

Revitalizing Madison's ADA Transition Plan

Public Facilities & Web and Digital Accessibility

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Department of Civil Rights



ADA Transition Plans



Public Entities

“A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.”

28 CFR § 35.150 (a)



Background

- Madison enacted an ADA Transition Plan in the 1990s.
- Compliance has been maintained, although some of the elements of that compliance have become somewhat decentralized over time.
- The City of Madison has grown and changed significantly since the 1990's.
- The compliance requirements have evolved.

As a result, our ADA Transition Plan needs to be updated to **ensure legal compliance accessibility and usability** of the City's programs and facilities.

A Transition Plan must

- Identify barriers to access in public facilities that limit the accessibility of programs or activities for people with disabilities
- Describe how we will make the facilities accessible
- Make a schedule with steps to be taken each year that are needed to achieve compliance
- Name the official responsible for implementation of the plan.

(28 CFR § 35.150(d)(3))

Process & Elements

- ✓ Designate an ADA Coordinator
- ✓ Include a Complaint Process
- ✓ Develop internal design standards
- ✓ Include Self-Evaluation
- ✓ Approve a schedule and budget for the Transition Plan
- ✓ Notice & public engagement
- Monitor the progress

Project Roles



Lead Staff:

**Rebecca Hoyt,
Disability Rights
and Services
Specialist**



Lead Agency:

**Department of Civil
Rights**



Key Collaborators:

**Office of the City
Attorney,
Engineering,
Information
Technology and
other relevant
agency staff**



Agency

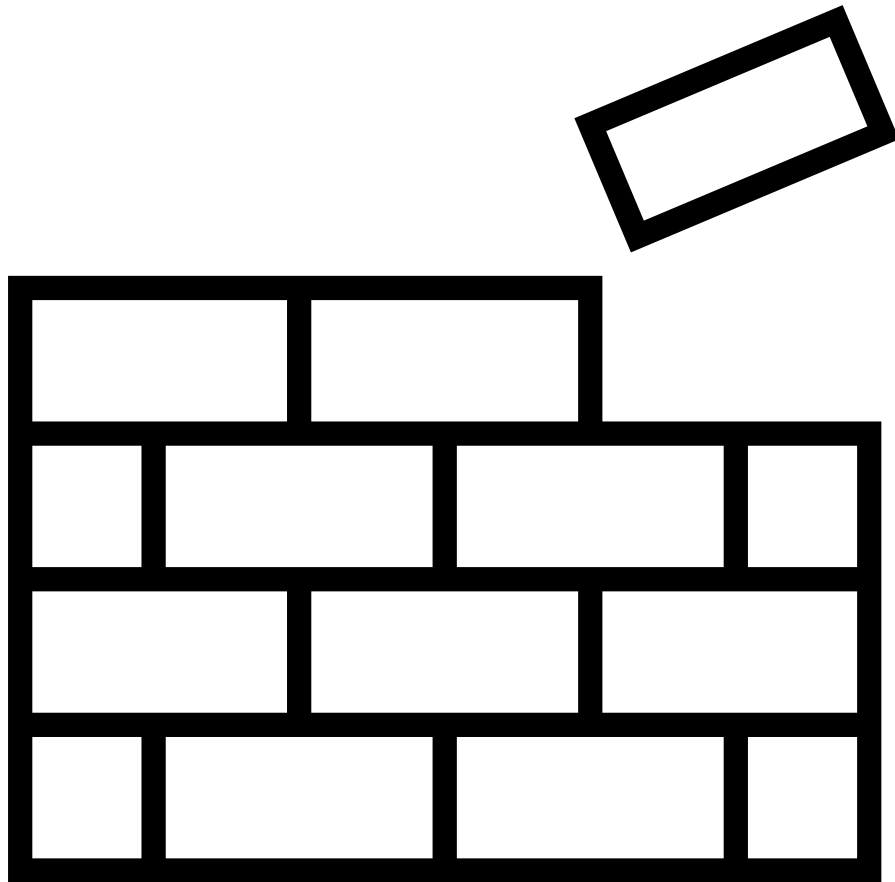
Responsibilities:

