city of CINCINNATI
Interdepartmental Correspondence Sheet

Date: April 6, 2021

To: Paula Boggs Muething, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *L S*

Copies to: Internal Audit Committee
Christopher A. Bigham, Assistant City Manager
John S. Brazina, P.E., Director of Transportation and Engineering

Subject: **Pedestrian Safety Program Audit**

Attached is the Department of Transportation and Engineering's Pedestrian Safety Program audit report. The primary objectives of this performance audit were to determine if the Pedestrian Safety Program operates with maximum efficiency and effectiveness, and to assess if the program effectively prioritizes and implements infrastructure improvements to enhance pedestrian safety.

We would like to thank the management and staff of the Department of Transportation and Engineering for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

Pedestrian Safety Program Audit

April 2021

Lauren Sundararajan, CFE
Internal Audit Manager

Ann Herzner
Senior Internal Auditor

Table of Contents

Executive Summary

Internal Audit (IA) conducted a performance audit of the Pedestrian Safety Program within the Department of Transportation and Engineering (DOTE). The primary objectives of this audit were to determine if the Pedestrian Safety Program operates with maximum efficiency and effectiveness, and to assess if the program effectively prioritizes and implements infrastructure improvements to enhance pedestrian safety.

The Pedestrian Safety Program plays a vital role in the improvement of safety for the City of Cincinnati's (City) most vulnerable street users – pedestrians. The program is responsible for enhancing pedestrian safety by making improvements to neighborhood business districts, school zones, and recreation centers.

The audit revealed several opportunities for strengthening the internal controls governing the program. IA found there is no written policies and procedures to show how the program properly executes its goals and initiatives. A lack of documentation prohibits the program's efficiency and creates inconsistencies in the execution of project functions. Also, IA found that the program manager's responsibilities are not well-defined. To ensure reasonable governance over the program, documentation of key responsibilities is necessary to ensure accountability.

Additionally, IA found there is no long-term pedestrian safety plan in place. Developing and implementing a long-term pedestrian safety plan will create a vision and long-term goals for the program to properly identify and improve pedestrian safety for all City neighborhoods. Also, the process used to assess pedestrian safety requests needs improvement. Department files lacked key documentation and old data was used to assess specific requests. Maintaining proper documentation and relying on current data is necessary to ensure transparency and accurate decision making for the program.

Finally, the components that make up a Vision Zero commitment need to be expanded. Nine elements were identified that contribute to a strong commitment, and without properly adopting all components, the program will not maximize its efficiency and effectiveness.

To strengthen the internal controls over the program, the following should be incorporated: establish and document policies and procedures pertaining to program operations and internal processes, define the role and responsibilities of the program manager, adopt a long-term pedestrian safety plan that identifies goals, actions, and milestones to improve the safety and quality of life for all pedestrians, maintain all supporting documentation in files, utilize current pedestrian safety data when evaluating requests, and expand upon all components that make up a strong Vision Zero commitment. Implementing these recommendations will ensure the program exercises proper internal controls over key processes while enhancing pedestrian safety for everyone.

I. Introduction

Background

In 2017, City Council allocated $500,000 from the capital budget for a Pedestrian Safety Program. The program was designed to construct pedestrian safety and traffic calming needs throughout the City. This was accomplished primarily through the feedback received from the neighborhood councils.

As the program grew, it expanded its role and adopted new strategies to tackle pedestrian safety**.** In 2019,[1] the Pedestrian Safety Program adopted the Vision Zero philosophy. Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries. It was first implemented in Sweden in the 1990s and has gained momentum in cities across the United States as a tactic for increasing pedestrian safety awareness.[2]

After Vision Zero was adopted, a Vision Zero website was created to solicit feedback from communities through the use of online surveys, and view crash data through an online dashboard created by the Office of Performance and Data Analytics (OPDA). Additionally, a two-year Vision Zero plan was created, and subsequently, the Pedestrian Safety Program began referring to itself as the Vision Zero program.

The program's capital budget is broken down by fiscal year (FY) in *Figure 1* below. None of the funds listed were financed with resources from the General Fund 050.

	FY2018	FY2019[3]	FY2020	FY2021
Amount	$500,000	$1,000,000	$750,000	$750,000

Figure 1: Pedestrian Safety Program Budget

The program is managed by one person, who relies upon internal staff for assistance with program operations. This program manager is responsible for assessing all incoming pedestrian safety requests and concerns. This information is received through a variety of venues, and IA has identified a few below:

- Neighborhood councils
- Cincinnati Area Geographic Information System (CAGIS) mapping
- Emails or phone calls to elected City officials
- Online surveys
- Social media

[1] *Council Item 201900070*.
[2] https://visionzeronetwork.org/about/what-is-vision-zero/.
[3] *Ordinance No. 0047-2019* appropriated an additional $500,000 to the FY2019 "Pedestrian Safety Improvements" capital account for a program total of $1,000,000.

