

# Bi-State Regional Commission ADA Program Access Plan

February 25, 2026





# **Bi-State Regional Commission ADA**

## **Program Access Plan**

**Approved February 25, 2026**



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Rick Dunn, Alderman  
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City of East Moline, Illinois

Sangeetha Rayapati, Mayor  
City of Moline, Illinois

Dennis Gerard, Mayor<sup>3,4</sup>  
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Ashley Harris, Mayor  
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Rock Island County Board

Ross Paustian  
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Administrator, Federal Transit  
Administration – Region VII  
(Alternate: Jeremiah Shuler)

Vershun Tolliver (ex-officio, non-voting)  
Interim Division Administrator  
Federal Highway Administration – Illinois  
(Alternate: Anna Musial)

Vershun Tolliver (ex-officio, non-voting)  
Interim Division Administrator  
Federal Highway Administrator – Iowa  
(Alternate: Sean Litteral)

Stuart Anderson, Director  
Transportation Development Division  
Iowa Department of Transportation  
(Alternate: Hector Torres-Cacho,  
District Transportation Planner)

<sup>1</sup> The Policy Committee voting is restricted to one vote for each voting member. Voting members may authorize an alternate, with the stipulation that alternates of elected officials also be an elected representative of the appropriate jurisdiction.

<sup>2</sup> Chair, Transportation Policy Committee

<sup>3</sup> Vice-Chair, Transportation Policy Committee

<sup>4</sup> The mayors of the cities of Buffalo, Eldridge, LeClaire, Princeton, and Riverdale in the Iowa portion and the cities and villages of Andalusia, Carbon Cliff, Coal Valley, Colona, Hampton, Milan, Oak Grove, Port Byron, Rapids City, and Silvis in the Illinois portion select a representative from their jurisdictions (Iowa and Illinois separately) to represent them on the Policy and Technical Committees.

## Transportation Technical Committee<sup>1</sup>

Brent Morlok, City Engineer<sup>2</sup>  
City of Bettendorf, Iowa

Jeff Reiter, Economic Development Director  
City of Bettendorf, Iowa

Brian Schadt, City Engineer  
City of Davenport, Iowa

Gary Statz, Engineer  
City of Davenport, Iowa

Bruce Berger, Community Planning & Economic  
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City of East Moline, Illinois

Mark Rothert, City Administrator  
City of East Moline, Illinois

Nevada Lemke, City Administrator<sup>4</sup>  
City of Eldridge, Iowa  
(Alternate: Dennis Bockenstedt, LeClaire, Iowa)

Jerry Lebovitz, City Administrator<sup>4</sup>  
City of Silvis, Illinois  
(Alternate: Nick Gottwalt, Carbon Cliff, Illinois)

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City of Moline, Illinois

Laura Klauer, City Engineer  
City of Moline, Illinois

Tanner Osing, Planning and Zoning Manager  
City of Rock Island, Illinois

Mike Kane, City Engineer  
City of Rock Island, Illinois

Scott Stephenson, County Engineer  
Henry County, Illinois

Matt Miller, Public Works Engineer  
Rock Island County, Illinois

Greg Thorpe, Director of Building & Zoning  
Rock Island County, Illinois

Ben Limmer, General Manager  
Rock Island County Metropolitan  
Mass Transit District

Greg Schaapveld, Planning & Development  
Director  
Scott County, Iowa

Angie Kersten, County Engineer  
Scott County, Iowa

Anna Musial  
Federal Highway Administration  
Illinois Division

Sean Litteral  
Federal Highway Administration  
Iowa Division

Jeremiah Shuler  
Federal Transit Administration

Katie Smith  
Illinois Department of Transportation

Hector Torres-Cacho  
Iowa Department of Transportation

<sup>1</sup> The Technical Committee system allows one vote per agency with delegated representative voting permitted in the absence of an agency's listed member. The City of Davenport has three votes. Transit managers for Bettendorf Transit and Davenport CitiBus are invited.

<sup>2</sup> Chair, Transportation Technical Committee.

<sup>3</sup> Vice-Chair, Transportation Technical Committee.

<sup>4</sup> The mayors of the cities of Buffalo, Eldridge, LeClaire, Princeton, and Riverdale in the Iowa portion and the cities and villages of Andalusia, Carbon Cliff, Coal Valley, Colona, Hampton, Milan, Oak Grove, Port Byron, Rapids City, and Silvis in the Illinois portion select a representative from their jurisdictions (Iowa and Illinois separately) to represent them on the Policy and Technical Committees.

NOTE: Additional membership may include advisory representatives from the Illinois and Iowa Departments of Transportation, planning and research engineers from the Illinois and Iowa Federal Highway Administration, and a community planning representative from the Federal Transit Administration Region VII.

