Improve Accessibility: Self-Evaluations and Transition Plans

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About Accessibility Self-Evaluations

A self-evaluation is a process by which a municipality identifies policies or practices that discriminate against people with disabilities. All government entities were required to self-evaluate access to their services, policies, programs, and practices and to identify accessibility obstacles or issues that need to be addressed by January 26, 1993. While neither the ADA nor the Rehabilitation Act specifically requires public entities to conduct a new self-evaluation or develop a new transition plan, public entities are encouraged to do so, especially if the municipality cannot locate its 1990s self-evaluation.

Completing Your Self-Evalution

Municipalities can complete the inventory themselves or hire qualified consultants to help them complete the inventory. The process can vary based on the municipality's capacity or the consultant's approach. A typical self-evaluation process engages municipal staff and people with disabilities and/or organizations that represent them in conversations about potential barriers to participation. Commonly, self-evaluations:

- begin with identifying the programs and activities the municipality conducts and collecting the policies and practices that govern them. Make a list of the services, programs, or activities the municipality provides and identify how people access them (i.e., in person, by telephone, on the web, via a board or committee);
- identify policies and practices the municipality has and how they affect individuals with disabilities (ex. what is in policy and what is not in the policy and should be) and whether facilities and the access to them present any barriers for people with disabilities. This is an excellent time to engage people with disabilities about their experiences. Barriers are different depending on whether a disability is related to mobility, vision, hearing, cognitive function, etc.; and

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- consider what modifications are needed if a barrier exists. Modifications might be structural, or they might be changes in or alternatives to existing practices. For instance, if standing for extended periods is a challenge, seating could be provided, or the service could be offered both in person and online.

Self-evaluations must provide an opportunity for people to participate. At minimum, people must be able to submit comments.

About Transition Plans

Municipalities with 50 or more employees are required to develop an ADA Transition Plan. A Transition Plan is a plan that shows how an entity will remove physical barriers that prevent accessibility for people with disabilities. Transition plans are like capital plans. A transition plan:

- lists the physical obstacles in facilities that limit accessibility;
- describes the methods (physical or non-physical) that will be used to make a facility accessible;
- sets a schedule for making the necessary modification; and
- names the official(s) responsible for ensuring each modification, or the plan in its entirety, is implemented.

Transition Plans of municipalities with responsibility or authority over streets, roads, or walkways must include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs.

During the planning process, the municipality must provide an opportunity for people to participate in the development of the transition plan, at minimum by submitting comments. The Plan must be made available for public inspection. Best Practice is posting it to the municipality's website.

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Municipalities that employ 50 or more people must keep on file and make available for public inspection:

- a list of the people consulted,
- a description of areas examined and any problems identified (the self-evaluation), and
- a description of any modifications made.

This public record must be available for at least three years.

Setting Transition Plan Action Priorities

The ADA sets priorities for removing barriers to accessibility. The priorities are:

1. Accessible approach and entrance,
2. Access to goods and services,
3. Access to public toilet rooms, and
4. Access to other items such as water fountains and public telephones.

Transition Plans for municipalities that have responsibility or authority over streets, roads, or walkways must give priority to walkways serving 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))

Transition Plan Best Practices

- Add action items for non-structural barriers like IT, policies, or regulations that prevent program accessibility for people with disabilities.
- Incorporate a cost estimate and a funding source, if known, for each modification.
- Update the Plan periodically to demonstrate progress, to assess whether any accessibility requirements may have changed, and to double check any new facilities.

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