Where the sidewalk ends

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

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Great Lakes

Metropolitan Planning Council

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Summary

The Americans with Disabilities Act (ADA) passed in 1990, yet more than 30 years later accessibility for pedestrians with disabilities remains low in many places. The regulations for implementing Title II of the ADA obligated local public agencies to develop an ADA transition plan within three years of the law's enactment. A transition plan is a planning document that identifies all barriers to access in publicly-owned streets and buildings, and develops a strategy for the removal of those barriers. Although it has been well over three years, local entities are still obligated to remove barriers for pedestrians with disabilities, and an ADA transition plan facilitates a coordinated effort to remove barriers throughout a community. This is why in 2015, the Federal Highway Administration (FHWA) published a circular clarifying that state departments of transportation still needed to develop ADA transition plans for their public rights-of-way. Locally, the Illinois Department of Transportation (IDOT) sent out a letter in 2014 to agencies that receive federal transportation funding emphasizing the federal requirement to have an updated ADA transition plan.

This report documents a first-of-its-kind assessment in the Chicago region of the status and quality of ADA transition plans for the public right-of-way. The Metropolitan Planning Council (MPC) and the Great Lakes ADA Center at the University of Illinois at Chicago (UIC) worked with students in UIC's urban studies program to study the presence and quality of ADA transition plans in the Chicago region. The team surveyed the region's 200 municipalities with more than 50 employees to establish whether they had a plan. Using a standardized audit tool, the team analyzed the plans found through the survey.

The study found that only 22 of the region's 200 municipalities with more than 50 employees (11%) had a plan. Among those 22 communities, none of the plans satisfied all of the five required plan elements. Beyond that, the quality of transition plans varied widely. Common weaknesses included a poor public engagement process and few details on how the plans would be implemented. Analysis of community characteristics revealed that a higher percentage of communities with large populations, more public employees, and higher incomes had plans as compared to smaller, low-income communities. Surprisingly, communities with a higher percentage of people with disabilities had plans less often or tended to have lower-quality plans.

In addition to the results of the assessment, this report makes a case for why transition planning is important to residents in the Chicago region. Local governments have a lot to gain by working through this process, and leave themselves exposed to risk if they don't. We explain the purpose of ADA transition plans and describe what is known on the topic and what this study adds. The report concludes by providing a list of resources to help local leaders and advocates begin the process of creating more accessible communities.



Only **11%** of the region's 200 municipalities could show evidence of having a recent ADA transition plan.



Introduction

Nearly every person will experience disability at some point in their lifetime, either personally or in a caregiving role. In fact, one-third of Americans over the age of 65 experience a mobility-limiting disability. And in the Chicago region, we're getting older. According to the Chicago Metropolitan Agency for Planning (CMAP), a large increase in the number of people over 85 will increase the average age of the region's residents from 35.7 in 2010 to 39.4 in 2050.¹ In 2019, there were 828,419 people in the six-county Chicago region who identified as a person with a disability. That's an increase of 11.6% since 2010. During that same period, the region's overall population actually fell by half a percent.²

When sidewalks, crosswalks, and transit stations are universally accessible, people of all abilities and ages can stay mobile and actively participate in their communities. Not only is that important for general health and well-being, but it enables residents to age in place without fear of becoming disconnected or homebound should they experience a disability. Creating inclusive and livable communities for people of all ages and abilities should be a major focus of community planning, because this issue affects everyone.

- 1 CMAP. ON TO 2050. https://www.cmap.illinois.gov/2050
- 2 American Community Survey 1-year estimates for 2010 and 2019. The six-county Chicago region includes Cook, DuPage, Kane, Lake, McHenry, and Will Counties.

The lack of sidewalks prevents any kind of meaningful access to this bus stop for people with disabilities.

Image courtesy Metropolitan Planning Council.



In 2020, the U.S. celebrated the 30-year anniversary of the Americans with Disabilities Act (ADA), the landmark civil rights legislation that prohibits discrimination against people with disabilities in all areas of public life. The ADA was the first of its kind, a model for other nations around the world. Now is an opportune time to reflect on the progress made in three decades, and also to take stock of how much work remains to create a just and equitable society for people with disabilities.

The unfortunate reality is that many requirements of the ADA, especially at the local level, have not been fully implemented. This is largely due to insufficient education and enforcement by the federal government. Nowhere is this truer than on our streets and sidewalks.

Pedestrian infrastructure matters. Pathways for walking and wheeling are critical for people of all abilities to get to the places they want and need to go, including jobs, school, healthcare, recreation, and social activities. Pathways that are broken, incomplete, or otherwise inaccessible to people with disabilities make that difficult or impossible. The ADA implementing regulations require that all pathways in the public right-of-way, such as sidewalks, be accessible to all people. Due to a lack of coordinated planning, there is often a patchwork of accessible and inaccessible infrastructure that creates discontinuous routes.

The <u>United States Access Board</u>, a federal agency focusing on accessible design, has <u>guidelines</u> to help local governments build pedestrian facilities that are compliant with the ADA. Existing sidewalks must be wide, flat, and barrier-free. Ramps must connect

This incomplete sidewalk makes passage difficult or impossible for people with disabilities.

Image courtesy Melissa Phillip / Houston Chronicle via AP. sidewalks to the street at intersections. These qualities of pedestrian infrastructure may escape the attention of an able-bodied person but can prevent access to a person with a disability, and this inequitable access is a critical civil rights issue.

The first step to ensuring equitable access in the public right-ofway is to identify existing barriers. Careful planning is necessary as streetscape infrastructure investments remain in place for many years, and are costly. Title II of the ADA requires any unit of government with more than 50 employees to create an **ADA transition plan** that identifies barriers to access in the public rightof-way, and describes a plan for removing those barriers.³

The ADA regulations for implementing Title II instructed all nonexempt units of government to complete their transition plan shortly after the passage of the act in 1990. While anecdotal evidence suggested a low compliance rate, the actual number of completed transition plans is unknown. Furthermore, revised ADA guidelines finalized in 2010 necessitated plan updates. The intention of this research was to determine how many municipalities in the Chicago region have ADA transition plans and to assess the quality of those plans. While transition plans are also required to address barriers to access in public buildings, this study focuses only on the public right-of-way (i.e. streets and sidewalks). To better understand the status of transition planning in the Chicago region, the Metropolitan Planning Council (MPC) partnered with the Great Lakes ADA Center at the University of Illinois at Chicago to conduct a regional assessment.

This study grew out of MPC's 2019 report titled <u>Toward Universal</u> <u>Mobility: Charting a Path to Improve Transportation Accessibility</u>. The report outlined 32 recommendations to improve transportation and mobility for people with disabilities in the greater Chicago region. Many of the recommendations stem directly from the requirements of the ADA, especially as they pertain to physical infrastructure and transit service. One such recommendation is to create a technical assistance program to help local governments develop ADA transition plans. This report provides baseline data that could inform such a program.