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## Introduction

This Americans with Disability Act (ADA) Program Access Plan for the Bi-State Regional Commission fulfils non-discrimination policy requirements toward persons with disabilities for all federally-funded programs under the agency, including, but not limited to:

- Federal Highway Administration (FHWA)
- Federal Transit Administration (FTA)
- Economic Development Administration (EDA)

In addition to this ADA Program Access Plan, Bi-State Regional Commission's *Title VI Program, Plan, and Non-Discrimination Policy* addresses policies and procedures related to non-discrimination. As the Metropolitan Planning Organization (MPO) and an EDA District, Bi-State Regional Commission is a recipient of Federal Highway Administration, Federal Transit Administration, and Economic Development Administration funds. Bi-State Regional Commission for metropolitan transportation receives federal transportation funds administered through the States of Iowa and Illinois Departments of Transportation. EDA funds are received directly from the federal government. As part of these grant agreements, Bi-State Regional Commission agrees to federal certifications and assurances, including ADA.

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# ADA Program Access Plan Basis

## *Background on Bi-State Regional Commission*

Bi-State Regional Commission is a local voluntary organization made up of five counties and 48 municipalities whose mission statement is “To serve as a forum for intergovernmental cooperation and delivery of regional programs and to assist member local governments in planning and project development.” Map 1 illustrates the geographic coverage of Bi-State Regional Commission.

The Bi-State Metropolitan Planning Commission was created in 1966 through the merger of the Scott County (IA) Metropolitan Planning Commission and the Rock Island County (IL) Regional Planning Commission. This merger took place, in part, in response to the Federal Aid Highway Act of 1962 that required transportation planning in metropolitan areas to be done cooperatively. In 1974, the Henry County (IL) Regional Planning Commission merged with Bi-State, at the urging of the U.S. Department of Housing and Urban Development and Henry County's status as part of the three county Metropolitan Statistical Area (MSA), as defined by the Census Bureau. Then in 1976, Mercer County (IL) and Muscatine County (IA) joined Bi-State. Mercer County is currently not a member of Bi-State Regional Commission, but the commission serves a number of communities in this county.

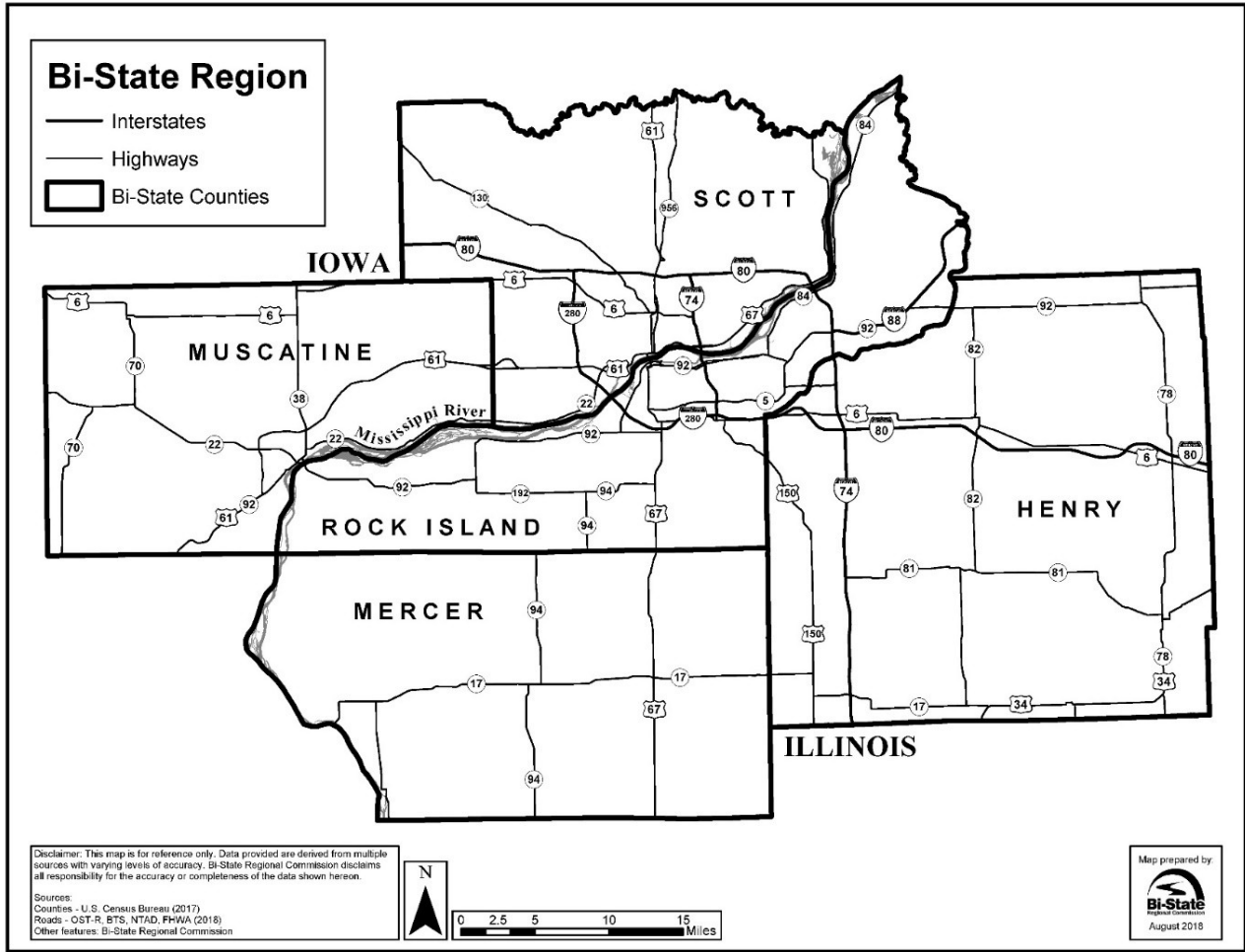
Bi-State Regional Commission is the Metropolitan Planning Organization (MPO) for the Davenport IA-IL urbanized area. Bi-State staff prepare transportation plans for the urbanized area, commonly known as the Quad Cities, Iowa/Illinois. Transportation planning in the urban area is a coordinated and continuing process. Its purpose is to assist communities in the implementation of transportation improvements, both short and long term. This type of planning is required before federal funds can be spent on transportation projects – streets, public transit, or bicycle facilities. Planning before implementation has the added benefit of providing a technical means of prioritizing transportation needs and aligning these priorities with available funding. Roadways, transit, railroads, waterways, airports, trails and intermodal facilities are all considered in the planning process. Local, state, and federal jurisdictions work together to develop planning and programming recommendations for transportation improvements with support from Bi-State staff. In the Quad Cities Urbanized Area, recommendations are considered by the

