Statement of accommodations for persons with disabilities to provide for equal access to agency programs, services and activities was not noticed and posted on public-facing documents. Fifty-eight percent (58%), were able to provide a statement of nondiscrimination for all services and programs offered to the public, that also includes information on providing accommodations and contact information to request an accommodation. Twenty-nine percent (29%) of responding agencies had partial statements. A less prevalent area of compliance included the statement of reasonable accommodations by the agency. Fifty-four percent (54%) had a compliant statement of accommodations. For forty-six percent (46%) of agencies, the statement was only found on a minimal number of public notices and agendas, did not include contact information, or stated inconsistent procedures for requesting and providing accommodations.
14. The role and the identity of the ADA/504 Coordinator was not well known. Most of the agencies knew the identity of the designated ADA Coordinator or designated responsible person, and some agencies reported the identity of the 504 Coordinator. Some agencies reported the ADA Coordinator as the same as the 504 Coordinator. Most agencies understood that compliance with the ADA was required and a few understood that compliance with Section 504 was required. Eighty-five percent (85%) of the responding agencies overall have designated an ADA/504 Coordinator with the identity and contact information publicly noticed and available. Additionally, nine percent (9%) of the responding agencies stated that an ADA/504 Coordinator is appointed but were not able to provide any public notices showing this information. One hundred percent (100%) of the responding agencies from Districts three (3) and five (5) were able to provide evidence of a noticed and posted ADA/504 Coordinator. Keeping ADA/504 Coordinator contact information up to date and consistent across all postings and documents was expressed as a challenge by agencies, and particularly difficult when an agency experiences staff member changes and a new ADA/504 Coordinator is appointed. A question that was asked of agencies when responding to the questionnaire was to describe the responsibilities of the ADA Coordinator. Most of the agencies included very brief explanations that centered only on responding to complaints. This response indicates that most agencies do not have extensive understanding of the full range of responsibilities of the ADA Coordinator, which include proactive and administrative tasks such as reviewing and updating policies to ensure policies and procedures are not potentially discriminatory, as well as overseeing implementation of the transition plan.
15. Grievance procedures and forms for the public were not known and readily available in some agencies. Of the agencies reviewed, seventy-two percent (72%), had grievance procedures in place to process complaints and grievances filed by the public for ADA/504 related matters.

An additional twenty-one percent (21%) had partial or incomplete procedures. Some agencies had established procedures for employees but not for the public.

16. The location or methods to access the agency's ADA/504 Self-evaluation and Transition Plan were frequently not known. A response comment that was stated by several agencies was that due to staff changes, reorganizations, and plans being developed by different departments, it was challenging to locate the information regarding the self-evaluation and transition plans. The data was not kept in a centralized location or agency staff did not know where the plan was located.

Root Causes

A finite root cause or profile of causes would need further analysis. The redevelopment of the questionnaire would facilitate a clearer diagnosis of specific variables contributing to noncompliance of agencies. General potential root causes can be extrapolated from the existing project findings but may not be detailed enough to develop a detailed prescriptive plan. It is expected that root causes may vary by agency, but general trends can be identified.

Accessibility Trends

Some accessibility trends continue to evolve due to technology advances. An example is the requirement for accessible websites for persons with disabilities. Website accessibility is a requirement for equally effective communication. Website accessibility continues to trend with additional requirements, such as WCAG 2.0 Level AA. Social media also provides a challenge to accessibility as those platforms are third party programs not controlled by the public entity and are not required to comply with Section 508 standards. Additional trends are complaints and claims related to lack of open and closed captioning on audio and video files and increasing claims for inaccessible PDF's and other documents or forms on websites.

Trends at times surface as a result of claims and litigation and can forecast the foundation of future trends and predictions. An example of a recent surge in litigation is inaccessible bus shelters and other pedestrian access routes, especially in new construction which is expected to be compliant.

Recommendations to Improve Compliance

Based on the project objectives and findings, the following recommendations are made to improve accessibility compliance:

1. Staff training

Training and support are indicated as a need to assist the agencies with achieving and maintaining full compliance with all ADA and Section 504 laws and regulations. Training and informational packets or modules will assist with the understanding the ADA and Section 504 requirements and methods and strategies to implement the requirements.