Transition planning in the COVID era

The coronavirus pandemic that swept across the globe in 2020 has been devastating. While very little data has been collected on the disability status of COVID-19 victims, we know that a large portion of deaths – possibly as much as 50% – have happened in nursing homes and other congregate living environments where many people with disabilities live.

This public health crisis has profound implications for the disability community, so it's more important than ever that local governments renew their commitment to fulfilling the requirements of the ADA.

With widespread government orders to shelter in place or otherwise reduce travel, our worlds are shrinking. Many people are using pedestrian infrastructure more than ever before for basic transportation and recreation. But when barriers to accessible mobility exist, quarantine can become confinement.

3 The ADA also requires that transition plans address barriers to accessing public facilities. However, this report is only focusing on barriers in the public right-of-way.

What is an ADA transition plan, and why is it important?

The Americans with Disabilities Act is a landmark civil rights law passed in 1990 that prohibits discrimination against people with disabilities in all aspects of public life. It is divided into five titles that require equal access in areas including employment, education, transportation, and public space. The ADA National Network has <u>detailed</u> <u>information</u> on each of the Act's titles.

Title II of the ADA requires that units of government with 50 or more employees develop a transition plan to identify and remove physical barriers in their built environment, including pedestrian infrastructure, public buildings, and park facilities. Examples of barriers in the pedestrian environment include deteriorated or inaccessible infrastructure, such as broken sidewalks or overly steep curb ramps. At a minimum, plans need to include:

A designation of the official(s) responsible for the implementation of the transition plan

An inventory of barriers (i.e., identification of physical obstacles to access)

A prioritized schedule of when barriers will be eliminated and deficiencies corrected

A description of the methods that will be used to make facilities accessible

Provision of an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments

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Requirements vs Best Practices

Transition plans vary widely in detail, quality, and comprehensibility. In addition to the requirements discussed above, experts have identified best practices for transition plans to make them more representative of their communities' needs and more likely to be implemented: ⁴

Meaningful public engagement. Local governments are required to provide an opportunity to interested parties to view transition plans and submit comments. This is a low bar for public engagement. Moving beyond the requirement means to authentically involve people with disabilities and other stakeholders to tap their vast knowledge on accessibility barriers in their communities. Meaningful engagement with the disability community will strengthen the quality of a plan, build support for implementation, and potentially mitigate the risk of legal challenges.

Transparent inventory methods and results. One of the first steps in the transition planning process is to conduct a self-assessment to create an inventory of all accessibility barriers in the public right-of-way. Communities use various kinds of inventory methods that include physical audits, GIS mapping, and aerial imagery analysis. A thorough inventory with a well-defined methodology creates trust in the process and ensures that all barriers are documented. Although communities may be afraid to report barriers because of concerns that it opens them up to potential litigation, reporting barriers is a transparent approach to sharing the information gathered so that internal and external stakeholders have a comprehensive understanding of the existing conditions.

Detailed and actionable implementation plans. Identifying barriers to access is a useful exercise by itself, but the real purpose of an ADA transition plan is to *transition* to a state of universal accessibility in the public realm. High-quality transition plans, therefore, provide a detailed schedule for barrier removal and explicitly define the methods that will be used. Since local governments have scarce resources, high-quality plans will also detail how barrier removal will be funded and how the work will be phased and prioritized. All plans are required to specify a responsible public official, but local governments that are serious about implementation will designate a senior official who is accountable to the public.

Planning for the future. Although not required by the ADA, high-quality plans will establish a system to monitor progress and make periodic updates. ADA transition plans should also describe how they align with other local or regional planning processes.

4 Eisenberg, Y., Heider, A., Gould, R. and Jones, R., 2020. Are communities in the United States planning for pedestrians with disabilities? Findings from a systematic evaluation of local government barrier removal plans. *Cities*, 102, p.102720. M eaningful engagement with the disability community will strengthen the quality of a plan, build support for implementation, and potentially mitigate the risk of legal challenges.



Cross-jurisdictional collaboration is especially important for transition planning. Responsibility for accessibility improvements changes depending on who has jurisdiction over a road. This distinction is of little importance to pedestrians, who are likely unaware when crossing arbitrary municipal boundaries, but can have a major impact on access and safety. Prioritizing the removal of barriers to access should be embedded in every transportation planning effort in the region. The reality of municipal finance means infrastructure improvements are often done in a piecemeal way. But a fragmented network may actually be more dangerous to people with disabilities than none at all.

Image courtesy AP Photo / Detroit News, Daniel Mears.

2.2

Real-world impacts

Profiles

Pedestrian infrastructure is the bedrock of every transportation system. Without accessible sidewalks and safe crossings, trips can become dangerous, expensive, or impossible. This is especially true for people with disabilities. The barriers that exist today have real-world impacts on access to opportunities of all kinds: employment, recreation, family, education, healthcare, and more. These are some of the stories that bring to life the consequences of inaction, and the opportunities that come with universal access.

Michele Lee

Michele Lee enjoys trying new restaurants.

She's savvy, a person whose Instagram photo of a well-executed entrée would inspire copycat reservations from her friends and followers. A downtown employee, a resident of the West Loop—where construction cranes tower above hyped new bars and restaurants—Michele is right at home in her neighborhood. She watches storefronts open from her windows.

But even nearby dining requires planning and logistics. Michele uses a power chair after a college car crash paralyzed her from the chest down, so something as simple as a missing ramp or curb cut can keep her from getting in the door of an "accessible" establishment.

"I kind of have to stick to my neighborhood, and I don't get to explore as much because of transportation and accessibility

"Many people with disabilities are underemployed and one reason is lack of access to transportation." constraints," Michele says. "I'd love to go to Wicker Park more. There are so many bars and restaurants. Big Star, Violet Hour, Mindy's...



"But the Damen Blue Line stop is not wheelchair accessible. There's no elevator, only stairs. Especially in the winter, when some Piece Pizza or Mindy's Hot Chocolate could

really hit the spot, and because of my wheelchair I can't go, it sucks. The winter in Chicago is already depressing enough when it's cold and bleak—cabin fever is real and to not be able to get somewhere because of accessibility, it's a bummer."

The truth is, Michele can afford to live in a dense, transit-rich hub. Tricky as the West Loop can be, it's a haven. Lee moved from Glenview years ago because getting home to the suburbs from her downtown office took three hours.

"Many people with disabilities are underemployed and one reason is lack of access to transportation, not because they cannot work," Michele says. "The reason I chose where I live is because it's directly on the bus route that goes to my office. I was very intentional about it. I'm kind of stuck, because of where I work, where I can live."

Image courtesy Lynn Renee Photography

Adam Ballard

For Adam Ballard, access to transportation is personal.