Transportation Policy Committee composed of chief elected officials of cities and counties, Illinois and Iowa State Departments of Transportation, and the Illinois Quad Cities transit district.

Bi-State Regional Commission is also the Regional Planning Affiliation (RPA) for Region 9 in Iowa. Region 9 transportation planning began in fiscal year 1995 as part of an Iowa effort to provide rural transportation planning statewide. Region 9 covers rural Scott County and all of Muscatine County. Activities are similar to those in the MPO.

As an Economic Development Administration District, Bi-State Regional Commission is charged with annual reporting and five-year planning of the *Comprehensive Economic Development Strategy (CEDS) for the Bi-State Region*. Under this program, Bi-State staff assist local governments with grants and planning to support economic development in the region.

# Map 1 – Bi-State Region



Note: Map showing the Bi-State Region with interstate, highways, and counties highlighted.

## **Federal Requirements**

### **Americans with Disabilities Act**

The Americans with Disabilities Act—or ADA—and section 504 of the Rehabilitation Act of 1973 require organizations with less than 50 employees who are recipients or subrecipients of federal funds to develop a self-evaluation and an ADA Access Plan.

- Title I
  - Title I of the ADA prohibits the discrimination of qualified persons on the basis of disability in regard to job application procedures, hiring, advancement, employee compensation, job training, or discharge from employment.
  - Bi-State Regional Commission does not discriminate on the basis of physical or mental disabilities, or any other legally protected categories. Bi-State is committed to providing reasonable accommodations to qualified individuals if the accommodation does not put an undue burden on the Commission. If an employed individual or prospective employee feels they are unable to do their work due to their physical or mental disability, it is encouraged to discuss possible accommodations with Bi-State’s Executive Director, and Administration and Finance Services Director.
- Title II
  - Title II of the ADA makes certain that persons with a disability are not denied access to programs, services, and activities put on by local, state, and federal government agencies.
  - People with disabilities must have equal access and opportunity to get involved and benefit from state and local governments’ programs, services, and activities.

### **Title VI Non-Discrimination**

In addition to ADA requirements noted above, Bi-State Regional Commission is an Equal Opportunity Employer committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. The Title VI document provides information on programs and activities that are federally funded

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and where efforts are made to deliver those programs in a non-discriminatory way. The Title VI Program and Non-Discrimination Policy can be found here <https://bistateonline.org/about/title-vi-and-non-discrimination-policy>.

If a citizen or interested party feels there are grounds for complaints related to Title VI where discrimination has occurred, the policy outlines procedures to submit a complaint. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

## **ADA Context – Nationally and in the Bi-State Region**

### **National Definitions**

The Americans with Disabilities Act of 1990 has two definitions that apply to this ADA Program Access Plan.

**Accessibility**    The ability for all people to have the opportunity and access to Bi-State Regional Commission programs, services, and activities.