**Self-Evaluation
Schedule, cost, and
priorities for
removal of barriers**

Complaints

Equal Opportunities Complaint

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



Public Facilities

Facilities

- May not exclude people with disabilities
- Must provide access to services, programs, and activities
- Must be the most integrated setting possible
- Must be accessible and usable
- Must maintain accessibility features
- Must be accessible to service animals and mobility devices



Design Standards

The ADA has different standards for buildings and facilities based on when they were constructed or altered:

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

Exceptions

- Not necessarily required to make **each** existing facility accessible to and usable by individuals with disabilities
- Updates that threaten or destroy historic property or historic significance of a property
- Fundamental alteration of the nature of a service, program, or activity
- Undue financial or administrative burden
- Safe Harbor Facilities do not have to comply with 2010 Design Standards, but may have to comply with other standards



ADA Design Standards Overview

Access for Wheelchair Users

- Parking
- Smooth unobstructed surface
- Path of travel
- Turning radius
- Reach range
- Knee and toe clearance

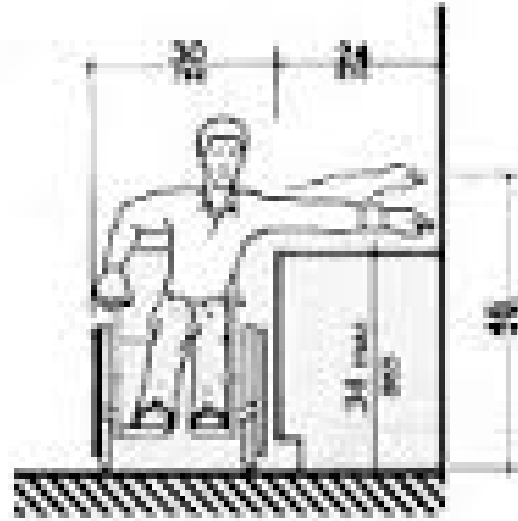
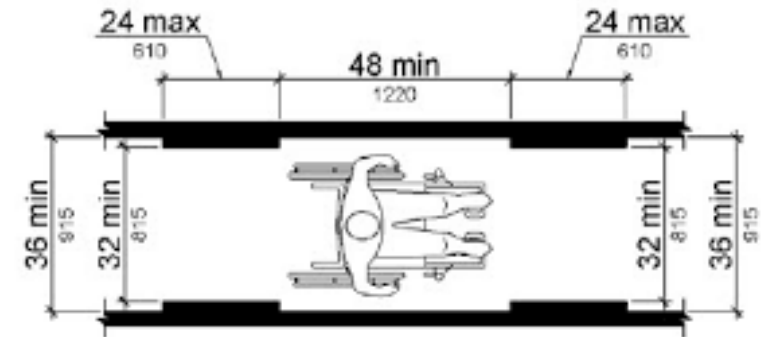
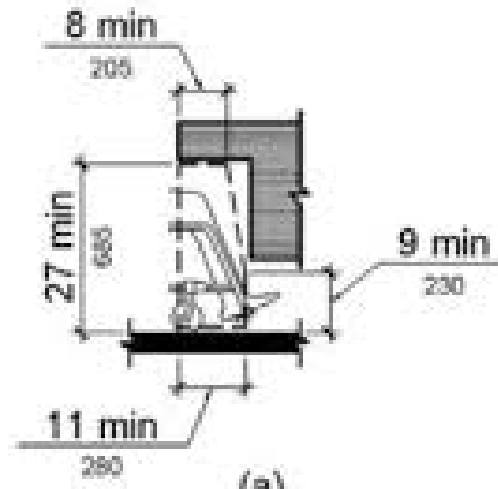
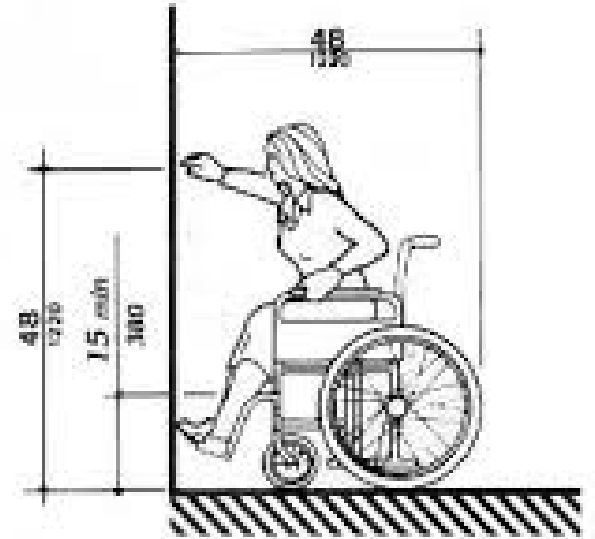