- a. Compliance requirements of the ADA and Section 504
- b. Strategies to achieve compliance with the ADA and Section 504
- c. Implementation and documentation of the ADA/504 Plan
- d. Reporting strategies and methods

2. Development of an assistance packet of materials

- a. Sample policies and forms
 - a. Provide sample grievance policies and forms
 - b. Reasonable accommodations policies and statements
 - c. Maintenance of accessible features
 - d. Methods for public participation
 - e. Systems for periodic updates

3. Sample notices and postings

- a. Notice of rights afforded for individuals with disabilities that includes a nondiscrimination statement and other information regarding surcharges
- b. Identity of the ADA Coordinator, 504 Coordinator and/or joint ADA/504 Coordinator that includes the required items and contact information

4. Website accessibility

- a. Website compliance requires continuous monitoring as the information and data that is routinely updated and added to the pages of the site can alter the accessibility of the website. Each agency's webmaster, along with all staff who design and add or manage content on the agency's website, should receive training on the requirements for website accessibility. An accessible standard design template for the site's pages should be created by the agency that will prevent staff from unintentionally altering the accessibility of the page by adding or deleting content. Agencies that do not have dedicated website design and management staff may benefit from contracting with a website design firm that will guarantee an accessible website design and provide routine monitoring of the agency's site to ensure continued accessibility.
- b. The agency's website is a vital tool to provide information and services to the public. Community members and others such as vendors are expected to access the agency's website as a primary resource for many services, such as information on meetings and events, locations where public services are provided, and even for transactions such as registering for permits and responding to requests for proposals.
- c. In order to ensure that all members of the community have equal access to these online services, agencies need to ensure that the staff formatting the website and updating the content on the pages are aware of the accessibility requirements and frequently check the site for inaccessible content that should be corrected.

5. Ongoing and available assistance

Methods to provide ongoing assistance should be developed and assistance provided.

6. Regular schedule of desk and onsite assessments

Assessments should be regularly scheduled to monitor compliance followed by a prescribed support system based on the results of the desk and onsite assessments. Compliant and noncompliant trends should be tracked, and the remediation methods reviewed to determine if the methods improved compliance. A long-term compliance, monitoring and training program should be developed and implemented.

Conclusion

The findings from the scope of services and project activities produced documentation that additional activities and intervention is needed to increase agency compliance in order to meet the minimum requirements of the ADA and Section 504 in a significant number of agencies. Most responding agencies provided evidence of accessibility efforts and demonstrated that they were providing or attempting to provide accessible programs, services and activities for persons with disabilities. Most agencies responded that reasonable accommodations would be provided if requested but were not able to produce formal procedures for providing accommodations. This lack of formal procedures could result in unintentional discrimination if there are not standard processes to follow, and the provision of requested accommodations are viewed as inequitable. Local agencies would benefit from assistance and training to ensure that informal practices conform to ADA and Section 504 requirements and are standardized and formalized for consistent application. The Caltrans Division of Local Assistance is responsible for follow-up with subrecipient local agencies to provide training and technical assistance regarding compliance with ADA and Section 504 requirements.

Appendix A – Caltrans District Map and List of Responding Agencies

Caltrans Districts are defined by inclusion of the agencies within the following Counties:

District 1	Del Norte, Humboldt, Lake and Mendocino
District 2	Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehama and Trinity
District 3	Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo and Yuba
District 4	Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma
District 5	Santa Barbara, San Luis Obispo, Monterey, San Benito and Santa Cruz
District 6	Fresno, Kern, Kings, Madera and Tulare
District 7	Los Angeles and Ventura
District 8	Riverside and San Bernardino
District 9	Inyo, Mono and Eastern Kern
District 10	Alpine, Amador, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus and Tuolumne
District 11	San Diego and Imperial
District 12	Orange



Responding Agencies from Each District

The following is the list of the agencies that provided responses to the information request and is reported by District.