**Disability**        (1) An individual with a physical or mental impairment that substantially limits one or more major life activities of such individual.  
                              (2) A record of such impairment; or being regarded as having such an impairment

*Source: The Americans with Disabilities Act of 1990 (ADA)*

### **National Disability Statistics**

This ADA Program Access Plan helps bring awareness to the challenges with public participation for those with disabilities. Awareness and education help to inform program facilitators of potential barriers to public involvement in planning processes by those with disabilities. The national statistics illustrate the nature of this issue.

- 1 in 4 people have a disability
- 16% of people with disabilities use mobility devices (crutches, canes, wheelchairs, etc.) and face the greatest number of physical barriers in the community
- 49% of people with disabilities have either vision or hearing impairment

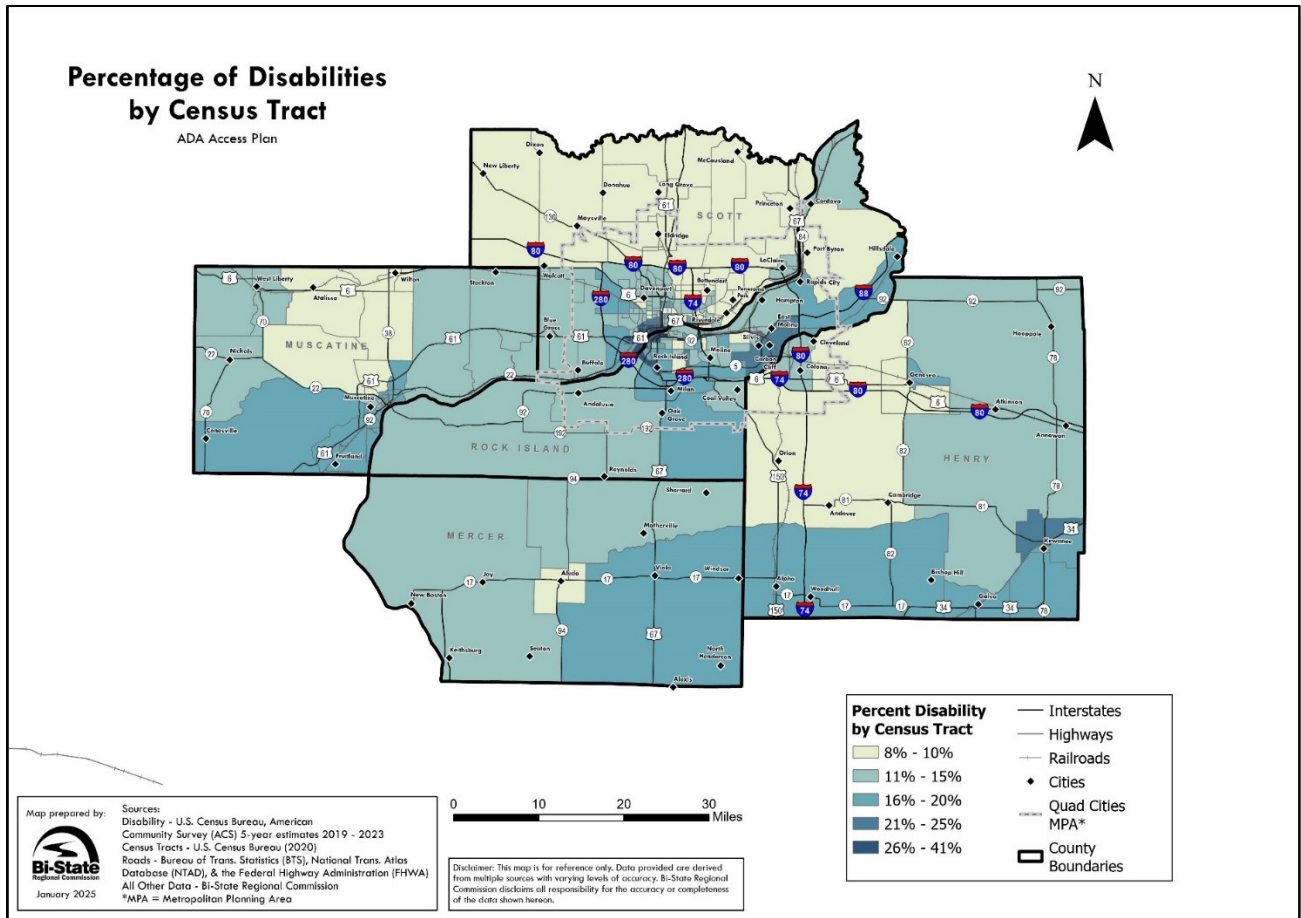
- 33% of people with disabilities have a major medical condition (Diabetes, Heart Disease, HIV, Seizure Disorder, etc.)
- The majority of disabilities are “invisible”

*Source: Center for Disease Control and Prevention. Disability and Health Data System (DHDS), 2024.*

## **Regional Disability Statistics**

Representing a five-county area, the Bi-State Regional Commission monitors demographic data provided through the U.S. Census Bureau. Map 2 illustrates the percentages of persons with disabilities in the Bi-State Region. The table following the map outlines the characteristics of those disabilities by type and by county in the Bi-State Region.