Audit Selection
IA conducted this audit in accordance with the current Audit Work Plan.

Audit Objectives
To determine if the Pedestrian Safety Program operates with maximum efficiency and effectiveness, and to assess if the program effectively prioritizes and implements infrastructure improvements to enhance pedestrian safety.

Audit Scope and Methodology
To achieve the audit objective, IA interviewed relevant staff members, compared current practices to relevant City policies and industry standards, benchmarked other cities' pedestrian safety programs or plans, and examined data and files. Records reviewed included FY2019 - FY2020.

Statement of Auditing Standards
As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure the conformance with applicable GAGAS. IA performed the fieldwork between November of 2020 to January of 2021.

Commendations
IA commends the staff of the Department of Transportation and Engineering for their cooperation throughout the audit.

II. Audit Findings and Recommendations

Policies and procedures governing the Pedestrian Safety Program have not been established and documented.

Policies and procedures are key components of an internal control structure. Policies are designed to provide direction to staff on how to properly manage a particular function. Procedures provide employees with instructions on how to carry out the day-to-day activities. IA found the Pedestrian Safety Program has no written policies and procedures pertaining to program operations and internal processes. The lack of written policies and procedures can prohibit efficiency and create inconsistencies in the execution of project functions.

For example, the program has instituted three performance goals which include: reduce the number of fatal and severe crashes, decrease the total number of pedestrian crashes, and increase the community perception of feeling safe and comfortable over time. To achieve the program goals, the program manager works with multiple departments and City employees to obtain key data, review crash reports, monitor online surveys and respond to City Council requests. These internal processes, including the goals previously mentioned, are not documented in a policy and procedural manual to illustrate how the program manager effectively achieves the organization’s objectives while performing her duties on a continuous basis.

Recommendation 1: Establish and document policies and procedures pertaining to program operations and internal processes.

Department Response: Agree. The Program Manager will draft policies and procedures for senior management review. The draft will be available by July 30, 2021.

The role and responsibilities of the program manager are not well-defined.

The program manager is responsible for a variety of initiatives to ensure the program operates effectively. Some of these tasks are delegated to internal employees whereas other tasks are performed by the program manager. As the program continues to expand, IA found the program manager’s responsibilities are not well-defined. To ensure accountability and proper governance over the entire program, senior management’s expectations need to be documented.

Recommendation 2: Define the role and responsibilities of the program manager to ensure the program operates effectively.

Department Response: Agree. The Program Manager will draft roles and responsibilities for senior management review. The draft will be available by July 30, 2021.

DOTE does not have a long-term pedestrian safety plan.

Identifying safety issues and trends in City neighborhoods is critical for enhancing pedestrian safety. After careful review of the program’s operations, IA found there is no long-term pedestrian safety plan. IA benchmarked cities from around the country that have comprehensive pedestrian safety plans in place. These plans involve collaboration with other departments, civic organizations, and outside entities to create a vision, and establish goals with recommendations on how best to improve pedestrian safety in their respective cities. Developing a long-term pedestrian safety plan that identifies the root cause of pedestrian safety in neighborhoods and presents long-term solutions, will allow the program to operate with maximum efficiency.

Recommendation 3: Adopt a long-term pedestrian safety plan that identifies the goals, actions, and milestones necessary to improve the safety and quality of life for all pedestrians throughout the City.

Department Response: Agree. DOTE does not currently have the in-house staff resources or budget to develop and implement a long-term plan. The program as it exists today was developed to respond to community priority requests and implement small-scale solutions within a 12-18-month timeframe. However, if additional staff and funding are dedicated to the program in the future, DOTE will work toward developing a more proactive, long-term plan.

The process used to assess pedestrian safety requests needs improvement.

The program manager annually solicits pedestrian safety requests from neighborhood councils with guidelines about which projects may be requested. When a pedestrian safety request is submitted to the program manager[4], an internal review is initiated and a scorecard may be created where points are awarded based upon certain criteria.[5] This point system was created to prioritize requests since program funding and resources are limited each year. Out of 100, a low score means the request is *unlikely* to be funded whereas a score closer to 100 is *likely* to be funded by the program.