District 1

Includes agencies within the Counties of Del Norte, Humboldt, Lake and Mendocino

- City of Arcata
- City of Crescent City
- County Del Norte
- City of Fort Bragg
- City of Fortuna
- City of Lakeport
- City of Point Arena

District 2

Includes agencies within the Counties of Lassen, Modoc, Plumas, Shasta, Siskiyou, Tehama and Trinity

- City of Alturas
- City of Anderson
- City of Dorris
- County of Lassen
- City of Portola
- City of Redding
- City of Shasta Lake
- County of Siskiyou
- City of Tehama
- City of Yreka

District 3

Includes agencies within the Counties of Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo and Yuba

- City of Chico
- City of Citrus Heights
- County of El Dorado
- City of Galt
- City of Lincoln
- City of Rancho Cordova
- City of Roseville
- Sacramento Metropolitan Air Quality Management District
- City of South Lake Tahoe
- Tahoe Transportation District
- Town of Truckee
- City of Woodland
- County of Yolo
- County of Yuba

District 4

Includes agencies within the Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma

- Alameda County Public Works Agency
- Bay Area Air Quality Management District
- County of Contra Costa
- Contra Costa Transportation Authority
- City of El Cerrito

- City of Lafayette
- City of Livermore
- City of Los Altos
- County of Marin
- City of Palo Alto
- City of Petaluma
- City of Pleasant Hill
- City of Pleasanton
- City of Redwood City
- Town of Ross
- City of San Carlos
- City of San Rafael
- City of Santa Rosa
- City of Sebastopol
- County of Sonoma
- City of Vacaville

District 5

Includes agencies within the Counties of Santa Barbara, San Luis Obispo, Monterey, San Benito and Santa Cruz

- City of Atascadero
- City of Lompoc
- City of Marina
- City of Monterey
- County of Monterey
- San Luis Obispo Council of Governments
- City of Santa Barbara
- County of Santa Cruz
- City of Santa Maria
- University of California - Santa Barbara

District 6

Includes agencies within the Counties of Fresno, Kern, Kings, Madera and Tulare

- City of Arvin
- City of Exeter
- City of Farmersville
- City of Firebaugh
- City of Fresno
- County of Fresno
- County of Kings
- City of Madera
- City of Orange Cove
- City of Porterville
- City of Sanger
- City of Tulare

District 7

Includes agencies within the Counties of Los Angeles and Ventura

- City of Alhambra
- City of Bellflower
- City of Beverly Hills
- City of Burbank

- City of Camarillo
- City of Commerce
- City of Lancaster
- City of Pasadena
- City of San Buenaventura
- City of Santa Clarita
- City of Simi Valley

District 8

Includes agencies within the Counties of Riverside and San Bernardino

- City of Chino Hills
- City of Corona
- City of Highland
- City of Lake Elsinore
- City of Riverside
- County of San Bernardino
- City of Yucaipa

District 9

Includes agencies within the Counties of Inyo, Mono and Eastern Kern

- City of California City
- City of Ridgecrest
- City of Tehachapi

District 10

Includes agencies within the Counties of Alpine, Amador, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus and Tuolumne

- City of Angels Camp
- City of Atwater
- City of Livingston
- County of Mariposa
- City of Merced
- County of Merced
- City of Ripon
- County of San Joaquin
- City of Sonora
- County of Stanislaus
- City of Stockton
- City of Tracy

District 11

Includes agencies within the Counties of San Diego and Imperial

- City of Brawley
- City of Chula Vista
- City of El Cajon
- City of Encinitas
- City of National City
- City of Oceanside
- City of San Diego
- San Diego Unified Port District
- City of San Marcos
- City of Vista
- City of Westmorland

District 12

Includes agencies within the County of Orange

- City of Costa Mesa
- City of Fullerton
- City of Garden Grove
- City of Laguna Hills
- City of Newport Beach
- Orange County Transportation Authority
- City of Placentia
- City of Seal Beach

Appendix B – Matrix of Compliance by District

The following matrix summarizes the levels of compliance with ADA/504 requirements of responding agencies from each District. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from each District that were found to be at the indicated level compared to the other agencies within the same District.

To create the summary rating, a numeric value was assigned to the level of compliance for each agency within each District. The rating summarized the compilation of compliance levels by each agency that were compiled to provide an overall level of compliance for all responding agencies for the entire District, with a percentage rating score out of a possible 100%.