## Map 2 – Percentage of Disabilities by Census Tract



Note: Map showing percentage of disabilities by census tract in the Bi-State Region, ranging from 8% to 41%.

### Disability Characteristics Table

	7,415 (5.3%)	5,606 (3.2%)	2,205 (4.6%)	1,684 (4.0%)	685 (4.43%)
	3,768 (2.7%)	3,442 (2.0%)	940 (1.9%)	978 (2.3%)	283 (1.83%)
	8,163 (6.2%)	6,741 (4.1%)	2,315 (5.1%)	1,855 (4.7%)	668 (4.32%)
	9,740 (7.4%)	10,592 (6.5%)	2,908 (6.4%)	2,546 (6.5%)	1,009 (6.53%)
	3,188 (2.4%)	2,995 (1.8%)	917 (2.0%)	1,029 (2.6%)	480 (3.1%)
	7,396 (6.9%)	6,484 (4.9%)	2,401 (6.4%)	1,426 (4.5%)	732 (4.73%)

Source: 2023 ACS 5-Year Estimates

	Deaf or having serious difficulty hearing (DEAR)
	Blind or having serious difficulty seeing, even when wearing glasses (DEYE)
	Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM)
	Having serious difficulty walking or climbing stairs (DPHY)
	Having difficulty bathing or dressing (DDRS)
	Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping (DOUT)

Source: United States Census Bureau

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## **ADA Program Access Mission**

Bi-State is committed to ensuring that no person on any statutorily prescribed basis be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by Bi-State Regional Commission. Bi-State rents office space in the Rock Island County Office Building and acknowledges that ADA compliance of the building itself is under the authority and responsibility of the county. However, Bi-State ensures ADA compliance for its public meetings by taking every reasonable action to make a selected meeting location in the county office building or off-site as ADA compliant as possible given the condition of the facility where meetings are held. Bi-State also ensures that all persons have access to the necessary resources needed in order to participate in the planning process.

## **ADA Notice – In Accordance Section**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), Bi-State Regional Commission will not discriminate against qualified individuals with disabilities in its services, programs, or activities.

- **Employment:** Bi-State Regional Commission does not discriminate on the basis of disability in its hiring or employment process and complies with all regulations in the U.S. Equal Employment Opportunity Commission under Title I of the ADA with reasonable accommodation.
- **Effective Communication:** Bi-State Regional Commission will, upon request with reasonable notice, provide appropriate accommodations leading to clear communication for qualified persons with disabilities, so they can participate equally in Bi-State's programs, services, and activities.
- **Modification to Policies and Procedures:** Bi-State Regional Commission will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to participate in all Bi-State programs, services, and activities.

Anyone who requires auxiliary aid or service for effective communication, or a change in policy to be able to participate in a Bi-State activity or service should call (309) 793-6300 as soon as possible, but no later than 72 hours before the scheduled event. Bi-State staff will direct the request to the staff member facilitating the activity.

The ADA does not require Bi-State Regional Commission to take any action that would fundamentally alter the nature of its program or services, or impose an undue financial or administrative burden.

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# Accessibility in the Planning Process

## *Location Requirements*

When selecting a location for a public meeting, such as a public forum, Bi-State considers the geographic distribution of ADA populations depending on the geographic area being represented in the planning process. There are two key factors to picking a meeting location: ADA accessibility and multi-modal access. For a meeting location to be considered ADA compliant, it should have features that make the area accessible to all, as general examples with level entries or ramps for wheelchairs, braille for those visionally impaired navigating into a building, and assisted or automatic opening doors for those with physical limitations.

For a meeting location to have multimodal access, it should be accessible by car, bus, bicycle, and on foot, where possible. A meeting location's accessibility should consider the bus route location to the meeting facility and bus service hours, if available. The location should have sidewalk accessibility and bicycle access. Bi-State does not own or operate any roadways or transit services. Therefore, there is no guarantee that every location will have access to all modes; however, every effort is made to ensure that meetings are accessible to as many modes of transportation as possible. If a person is unable to access any of the transportation modes mentioned, a comprehensive list of organizations that offer transportation assistance is provided. These resources are in the *Transit Development Plan* on Bi-State's website [www.bistateonline.org](http://www.bistateonline.org).

When selecting a location for a public meeting, the geography being served by the program, services, or activities should be considered. As an example, a balance of meetings on both the Iowa and Illinois sides of the Quad Cities should be maintained if the Quad Cities Metropolitan Planning Area is the focus. If possible, meetings should also be held with the population being served by the planning process. Locations with a greater concentration of potential participants should consider whether the planning process would effectively serve that population by being in a downtown area, at a community center, or in a public building. These places typically comply with all meeting location requirements; however, not all meetings are held in these areas based on the topic.

