

## WisDOT ADA Transition Plan - Comments with Responses

Page Number	Comments	Responsible Area	Notes
7, 9	I looked over WisDOT's 2018 Transition Plan and found the Title VI and ADA Notice was on one document and same for the Grievance Policy. I'm not sure about US DOJ's take on have one combined Notice and Grievance Policy, reason being they provide attached for these two documents on what the City of Milwaukee needed to adopt. I've included their attachments and then our final document for each.	Office of Business Opportunity and Equity Compliance	The Title VI and ADA Notice has been updated and separated into two notices. The Title VI and ADA complaint procedure is one discrimination complaint procedure.
11	Accessibility issues with wisconsin.gov: Site does not meet WCAG 2.0 A Guidelines. This is surprising because most government sites are mandated to be accessible. It is clear that accessibility was considered in part (most images have alt text, etc.), but there are several errors and quite a few structural problems. This was just with the homepage; the site is huge. A couple of other pages had similar issues as the homepage, and we didn't get into testing online forms for accessibility.	Innovation and Technology Section	The State of Wisconsin accessibility policy requires sites to meet a set of accessibility requirements based on Section 508 of the Rehabilitation Act that include: <ul style="list-style-type: none"> <li>• Providing text equivalents for images</li> <li>• Creating accessible forms</li> <li>• Supporting flexible font sizes</li> <li>• Ensuring sites are functional without a mouse</li> <li>• Limiting use of Flash and JavaScript. When used, insuring the site is still functional if these technologies are not available to users.</li> </ul>
11	Errors in homepage: 1. Two images without alt text (they should be marked decorative). Screen readers won't be able to tell if there is something they are missing; they will only know that there is an image without a description. 2. 9 empty links – these are bad for a screen reader.	Innovation and Technology Section	The State of Wisconsin's web developer, Wisconsin Interactive Network (WIN), removed the two empty alt tags on home page and the 9 empty links from the site template.
11	Other principles of accessibility not being followed on homepage: 1. 13 Redundant links (same link repeated two times adjacent)– bad for screen readers. 2. Poor page structure – should use heading levels to allow screen reader to navigate through page. a. On home page, there is no H1 (there should be), and the title is labeled H5. b. Other elements are H2 and H3, and not reflective of the logical page structure 3. Tiny font for menus and poor contrast between background and text in some areas.	Innovation and Technology Section	Working with the Office of Public Affairs to possibly update the site link color. Also working with WIN to see if their designers can make changes to their site templates. Our team will look for other WCAG accessibility issues/concerns and address in the future.
11	Need to ensure that all developers are familiar with accessibility guidelines and evaluation tools throughout the development process and whenever updates or changes are made.	Innovation and Technology Section	The State of Wisconsin accessibility policy requires sites to meet a set of accessibility requirements based on Section 508 of the Rehabilitation Act. Reached out to DMV supervisors about the applications and the forms manager for forms

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			accessibility. Communicated to all WisDOT authors to keep accessibility in mind.
11	Need to work with groups of people with disabilities to make sure new site is accessible. Evaluation tools can't catch many accessibility issues. It's important to have testers using screen readers, evaluate for low vision issues, etc.	Office of Business Opportunity and Equity Compliance	This will be done as part of the development of WisDOT's Effective Communication Plan.
11-12	Also, the WisDOT Public Hearing Press Release Template has been updated but there is still an issue that needs to be correct: 1. The second to last paragraph states ... The meeting facility is wheelchair accessible. Deaf or hard of hearing persons needing assistance may call the Wisconsin Telecommunication Relay System (dial 711). To allow time for arranging assistance, please call no later than three working days prior to the hearing. 2. Please note calling 711 is used by individuals who are deaf, hard of hearing, have speech impediments, etc. to access the Wisconsin Relay System (WRS) as third party to relay conversations between the individual with a disability and another individual with who they wish to speak. The WRS operator will ask the individual what phone number they wish to call, you cannot just call 711 and speak to the desired party. The project manager or responsible party conducting the public meeting should have their name listed on the Public Hearing Press Release.	Office of Public Affairs	Template has been changed. See example: Persons who are unable to attend the meeting can receive project information by contacting WisDOT Project Manager Stacy Hagenbucher by calling (715) 365-5770 or via email at <a href="mailto:Stacy.Hagenbucher@dot.wi.gov">Stacy.Hagenbucher@dot.wi.gov</a> . Persons who are deaf or hard of hearing and who require an interpreter may request one by contacting Stacy Hagenbucher at least three working days prior to the meeting via the Wisconsin Telecommunications Relay System (dial 711).
12	Accessible tables for addressing personal care needs in restrooms is essential. No one wants to have their bathroom needs address by laying on the floor or struggling while sitting. Hi - lo tables are great. But even a stationary adult chairing table is better than the bathroom floor.	Bureau of Business Services	Thank You for your suggestion regarding the ADA Transition Plan. WisDOT currently meets or is in the process of making all restrooms and buildings ADA compliant. Although tables are not an ADA requirement, WisDOT will consider adding them when planning future remodels.
12	Accessible doors. Accessible entryways are critical for many people with I/DD (Intellectual and Developmental Disabilities) who have mobility equipment or who have muscle weakness that can make pushing or pulling heavy doors difficult.	Bureau of Business Services	Thank You for your suggestion regarding accessible doors. WisDOT strives to meet all ADA requirements, including door pull force. We will add accessible doors to our design list for future remodels.
12	Investment in family and single-occupancy non-gender specific restrooms. People with I/DD (Intellectual and Developmental Disabilities) may have specific personal care needs that require assistance from paid caregivers or family members. Assisting with personal cares often requires additional space that may involve a caregiver that is a different gender than the person with disability they are assisting.	Bureau of Business Services	Thank You for your suggestions and comments regarding family restrooms, WisDOT understands how important these are to our customers. We try to add a family restroom during each remodel but unfortunately some facilities cannot accommodate them due to space limitations. Family restrooms are