Level of Compliance Legend:

Compliant - items met compliance requirements

Partially Compliant - some met compliance

Not Compliant - did not meet compliance requirements or were not submitted

The areas of review represent a condensed version of the specific topic in the questionnaire. For example, some agencies may have a transition plan that met only portions of the required elements for a transition plan or included only facilities. Depending upon the level of detail, the agency may be determined to be partially compliant (PC) for that specific area of review.

Numbers reported are percentages.

Area of Review	Level of Compliance			Summary Percentage
	Compliant	Partially Compliant	Not Compliant	
District 1				
ADA/504 Coordinator	86	14	0	93
Grievance Policy and Procedure	57	43	0	79
ADA Nondiscrimination Statement	43	43	14	64
Self-Evaluation	43	57	0	71
Transition Plan	29	71	0	64
Public Participation	57	43	0	79
System for Periodic Updates	43	29	29	57
Maintenance of Accessible Features	43	57	0	71
Accessibility Standards Used	29	71	0	64
Reasonable Accommodation	43	57	0	71
Website Accessibility	14	29	57	29
District 2				
ADA/504 Coordinator	80	0	20	80
Grievance Policy and Procedure	50	30	20	65
ADA Nondiscrimination Statement	70	20	10	80
Self-Evaluation	40	30	30	55
Transition Plan	50	20	30	60
Public Participation	30	20	50	40
System for Periodic Updates	10	80	10	50
Maintenance of Accessible Features	30	40	30	50
Accessibility Standards Used	10	70	20	45
Reasonable Accommodation	60	40	0	80
Website Accessibility	20	10	70	25

District 3				
ADA/504 Coordinator	100	0	0	100
Grievance Policy and Procedure	71	29	0	86
ADA Nondiscrimination Statement	64	29	7	79
Self-Evaluation	50	43	7	71
Transition Plan	29	64	7	61
Public Participation	43	36	21	61
System for Periodic Updates	29	36	36	46
Maintenance of Accessible Features	64	29	7	79
Accessibility Standards Used	7	86	7	50
Reasonable Accommodation	64	36	0	82
Website Accessibility	43	21	36	54
District 4				
ADA/504 Coordinator	90	10	0	95
Grievance Policy and Procedure	76	24	0	88
ADA Nondiscrimination Statement	57	43	0	79
Self-Evaluation	38	52	10	64
Transition Plan	24	71	5	60
Public Participation	71	14	14	79
System for Periodic Updates	38	43	19	60
Maintenance of Accessible Features	24	76	0	62
Accessibility Standards Used	14	86	0	57
Reasonable Accommodation	52	48	0	76
Website Accessibility	19	52	29	45
District 5				
ADA/504 Coordinator	100	0	0	100
Grievance Policy and Procedure	90	10	0	95
ADA Nondiscrimination Statement	60	40	0	80
Self-Evaluation	40	60	0	70
Transition Plan	30	60	10	60
Public Participation	40	50	10	65
System for Periodic Updates	50	40	10	70
Maintenance of Accessible Features	30	60	10	60
Accessibility Standards Used	10	80	10	50
Reasonable Accommodation	60	40	0	80
Website Accessibility	30	50	20	55
District 6				
ADA/504 Coordinator	92	8	0	96
Grievance Policy and Procedure	83	17	0	92
ADA Nondiscrimination Statement	50	33	17	67
Self-Evaluation	67	33	0	83
Transition Plan	58	42	0	79
Public Participation	75	25	0	88
System for Periodic Updates	50	42	8	71
Maintenance of Accessible Features	17	75	8	54
Accessibility Standards Used	8	83	8	50
Reasonable Accommodation	42	58	0	71
Website Accessibility	17	58	25	46

