Americans with Disabilities Act
Transition Plan

Board of Education Review Draft

Updated: 2021/11/22
pps.net/accessibility

Contents

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[1] Underlined text throughout this document is hyperlinked.

Portland Public Schools is committed to equitable access to all programs, for all students, regardless of ability. To quote the District's Racial Equity and Social Justice Lens, "... We must ensure that all students are guaranteed a comprehensive, rigorous, equitable, and inclusive education. Universal access to quality education not only benefits students from all backgrounds but strengthens our communities and promotes societal prosperity." Yet, most of the District's buildings and grounds subvert this goal for individuals experiencing disability. Prior to 1973[2] — when 89 of the District's 99 buildings were constructed, protections for individuals experiencing disability did not exist. Students, staff, and community members continue to face obstacles from the pernicious architecture of this time.

In developing this transition plan, we recognize the subtle and often insidious ways the physical environment can shape one's experience. Buildings have historically matched the needs of their dominant culture. Today the challenge we face is a radical reshaping of the inherited structures of our world. This plan will guide the District's future improvements and establish a clear path to achieve full-accessibility, District-wide.

The magnitude of this effort cannot be overstated. Few schools within the PPS portfolio are fully accessible, and the current estimate to bring all sites in alignment with Oregon building code exceeds $100,000,000. A schedule of improvements broken out into four phases can be found in the last section. These phases were developed in collaboration with community members and partner organizations during Summer 2020. Central to this collaboration is a commitment to continued dialogue with our community - especially those experiencing disability.

ADA Title II Overview

The Americans with Disabilities Act, known as the ADA, had its beginning under Section 504 of the Rehabilitation Act of 1973, which prohibited discrimination based on disability by recipients of federal funds. It recognized persons with disabilities as a class, or legitimate minority, subject to discrimination as valid as inequity based on race, religion, age, and sex, and just as deserving of basic civil rights protections. This act endeavored to establish equal opportunities for those with disabilities.

The ADA is divided into five topic areas:

Title I: EMPLOYMENT

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[2] The Rehabilitation Act of 1973 became law.

Title II: PUBLIC SERVICES
Title III: PUBLIC ACCOMMODATIONS
Title IV: TELECOMMUNICATIONS
Title V: MISCELLANEOUS PROVISIONS

Title II of the ADA requires that public entities with 50 or more employees evaluate their services, programs, policies, and practices to determine whether they comply with the ADA's nondiscrimination regulations. The regulations detailing compliance requirements were issued in July 1991 and revised in 2010. These regulations mandate that each public entity is required to examine activities and services, identify problems or physical barriers that may limit accessibility by individuals experiencing disability, and describe potential compliance solutions.

Further, Title II mandates that public entities may not require eligibility criteria for participation in programs and activities that would screen persons with disabilities unless proven that such requirements are necessary for the service or program's mandatory provision. A public entity must reasonably modify its policies and procedures to avoid discrimination toward individuals with disabilities. If the public body can demonstrate that a modification would fundamentally alter its programming, it would not be required to make that modification. Title II also discusses the use of auxiliary aids necessary to enable persons who have visual, hearing, mobility, or similar impairments to access programs and activities provided by making appropriate and reasonable accommodation.

The sole limitation of these requirements would be modifications causing undue hardship. "Undue hardship" is defined in the ADA as an "action requiring significant difficulty or expense" when considering the nature and cost of the accommodation with respect to the size, resources, and structure of the specific operation. Undue hardship will be determined in the context of District resources and on an individual basis. The District completed a self-evaluation, described below, to assess existing programs and services to assure that barriers are identified and removed. Where it is necessary to remove architectural barriers to program accessibility, the District must also prepare a transition plan.

Purpose

The transition plan's primary purpose is to provide an actionable and coordinated work plan for removing architectural barriers across the district's buildings and grounds. Stated another way: this plan guides the *transition* to compliance with standards, thereby improving Portland Public Schools' facilities for people with disabilities. The transition plan outlines the structural and programmatic modifications necessary for equitable access to all District programming.

Collective Access

Collective access is an essential principle of the ADA and of this transition plan. District programming must be considered at the systems level to ensure incremental, meaningful

access is provided over time. The frameworks discussed here are necessarily scaleable and systems-driven.