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			not an ADA requirement but WisDOT will continue to add them when there is adequate space.
12	Image-based signage. Clear signage that minimizes words and uses symbols to represent meaning benefit people with I/DD (Intellectual and Developmental Disabilities) who are visually impaired or who are non-readers.	Bureau of Business Services	WisDOT-owned and DOA-owned facilities have signage that followed appropriate ADA guidance (if any) at the time they were constructed or most recently remodeled. Currently, any new construction or remodels follow the 2010 ADA Standards for Accessible Design – Section 703: Signs. Along these same lines, facilities that WisDOT leases from private entities are likely signed in accordance with state and local building code at the time they were constructed or most recently remodeled, along with lease requirements. Current lease language includes the requirements for signage in Schedule II - Construction Requirements.
12-13	Since you've already taken the first step in banning air fresheners and scented soaps in your rest stop restrooms, will you consider additional policies to improve access/accommodation for those with fragrance allergies? To this end, will cleaning products @ rest stops be fragrance free in order to provide access and accommodation for those who have adverse reactions to fragrance due to asthma, fragrance allergies, chemical sensitivities, as well those whose migraines are induced by fragrance, etc.? In addition, will you consider implementing a 'no fragrance' policy for those who work at DOT facilities to increase access/accommodation for the above-mentioned groups? Thank you for your consideration.	Bureau of Highway Maintenance	Our roadside facilities, rest areas, and Safety and Weight Enforcement Facilities follow the attached policies which direct the use of fragrance free custodial solutions for cleaning and sanitizing the facilities. This follows existing policies for fragrance free hand soaps/sanitizers and deodorizers. As a general guideline, service providers should use a hydrogen peroxide-based sanitizer for cleaning five days per week and a hospital-grade quaternary disinfectant two days per week for all sink, counter, toilet, urinal and partition surfaces as well as restroom doors and door handles. All cleaning products must be fragrance free/odorless. WisDOT has mandated that all hand soap and hand sanitizers used in rest areas and waysides be of the unscented variety. Current inventories of hand soap and sanitizer may be used up, but all future orders must be for unscented hand cleanser. No air fresheners or urinal

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			cakes/deodorizers shall be used in any rest area building.
12-13	Parking. Expanding the number of parking spots that can accommodate side loading lift vans as well as parking enforcement benefits people with I/DD and their families and caregivers who rely on specialized vehicles.	Bureau of Traffic Operations	The person(s) will have to contact a member of the legislature or an advocacy group. Parking for the physically disabled is codified in Wisconsin Statute 346.503.
13-14	I would propose two additions to the State Highway Curb Ramps and Sidewalk ADA Inventory Database, if they are not already present: 1- The name, address and phone number of the agency responsible for snow removal. 2- An indicator for camera monitoring of location.	Bureau of Planning and Economic Development	WisDOT doesn't have a way to track this information at this time. The municipality is responsible for snow removal. WisDOT doesn't use photo enforcement cameras. State statutes would need to change to allow WisDOT to do that. The traffic cameras utilized for WisDOT are for operational efficiency of travel, intersection operations and incident management. No cameras are used for enforcement or security purposes).
13-14	I would also propose that all locations in the State Highway Curb Ramps and Sidewalk ADA Inventory Database have camera monitoring as a safety requirement. Camera quality should be such that local law enforcement may be able to use video for crime monitoring.	Bureau of Planning and Economic Development	WisDOT doesn't use photo enforcement cameras. State statutes would need to change to allow WisDOT to do that. The traffic cameras utilized for WisDOT are for operational efficiency of travel, intersection operations and incident management. No cameras are used for enforcement or security purposes. Resources are lacking for WisDOT to expand their scope to include enforcement and security at the intersection locations throughout the state.
13-14	Curb ramps. Many people with I/DD (Intellectual and Developmental Disabilities) use mobility equipment—including wheelchairs, walkers—or have challenges with balance or vision and need a flat inclined surface rather than a step to access public transit and pedestrian areas.  We mean the actual bus should not just have steps. A flat loading surface is preferable to an incline.  Curb cuts at bus stops are also a good best practice to facilitate loading and unloading.	Bureau of Planning and Economic Development	WisDOT has design guidelines for pedestrian facilities including curb ramps in the Facilities Development Manual (FDM). <a href="https://wisconsin.gov/rdwy/fdm/fd-11-46.pdf#fd11-46">https://wisconsin.gov/rdwy/fdm/fd-11-46.pdf#fd11-46</a> There is also information on Transit stop location and design in the Wisconsin Guide to Pedestrian Best Practices. <a href="https://wisconsin.gov/Documents/projects/multimodal/ped/guide-chap5.pdf">https://wisconsin.gov/Documents/projects/multimodal/ped/guide-chap5.pdf</a> Section 5.3.8.1. The Federal Transit Administration controls buses for commercial use, and the need to make them

