

Subrecipient 18-Month Compliance Check Standard Operating Procedures (SOP)

Local Governments that receive a preliminary satisfactory **"Green" status** through the immediate on-screen notice upon completion of Survey I, will be provided with instructions to proceed with Survey II. Please note that responses to Survey II are assessed for completeness and level of sufficiency. Responses must be sufficient to retain the green status. If Survey II is completed within the designated time period of two-weeks, and the Local Government retains a green status, the Local Government will be required to complete Survey III at the end of the 36-month period instead of the 18-month period.

When a **"Yellow" or "Red" status** results upon completion of ADA Subrecipient Compliance Survey I, Subrecipients must complete Survey III at the end of the designated 18-month period as identified in the ADA Subrecipient Technical Assistance Manual (pp. 9 – 13). Subrecipients scoring within either of these categories (Yellow or Red) must also complete ADA Subrecipient Compliance Survey II within the designated two-week period. Upon evaluation of the surveys, the ADA Compliance Specialists (ACS) will send the appropriate letter(s) and the Survey II evaluation results highlighted in a computer-generated ADA Survey II Chart. Subrecipients must:

1. Complete the ADA Subrecipient Technical Assistance Workshop (recorded format, on CIV website) if the Civil Rights ADA Compliance Team does not already have a record of completion.
2. Review the ADA Subrecipient Technical Assistance Manual and prepare questions for upcoming meeting.
3. Take the one-on-one technical assistance training. The ADA Coordinator or designated Subrecipient Point of Contact (POC) or the Subrecipient ADA Team must attend the training.
4. Meet with the Civil Rights ADA Compliance Team (1-2 times during a compliance cycle) to discuss its progress utilizing the ADA Survey II Chart as a guide. The milestones are:
 - 4 to 6-month period: One-on-One Session: review Survey II response (optional)
 - 6 to 9-month period: Milestone Call
5. Provide one narrative report to inform the TxDOT ADA Compliance Team of the Subrecipient's progress. The narrative must be a minimum of five pages and no more than ten pages. The narrative should be submitted no later than:
 - 12-month period: Narrative Report dueThe narrative must also describe with specificity, the efforts and actions the Subrecipients have completed at the designated milestone. Subrecipients must provide supportive documentation along with the report to substantiate the Subrecipients' claims (e.g., Accomplishments & Goals; please see 'Good Faith Efforts' Guidance)
6. Complete the ADA Survey III at the designated time. (See p. 12-13; Appendix G, pp. 58-67).
7. Review the evaluation of ADA Survey III and take corrective action(s) as instructed by the ADA Compliance Specialists.
8. Follow the guidelines in the ADA Subrecipient Technical Assistance Manual.

Subrecipient 18-Month Compliance Check Standard Operating Procedures (SOP)

The ADA Compliance Team will:

1. Review the results of the ADA Subrecipient Compliance Survey I in the SCAT Module to determine Subrecipients with preliminary green, yellow, or red status.
2. Send Subrecipients the appropriate letter related to the ADA Subrecipient Compliance Survey I results.
3. Evaluate the responses provided in the ADA Subrecipient Compliance Survey II located in the SCAT Module. Perform desk reviews and make notations for each Subrecipient.
4. Send Subrecipients the appropriate letter related to the ADA Subrecipient Compliance Survey II results and the "Good Faith Guidance" document.
5. Meet with Subrecipients for one-on-one sessions, upon request.
6. Meet with Subrecipient's ADA Coordinator, designated POC, or Team 1-2 times during a compliance cycle to provide technical assistance, if necessary.
7. Review the Subrecipients' narrative progress reports and input comments, notations, or concerns in the SCAT Module.
8. Evaluate ADA Survey III and provide corrective action recommendations in the ADA Review Follow-up Report of the Subrecipient. (See p. 12-13; Appendix I, pp. 65-67)
9. Follow the guidelines in the ADA Subrecipient Technical Assistance Manual.

Important Notes:

- The required designated, compliance deadline period will not change unless otherwise based on Survey II justification results
- All program timeline periods are relative to the SCAT Phase initiation date. For example, Phase 1 of the SCAT program began on May 1st, 2023 so the "18-Month" period for this phase would be May 1st, 2023 to November 1st, 2024.
- The designated, compliance deadline period for a "red" or "yellow" status is 18 months.
- These Standard Operating Procedures (SOP) allow TxDOT to substantiate the progress of a Subrecipient even though they may have received a "red" or "yellow" score.
- These procedures are beneficial to Subrecipients because it demonstrates commitment to attaining accessibility compliance, and it provides documentation to DOT, FHWA, or any other grant funding agency when TxDOT must confirm or disaffirm accessibility compliance.
- This SOP also applies to Subrecipients receiving a "Green" status should they choose to request technical assistance.
- See the ADA Subrecipient Technical Assistance Manual for additional details