He grew up in downstate Illinois, and moved to the Chicago suburbs in order to access the Metra system. Now he lives in Chicago's Pilsen neighborhood, where he's able to get around independently in his power chair without buying an expensive retrofitted vehicle.

"Transit and transportation infrastructure has been important to me for a long time," Adam says. "Rather than maintaining an accessible vehicle of my own, it makes sense financially to use public transit, paratransit, and taxis—everything I use here."

Much of Adam's mobility hinges on that most basic element of the transportation network: sidewalks. When pedestrian infrastructure is missing or inaccessible due to weather and construction, it has a drastic impact on his ability to participate



in his community. "When the weather is nice, I like to just roll everywhere or use transit because

"When I have no other option than paratransit, it really cuts down on what I can do because that service is so inflexible." those are the most flexible and reliable options," he said. "When I have no other option than paratransit, it really cuts down on what I can do because that service is so inflexible."

As the Housing and Transportation Policy Analyst at Access Living, he spent his days working to improve mobility outcomes for people with disabilities. "[People with disabilities are] still developing a political identity and a political voice around our disability identity," he said. Founded in 1980, Access Living is a Chicago-based center of advocacy, service, and social change led by and for people with disabilities. For decades,

the organization has been a hub. Cumulatively, its employees and constituents use their hard-earned political voice to advocate, including for better transportation.

Access Living's efforts have made a big difference in the Chicago region, and they're not slowing down. "We'd like to see transportation systems that are fully integrated every step of the way. No matter the mode of transportation, no matter your disability, you're going to be able to access the same level of service that a non-disabled person would."

Adam is now an Associate State Director at AARP Illinois, where he leads work on housing, transportation, and Livable Communities.

Image courtesy Lynn Renee Photography



Non-compliance is a gamble

More than 30 years after the passage of the ADA, people with disabilities continue to face barriers in the pedestrian environment. While the federal government has mostly taken a hands-off approach to enforcement, non-compliant entities are at risk of being sued by local groups in federal court. In most cases, a settlement agreement will force the local government into compliance, with potentially serious financial consequences. This has already happened on numerous occasions in Illinois.

In 2007, the City of Chicago entered a settlement where it was required to dedicate \$50 million in new funding to curb ramp repair and installation annually for a fiveyear period. In 2015, Champaign County reached a settlement agreement on a wide range of ADA issues, including the requirement to bring the public right-of-way into full compliance within three years. The town of Pekin, IL in Tazewell County is currently being sued by a group of residents for failure to provide accessible sidewalks and curb ramps. Noncompliance is not only financially risky, but it can be deadly. Like these other pedestrians, a wheelchair user was forced into the road by insufficient pedestrian infrastructure with fatal results.

Image courtesy AP Photo / Jim Cole.

2.2.2

One municipal ADA coordinator we talked to explains:

"Threats of lawsuits or losing federal funding – that's a pretty big hammer. And if you want grants for your community, then you better get on it. And unfortunately, that speaks to more people than doing the right thing... because everyone should have equal access to neighborhoods [and] businesses, to be able to live their lives." ⁵

Local governments that don't act risk losing out on future funding opportunities, or worse: losing control of their own capital improvement plans. Additionally, plans that are decades old likely do not satisfy the requirements of Title II. In <u>published guidance</u> to local governments, the FHWA calls transition plans "living" documents that must be updated as often as necessary to assure they remain relevant and inclusive of all outstanding accessibility barriers.

Benefits to communities

2.2.3

Going through the ADA transition planning process can increase the capacity of a community to support mobility and participation for people with disabilities. Local governments interested in doing the minimum can simply fill out a template and post it online. But going through the ADA transition planning process with purpose and intention can be a way to **infuse inclusion into a municipal government's culture.** An ADA coordinator explained,

"It's not just a block on a checklist, right? That's not what the intent of the ADA is in my opinion. It's a complete philosophy change in the way that we look at and treat other people. It's a sense of awareness that someone who might have a disability still has the same rights and accessibility to everything that we provide as a city." ⁶

If done well, the transition planning process facilitates cultural change. Public engagement facilitates a better relationship with an important constituency that will pay dividends in other ways.

It is standard practice to build new infrastructure following the most recent accessibility design guidelines and to bring streets and sidewalks into compliance with the ADA whenever a major reconstruction happens. One could argue, then, that transition planning is an unnecessary and expensive step that leads to the same eventual outcome.

T ransition plans allow local governments to identify and address accessibility issues in a systematic fashion, thereby maximizing the impact of investments.

6 Ibid.

⁵ Eisenberg, Yochai; Heider, Amy; Stokes, Michele; Deitrick, Stephanie. 2020. Planning for pedestrians with disabilities: Sharing successes and gaps from ADA Transition plans around the U.S. ADA-Audio recording. retrieved from <u>https://www.accessibilityonline.org/ADA-Audio/archives/110844</u>

However, transition plans allow local governments to identify and address accessibility issues in a systemic fashion, thereby maximizing the impact of investments. Transition plans are helpful tools that enable more informed decision-making and more efficient use of scarce public resources.

Additional benefits emerge from this planning process. Because many communities do not have a comprehensive database on the infrastructure in their right-of-way, the self-assessment required to create an inventory of accessibility barriers is an excellent opportunity to collect data that can be used for many planning efforts. Further, data on pedestrian infrastructure could eventually be used to develop navigation apps that provide users with disabilities customized routes that meets their mobility needs.

State of transition planning in the Chicago region

Methodology

The inventory and assessment of transition plans was conducted by a group of student researchers from the University of Illinois at Chicago's College of Urban Planning and Policy Administration. The student group followed a protocol developed by Eisenberg, et al. (2020)⁷ for a similar study at the national level. Using data from the Census Bureau's 2012 Census of Governments, the students identified the 200 municipalities in the seven-county Chicago region⁸ with more than 50 employees. While this study focused only on municipalities, any unit of government with more than 50 employees (states, counties, townships or special districts such as a park district) is required to complete a plan under federal rules.

To collect the plans, the students used a series of standardized protocols. First, they looked for plans on municipal websites using specific search terms. If a plan was not found online, the students attempted direct contact through email and phone, approaching a variety of contacts at each municipality such as an ADA Coordinator,

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Eisenberg, Y., Heider, A., Gould, R. and Jones, R., 2020. Are communities in the United States planning for 7 pedestrians with disabilities? Findings from a systematic evaluation of local government barrier removal plans. Cities, 102, p.102720.

Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will Counties

Director of Public Works, or municipal engineer. After acquiring the plans, the students audited them using an evaluation tool developed by Eisenberg, et al (2020). The tool consists of a list of transition plan elements, including all required elements specified by published guidance from the FHWA. It also includes good and best practices based on expert input. The plan elements included in the tool are organized into six categories:



Public participation opportunities

These elements consider whether the plan is available to the public, and how they were involved in developing the plan.



