

 <p style="text-align: center;"><b>Bulletin</b> <b>Statewide Programs Unit</b> <b>Certification Program Office</b> <b>(CPO)</b></p>	NUMBER 101-68-Rev1	SUPERSEDES 101-68
	EFFECTIVE DATE 02/07/2024 Revised: 9/24/2025	PAGE NUMBER Page 1 of 5
	REFERENCE ODOT Certification Program	
	TARGET AUDIENCE Certified LPAs, Applicant LPAs, Regions 1, 2, 3: Region Managers, Area Managers, Local Agency Liaisons/TPMs	
SUBJECT <b>Americans with Disabilities Act, Transition Plan Requirements and Guidance – ACTION REQUIRED</b>	cc ODOT Statewide Investments Manager, Statewide Programs Unit, and subject matter resources (Office of Engagement and Civil Rights), FHWA	

**PURPOSE:**

To notify Certified Local Public Agencies (LPAs) about the following:

1. Applicable criteria ODOT uses to review and accept ADA Title II Transition Plans and recommended timelines for updating ADA Title II Transition Plans.
2. Submittal and review process.

Note: Rev-1 revisions shown in underline text.

**BULLETIN INFORMATION:**

**1. Background:**

Title II of the Americans with Disabilities Act (ADA) requires state and local governments’ public transportation infrastructure to be accessible and usable by people with disabilities. Implementation of ADA-compliant features is important to ODOT and reflects our strategic goals of an equitable and modern transportation system in Oregon.

Per the Local Agency Guidelines for Certified Local Public Agencies ([LAG manual](#)) Section B, Subsection C.2, Certified LPAs are required to establish an ADA Title II Transition Plan as a foundational document for certification. Metropolitan Planning Organizations (MPOs) without physical assets to inventory as the basis for a Transition Plan address ADA compliance through the Title VI Implementation Plan. Transition plans are used to ensure compliance with the Americans with Disabilities Act and provide a detailed “roadmap” of a local agency’s program for ongoing improvements to its infrastructure to meet current ADA standards.

ODOT’s Office of Engagement and Civil Rights (OECR) and Certification Program Office (CPO) collaborate to review Certified LPAs’ transition plans and provide local partner agencies technical assistance in fulfilling this requirement. Oregon’s Certified LPAs are essential partners with ODOT in implementing the ADA and assuring access across the state’s transportation programs. After establishing a transition plan, all local FHWA subrecipients must maintain ADA compliance and self-monitor their progress in implementing their transition plan.

## 2. Transition Plan Criteria and Recommended Update Timeline:

ODOT applies a seven-point framework for evaluating a subrecipient's transition plan. The framework is found in the attachment at the end of this bulletin.

ODOT *recommends* updating ADA Title II Transition Plans on a five-year schedule. ODOT also recommends implementing a tracking system to monitor progress on Transition Plan elements and preparing an annual accomplishments report evaluating progress. Additional information on best management practices can be found under section 5 below.

## 3. Submittal and Review Process:

*For applicant agencies:*

Development and submittal of your agency's ADA Title II Transition Plan or other documentation showing compliance with ADA requirements is a condition of certification and will be addressed during the certification process.

*For currently Certified LPAs:*

If your agency's current ADA Title II Transition Plan has not received review by ODOT OECR, your agency will receive a request to submit the current Title II Transition Plan as part of OECR's regular reviews of Title VI Plans. Additionally, CPO may request submittal of your agency's plan as part of the next regular program review completed by CPO.

After OECR completes review of your agency's plan, you will be asked to submit any updates to your plan during each subsequent CPO compliance review.

**4. Action Required:** By October 8, 2025, the program liaison or coordinator for each Certified LPA should complete the [CPO Bulletin 101-68 Acknowledgement Survey](#).

**5. Technical Assistance:** Contact the [ODOT\\_ADA@ODOT.oregon.gov](mailto:ODOT_ADA@ODOT.oregon.gov) inbox or ADA Program Manager, Brenda Gessner, at 971-372-9291.

**6. Webpage links:** The following links provide background and guidance on ADA Title II Transition Plans:

- [Accessibility at ODOT](#)
- ODOT [ADA Transition Plan](#)
- FHWA Federal-Aid Essentials video: [Transition Plans](#)
- FHWA [ADA Transition Plans: A Guide to Best Management Practices](#)
- [LAG manual](#) (see Section B)

**Questions, concerns, or need an ADA accommodation or alternate format? Contact us at:**

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**ATTACHMENT:  
ADA TITLE II TRANSITION PLAN EVALUATION CRITERIA**

<b>Review Category</b>	<b>Category Name</b>	<b>Summary</b>	<b>Reference</b>
1	Official Responsible for Implementation of ADA Transition Plan	Identify an ADA Coordinator by name and position, with contact guidance; may also include delegation by agency director or equivalent.	<a href="#">§28 CFR 35.107(a)</a>
2	Inventory of Barriers	Includes results of inventory and assessments for at least two ADA-related features (best practice minimum: sidewalks and curb ramps or curb ramps and pedestrian signals); may include summary of inventory methodology.	<a href="#">§28 CFR 35.105</a>
3	Modification Schedule	Plan shows some commitment toward upgrading ADA elements identified in the inventory of barriers in the short term (planned capital improvement projects) and a recognition of priority of curb ramps at walkways serving entities covered by the ADA, per 28 CFR 35.150(d)(2). May include some planning for elimination of other barriers over time, per 28 CFR 35.150(d)(3).	<a href="#">§28 CFR 35.150(d)(2)</a> <a href="#">§28 CFR 35.150(d)(3)</a>
4	Accessibility Methods	Describe most of the Methods that will be used to make the facilities accessible; identify primary standards that will be applied (i.e., 2010 ADAAG, PROWAG).	<a href="#">§28 CFR 35.150(d)(3)</a>

5	Public Involvement in Transition Planning	Other ADA Requirements: Public Involvement – Description of process to allow public to readily access and submit comments for both inventory self-evaluation and transition plan.	<a href="#">§28 CFR 35.150(d)(1)</a> <a href="#">§28 CFR 35.105(b)</a>
6	ADA Policy Statement	Development of an ADA Policy or similar nondiscrimination assurance statement, inclusive of persons with disabilities, and posted publicly on the agency’s website and facility bulletin boards.	<a href="#">§28 CFR 35.106</a>
7	Complaint/Request/Grievance Process	Basic information included to help an individual know how to submit a request for accommodation, report a barrier, or file a formal ADA complaint, with link to form or other submittal method.	<a href="#">§28 CFR 35.107(b)</a>