FIG
Maximum Side Reach over Obstruction



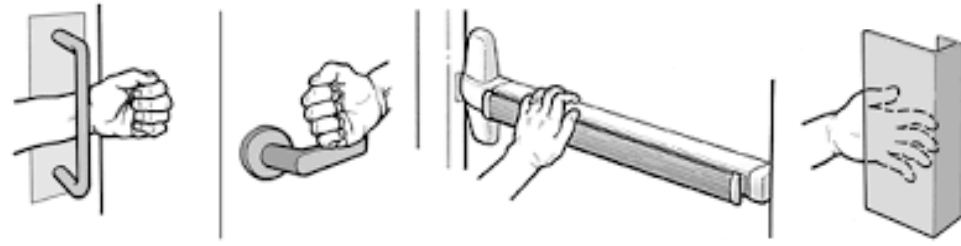
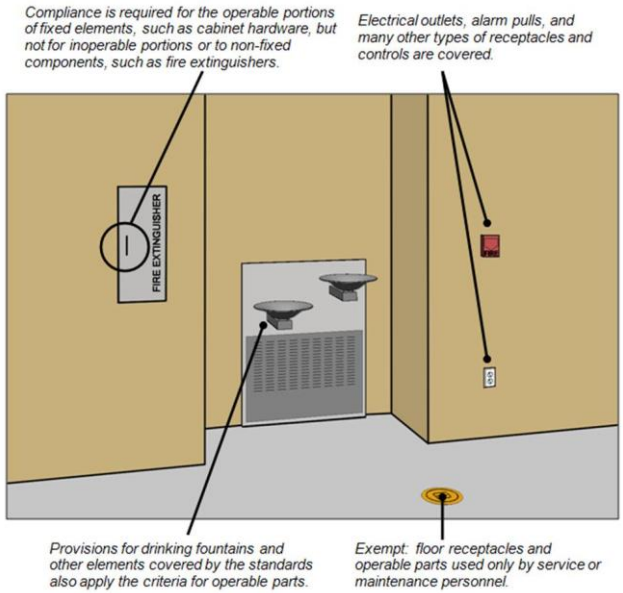
Access for the Blind and Visually Impaired



- Cane detection
- Wayfinding signage
- Tactile Indicators
- Audible Indicators

Other Accessibility Features

- Handrails
- Slope
- Stable, firm, and slip resistant ground surfaces
- Pull force
- Operable parts



Self Evaluation



Self Evaluation Tools

Each Department completed an evaluation for all its facilities that are open to the public.

- Buildings, Offices, Recreation Facilities - [2010 ADA Design Standards Existing Facilities Checklist](#)
- Public Transit Facilities - [Final Federal Transit Administration ADA Circular 4710.1.](#)
- City Shelters - US Access Board [Accessibility Standards Section 244](#)
- Parks also used mapping tools and record review

Self Evaluation Process

1. Department training on using the appropriate checklist or design standards.
2. 119 checklists completed, not including Madison Parks
3. The Disability Rights and Services Specialist and Engineering staff reviewed all checklists.
4. Every Department got a list of access barriers for their facilities
 - Things that could be easily fixed/removed were taken care of right away.
 - Barriers that need more time or require a budget, are included in the Plan.