District 7				
ADA/504 Coordinator	91	9	0	95
Grievance Policy and Procedure	64	27	9	77
ADA Nondiscrimination Statement	55	45	0	77
Self-Evaluation	27	64	9	59
Transition Plan	0	91	9	45
Public Participation	27	45	27	50
System for Periodic Updates	9	73	18	45
Maintenance of Accessible Features	9	91	0	55
Accessibility Standards Used	9	91	0	55
Reasonable Accommodation	55	45	0	77
Website Accessibility	27	55	18	55
District 8				
ADA/504 Coordinator	86	14	0	93
Grievance Policy and Procedure	86	14	0	93
ADA Nondiscrimination Statement	57	29	14	71
Self-Evaluation	14	57	29	43
Transition Plan	14	71	14	50
Public Participation	14	14	71	21
System for Periodic Updates	43	43	14	64
Maintenance of Accessible Features	29	71	0	64
Accessibility Standards Used	0	100	0	50
Reasonable Accommodation	57	43	0	79
Website Accessibility	14	43	43	36
District 9				
ADA/504 Coordinator	67	33	0	83
Grievance Policy and Procedure	67	0	33	67
ADA Nondiscrimination Statement	33	67	0	67
Self-Evaluation	0	33	67	17
Transition Plan	0	67	33	33
Public Participation	0	33	67	17
System for Periodic Updates	0	33	67	17
Maintenance of Accessible Features	0	100	0	50
Accessibility Standards Used	0	100	0	50
Reasonable Accommodation	0	100	0	50
Website Accessibility	0	67	33	33
District 10				
ADA/504 Coordinator	83	0	17	83
Grievance Policy and Procedure	75	17	8	83
ADA Nondiscrimination Statement	58	17	25	67
Self-Evaluation	25	75	0	63
Transition Plan	17	75	8	54
Public Participation	58	8	33	63
System for Periodic Updates	33	42	25	54
Maintenance of Accessible Features	25	75	0	63
Accessibility Standards Used	33	67	0	67
Reasonable Accommodation	50	50	0	75
Website Accessibility	8	33	58	25

District 11				
ADA/504 Coordinator	82	18	0	91
Grievance Policy and Procedure	82	9	9	86
ADA Nondiscrimination Statement	82	0	18	82
Self-Evaluation	9	82	9	50
Transition Plan	9	9	82	50
Public Participation	55	9	36	59
System for Periodic Updates	18	55	27	45
Maintenance of Accessible Features	9	91	0	55
Accessibility Standards Used	55	45	0	77
Reasonable Accommodation	73	27	0	86
Website Accessibility	0	100	0	50
District 12				
ADA/504 Coordinator	50	25	25	63
Grievance Policy and Procedure	50	13	38	56
ADA Nondiscrimination Statement	38	25	38	50
Self-Evaluation	13	50	38	38
Transition Plan	13	50	38	38
Public Participation	25	25	50	38
System for Periodic Updates	13	25	63	25
Maintenance of Accessible Features	0	100	0	50
Accessibility Standards Used	13	75	13	50
Reasonable Accommodation	38	63	0	69
Website Accessibility	0	75	25	38

Appendix C – Summary Matrix of All Districts

The following matrix summarizes the levels of compliance with ADA/504 requirements of responding agencies from all Districts. The matrix is a condensed and abbreviated version of the full questionnaire that was completed by each agency and reflects only specific topics for the purpose of this report. The level of compliance percentage indicates the proportion of reviewed agencies from all Districts that were found to be at the indicated level.

To create the summary rating, a numeric value was assigned to the level of compliance for each agency. The rating summarizes the overall level of compliance for all responding agencies from all Districts, with a percentage rating score out of a possible 100%.

Level of Compliance Legend:

Compliant - items met compliance requirements

Partially Compliant - some met compliance

Not Compliant - did not meet compliance requirements or were not submitted

The areas of review represent a condensed version of the specific topic in the questionnaire. For example, some agencies may have a transition plan that met only portions of the required elements for a transition plan or included only facilities. Depending upon the level of detail, the agency may be determined to be partially compliant (PC) for that specific area of review.

Numbers reported are percentages.

Area of Review	Level of Compliance			Summary Percentage
	Compliant	Partially Compliant	Not Compliant	
Summary of All Districts				
ADA/504 Coordinator	85	9	5	90
Grievance Policy and Procedure	72	21	7	83
ADA Nondiscrimination Statement	58	29	13	72
Self-Evaluation	32	55	13	59
Transition Plan	24	58	18	56
Public Participation	43	25	32	55
System for Periodic Updates	32	46	23	54
Maintenance of Accessible Features	26	70	5	61
Accessibility Standards Used	16	80	5	55
Reasonable Accommodation Procedures	54	46	0	77
Website Accessibility	17	47	35	41