IA sought to verify the number of points awarded for 37 scorecards created for FY2019, and determined the points could not be verified, because all supporting documentation is not maintained. Not maintaining adequate supporting documentation prohibits a third party from determining if the program effectively prioritizes and implements infrastructure improvements. Additionally, IA found old data[6] for scorecard criteria 7 and 8 (Actual Speed of Traffic and or Vehicular Volume) was used when assessing 11 (30%) of 37 scorecards. This increases the risk of inaccurate data (being factored into scorecards) when it does not reflect current traffic patterns.

Recommendation 4: DOTE should maintain all supporting documentation with each scorecard file to ensure the points awarded to each project can be verified and the project selected can be substantiated.

Department Response: Agree. Going forward the Program Manager will record all relevant supporting data in a spreadsheet.

Recommendation 5: When current data is unavailable, DOTE should take this into consideration when evaluating and scoring pedestrian safety requests due to changes in traffic patterns.

[4] It is important to note that pedestrian safety requests are not limited to neighborhood councils; outside entities may participate in the process if they have a specific request, as shown on the Pedestrian Safety Project scorecard.
[5] See Appendix A – Pedestrian Safety Project Scorecard.
[6] Data used for the Pedestrian Safety Project Scorecard criteria identified by IA ranged from 2005 – 2010.

Department Response: Agree. When current data is unavailable, DOTE does take this into consideration. Staff considers the likelihood of whether or not the data may have changed based on known changes in land use, new development etc., and uses professional judgement to make an assumption regarding current traffic patterns.

Interdepartmental coordination efforts need improving.

The program manager and a team of engineers are responsible for reviewing the scorecards to determine if the number of points awarded will increase the likelihood of the request receiving funding. Although the team has years of experience in engineering and planning, IA found that when key data is not available to fulfill the scorecard criteria, the team's professional judgement is used. DOTE does not include employees from outside the department, such as the Cincinnati Police Department (CPD) or the Cincinnati Recreation Commission (CRC), in these discussions. However, CPD and CRC employees' observations and knowledge from working in City neighborhoods could be useful for making decisions when key data is absent.

Recommendation 6: Implement a policy to involve employees from outside of DOTE to be involved in the scorecard process.

Department Response: Agree. DOTE uses the design team approach. DOTE currently coordinates with CRC on requested improvements adjacent to CRC facilities. DOTE has also begun meeting regularly with CPD. This design team approach will be documented in the program's roles and responsibilities of Recommendation 1.

The community is not notified when a pedestrian safety request has been completed.

When a pedestrian safety request has gone through the scorecard process and is selected for completion, the work is either performed internally by DOTE, the Department of Public Services, or contracted to an outside organization. Regardless of the agency assigned to complete the work, IA found the community is not notified when a pedestrian safety request has been completed. Enhancing the communication between the program and the City neighborhoods is critical for maintaining transparency and program efficiency.

Recommendation 7: Notify neighborhood councils when a pedestrian safety request has been completed.

Department Response: Disagree. DOTE will notify neighborhood councils when a project has been selected for funding and will share an approximate construction date. Notifying councils that a project has been constructed is an inefficient use of staff time and resources due to the large number of projects in a given year.

Pedestrian data poses limitations for efficient processing.

When assessing pedestrian safety scorecards, the program manager relies upon a variety of databases and websites to review the location of the request. These systems pull data from both internal and external sources and is maintained in several locations. Because the systems do not synchronize, the process of obtaining the required data is cumbersome and inefficient. Therefore, in order for the program manager to effectively oversee, prioritize, and rank pedestrian safety projects, the data should be centralized to ensure it is easily accessible. This will allow the program to organize its data in a way that improves decision-making and enhances pedestrian safety services.

Recommendation 8: DOTE should address the limitations posed by the data and determine if the systems have the capability to synchronize to improve program efficiency.

Department Response: Agree. DOTE will investigate to determine if streamlining or synchronization is possible. The Program Manager will report to Senior Management by September 30, 2021.

DOTE does not analyze pedestrian incidents and survey data on a continuous basis.

The City allows pedestrians the opportunity to report incidents (also referred to as close calls) and safety information to two separate websites maintained by CAGIS.[7],[8] These self-reporting websites provide useful information to the program manager about safety trends and behavior in City neighborhoods. IA found DOTE does not analyze the data collected from these websites on a continuous basis to determine if pedestrian safety trends are developing. Instead, the information is reviewed once it is received, and possibly a second time if requested for the scorecard process.