Priorities

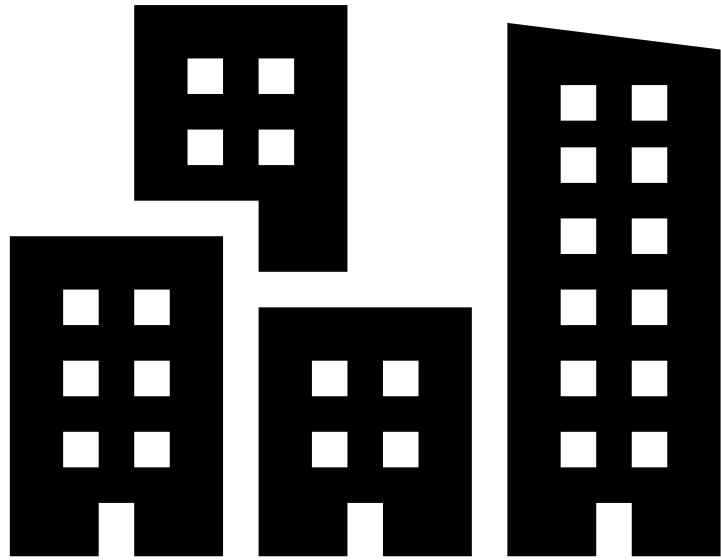
Each access barrier has been assigned a priority number:

Priority 1: Accessible approach and entrance

Priority 2: Access to goods and services

Priority 3: Access to public restrooms

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



Buildings and Offices

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What was evaluated?

- Madison Municipal Building
 - City County Building
 - Metro Transit Office
 - Monona Terrace
 - Greater Madison MPO Office
 - Madison Senior Center
 - Madison Public Libraries
 - Police Stations and Training Center
 - Public Health Madison Dane County
- 
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Compliance Issues: Buildings and Offices

A detailed list of access barriers for each facility and how they will be removed is included in *Appendix VI - Schedule, Cost, and Priorities for Removal of Access Barriers in Public Facilities*

Most common issues:	Other issues (less common):
<ul style="list-style-type: none">• Wayfinding and other signs• Door weight and closure speed• Protruding objects	<ul style="list-style-type: none">• Lack of accessible parking• Noncompliant accessible public restrooms



Older Buildings

Some buildings were built before the ADA. However, we still encourage the City to make all facilities as accessible and useable as possible for people with disabilities even if not required by law.

The plan includes ways that some agencies will offer access to services if they are unable to make a particular facility accessible.

- Curbside services
- Virtual or hybrid meetings
- Meetings at other accessible locations

Cost and Schedule

- The budget numbers and schedules included in the Plan are estimates.
- The remedies, estimated cost, and schedule to remove access barriers will be included in an addendum to this Plan by 2030.
- The City of Madison anticipates that it will remove the barriers to access in public facilities as outlined in this Plan by **2040** through reoccurring annual Capital Improvement Plan budget requests.



Public Tours

Madison Fire Department

- Prioritize bringing tour routes for Fire Stations 1, 7, 11, 12, 13, and 14 into compliance
- Information about the availability of accessible tour locations will be made available on the Fire Department website and other materials



Madison Water Utility

- Prioritize achieving full compliance on tour routes at Unit Well 7 and Unit Well 31.
- Work with the Disability Rights and Services Program over the next **three years** to identify other wells that can offer accessible tours within the **next ten years**.

For information about planning a tour and the availability of accessible locations, contact water@madisonwater.org.





Parking Lots and Garages



What was evaluated?

- Blair Lot
- Buckeye Lot
- Capitol Square North Garage
- Evergreen Lot
- Overture Center Garage
- South Livingston Street Garage
- State Street Campus Garage
- State Street Capitol Garage
- Wilson Street Garage
- Wingra Lot

Compliance Issues

Blair Lot had *no compliance issues*.

Buckeye Lot, Evergreen Lot, South Livingston Street Garage, and State Street Capital Garage had minimal issues:

- Incorrect signage or sign height
- Door weight and closing speed
- Require additional accessible parking stalls to meet the required standards

More Resource-Intensive Compliance Issues

Wingra Lot - needs to be regraded to address the how steep the surface of the ground is (slope).

