



# Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

January 6, 2021

## **CIRCULAR LETTER 2021-01**

### **IDOT POLICY AND PROCEDURE FOR COMPLETING DELINQUENT NBIS INSPECTIONS DUE TO HARDSHIP**

COUNTY ENGINEERS / SUPERINTENDENTS OF HIGHWAYS  
MUNICIPAL ENGINEERS / DIRECTORS OF PUBLIC WORKS / MAYORS  
METROPOLITAN PLANNING ORGANIZATIONS – DIRECTORS  
TOWNSHIP HIGHWAY COMMISSIONERS  
CONSULTING ENGINEERS

This Circular Letter is to provide information to Local Public Agencies about the policy and procedure IDOT developed to complete delinquent bridge inspections due to hardship.

#### **Issue: Delinquent Inspections of Non-IDOT Maintained Bridges**

##### **History/Purpose**

In 2011, the Federal Highway Administration (FHWA) implemented a data-driven, risk-based approach to oversight of the National Bridge Inspection Program (NBIP) and monitoring State compliance with the National Bridge Inspection Standards (NBIS).

Under this approach, the FHWA assesses 23 compliance metrics, each having direct reference to the NBIS. Metrics 6-11 assess Inspection Delinquencies of Routine Low Risk; Routine High Risk; Underwater Low Risk; Underwater High Risk; Fracture Critical Member; and Reduced Intervals/Damage/In-Depth/Special. The FHWA measures a State's compliance for each metric and assigns it to one of three performance categories: Compliant, Substantially Compliant, and Non-Compliant.

The FHWA has determined the Illinois Department of Transportation (IDOT) to be Non-Compliant for NBIP Metrics 6 and/or 10 in 2011, 2013, 2014, 2015, 2018, 2019, and 2020. In order to receive a Non-Compliance determination for NBIP Metric 6, either less than 90% of the inspections were performed within the interval plus 30 days and/or less than 100% of the inspections were performed within the interval plus 120 days. In order to receive a Non-Compliance determination for NBIP Metric 10, either less than 95% of the inspections were performed within the interval plus 30 days and/or less than 100% of the inspections were performed within the interval plus 120 days. Delinquencies with documented notice to the Statewide NBIS Program

Manager for Illinois and approval from the FHWA are considered legitimate and do not negatively affect the assessment.

After the FHWA determined IDOT was Non-Compliant for NBIP Metrics 6 and 10 in 2018, the FHWA- approved Plans of Corrective Action developed by the Bureau of Bridges & Structures (BB&S) included an Action Item to establish a contract for an on-call consultant to perform inspections as necessary.

After the FHWA determined IDOT was Non-Compliant for NBIP Metrics 6 and 10 in 2019, the FHWA-approved Plans of Corrective Action developed by the BB&S included an Action Item to develop official policy and procedure for the Bridge Management & Inspection (BM&I) Unit to:

- 1) Notify the entity having maintenance responsibility, and their Designated NBIS Program Manager if applicable, of a bridge(s) with delinquent inspection(s);
- 2) Coordinate with the entity having maintenance responsibility, the deployment of IDOT BBS in-house staff or an on-call consultant to perform delinquent inspection(s) after it has been confirmed the entity having maintenance responsibility is (has) experiencing (experienced) a legitimate hardship. Examples of legitimate hardship include but are not limited to the sudden departure of the Agency Designated NBIS Program Manager and no other IL NBIS Certified personnel on staff or short-term health issues for entities with limited staff. Contract negotiation, contract execution, and coordination with a 3<sup>rd</sup> party are examples of non-legitimate reasons for delinquent inspection(s) and won't be considered for hardship.

### **Policy and Procedure for Completing Delinquent NBIS Inspections Due to Hardship**

The intent of this policy and procedure is for the Department to provide limited, short-term assistance to entities with legitimate, and properly documented, hardship. It is not an on-going service provided by the Department at no cost. Furthermore, all entities are encouraged to have contingency plans in place in the event hardship is encountered or the Department resources are not available.

- When the BM&I Unit is notified by the entity having maintenance responsibility, or the Designated NBIS Program Manager if applicable, of a potential/existing hardship which has or will result in delinquent bridge inspection(s), the Statewide NBIS Program Manager for Illinois will review the circumstances related to the potential/existing hardship.

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- Once the potential/existing hardship review is completed, the entity having maintenance responsibility, and Designated NBIS Program Manager if applicable, will receive email notification. If the potential/existing hardship is deemed legitimate, the BM&I Unit will coordinate with the entity having maintenance responsibility, and the Designated NBIS Program Manager if applicable, to perform bridge inspection(s) that is (are) or will be delinquent using IDOT BBS in-house staff or an on-call consultant.
- Once the bridge inspection(s) is (are) completed, the BM&I Unit will enter the information into the Bridge Inspection System (BIS) and provide the bridge inspection report(s) to the entity having maintenance responsibility.

For cases of legitimate hardship, the entity having maintenance responsibility of the bridge(s) requiring inspection will not be accountable for the costs incurred by the Department to perform the inspection(s).

Entities, or their Designated NBIS Program Manager, experiencing repeated or frequent hardship will be monitored by the BM&I Unit and guidance will be provided to correct issues encountered. If the Agency Designated NBIS Program Manager is found to be uncooperative or to have otherwise inhibited the correction of the issues encountered, the Agency Designated NBIS Program Manager's Certification may be revoked until corrective measures are implemented.

Local agencies following this procedure should send requests and documentation to [DOT.BBS.BridgeMgmt@illinois.gov](mailto:DOT.BBS.BridgeMgmt@illinois.gov). Agencies do not have to wait until their inspections are overdue to submit requests. Requests should be sent when agencies become aware there will be a problem. Early submission of requests reduces costs and may provide more options for providing the needed services.

Please direct any questions regarding this policy to Mr. William Beisner, Bridge Management and Inspection Unit Chief, at [DOT.BBS.BridgeMgmt@illinois.gov](mailto:DOT.BBS.BridgeMgmt@illinois.gov).

Sincerely,



George A. Tapas, P.E., S.E.  
Engineer of Local Roads and Streets



D. Carl Puzey, P.E., S.E.  
Engineer of Bridges and Structures

cc: Dan Brydl, FHWA - Illinois Division  
Bryan Smith, Township Officials of Illinois  
Brian Otten, Illinois Association of County Engineers  
Brad Cole, Illinois Municipal League  
Donald Goad, Township Highway Commissioners of Illinois