Inventory

These elements evaluate the process used to catalog and describe the barriers that exist in the public right-of-way.



Method and schedule

These elements assess the plan's description of how the identified barriers will be removed, and on what timeline.



Designated official

These elements check to see if the plan designated a public official responsible for implementation, and whether their contact information is shared with the public.



Monitoring progress

These elements consider whether a plan is in place for monitoring the barrier removal process, and how often the transition plan itself will be updated.

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Other

The evaluation tool also includes a few miscellaneous best practices, such as checking to see if the plan was formally adopted and how the plan has been incorporated into other planning efforts.

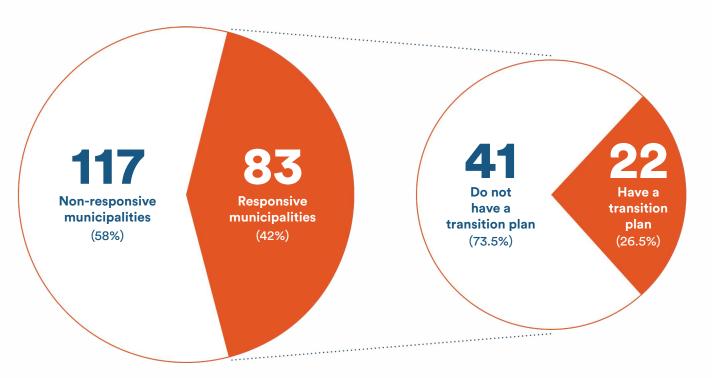
You can see a full list of the considered plan elements, and the detailed results of the regional assessment, in Table A1 in the <u>Appendix</u>.

Results of the Chicago region assessment

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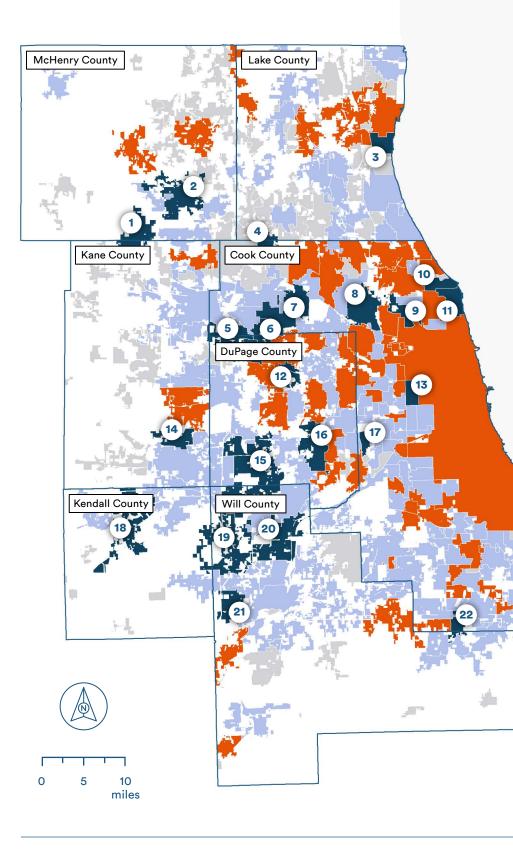
Of the 200 municipalities, **only 42%** were responsive to the students' multiple inquiries. The students received 83 responses, of which 22 provided an ADA transition plan. It's unlikely that the 117 non-responsive municipalities have current plans because they are required to be publicly available.

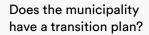




As shown on the map in Figure 2, the municipalities that provided an ADA transition plan are fairly dispersed throughout the region and have diverse characteristics. They range from very dense central cities to small rural communities. Certain parts of the region that are known to struggle with municipal capacity issues – such as South Cook County – had low response/plan completion rates. Yet other areas that are quite wealthy, like the North Shore in northern Cook and Lake Counties, had similar patterns. The municipalities with fewer than 50 employees that are not required to have ADA transition plans are mainly located on the fringes of the region. It is worth noting that the unincorporated areas of the seven-county region are not exempt from transition planning, but should be covered by county plans, which are beyond the scope of this report.









	Municipalities with plans
1	Huntley
2	Crystal Lake
3	North Chicago
4	Barrington
5	Bartlett
6	Hanover Park
7	Schaumburg
8	Des Plaines
9	Niles
10	Wilmette
11	Evanston
12	Glendale Heights
13	Oak Park
14	North Aurora
15	Naperville
16	Downers Grove
17	Western Springs
18	Yorkville
19	Plainfield
20	Romeoville
21	Shorewood
22	Park Forest

Data from a Spring 2020 survey of all municipalities in the 7-county Chicago region Table 1 shows how well the 22 reviewed plans satisfied the five basic federally required elements of an ADA transition plan. The most essential part of a transition plan, the inventory of barriers, was completed in all but one case. Similarly, most plans that created an inventory also described methods for barrier removal. Most plans, but not all, satisfied the simplest requirement: designating an official who is responsible for plan implementation. Public engagement was generally poor (50% of plans), and half of the plans included no details on when barriers would be removed.

Table 1. Compliance with the ADA's Five Required Elements

Required Element	Count	%
Complete an inventory of barriers in public rights-of-way	21	95%
Identification of a public official responsible for plan implementation	20	91%
Describe the methods that will be used to remove barriers and make facilities accessible	18	82%
Include a prioritized schedule for barrier removal	11	50%
Provide an opportunity for interested persons to participate in the development of the plan	11	50%

Table 2 shows how well the region did collectively at satisfying the most important plan elements evaluated in the assessment methodology, including both required and best practice components. A detailed list of the 35 evaluated elements is located in Table A1 in the <u>Appendix</u>. The score is the average percentage of elements satisfied in each category across the 22 plans.

Across all categories in the evaluated plans, 66% of the 35 elements were satisfied, whether required, critical, or identified as a best or good practice. Critical elements are actions not explicitly required under the ADA, but are necessary steps to satisfying the required elements. Collectively, the plans performed better in some categories than others. The plans were generally strong on developing a thorough inventory of access barriers and designating a high-ranking official to implement the plan. They were much less consistent with regard to public participation, describing their barrier removal methods, or providing a schedule for improvements.

Table 2. Assessment of Plan Quality Across Categories

Category	# of elements	Score
Public Participation Opportunities	5	52%
Inventory	8	85%
Method and Schedule	10	51%
Designated Implementer	5	86%
Monitoring Progress	3	56%
Other	4	61%
All Categories	35	66%

Figure 3 shows the distribution of required, critical, and best practice elements from the audit tool for each of the 22 plans the team reviewed. There was a wide range of plan quality, with the least complete plan satisfying only three required, critical, or best practice elements and the most complete plan achieving 22. The average was completion of around 16 elements, with 16 plans satisfying at least 15 elements.