Wilson Street Garage - door weight and closing speed of the doors are not compliant. Due to the design of this garage and the number of doors involved, this facility requires significant resource investment in order to be accessible and useable for people with disabilities.

Older Parking Garages

Capitol Square North Garage, Overture Center Garage and State Street Campus (Frances) Garage were built before the ADA design standards.

Due to their design and structure, it is **not feasible** to address barriers related to:

- Height needed for some accessible vans
- How steep the ground is (slope)

The agency will remove any barriers to access that are readily achievable.

Parks and Recreation



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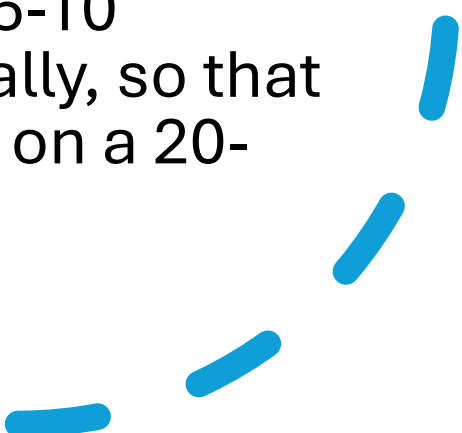
Playgrounds

All playgrounds installed after 2013 are required to comply with the 2010 ADA design standards.

Madison has 162 playgrounds

- 103 passed inspection when installed after 2013
- 59 of our playgrounds are scheduled to be replaced before 2033

The Parks Division has an annual Capital Improvement Plan with funds for 5-10 playgrounds to be replaced annually, so that a full system replacement occurs on a 20-year cycle.

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Inclusive Playgrounds

In partnership with the Madison Parks Foundation, these inclusive playgrounds have been installed:

- Elver Park
- Brittingham Park
- Rennebohm Park
- Warner Park
- Reindahl Park – coming in 2027



Acacia Ridge Park
Brittingham Park
Burrows Park
Country Grove Park
Cypress Spray Park
Duane F Bowman Park
Edna Taylor Conservation Park
Elver Park
Filene Park
Garner Park
Manchester Park
Normal Hall Pavillion
Odana Hills Golf Course
Owen Conservation Park
Reindahl Park
Vilas Park
Warner Park

Planned Improvements

Many of the barriers identified by the evaluation are issues with the paving, curb cuts, or uneven paths of travel.

The listed parks have the removal of access barriers planned in the 5-year Capital Improvement Plan (CIP).