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			accessible for persons with disabilities, i.e., ramps/lifts to get on the bus itself. Otherwise, the ADA would apply to bus stops and barriers at the bus stop itself, i.e., curb ramps, vertical surface discontinuities. Most likely the State or Local Public Agency would be responsible to make the pedestrian facilities accessible, whomever is responsible for the public right-of-way it is on.
16	<p>Furthermore, there are significant concerns with the time it is taking for the Department of Transportation to come into compliance with the Americans with Disabilities Act (ADA). The ADA was passed in 1990, now more than 28 years ago. This plan contemplates activities over the next 6 years taking us until 2024, some 34 years after the law’s passage. Despite that length of time, by my calculations even if all the six-year program projects are completed and all the priority curb ramp locations under other projects are also completed, there will still be over 15,000 curb ramps either absent or missing detectable warnings at that time. This is not acceptable. People with disabilities should not have to wait close to 40 years to safely cross the street. I urge you to move up your project schedule and ask the legislature for more money to complete these projects if necessary. The disability community would support DOT in any such request.</p>	Office of Business Opportunity and Equity Compliance	<p>For curb ramp improvements that are to be addressed as part of the Six-Year Program it is estimated that expenditures would be roughly \$15 million for construction costs, not including acquiring right-of-way. It is estimated that this will address approximately 1,500/year curb ramp locations. The schedule for the stand-alone curb ramp program to address all non, six-year program curb ramps is 3 six-year program cycles (18 years). It is estimated that approximately 1,000/year curb ramp locations will be addressed over a six-year period.</p>
17-18	<p>My question is what is being done to involve the 1 million people who directly look at this from the perspective of how people with disabilities are served or not served well by the WisDOT? I find government challenge to do justice to these Survey attempts and efforts. There should be 100s of thousands of people responding, and I bet you only get hundreds or 1 thousand responses tops. I have experienced state business opening up to the public and it is a dismally small number aware that the format is available. This is an issue and one I expect WisDOT to solve. I am facilitating One Team Wisconsin which provides that the over 5 million people of Wisconsin are available to notify about WisDOT business. My expectation is that WisDOT will establish an outreach effort to be a better neighbor to the faith-based community, service organizations, the educational sector, and the business realm. It is in this way we can leverage sufficient social capital to expect response.</p>	Bureau of Technical Services	<p>WisDOT has a very robust public involvement program. Surveys are only one way the Department gathers public information related to our policy and program improvements. Any survey responses are typically very low compared to the number of people to which the survey was made available.</p>

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### General Comments

Comments	Notes
<p>First, I want to compliment the DOT on developing a comprehensive ADA transition plan. Many other agencies have fallen far short on this obligation and I appreciate the effort here. Similarly, having an ADA coordinator that is in place and visible.</p>	<p>No response needed.</p>
<p>Second, I think it is great that you offer several different methods for filing a disability discrimination complaint.</p>	<p>No response needed.</p>
<p>People with disabilities can hardly afford groceries they rely on transportation that is affordable to get them where they need to be. Please consider the low income of this population before taking away services.</p>	<p>WisDOT’s Public and Specialized Transit Section is committed to supporting affordable, accessible public transportation options in Wisconsin. Although WisDOT does not own or operate any transit services, there are approximately 80 local transit agencies throughout the state that do, both for the public and for specialized needs, and both in urban and rural parts of the state. For concerns about reductions in affordable service, contact your local transit agency – Transit Section staff can help you find the information.</p> <p>Although WisDOT’s Transit Section does not operate transit services, it does interact with smaller rural transit systems, ensuring that federal and state transit funds that get awarded to these systems are used properly and comply with all federal and state requirements, including ADA requirements that relate to accessibility and affordability. WisDOT also analyzes how it allocates federal funds to ensure different parts of the state and groups of people aren’t impacted disparately by the programs. Larger urban transit agencies get their federal funding directly from the Federal Transit Administration, not through WisDOT. Even though WisDOT does not oversee those systems, Transit Section staff can still help get you in contact with them as well.</p>