On this score, the ADA grants that: "A public entity shall operate each service, program, or activity so that the service, program or activity, *when viewed in its entirety,* [emphasis added] is readily accessible to and usable by individuals with disabilities" (28 CFR 35.150). And so through balancing financial and logistical realities with community vision, the plan will outline strategies that are both structural and non-structural to provide equitable program access across Portland Public Schools.

The distinction between structural and non-structural modifications warrants further discussion. Where appropriate, this transition plan addresses accessibility through non-structural means. Examples of non-structural modifications include program modification, moving programs, or student transportation to more accessible facilities. Per the ADA, "A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section" (28 CFR 35.150). Non-structural modifications require careful coordination with building administrators and should be reviewed annually by the District's ADA Coordinators.

Resolving Grievances

In addition to this transition plan, Portland Public Schools is required by the ADA to adopt procedures providing for equitable resolution of Title II violations. District processes make allowance for reasonable accommodation regarding physical barriers when it is financially and logistically feasible. The transition plan and self-evaluation certainly inform the process to resolve the claim but may not pre-determine the resolution. The District will evaluate each request on a case-by-case basis. Please contact the District's ADA Coordinators to initiate a grievance process.

In addition, students, staff, and community members are encouraged to notify the District's ADA Coordinators of any barriers not documented in **Appendix D**. Please see the contact information below.

Rebecca Winn	**John Lyons**	**Mail to:** **ADA Coordinators**
Code Compliance Manager	*Sr. Program Manager*	501 N. Dixon St
accessibility@pps.net	ADA Transition Plan Liaison	Portland, OR 97227
	accessibility@pps.net	

Self-Assessment

First, in 2009, and later with a comprehensive update in 2019/ 2020, the District completed a physical audit of facilities to identify facility barriers and identify recommendations and alterations to meet State and Federal accessibility standards. A complete list of the facilities evaluated and the assessment findings with associated costs are detailed in the appendices of this document. See **Appendix D** for detailed information on each of the 1625 barriers identified.

The facility evaluations were conducted according to the ADA 2010 Standards, 2014 Oregon Structural Specialty Code Chapter 11 Accessibility, and the Architectural Barriers Act (ABA). Evaluators used accessibility checklists to evaluate barriers in District facilities. The list covers all manner of barrier conditions commonly found in District facilities and programs, including parking, signage, paths of travel, buildings, and playgrounds.

The facility evaluation findings were entered into a database outlining identified barriers, after which the assessment team proposed barrier removal actions. The resulting facility documentation is available under the appendices. In addition to a list of each potential barrier District-wide, the assessment data provides information about the relevant State and Federal codes, including a planning-level cost estimate to remove the barrier.

Programs can be made accessible in three ways:

1. Minor programmatic changes, such as providing test material in alternate formats,
2. Moving the program to an accessible site, or
3. Making facility upgrades, "structural modifications," to the program site

When choosing a method of providing program access, the District will prioritize the one that results in the most integrated setting appropriate to encourage interaction, including individuals with disabilities.

Accessibility Criteria

This transition plan is only one among a collection of documents establishing accessibility criteria for the District. Others include the District's Long-Range Facility Plan, the Ed Specifications, and the Technical Design and Construction Standards.

The criteria described in this document align with the Americans with Disabilities Act Accessibility Guidelines and therefore only measure progress toward federal accessibility

standards. Meaningful accessibility for our students requires a broader lens than federal guidelines. Yet, a narrow focus on federal accessibility guidelines is necessary for the purposes of this document: the Title II of the ADA requires quantifiable and measurable progress toward the Americans with Disabilities Act Accessibility Guidelines over time.

The broader accessibility lens described in other District guiding documents may not be measurable in the same way as federal accessibility guidelines are therefore not discussed in this document. Please see the District's website or contact the ADA Transition Plan Liaison for more details.

The federal requirements described in this document will be applied for existing facilities where new construction or modernization is not otherwise under consideration. Where the District undertakes new development or modernization not restricted to accessibility work, modifications to upgrade accessibility features may be required that are not proposed in this transition plan. Such work may also be triggered by the authority having jurisdiction. This work is separate from the program access requirement addressed by the self-evaluation and transition plan.

Prioritization

Recognizing that the District has limited funds and cannot immediately make all schools fully accessible, District stakeholders and community members were asked to consider prioritization criteria. Once established and adopted by the Board of Education, these criteria will guide barrier-removal across the District's buildings and grounds following a phased, systems-level approach.