Other Parks Facilities

- Shelters
- Restrooms
- Paths of travel
- Drinking fountains

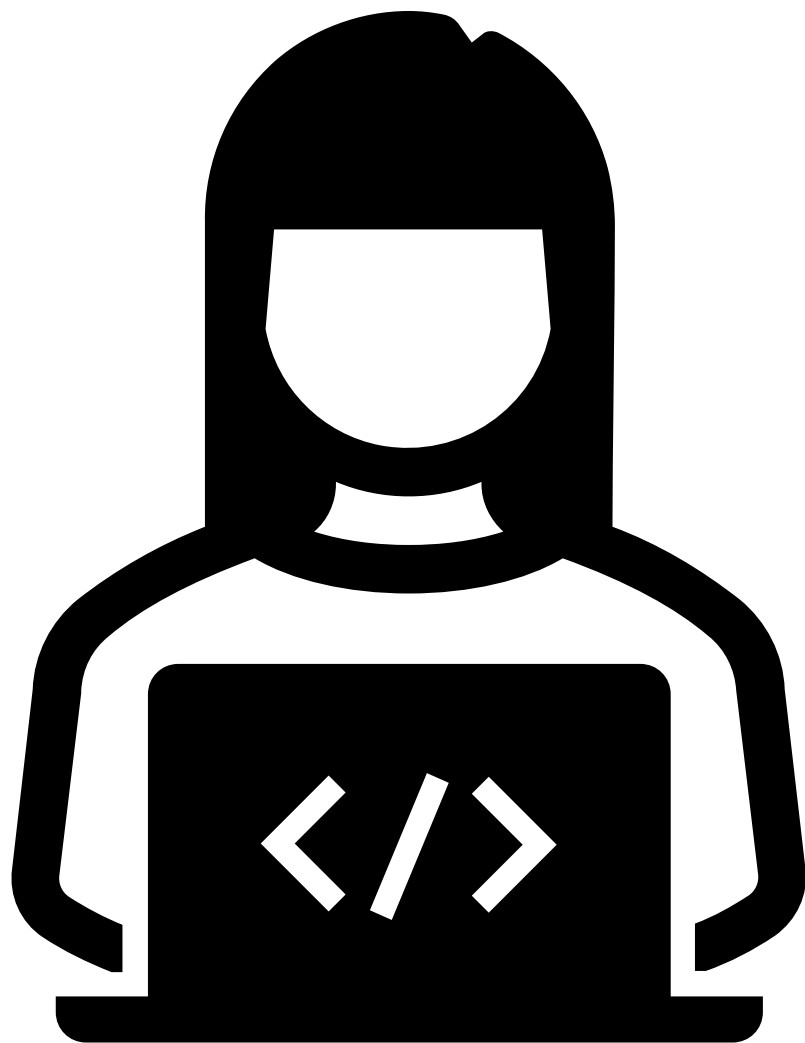
For a full list of access barriers and anticipated costs see: Parks ADA Self-Evaluation Master Spreadsheet.



Costs and Schedule

Costs to remove other access barriers will be incorporated into the Parks Capital Improvement Plan. As park facilities are replaced or upgraded, they will be brought into compliance with modern ADA standards. This Plan will be **parks facilities into compliance by 2055.**

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



Web & Digital Accessibility

What should be accessible?

- **Digital Content** includes all digital information and services provided by the City of Madison.
 - **Examples:**
 - City of Madison website
 - Online payments
 - Committee meetings and legislative information
 - Library services
 - Licenses and permit applications
- **Technology** includes hardware and software used to access information and services.
- **Web Content Accessibility Guidelines (WCAG):** Standards for digital accessibility.

Digital Accessibility Standards

The ADA requires cities like Madison to make digital content and technology accessible and useable for people with disabilities.

Standards (DOJ):

- WCAG 2.1 AA required (announced April 2024)
- Deadline: April 2026 for all publicly available, unarchived digital content.

Why?

Consider the needs of a wider range of people with disabilities.

Consider the ways people with disabilities access digital content.



Madison Standards and Practices

- Strong guidance and training
- Designated Digital Inclusion Coordinator
- Regular website monitoring and updates
- Updating older sections of the City website
- Accessibility reporting required for all new vendors and digital products.
- Report accessibility issues

Beyond Compliance

Primary standard: WCAG 2.1 AA

Our vision:

- Section 508 of the Rehabilitation Act
- WCAG 2.2 AA



Self-Evaluation Findings

Findings: Publicly Available Digital Content

1. City of Madison has **prioritized conformance to current WCAG standards.**
2. We're on track to meet the WCAG 2.1 AA standards **by April 26, 2026.**



Where we can improve: Publicly Available Digital Content

1. Captions:
 - a. Open and closed for livestreamed meetings
 - b. Auto-generated in recordings of virtual meetings
2. Updates to unarchived documents and videos
3. Updates to older websites
4. Vendor-hosted digital content
5. Training and support for all City staff

Staff Digital Content

Make accessible and useable for employees with disabilities by **2031.**



Costs

- Captions for older, unarchived videos: \$400,000
- Staff training and vendor relations: \$100,000
- Removing web and digital access barriers; ongoing monitoring: \$500,000

Additional Recommendations

1. Explore options for serving people with disabilities who use captioning and prefer a language other than English (i.e. subtitles).
2. Engage with stakeholders to explore future City AI policies and how they may impact communication options for people with disabilities.





THE FUTURE

IS ACCESSIBLE


Submit Comments

www.cityofmadison.com/ADAcomments

RHoyt@CityOfMadison.com

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