## **Public Communications**

Going beyond the meeting location, meetings are also held during times when citizens can most likely attend. Accommodations are made for different working hours, typically with meetings held in the early morning, midday during a lunch hour, or the late afternoon from 4:00 p.m. to 6:00 p.m.

There are also virtual and hybrid meetings, in addition to those held in person. Certain public meetings with elected officials require in-person presence based on state open meetings law. When a virtual and/or hybrid meeting is held, closed captioning and a chat box can be available for attendees. If this is the considered accommodation, a chat room moderator can be used to ensure that all questions are addressed during the meeting or addressed at or after the session. Bi-State recognizes that not all residents can attend in-person meetings; therefore, the virtual and/or hybrid meetings will also be recorded related to gaining public input, allowing those who were unable to join to watch the meeting later online. In-person public input meetings without a virtual component will not be recorded.

In addition to selecting an accessible location and time, meeting locations and times are posted on the Bi-State website, a bulletin board in the Bi-State office, and shared in as many places as possible. Those places include Bi-State's website, social media (specifically Facebook), local news organizations, and cities, as well as the Regional Transportation Advisory Group (RTAG) and Regional Transit Interest Group (RTIG). RTAG and RTIG are voluntary lists of interest groups for residents and agencies in the Quad Cities that have expressed an interest in Bi-State transportation planning activities. There may be other outreach based on the topic and federal grant requirements.

For website accessibility, Bi-State Regional Commission implemented a user widget to increase accessibility for motor impairment, color blindness, blindness, low vision, dyslexia, and other sensory impairments. The tool directions are available in different languages. The blue button on the right-hand side of the each webpage is the point of access. This addition enhances the website user experience for visitors to the Bi-State Regional Commission website and to the information shared about the region. Bi-State Regional Commission continues to monitor Web Content Accessibility Guidelines (WCAG) standards.

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For language accommodations, Bi-State, upon request, will contract translators for American Sign Language (ASL) and other common languages for public meetings and phone calls if determined to be a reasonable accommodation. In order to be able to secure a translator for a meeting, at least 72 hours' notice is required by calling (309) 793-6300. Every reasonable step is taken to include everyone in the planning processes. Everyone, regardless of English proficiency or disability, should have their voices heard.

To see Bi-State's public communications, visit [www.bistateonline.org](http://www.bistateonline.org).

## Resource Checklist

A resource checklist has been created for reference. Changes to the listing and updates will be made as needed as an administrative modification of this plan.

<a href="#">Illinois Iowa Center for Independent Living</a>	Blind and Low Vision Assistance	501 11th St. Rock Island, IL 61201, (309)-793-0090, <a href="mailto:carolyn@iicil.com">carolyn@iicil.com</a>
<a href="#">Association of the Blind</a>	Assistance and resources for those who are blind or assisting someone who is blind	2900 S Quincy St, #200, Arlington, VA 22206, 212-502-7600, <a href="mailto:connectcenter@aph.org">connectcenter@aph.org</a>
<a href="#">Council for the United Blind</a>	Helps connect those who are blind to resources like Consumer Organizations of the Blind, Rehabilitation Services, and Assistive Devices and Technology	304 W Cedar Street, Goldfield, Iowa, 50542, 1-866-436-0141
<a href="#">The Arc QC Area</a>	Assistive Technology, Developmental Training, Autism Spectrum Disorder Services, Community Support	4016 9th Street Rock Island, IL 61201, 309-786-6474, <a href="mailto:info@arcqca.org">info@arcqca.org</a>
<a href="#">iTek Interpreting Solutions, LLC</a>	Sign Language, On-Site Interpretation, Over-the-Phone Interpretation, Video Remote Interpretation, and Document Translation	202 1st Street A #113, Moline, IL 61265, 309-948-6700, <a href="mailto:hello@itekinterpretingsolutions.com">hello@itekinterpretingsolutions.com</a>
Noble Interpreter LLC	Business Interpreter Services, Data Entry, Google Translate, Interpreting Services Company, Legal Assistant, and translator assistant	5600 Jersey Ridge Rd, Davenport, IA 52807, 563-639-8998

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## Other Resources

National Association of the Deaf – Video Remote Interpreting:  
<https://www.nad.org/resources/technology/video-remote-interpreting/>.  
Used when on-site interpreter services are unavailable.

National Association of the Deaf – Communication Access Realtime  
Translation - <https://www.nad.org/resources/technology/video-remote-interpreting/>. Use of closed caption decoders.

## **ADA Coordinator**

Bi-State Regional Commission has designated Denise Bulat as the ADA Coordinator. Citizens are encouraged to contact Ms. Bulat, or her designee, if in need of ADA accommodations or to file a complaint.