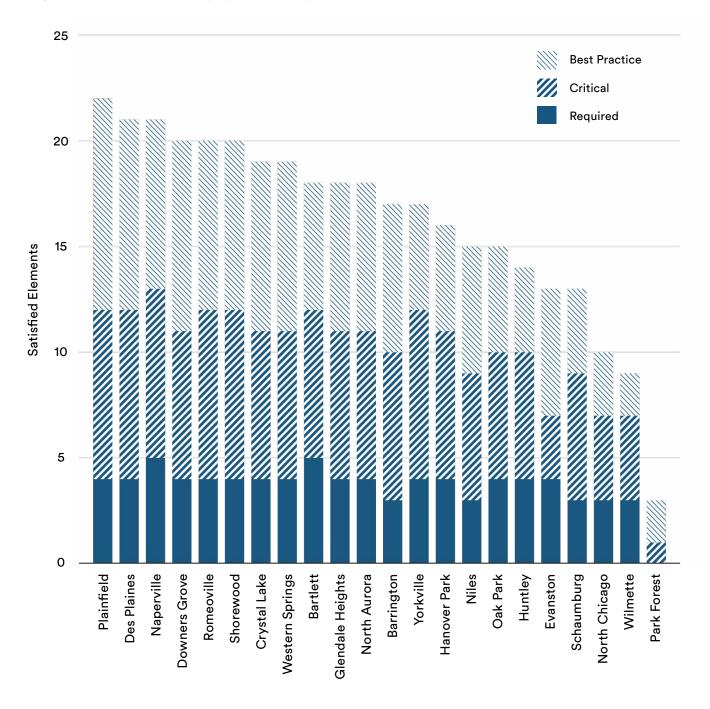


Figure 3. Overall Plan Quality by Municipality



Public Participation Opportunities

All 22 municipalities with plans fulfill the requirement to make them publicly available, either by posting the plan to their website (14 communities) or by providing it upon request (8 communities). However, the ADA also requires local governments to provide an opportunity to interested parties for feedback. Only half of the surveyed plans had some kind of public participation process during plan development. Only two plans specified that they used more than one engagement strategy to solicit feedback, and only eight plans had targeted efforts to engage people with disabilities.



Inventory

All but one of the plans completed an inventory of barriers in the public right-of-way.

Of the 21 plans that completed an inventory, almost all of them described which facilities were inventoried, as well as their adherence to federal design standards. Curb cuts were the most commonly inventoried facility. More than three-quarters (77%) provided the actual results of the evaluation by specifying, for example, the number of missing curb ramps or non-compliant sidewalks.



Method and Schedule

Most (82%) of plans included a description of the methods that would be used to remove barriers in the public right-of-way. All of those plans also included a description of how barrier removals would be prioritized. Only half gave a schedule for when barriers would be removed, and only 27% provided dates for any improvements other than curb cuts. More than three-quarters (77%) identified potential funding sources, but only one plan identified a dedicated set-aside for barrier removal.



Designated Official

All but two of the 22 plans designated a public official responsible for plan implementation. In all cases, it was a person with considerable authority, such as the director of the public works department. However, only 68% of the plans provided the designated official's contact information.



Monitoring Progress

Only 68% of the ADA transition plans outlined procedures for monitoring implementation progress. Even fewer (59%) specified how often the plan would be updated. Only nine of the 22 plans explained how the public can be involved in future planning efforts for removing barriers from the public right-of-way. While none of these elements is federally required, they promote transparency and public confidence.

Other Factors

Interestingly, only 55% of the plans had been clearly adopted by their municipalities, either by ordinance or signature. Many appeared to be drafts and a finalized version could not be located. Only 36% of the plans described how barrier removal will be incorporated into other transportation planning efforts.

Community characteristics and transition plans

Relationship to plan status

Creating an ADA transition plan takes time, money, and expertise. These resources are not evenly spread across communities in the Chicago region, and this likely has an impact on a municipality's ability to create a transition plan. To investigate this idea, the team looked for a relationship between municipal transition plan status and a number of community characteristics. For general measures of municipal capacity, we used: total population, median household income, number of municipal employees, and state tax revenue disbursement per capita.⁹ To focus on specific demographic groups, we used: percent of the population with a disability; percent of the population over 65; percent of the population that is white, Black, Asian, or Latinx; and the total percent of the population that are people of color.

To do the analysis, all unresponsive municipalities were grouped with the municipalities who affirmatively answered "no" for whether they had a transition plan. The 200 eligible municipalities were separated into four quartiles of 50 for each of the community characteristics described above. You can see the full results of this analysis in Table A2 in the <u>Appendix</u>. Many of the findings are intuitive, but others were surprising, and perhaps reveal the decision-making processes in the region.

The measures of municipal capacity had the strongest relationship with transition plan status. Unsurprisingly, more of the communities with large populations had a plan than communities with small populations. None of the 50 municipalities in the lowest population quartile had a plan. The percent with a plan grew with each quartile, with 24% of 50 largest municipalities having a plan. This is more than double the regional average of 11%. The relationship between plan development and municipal staff count had a nearly identical distribution. More municipalities with higher median household income had a plan than those with lower median incomes. Only five of the 22 municipalities with plans were in the bottom 50% for median household income. Similarly, only eight of the 22 municipalities with plans were in the bottom 50% for tax revenue.

Given how deeply race is linked with many other socioeconomic factors, we expected to see some relationship between demographic groups and plan status. Communities with a low percentage of white or Asian residents are less likely to have a plan, but no

9 This is a measure of the per capita tax revenue municipalities received from the state in the 2019 fiscal year from the following sources: business district tax, charitable games and pull tabs/jar games, excise taxes, income tax, local use tax, cannabis use tax, and sales taxes.

Any of the findings are intuitive, but others were surprising and perhaps reveal some of the decision-making processes in the region.

3.3

3.3.1

clear relationship exists between plan status and the percentage of Black or Latinx residents. Aggregating all people of color together by community also did not suggest a relationship.

We also expected to find more ADA transition plans in communities with larger populations of seniors and people with disabilities. Within these communities, we thought there may be more political pressure to create a plan. We found no such evidence. Surprisingly, we found that municipalities with a higher percent of people with disabilities were actually less likely to have a plan. Only seven of the 22 municipalities with plans were in the top two quartiles for percent of population with a disability. Despite the lack of similar findings for race and ethnicity, this may be related to issues of municipal capacity compounded by overlapping socio-economic factors. Poor communities are likely to have more people with disabilities, and are also less likely to have the funds or expertise to complete an ADA transition plan.

Relationship to plan quality

3.3.2

To assess whether any of these community characteristics relate to the quality of the ADA transition plans, a similar analysis was done using only the 22 municipalities with plans. We compared the same set of community characteristics as above to the number of required elements, critical elements and best practices that each plan satisfied. To do this, we recalculated the quartiles for each community characteristic using the 22 municipalities only, then calculated the mean number of required elements and best practices satisfied in each quartile. As before, you can see the full results of this analysis in Table A3 in the Appendix.