Broadly, two types of prioritizations must take place:

1. **Prioritization of facilities**

Portland Public Schools buildings evade generalization; each facility must be analyzed individually. District programs and services offered at individual sites will shape the transition plan and the engagement process. This question — *where do we invest first?* — must consider geography, demographics, and programming, to name just three examples. This transition plan explores several lenses through which to view this question in the engagement sections below. This document's appendices contain details on each of the District's facilities, including cost estimates in 2020 dollars.

2. **Prioritization of barriers within each facility**

All barriers in this document's appendices are assigned a category aligned with Oregon building codes. These categories follow a sequence of movement from the outside of the building, to the

building entrance, to the intended building program area, including plumbing fixtures and communication devices. The categories are listed below. See **Appendix B** for additional details.

- A. Site Accessibility
- B. Accessible Route & Reach Range
- C. Plumbing Elements
- D. Communication Elements
- E. Special Spaces, Built-in Elements & Recreational Facilities

The inherent logic of this sequence needs little explanation; however, should a circumstance arise where departing from this order would benefit a student or community member, Title II of the ADA offers latitude when prioritizing individual barrier removal. The ADA Title II, Technical Assistance Manual, states, "when choosing a method of providing program access, a public entity must give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities." That is to say, when meeting our obligation to Title II, the District has some leeway in prioritizing specific barriers at individual sites. This question, like the question, *where do we invest first?* discussed above, is viewed through stakeholder and community lenses below.

Engagement: Introduction

Prioritization criteria were further developed under the guidance of District stakeholders and community members. But, like most components of society in 2020, the COVID-19 pandemic complicated engagement for this effort. After the extended closures under the *Stay Home, Save Lives* order, feedback on transition priorities were broken into four steps:

1. Transition frameworks developed under a funding task force composed of Portland Public Schools staff
2. A twelve-week public review and comment period of a draft transition plan posted to the District website
3. Three virtual town halls developed in collaboration with **FACT Oregon** and **Community Vision**
4. Spanish-language interviews with parents of students with disabilities

Further complicating the development of this transition plan was the parallel development of the 2020 School Bond. The Bond referral timing preceded much of the community engagement and so limiting the variables for comment. To further illustrate the interplay between the pandemic, the Bond referral, and the development of this plan, see the timeline in the section below.

Transition Plan Development Timeline

Date   **Event**

2020-01	*Barrier Assessment Complete*
2020-02	*Transition Plan Project Start-Up*
2020-03-08	*Stay Home, Save Lives Order*
2020-04	*Transition Plan Engagement Revised*
2020-05	*District Stakeholder Engagement*
2020-06	*Transition Plan Drafted*
2020-07-13	*Draft Transition Plan Posted to District Website*
2020-07-21	*Special Board Meeting Finalizing ADA Scope for the Bond*
2020-07-30	*Virtual Town Hall - 1*
2020-08-11	*Virtual Town Hall - 2*
2020-08-13	*Virtual Town Hall - 3*
2020-09-18	*Comment Period on Draft Document Closed*
2020-11-03	*School Bond Passed by Portland Voters*

Engagement: District Stakeholders

Members of the funding task force internal to the District were identified based on three criteria:

1. Project experience with work related to barrier-removal within the District, and/or
2. Anticipated stewardship of barrier-removal projects once the transition plan is complete, and/or
3. Leadership in education for students experiencing disability.

In addition to their roles as accessibility stewards, this group offered expertise on the legislative, operational, and financial feasibility of barrier removal.

Members included:

Brian Baker, *Senior Legal Counsel* — Special Education
Heidi Bertman, *Project Manager* — Office of School Modernization
Chris Burns, *Assistant Principal* — Pioneer Special School Program
Tricia Curley, *Assistant Director* — Special Education
Maria Gianotti, *Assistant Director* — Special Education
Dani Ledezma, *Senior Advisor* — Superintendent's Leadership Team
Steve Simonson, *Project Manager* — Office of School Modernization
Noelle Sisk, *Family Engagement Specialist* — Special Education
Claire Skelly, *Assistant Director* — Special Education
Jen Sohm, *Project Manager* — Office of School Modernization
Rebecca Winn, *Code Compliance Manager* — Projects & Construction

The task force met individually with the project liaison in May 2020. Each stakeholder was tasked with developing four transition frameworks. Initial drafts of this transition plan, including the draft posted for public comment, were developed around these frameworks.