According to New Jersey Safe Routes to Schools Resource Center, studying pedestrian incidents/near-miss data is important for understanding pedestrian behavior. In their study, the authors found "near-miss data may be more predictive of future pedestrian-vehicle conflict at certain locations" which could "prevent serious pedestrian injury or death…"[9] Putting forth the time and effort on a continuous basis to analyze the data is necessary for identifying pedestrian behavior and trends at specific locations.

Recommendation 9: Analyze the data on a routine basis to ensure the program is keeping abreast of pedestrian safety trends in City neighborhoods.

Department Response: Agree. Effective immediately the Program Manager will schedule a quarterly review of crash and near miss data. This task will be documented in the program's roles and responsibilities of Recommendation 1.

DOTE needs to expand upon the elements that make up a Vision Zero commitment.

When the City adopted the Vision Zero philosophy in 2019, several elements were incorporated. These elements included receiving public support from elected officials, tracking pertinent data, and soliciting community feedback through neighborhood councils and online surveys.

However, IA found some of the initiatives adopted by the program can be expanded. For example, according to the website www.visionzeronetwork.org, there are nine components that make up a strong Vision Zero commitment. These components are identified in *Figure 2* below.

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[7] Pedestrian Safety Incident Website https://cagismaps.hamilton-co.org/csr/cincinnati/.
[8] Pedestrian Safety Survey http://cagisonline.hamilton-co.org/pedsafetysurvey/.
[9] Catherine B. Bull, MCRP et. al, *Predictable is Preventable: Tracking Pedestrian Near-miss Incidents* (New Brunswick, NJ: New Jersey Safe Routes to Schools Resource Center, 2016), 8.

Political Commitment	Highest-ranking officials make official and public commitment toward a Vision Zero goal to achieve zero traffic fatalities and severe injuries among all road users within a set timeframe. This should include the passage of a local policy laying out goals, timeline, stakeholders, and a commitment to community engagement, transparency, and equitable outcomes.
Multi-Disciplinary Leadership	An official city Vision Zero Taskforce (or Leadership Committee) is created and charged with leading the planning effort for Vision Zero. The Taskforce should include, at a minimum, high-ranking representatives from the following local departments: Office of the Mayor, Police, Transportation (or equivalent), and Public Health. Other departments to involve include Planning, Fire, Emergency Services, Public Works, District Attorney, Office of Senior Services, Disability, and the School District.
Action Plan	A Vision Zero Action Plan (or Strategy) is created within one year of initial commitment [by leadership team]. The plan is implemented with clear strategies, “owners” of each strategy, interim targets, timelines, and performance measures.
Equity	City stakeholders commit to both an equitable approach to Vision Zero by establishing inclusive and representative processes, as well as to equitable outcomes by ensuring measurable benchmarks to provide safe transportation options for all road users in all parts of the city.
Cooperation and Collaboration	A commitment is made to encourage meaningful cooperation and collaboration among relevant governmental agencies and community stakeholders to establish a framework for multiple stakeholders to set shared goals and focus on coordination and accountability.
Systems-Based Approach	City leaders commit to and prioritize a systems-based approach to Vision Zero – focusing on the built environment, systems, and policies that influence behavior – as well as adopting messaging that emphasizes that these traffic losses are preventable.
Data-Driven	City stakeholders leading Vision Zero efforts commit to gather, analyze, utilize and share reliable data to understand traffic safety issues and prioritize resources based on evidence of the greatest needs and impact.
Community Engagement	Opportunities are created to invite meaningful community engagement, such as select community representation on the Taskforce, broader community input through public meetings, or workshops, online surveys, and other feedback opportunities.
Transparency	The city’s process is transparent to city stakeholders and the community, including regular updates on the progress of the Action Plan and performance measures, and a yearly report to local governing boards (e.g. City Council).

Figure 2: Nine Elements that Make a Strong Vision Zero Commitment

One area that can be expanded is developing a multi-task leadership team (aka taskforce). This taskforce can serve in an advisory capacity and provide professional input to enhance pedestrian safety.

Another area that can be expanded is transparency. Providing a yearly report to City Council with updates on program goals, operations, and specific projects is critical to enhancing the Vision Zero commitment and maintaining consistency.

Recommendation 10: DOTE should expand upon the elements that make up a strong Vision Zero commitment.

Department Response: Agree. DOTE will expand transparency by providing an annual report to City Council and posting the report on the Vision Zero webpage. The report will be completed by Q2 of the following FY. If additional staff and funding are dedicated to the program in the future, DOTE will expand on additional elements.

Additional management review and oversight is needed.