Interestingly, some of the strongest predictors of plan completion status have little relationship to the quality of those transition plans. For instance, the municipalities in the bottom quartiles for total population and municipal employees both have a higher average number of satisfied required or critical elements than the top quartiles. However, high plan quality was seen more in communities with higher median household income and per capita tax revenue. As income and revenue increase, so do the average number of required elements and best practices within the plans.

Following the same counterintuitive pattern as plan status, the municipalities with the highest percentage of people with disabilities had on average the fewest required or critical elements satisfied and adhered to the fewest best practices. But while race and ethnicity seemed to have little relationship to the presence or absence of a transition plan, these characteristics do seem more connected to plan quality. The municipalities with the highest percentage of Black residents and people of color had completed significantly fewer required elements and best practices in their plans.

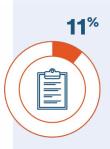
e expected to find more ADA transition plans in communities with larger populations of seniors and people with disabilities. We found no such evidence.

Key Findings

Overall, ADA transition planning in the Chicago region is low. **Only 11% of communities could show evidence of having a recent plan.** The quality of most plans was also low, and many communities did not include some of the critical elements, nor did they meet best practices for plan implementation. Issues of municipal capacity seem to have a strong relationship with whether a municipality has a plan, and the quality of that plan. Municipalities with more residents and more employees — and therefore more capacity — were more likely to have plans. Communities with higher incomes were more likely to have plans, and those plans were likely to be of a higher quality. Because poverty is intersectional with many other marginalized groups, communities with large Black populations and a higher percentage of people with disabilities were less likely to have a plan and much more likely to have a low-quality plan. Future interventions in the region to support transition plan development should prioritize these communities. The lower levels of transition planning in communities with more people with disabilities is disconcerting, and the region should strive to close this gap.

Among the compliant municipalities, it's not clear how seriously officials took the process beyond satisfying the legal requirement to complete the plan. There is limited information about implementation progress or future updates. A well-known adage in urban planning is that the true priorities of government aren't found in planning documents, but in budgets. Very few plans specified sources of dedicated funding that would ensure sustained implementation.

Public participation and engagement is another area in need of improvement. Most plans had a very cursory outreach process, and a surprising number had no obvious means for public comment at all. **Meaningful engagement can help make plans more responsive to community needs, build political support for implementation, and protect municipalities against litigation.** Such efforts can be integrated into other planning efforts, such as complete streets, pedestrian plans, and transportation plans. There is a critical need for planners and engineers to engage people with disabilities in community settings.



Only **11%** of communities could show evidence of having a recent plan.

he lower levels of transition planning in communities with more people with disabilities is disconcerting, and the region should strive to close this gap.

Take action!

If your community does not have an ADA transition plan, now is a great time to get started developing one. If your plan is over 10 years old, it's time for an update. There are likely more residents with a disability in your community than you realize. As the population ages, the number of people with mobility challenges increases. But it's not just people with disabilities that benefit from an accessible pedestrian environment. Faded crosswalks make it dangerous for children to cross the street. Missing curb ramps pose a problem to parents pushing strollers. Crumbling sidewalks discourage activity and blight neighborhoods. An ADA transition plan can be the first step toward changes that improve the community for people of all ages and abilities. Developing and implementing an ADA transition plan is key to making your community livable and ensuring residents can age in place.

It's important to get started, even if progress is incremental. As one municipal ADA coordinator said:

"Eat the elephant one bite at a time, take baby steps... What is the first thing you need to do? For me, it was, let's get this data. Let's try an engineer. But for other communities that don't have [resources], let's partner with our schools or our volunteer groups to make this [data collection] happen."¹⁰

10 Eisenberg, Yochai; Heider, Amy; Stokes, Michele; Deitrick, Stephanie. 2020. Planning for pedestrians with disabilities: Sharing successes and gaps from ADA Transition plans around the U.S. ADA-Audio recording. retrieved from <u>https://www.accessibilityonline.org/ADA-Audio/archives/110844</u>

4

Resources

There are many resources available to local governments to help with the ADA transition plan development process. The New England ADA Center has a very comprehensive website to help local governments learn about the requirements of Title II of the ADA:

Title II Action Guide for State and Local Governments

The Minnesota Department of Transportation has compiled several transition plan templates, examples, and educational resources specific to rights-of-way:

State Aid for Local Transportation - ADA

The Ohio Department of Transportation similarly has provided templates and examples of ADA transition plans:

ADA Transition Plan Resources for Local Agencies

The National Cooperative Highway Research Program developed a very detailed guide on best practices for ADA transition planning. The report is written for state departments of transportation, but is relevant for local governments as well:

NCHRP Project Number 20-7 (232) - ADA Transition Plans: A Guide to Best Management Practices

The Great Plains ADA Center has developed a national certification program for people who have been designated as an ADA coordinator by their local government. This is a great way to learn about the role and to learn strategies that will help you complete and implement a good transition plan:

ADA Coordinator Training Certification Program (ACTCP)

The Metropolitan Mayors Caucus, a membership organization of the Chicago region's municipal leaders, has an ADA Coordinators group and convenes the Age-Friendly Communities Collaborative. Both meet regularly to share best practices and resources:

Age-Friendly Communities Collaborative

Finally, the Great Lakes ADA Center is available for technical assistance and support on any questions or work related to the Americans with Disabilities Act for communities in the Great Lakes Region:

Great Lakes ADA Center

Funding

4.2

Creating an ADA transition plan does require resources, but it's an investment worth making. Fortunately, there are a number of funding opportunities that local governments can apply for to help ease the financial burden.

Statewide Planning and Research Funds: IDOT sets aside \$20 million annually to support transportation planning and research activities throughout the state. Applicants must demonstrate how their project supports the goals and objectives of the state's Long Range Transportation Plan (LRTP). Transition plans have a clear connection to at least two of the LRTP's five performance goals: livability and mobility. SPR Projects must also demonstrate how they benefit disadvantaged communities, which is an easy task for transition plans.

CMAP Local Technical Assistance Program: The Chicago Metropolitan Agency for Planning (CMAP) has a program to provide financial and/or technical assistance to local governments for a wide variety of planning efforts. The program has funded many pedestrian and access-oriented plans in the past. Projects should demonstrate how they align with the principles of CMAP's <u>ON TO 2050</u> regional plan. ADA transition planning has an immediate and natural connection to CMAP's inclusive growth principle.