Engagement: District Stakeholder Summary

Multiple stakeholders indicated main-level accessibility as their highest priority, specifically main-level accessibility in multi-level schools without elevators. Several respondents further detailed the minimum requirements of this approach: access to the cafeteria, gymnasium, library, classrooms, and restrooms are critical for this approach to be functionally meaningful.

Many stakeholders reinforced a systems approach to program accessibility. Examples include equitable program access for students across the District, including core curriculum as well as specialized student groups or clubs and educational areas such as STEAM, Maker Spaces, and Career Technical Education. Geographical considerations come into play with this approach, as well.

Stakeholders ranked multi-level access, accessible parking, playgrounds, and SPED classroom improvements as priorities but secondary to universal design considerations around the building entrance and essential functions. Notably, elevators did not appear until the third priority.

Five salient frameworks to accessibility emerged across stakeholders. Each is detailed below.

Stakeholder Framework One

Main-level accessibility. This framework would provide accessibility improvements to the ground level, including portions of the site necessary to reach the main entrance from the bus or drop-off area, the main entrance, and access to essential programming. Here, "essential programming" includes an individual's classroom(s), the cafeteria, library, and gym, in addition to one or more accessible restrooms.

This framework may require administrators to schedule programming for individuals with disabilities in multi-level buildings without elevators. In addition to instructional programming, sensitivity to school-club placement and other extracurricular activities must be observed.

The advantage of this framework is its economy and relative speed to implement District-wide. By omitting elevators — far and away, the most costly accessibility improvement — the District's accessibility budget could reach many more schools.

To be sure, the operational challenges this approach may present to building administrators should not be underestimated. Consider a middle school student in a multi-level K-8 building

without an elevator. While classrooms at the elementary level are, for the most part, interchangeable, differences become exaggerated in later grade levels. An eighth-grade science classroom has little in common with an eighth-grade English classroom, for instance.

Stakeholder Framework Two

One Accessible School at Each Configuration, per Cluster. Portland Public Schools consists of, among other programs, eight "clusters" or pathways from kindergarten to graduation based on a student's home address or election to a focus option program. Aging through a cluster follows a specific sequence of schools. The framework discussed here would ensure that a student with a disability could remain, if not within their neighborhood school, at least within their cluster.

This framework addresses full accessibility but does not optimize geographic distribution. As currently imagined, schools designated for improvements are the most affordable options, typically because they do not require elevators.

Stakeholder Framework Three

Title I First. Schools with large concentrations of low-income students receive supplemental federal funds to meet students' educational goals. This program is known as Title I. During the 20/21 school year, 24 schools qualified for Title I support. The location of these schools corresponds to a high degree to Portland's historically under-served and historically Black neighborhoods.

While not directly associated with disability, Title I indicators correlate with disproportionately higher percentages of disability in the United States. According to the Centers for Disease Control and Prevention, one in four Black Americans has a disability, while three in ten Indigenous Americans have a disability, compared with one in five for White Americans.[3] Indeed, Black and Indigenous Americans are more likely than Non-Hispanic Whites to have a disability in every age group.

Race, poverty, and disability overlap in complex, cumulative ways in the United States, compounding existing racial disparities in our society. Children living in poverty are more likely to have asthma, chronic illness, and environmental trauma such as lead poisoning, learning problems, and low birth weight leading to disabilities.[4] Moreover, those experiencing poverty are less able to treat disabling conditions and mitigate their impact. While the reasons for this are complex, limited access to high-quality medical care and early intervention certainly exacerbate many conditions.[5]

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[3] Centers for Disease Control and Prevention. https://www.cdc.gov/ncbddd/disabilityandhealth/materials/infographic-disabilities-ethnicity-race.html
[4] Woolf, SH, Aron, L., Laudan, Dubay, L. Simon, S.S., Zimmerman, E. Luk, K.X. (2015) How Are Income and Wealth Linked to Health and Longevity? http://www.urban.org/sites/default/files/alfresco/publication-pdfs/2000178-How-are-Income-and-Wealth-Linked-to-Health-and-Longevity.pdf
[5] Pokempner, Jennifer and Roberts, Dorothy E. (2001), "Poverty, Welfare Reform, and the Meaning of Disability"

Our schools are critical institutions in Portland neighborhoods. Creating environments that elevate the health, dignity, and independence for all students — but with particular consideration for those from communities in the long shadow of systemic racism — reinforces Portland Public Schools' role as vital neighborhood centers.