According to the Standards for Internal Control in the Federal Government, "The oversight body is responsible for overseeing the strategic direction of the entity and obligations related to the accountability of the entity. This includes overseeing management's design, implementation and operation of an internal control system."[10] IA found senior management is not providing sufficient oversight over the Pedestrian Safety Program. At a minimum, senior management should oversee the program's adoption of a policy and procedural manual, define the role and responsibilities of the program manager, and ensure a long-term pedestrian safety plan is created and implemented. Applying these internal controls will allow senior management to properly monitor the program and achieve efficiency.

Recommendation 11: Additional senior management review and oversight should occur on a continuous basis to ensure program efficiency and effectiveness.

Department Response: Agree with the idea of review and oversight. Disagree that additional review and oversight is needed. Senior management currently meets with the Program Manager on a weekly basis. Senior management will review and provide feedback on draft policies/procedures, and roles/responsibilities by August 31, 2021.

There is no succession planning for the position of program manager.

Succession planning is the process of identifying alternative personnel who have the skills to fulfill the duties of the organization's primary positions. This entails documenting current processes to allow for a seamless transition of personnel in case of one's departure. Currently, the position of program manager is responsible for creating, implementing, and executing the program's goals and processes. In the event this employee departs from public service, it is imperative that the fundamental components of her position are documented and shared with a successor in effort to ensure business continuity of the program.

Recommendation 12: Develop a succession plan for the position of program manager.

Department Response: Agree. The creation of the documents requested in this audit will help senior management to develop a succession plan. The plan will be approved by the Division Manager by December 31, 2021.

[10] GAO-14-704G Federal Internal Control Standards.

III. Conclusion

The Pedestrian Safety Program is responsible for improving the safety of Cincinnati's most vulnerable street users, pedestrians. The program works with the communities to make improvements to school zones, recreation areas, and neighborhood business districts while enhancing the quality of life for everyone.

The audit revealed several opportunities for improvement over the internal control structure. For example, there are no written policies and procedures, the role and responsibilities of the program manager have not been well-defined, department files lacked key documentation, and outdated data was used to assess specific requests. Additionally, the program has not developed and implemented a long-term pedestrian safety plan, and the components that make up a Vision Zero commitment need to be expanded.

To strengthen the internal controls over the program, the following recommendations should be incorporated: establish and document policies and procedures pertaining to program operations and internal processes, define the role and responsibilities of the program manager, adopt a long-term pedestrian safety plan that identifies goals, actions, and milestones to improve the safety and quality of life for all pedestrians, maintain all supporting documentation in files, utilize current pedestrian safety data when evaluating requests, and expand upon the components that make up a strong Vision Zero commitment. Implementing these recommendations will ensure the program exercises proper internal controls over key processes while enhancing pedestrian safety for everyone.

IV. Department of Transportation and Engineering Response

To date, the Pedestrian Safety Program has been a reactive program due to staffing and funding resources. DOTE agrees that this audit reveals several opportunities for improvement but, also, defines the framework for improvement. To complete all the recommendations in the audit, additional staffing and funding is needed.

DOTE is thankful for IA's cooperation and help throughout this audit.

Recommendation 1: Establish and document policies and procedures pertaining to program operations and internal processes.

Department Response: Agree. The Program Manager will draft policies and procedures for senior management review. The draft will be available by July 30, 2021.

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V. Appendix A - Pedestrian Safety Project Scorecard

Pedestrian Safety Project Scorecard

Name of intersection:____

Neighborhood: ____

	Factors	**Score**	**Notes**
1	Pedestrian crashes • 1 crash = 10 points • 2+ crashes = 20 points		
2	Pedestrian incident reports for this location (up to 2 points)		
3	Adjacent to school, playground, recreation center, university, institution, social service agency, high ped generator (up to 10 points)		
4	Adjacent to elderly housing (up to 5 points)		
5	Adjacent to bus stop (up to 5 points)		
6	Number of travel lanes • 2 = 2 points • 2 with median or TWLTL = 1 point • 3 or 4 = 3 points • 4 with median or TWLTL = 2 points • 5 or 6 = 0 points		
7	Actual speed of traffic • <25 = 0 points • 25-30 = 2 points • 31-35 = 5 points • 36-40 = 2 points • >40 = 0 points		
8	Vehicular volume • 0 - <3k = 0 points • 3 - <9k = 3 points • 9 - <12k = 4 points • 12 - <15k = 5 points • >15k = evaluate case by case		
9	Visibility issues • Requesting “new” marked crosswalk = up to -10 points • At existing marked crosswalk = up to 10 points		
10	Closest signal over 400 ft away (up to 5 points)		
11	Project origination • Community Council, CPS, UC = 3 points • DOTE staff = 2 points		