Denise Bulat, Executive Director  
1504 Third Ave  
Rock Island, IL 61201  
(309) 793-6300 Ext. 1140  
[dbulat@bistateonline.org](mailto:dbulat@bistateonline.org)

## **Request and Complaint Procedure**

Requests for accommodation or documents and meeting materials in alternate formats should be made as soon as the need for accommodation is known, and at a minimum of 72 hours before the accommodation is needed. Accommodations for larger documents may take a longer amount of time to complete. Requests should be made to the ADA Coordinator and should include the requester's name, email, phone number, and a description of the accommodation or document/material format required.

As previously mentioned in this plan, Bi-State Regional Commission has a Title VI and Non-Discrimination Policy on its website. The complaint form may be used for Title VI-related items and ADA Access-related items as they relate to the planning process. If a citizen or interested party feels there are grounds for complaints related to Title VI where discrimination has occurred, the policy outlines procedures to submit a complaint. Title VI complaints must be filed within 180 days from the date of the alleged discrimination. Complaints regarding another agency or jurisdiction should be directed to that entity.

## **Undue Burden**

The ADA does not require Bi-State Regional Commission to provide an accommodation or modification if it imposes a significant alteration of services or creates an undue financial or administrative burden. If an action would result in such an alteration or such burdens, Bi-State staff will seek to take any other action that would not result in such an alteration or such burdens, but would still ensure that individuals who need ADA accommodations receive access to Bi-State planning activities.

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## ***Plan Revisions Process***

Changes to the plan will be taken as amendments if there are changes in Federal law or ADA requirements that would affect how the plan is administered. Amendments will be taken to the Bi-State Regional Commission.

Administrative modifications will be addressed at the Bi-State staff level for updates and changes to resources; advances in accessibility technology or application; changes in communication media, statistics and mapping updates; and references used in the plan.

These revisions will occur as needed and will include notification of the groups noted in the public communications section of this plan with a revised posting of the document to the Bi-State Regional Commission website.

# Self-Evaluation

## General Nondiscrimination

Public Entity Bi-State Regional Commission Date 9/5/25  
 Contact Person Denise Bulat Email dbulat@bistateonline.org Phone (309) 793-6300

Title II of the ADA requires that people with disabilities are assured an equal opportunity to participate in the services, programs and activities offered by public entities. This part of the Title II regulations covers a wide range of issues as you will see from the questions below.

Questions		Comments	Next Steps
1. Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?  Examples: A school district requires that students with autism have a parent accompany them on school trips. This is a discriminatory practice.  A city has a policy that applicants for a hunting license have a valid, state-issued driver's license. This is a discriminatory policy.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	See Title VI Program and Non-Discrimination Policy for Bi-State Regional Commission	
2. Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
3. If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?  Please explain:	Yes <input type="checkbox"/> No <input type="checkbox"/>		

Questions		Comments	Next Steps
<p>4. Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?</p> <p>Examples: A municipal recreation department has a wheelchair basketball program. A county museum has a tour for people who are blind with an opportunity to touch sculptures. These are not discriminatory.</p> <p>If yes, please describe:</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
<b>Contracting with External Organizations</b>			
<p>5. Do all employees who contract with outside agencies, organizations or businesses know that the public entity's ADA obligations apply whether the public entity provides the service, program or activity directly or contracts for it?</p> <p>Example: If a state department of emergency services funds a private organization to provide emergency shelters, the department maintains its ADA obligations to make sure people with disabilities receive the same services as people without disabilities.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Include in contract language	
<p>6. Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?</p> <p>If yes, please describe:</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Include in contract languages and federal assurances	
<p>7. Does the public entity require assurances from contractors of their fulfillment of Title II requirements?</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Include in contract languages and federal assurances	
<p>8. Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Include in contract languages and federal assurances	

Questions	Comments	Next Steps
the Title II requirements?  If yes, please describe:		
<b>Reasonable Modifications</b>		
9. Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?  Example: No food or beverages are allowed to be consumed at a regional transit authority's subway stations or in subway cars. In order to control blood sugar levels, a person with diabetes might need to drink juice. This would probably be a reasonable modification of a policy.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<b>Service Animals (Under Titles II and III only dogs can be service animals. Miniature horses can be service animals in some circumstances.)</b>		
10. Are employees and officials aware that:  a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Continue ongoing training
b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Continue ongoing training
c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Continue ongoing training

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www.NewEnglandADA.org • ADAinfo@NewEnglandADA.org

**ADA Self-Evaluation – General Nondiscrimination**  
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Questions		Comments	Next Steps
its ability to perform the work or task?			
d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable?  <i>Assessment factors include, the size and weight, whether the horse is housebroken, and whether its presence compromises safety requirements.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
<b>Wheelchairs and Other Power-Driven Mobility Devices</b>			
11. Are employees and officials aware that:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
a. People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?			
b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?  Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines—whether or not	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training