Stakeholder Framework Four

Focus Option Programs. In addition to neighborhood schools, the District supports several focus option programs ranging in emphasis from environmental science to the arts. The curriculum for each of these programs is unique, and so unlike neighborhood program curriculum — replicated throughout the District — admission to a focus option program is an unparalleled opportunity.

For this reason, focus options programs present a challenge to many of the accessibility frameworks described above. No transportation solution exists for a student experiencing a disability and hoping to attend a focus option program in an inaccessible building. Therefore, prioritizing accessibility for sites with focus option programs should be distinctly considered in this transition plan.

Stakeholder Framework Five

Elevators at Buildings with Multi-level Programming. This approach would be tantamount to full accessibility at buildings with multi-level programming. Where second and third floors are accessible, accessible restrooms must be provided, in addition to an accessible route from and including the main entrance to the elevator access.

The logistical and financial challenges of this approach cannot be overstated. Recent (2020) elevator installations have ranged from $800,000 to $1.5 million. At a minimum, construction is invasive and can only occur during the summer recess. Indeed, elevators are significant building modifications: adding an elevator to an existing building's interior is essentially inserting a structural core into an existing structure.

The additional structural benefit of adding an elevator is worth further discussion. When concrete, as opposed to metal studs, is used to construct elevator shaft walls, they can reinforce buildings against lateral movement, improving seismic performance. While not alone a seismic solution, it can be a significant step toward seismic safety, especially when combined with other building updates such as roof-replacements. The District will make every effort to coordinate elevator installations with other significant building modifications.

2020 Bond Development

As mentioned above, Portland Public Schools Board of Education developed and referred the 2020 School Bond, Measure 26-215, to the November 2020 ballot in parallel with the

development of this transition plan. As main-level accessibility District-wide emerged as the salient framework of this transition plan, the Board of Education included support for this transition framework in the final Bond referral.

Community engagement subsequent to the Bond referral used main-level accessibility as a starting place. Questions remained around the sequencing of schools within this framework as well as later phases of the transition plan. A summary of community input on these questions is detailed below.

Engagement: Community

Continued public review and input are critical to the success of this transition plan; the proposed frameworks described here were discussed and further detailed in collaboration with the disability community. During the transition plan development, outreach was supported by **FACT Oregon** and **Community Vision** — two organizations with close ties to the disability community. Outreach included a series of virtual town halls structured around District accessibility priorities as well as a public review draft of the transition plan, posted to the District's website with a comment form.

The comment period for the draft transition plan closed on September 18, 2020, after being open for ten weeks and collecting 21 comments. Many respondents identified academic supports in a virtual learning environment as their highest priority. The orientation of this transition plan is toward architectural barrier removal and, as such, can offer little support on this score. The virtual learning environment was challenging for the District and our community on many levels. The unpredictable, ever-evolving nature of the pandemic challenged generalizations from month to month and week to week, eluding wide-reaching and straightforward solutions. For details on the District's approach to virtual learning and supports offered during the coronavirus pandemic, please see pps.net/Page/15080.

Engagement: Virtual Town Halls

In addition to the public comment on the transition plan, the District hosted three virtual town halls between July and August 2020. The town halls included a brief overview of work on the transition plan completed to date, followed by an open forum for community members to voice their concerns, ask questions, and advocate for transition approaches. Each town hall was recorded and posted, together with meeting notes, to pps.net/accessibility.

Community feedback largely validated the approach foregrounded by the transition plan task force and carried in the 2020 Bond. Main-level accessibility is a logical and necessary first step in full accessibility; community voice largely echoed District staff and Board of Education support for this transition framework.

One important caveat regarding future planning, repeated in all town halls, was the need to reach out to the community again before committing to future phases. Accessibility investments beyond Phase II presented in this plan are therefore subject to further input, and possible revisions, from the District's disability community. Nonetheless, for the sake of completing a comprehensive plan, community members identified elevators in middle schools as priority investments, then elevators in elementary schools.

Beyond outlining phasing options, community members elevated aspects of accessibility where federal guidelines are anemic or silent altogether. Examples include the minimum size of restrooms, playgrounds and play equipment, acoustics and speech intelligibility, and, most broadly, building access.