Acknowledgements

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Appendix

6

Category								
		F	Public Parti	cipation O	pportunitie	s		
Eler	nent Type	Critical	Required	Good Practice	Best Practice	Good Practice		
	nent below)	Question 1	Question 2	Question 3	Question 4	Question 5		
Per	cent Satisfied	100.00%	50.00%	63.64%	9.09%	36.36%		
	Barrington	•	×	٠	×	×		
	Bartlett	•	•	×	•	×		
	Crystal Lake	•	×	•	×	×		
	Des Plaines	•	×	•	×	×		
	Downers Grove	•	•	•	•	×		
	Evanston	•	•	•	×	•		
	Glendale Heights	•	×	•	×	×		
	Hanover Park	•	•	×	×	•		
lity	Huntley	•	•	•	×	×		
cipa	Naperville	•	•	•	×	٠		
Auni	Niles	•	×	×	×	•		
Results by Municipality	North Aurora	•	٠	×	×	×		
ults	North Chicago	•	×	×	×	×		
Res	Oak Park	•	•	•	×	•		
	Park Forest	•	×	•	×	×		
	Plainfield	•	×	×	×	•		
	Romeoville	•	×	•	×	•		
	Schaumburg	•	•	×	×	×		
	Shorewood	•	×	•	×	×		
	Western Springs	•	•	•	×	•		
	Wilmette	•	•	×	×	×		
	Yorkville	•	×	•	×	×		

- 1. Is the transition plan available for public inspection?
- 2. Were people with disabilities and other interested individuals and organizations provided an opportunity to review and comment on the transition plan?
- 3. Is the transition plan available on the agency's website?
- 4. Were multiple outreach methods used to engage the public as part of the transition planning process?
- 5. Were targeted methods used to engage people with disability to become involved in the transition planning process?

Category		Inventory									
Eler	nent Type	Required	Good Practice	Good Practice	Critical	Critical	Best Practice	Critical	Critical		
	nent below)	Question 1	Question 2	Question 3	Question 4	Question 5	Question 6	Question 7	Question 8		
Perc	cent Satisfied	95.45%	77.27%	81.82%	86.36%	86.36%	77.27%	95.45%	77.27%		
	Barrington	•	•	•	•	•	•	•	•		
	Bartlett	•	•	•	•	•	•	•	•		
	Crystal Lake	•	×	•	•	•	•	•	•		
	Des Plaines	•	•	•	•	•	×	•	•		
	Downers Grove	•	•	•	•	•	•	•	•		
	Evanston	•	×	×	×	×	×	•	•		
	Glendale Heights	•	•	•	•	•	•	•	•		
	Hanover Park	•	•	×	•	•	•	•	•		
lity	Huntley	•	٠	•	٠	•	•	•	×		
cipa	Naperville	•	٠	•	٠	•	•	•	•		
Muni	Niles	•	•	•	•	•	•	•	•		
Results by Municipality	North Aurora	•	•	×	•	•	•	•	•		
ults	North Chicago	•	×	•	×	•	×	•	×		
Res	Oak Park	•	×	•	٠	•	×	•	×		
	Park Forest	×	×	×	×	×	×	×	×		
	Plainfield	•	٠	•	٠	•	•	•	•		
	Romeoville	•	٠	•	٠	•	•	•	•		
	Schaumburg	•	•	•	•	•	•	•	•		
	Shorewood	•	•	•	•	•	•	•	•		
	Western Springs	•	•	•	•	•	•	•	•		
	Wilmette	•	•	•	•	×	•	•	×		
	Yorkville	•	•	•	•	•	•	•	•		

- **1.** Was an inventory of the public right-of-way completed?
- 2. Was a description of the inventory procedures included?
- 3. What kind of sampling was used for the inventory? In other words, how much of the community?
- 4. Did the inventory assess whether pedestrian facilities, such as curb cuts, were present?
- 5. Did the inventory assess the compliance of existing pedestrian facilities using ADA guidelines for the public right-of-way?
- 6. How was compliance of pedestrian facilities assessed?
- 7. Which pedestrian facilities were assessed as part of the inventory and transition plan?
- 8. Does the transition plan list the physical barriers that limit the accessibility of services to individuals with disabilities?

Category		Method and Schedule									
Eler	nent Type	Required	Required	Critical	Best Practice	Good Practice	Critical	Best Practice	Best Practice	Good Practice	Best Practice
	nent below)	Question 1	Question 2	Question 3	Question 4	Question 5	Question 6	Question 7	Question 8	Question 9	Question 10
Perc	cent Satisfied	81.82%	50.00%	31.82%	27.27%	31.82%	72.73%	81.82%	54.55%	77.27%	4.55%
	Barrington	•	×	×	×	×	•	•	•	×	×
	Bartlett	•	•	×	×	×	•	•	×	•	×
	Crystal Lake	•	•	×	•	•	•	•	•	•	×
	Des Plaines	•	٠	•	٠	•	•	•	•	•	×
	Downers Grove	×	٠	×	×	×	•	•	×	•	×
	Evanston	•	×	×	×	•	×	•	•	•	×
	Glendale Heights	•	•	×	×	×	•	•	•	•	×
	Hanover Park	•	×	×	×	×	•	•	×	•	×
lity	Huntley	•	×	×	×	×	•	•	•	•	×
cipa	Naperville	•	•	•	•	•	•	•	•	•	•
Juni	Niles	•	×	×	×	×	×	•	×	•	×
Results by Municipality	North Aurora	•	×	×	×	×	•	•	•	•	×
ults	North Chicago	×	•	•	•	•	×	×	×	•	×
Res	Oak Park	•	×	×	×	×	•	•	×	×	×
	Park Forest	×	×	×	×	×	×	•	×	×	×
	Plainfield	•	•	•	•	•	•	•	•	•	×
	Romeoville	•	•	•	•	•	•	•	•	•	×
	Schaumburg	•	×	×	×	×	×	×	×	•	×
	Shorewood	•	•	•	×	×	•	•	•	×	×
	Western Springs	•	×	×	×	×	•	•	•	•	×
	Wilmette	×	×	×	×	×	×	×	×	×	×
	Yorkville	•	•	•	×	×	•	×	×	•	×

1. Does the plan include a description of the methods to be used to remove barriers in the right-of-way and make the facility accessible?

2. Does the plan include a schedule of improvements to upgrade accessibility following the plan for each year of the transition period?

- **3.** Does the plan include a schedule for other areas of the public right-of-way beyond curbcuts, such as sidewalks, crosswalks, and pedestrian signals?
- 4. Are dates attached to each barrier removal?
- 5. Until what year is barrier removal planned for?
- 6. Is a description of the prioritization for barrier removal present?
- 7. What factors were used for prioritization?
- 8. Which factors were given the highest weight?
- 9. Were funding sources identified?
- **10.** Is a separate pool of funds identified and set aside?