While the orientation of this transition plan is necessarily toward the District's federal obligation, the disability community clearly articulated the need to exceed or supplement federal guidelines in the areas discussed above. To this end, the District is pursuing supplemental standards, informed by and developed in collaboration with the disability community, to be incorporated into the District's guiding documents. By foregrounding accessibility across these documents, we seek a culture that privileges inclusion over the architectural status quo.

Beyond Federal Requirements

In the ADA, the term "disability" means, with respect to an individual:

- a physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- a record of such an impairment; or
- being regarded as having such an impairment.

Notably, disability cast in this light includes many invisible disabilities. While meeting our legislative requirement, the mitigation of architectural barriers offers little support for individuals experiencing post-traumatic stress disorder, peripheral neuropathy, or autism, to name just three examples.

Universal Design and Trauma-Informed Design are practical guidelines to protect the physical and emotional health of our community. These guidelines are broader than those of accessible design and barrier-free design. While the orientation of this transition plan is toward barrier removal, the District's forthcoming Ed Specification[6] will outline specific requirements for the built environment rooted in Universal and Trauma-Informed Design principles.

At their best, our schools gather students and educators together both materially and symbolically in relation to each other and themselves. People with diverse abilities must see a

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[6] Facilities & Asset Management / Education Specifications

place for themselves in our schools. To be sure, space is not a mute setting for life but rather an active agent in staging meaningful interaction critical for the wellbeing of our students and community.

IMPLEMENTATION OVERVIEW

Plan Timeline and Phases

Based on a 20-year implementation schedule, this transition plan is broken into four phases. Each phase identifies specific sites to focus investments, creating a holistic, accessible educational opportunity within a reasonable period and with available District resources.

The District will make every effort to accelerate the timeline presented here. The proposed timing of the phases is an estimate made in the absence of information on critical variables.

What's more, the District's accessibility community has emphasized ADA is only one component of larger accessibility outcomes. There are many other critical accessibility improvements that go beyond ADA compliance. Accessible playgrounds for all children to play and socialize, restrooms adequately sized for student and staff needs, and classroom acoustics to support auditory and sensory processing disorders are just 3 examples of critical accessibility improvements that are inadequately addressed in ADA.

Staff believe a narrow focus on compliance jeopardizes timely improvements of high-priority accessibility needs not specifically outlined in federal guidelines. The proposed ADA Transition Plan timing affords the District the opportunity to have a thoughtful discussion with the accessibility community, over the course of many years, about how best to weave together strict ADA compliance with a broader view of accessibility.

Overall Phasing

FY 2021 - 2023 **Phase I**
FY 2024 - 2026 **Phase II**
FY 2027 - 2033 **Phase III**
FY 2034 - 2041 **Phase IV**

Phase I

Main-level Accessibility: Title I, CSI/TSI[7], and Focus Option

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[7] Comprehensive Supports and Interventions/Targeted Supports and Interventions. CSI schools are high schools with an overall 4-year graduation rate less than 67 percent, among other indicators. TSI schools are identified by achievement indicators by student group.

Phase II

Main-level Accessibility: District-wide

Phase III

Multi-level access: MS/K-8s, Title I, CSI/TSI, and Focus Option

Phase IV

Multi-level access: District-wide

Barrier Removal Schedule

Appendix D is the framework for the continuous improvement of District facilities and the ongoing record of barrier removal for the District's facilities. It details the physical barriers documented through the Self-Assessment described above. The *phase* tab associated with each barrier identified corresponds with the phased implementation schedule outlined above.

The District's ADA Coordinator will update Appendix D as the District either removes barriers or finds programmatic solutions to eliminate or mitigate barriers. Contact the ADA Coordinator for the most current status of barrier remediation (accessibility@pps.net).

Implementation

Successful implementation of this transition plan requires many people across several departments within Portland Public Schools. The District's ADA Coordinators will develop a work plan coordinated with the funding amount allocated in the 2020 Bond. The amount designated in this Bond is committed to phase I and II frameworks, i.e., main-level accessibility District-wide.

Further alignment with the District's future capital plan will follow Phase II implementation. The District's ADA Coordinators will maintain the phased structure above but seek meaningful overlap with other capital improvements. Modernization is one example of such an overlap. When a school is fully modernized, all barriers are mitigated, and universal design is practiced where ever possible.