Category		Designated Official						
Eler	nent Type	Required	Best Practice	Good Practice	Critical	Good Practice		
-	nent below)	Question 1	Question 2	Question 3	Question 4	Question 5		
Perc	cent Satisfied	90.91%	95.45%	90.91%	86.36%	68.18%		
	Barrington	•	•	•	•	•		
	Bartlett	•	•	•	•	•		
	Crystal Lake	•	•	•	•	•		
	Des Plaines	•	•	•	•	•		
	Downers Grove	•	•	•	٠	•		
	Evanston	•	•	•	×	×		
	Glendale Heights	•	•	•	•	•		
	Hanover Park	•	•	•	•	•		
ality	Huntley	•	•	•	•	•		
icipa	Naperville	•	•	•	•	×		
Мил	Niles	•	•	•	•	•		
Results by Municipality	North Aurora	•	•	•	•	•		
sults	North Chicago	•	•	•	×	×		
Res	Oak Park	•	•	•	•	×		
	Park Forest	×	•	×	×	×		
	Plainfield	•	•	•	•	•		
	Romeoville	•	•	•	•	•		
	Schaumburg	×	×	×	•	×		
	Shorewood	•	•	•	•	•		
	Western Springs	•	•	•	•	•		
	Wilmette	•	•	•	•	×		
	Yorkville	•	•	•	•	•		

- 1. Does the transition plan name an official responsible for the plan's implementation?
- **2.** Is the official in a position of authority?
- 3. What is the responsible official's department and title?
- 4. Was an ADA coordinator designated?
- 5. Was the name and contact information of the ADA coordinator listed in the transition plan?

Cate	egory	Monitoring Progress				
Elen	nent Type	Best Practice	Good Practice	Good Practice		
	nent below)	Question 1	Question 2	Question 3		
Perc	ent Satisfied	68.18%	59.09%	40.91%		
	Barrington	•	•	×		
	Bartlett	٠	٠	×		
	Crystal Lake	٠	٠	×		
	Des Plaines	٠	٠	•		
	Downers Grove	٠	×	•		
	Evanston	×	×	•		
	Glendale Heights	٠	٠	×		
	Hanover Park	٠	٠	×		
ality	Huntley	×	•	×		
icip	Naperville	×	•	×		
Mun	Niles	•	×	•		
by I	North Aurora	•	•	•		
Results by Municipalit,	North Chicago	×	×	•		
Res	Oak Park	×	×	×		
	Park Forest	×	×	×		
	Plainfield	٠	•	•		
	Romeoville	•	•	×		
	Schaumburg	•	×	×		
	Shorewood	•	•	•		
	Western Springs	•	•	•		
	Wilmette	×	×	×		
	Yorkville	٠	×	×		

- **1.** Does the plan mention how monitoring of progress will take place, such as performance measures/regular reporting measures?
- 2. Does the plan specify how often the plan will be updated?
- **3.** Does the plan explain how the public can become involved in ongoing public right-of-way access issues for planning, prioritization and policy decisions?

Category		Other					
Eler	nent Type	Good Practice	Best Practice	Best Practice	Best Practice		
	nent below)	Question 1	Question 2	Question 3	Question 4		
Perc	cent Satisfied	81.82%	72.73%	54.55%	36.36%		
Barrington		•	٠	•	×		
	Bartlett	×	×	•	×		
	Crystal Lake	•	•	•	×		
	Des Plaines	•	•	•	•		
	Downers Grove	•	•	•	•		
	Evanston	•	•	•	×		
	Glendale Heights	•	•	×	•		
	Hanover Park	•	×	•	×		
ality	Huntley	•	×	×	×		
Results by Municipality	Naperville	•	•	×	•		
Mun	Niles	•	•	×	×		
by I	North Aurora	•	•	×	×		
sults	North Chicago	×	×	×	×		
Res	Oak Park	•	•	•	•		
	Park Forest	×	×	×	×		
	Plainfield	•	•	•	•		
	Romeoville	•	•	×	•		
	Schaumburg	•	•	•	×		
	Shorewood	•	•	×	•		
	Western Springs	•	•	•	×		
	Wilmette	×	×	×	×		
	Yorkville	•	٠	٠	×		

1. Was a set of accessibility guidelines for pedestrian facilities adopted?

- 2. Is the guideline updated for the 2010 ADA Accessibility Guidelines or Public Right-of-Way Accessibility Guidelines?
- 3. Is there any evidence the transition plan was put into operation by signature, ordinance or other means of adoption?
- **4.** Does the Transition Plan describe how the efforts and priorities listed will be incorporated into other pedestrian and transportation planning?

Table A2.	Transition	Plan status	by various	community	characteristics
-----------	------------	--------------------	------------	-----------	-----------------

Community Characteristic	Quartile	Does the municipality have a Transition Plan?	
		Yes	No/No Response
Total population	1	0	50
	2	4	46
	3	6	44
	4	12	38
Median household income	1	2	48
	2	3	47
	3	9	41
	4	8	42
Number of municipal employees	1	1	49
	2	3	47
	3	7	44
	4	11	38
State tax revenue disbursement per capita	1	4	46
	2	4	46
	3	9	41
	4	5	45
% of population with a disability	1	9	41
	2	6	44
	3	3	47
	4	4	46
% of population 65+	1	8	42
	2	3	47
	3	5	45
	4	6	44
% of population white alone	1	3	47
	2	6	44
	3	9	41
	4	4	46
% of population Black alone	1	5	45
	2	5	45
	3	8	42
	4	4	46
% of population Asian alone	1	2	48
	2	2	48
	3	9	41
	4	9	41
	1	5	45
% of population Latinx	2	7	43
% of population Latinx	3	6	44
	4	4	46
% of population POC	1	4	46
	2	8	42
	3	6	44
	4	4	46

Table A3. Average number of satisfied elements by various community characteristics

community Characteristic	Quartile	Average required or critical elements satisfied	Average best practices satisfied
Total population	1	11.2	7
	2	7.5	4
	3	11.5	7.7
	4	10.2	6.4
Median household income	1	8	5.4
	2	10	5.7
	3	11.3	6.8
	4	10.6	7
Number of municipal employees	1	11	6.2
	2	10	5.7
	3	9.2	6.7
	4	10.2	6.4
State tax revenue disbursement per capita	1	8.8	5
	2	9.3	5.2
	3	11.7	8
	4	10.2	6.6
	1	11.8	6.8
	2	10.2	6.5
% of population with a disability	3	10.2	6
	4	8	5.6
% of population 65+	1	10.8	6.2
	2	9.8	6.3
	3	10	6.7
	4	9.6	5.6
	1	8.4	5
% of population white alone	2	9.8	6
	3	11.7	7
	4	10	6.8
% of population Black alone	1	10.2	6.2
	2	10.3	6.5
	3	11.8	7.2
	4	7.4	4.8
% of population Asian alone	1	9.4	6.2
	2	10.7	6.7
	3	9.3	5.8
	4	10.8	6.2
% of population Latinx	1	8.6	5.8
	2	9.2	5.3
	3	11.7	7.3
	4	10.6	6.4
% of population POC	1	10	6.8
	2	11.5	6.7
	3	10	6.3
	4	8.4	5

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