Questions		Comments	Next Steps
<p>designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices, such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of Title II.</p> <p><i>Some of the factors that go into determining "legitimate safety requirements" include: size and speed of the device, the facility's design and characteristics (outdoor, indoor), and risk of harm to the immediate environment.</i></p>			
<p>c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?</p> <p><i>Credible assurance includes a state-issued, disability parking placard or card, or other state-issued proof of disability or a verbal representation, not contradicted by observable fact, that the other power-driven mobility device is being used for a mobility disability.</i></p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
<b>Surcharges and Costs</b>			
<p>12. Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?</p> <p>Examples: Charging a person who is hard of hearing for the cost of providing an assistive listening system for a state hearing. A housing authority requires an additional damage deposit if tenants have service animals. These are discriminatory policies.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training

Questions	Comments	Next Steps
<b>Ticketing (Not parking tickets, tickets for events that have seating.)</b>		
13. Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14. If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
15. Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?  Example: Maps or displays of seating configurations must include information on accessible seating.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
16. Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
17. Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
18. Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: <ul style="list-style-type: none"> <li>when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds back when declaring a sell-out); or</li> <li>when all non-accessible seats in a particular seating section have</li> </ul>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Questions		Comments	Next Steps
<p>been sold; or</p> <ul style="list-style-type: none"> <li>when all non-accessible seats in a particular price category have been sold?</li> </ul>			
<p>19. If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?</p> <p><i>A venue may choose to move a patron to another seat in order to give that accessible seat to a patron with a disability who requires it, but is not obligated to do so.</i></p>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
<p>20. Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?</p>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
<p>21. Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?</p>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
<b>Other</b>			
<p>22. Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program participants?</p> <p><i>Example: A state department of recreation includes information about accessible swimming pools, fishing piers, boat launches, picnic and camping areas on its website and in a brochure.</i></p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	ADA Program Access Plan for Bi-State Regional Commission	

## Effective Communication

Public Entity Bi-State Regional Commission Date 9/5/25  
 Contact Person Denise Bulat Email dbulat@bistateonline.org Phone (309) 793-6300

Many people who are blind or have low vision, who are deaf or hard of hearing or who have other communication disabilities are prevented from participating fully in programs, activities and services because of communication issues. To address this Title II requires that communication with people with disabilities be “as effective” as communication with others. Often good communication practices will suffice, such as not turning away when speaking with a person who is hard of hearing or taking the time to listen to a person who has a speech impairment. Other times a public entity needs to provide “auxiliary aids and services” to ensure that communication is effective.

Questions		Comments	Next Steps
<b>Auxiliary Aids and Services</b> <i>Use the Comments column to indicate how aides and services are provided.</i> <i>For example: Arranged through State Commission for the Deaf, rented from XYZ Company, available from the County Disability Office.</i>			
1. Does the public entity know how to provide the following for people who are deaf or hard of hearing:			
a. Sign language, oral, and cued speech interpreters	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
b. Video remote interpreting (VRI) services	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Used in 2021 during a public meeting (ASL). Use closed captioning during hybrid and virtual meetings.	
c. Computer-assisted real-time transcription (CART) services	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Only with virtual Zoom closed captioning.	

Questions		Comments	Next Steps
d. Assistive listening devices	Yes <input type="checkbox"/> No <input type="checkbox"/>		Learn more about this type of accommodation
e. Open and closed captioning of videos	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Virtual meetings with CC capabilities.	
f. Real time captioning of television programs	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
g. Other:	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
2. Does the public entity know how to provide documents in the following formats for people who are blind or visually impaired and others with print disabilities:			
a. Braille	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
b. Large print	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
c. Audio recordings	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
d. Accessible electronic formats that that can be accessed by screen reading software, for example, documents in plain text or HTML	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
e. Screen reader software installed on a computer that is used by the public, for example in a library	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
f. Magnification software installed on a computer that is used by the public, for example in a computer lab	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
g. Optical readers	Yes <input type="checkbox"/> No <input type="checkbox"/>		Learn more about this type of accommodation

Questions		Comments	Next Steps
h. Other	Yes <input type="checkbox"/> No <input type="checkbox"/>		
<b>Policies and Procedures</b>			
3. Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
4. Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
5. Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
6. Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
7. Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training
8. Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate?  Example: A deaf family member of a hospital patient might need a	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Continue ongoing training

Questions		Comments	Next Steps
sign language interpreter to communicate with the doctor.			
9. Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Only with virtual Zoom closed captioning.	Evaluate automated transcript accuracy
10. Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden?  <i>The decision of undue hardship must be made by the head of the public entity or his or her designee. There must be a written statement explaining the reasons for reaching that decision.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
<b>Telecommunications</b>			
11. Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Learn more about this type of accommodation
12. Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?  <i>A TTY is an electronic device for text communication over a telephone line that is designed for use by people with hearing or speech disabilities.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
13. Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A	
<b>Other</b>			

## Website Accessibility

Public Entity Bi-State Regional Commission Date 9/5/25  
 Contact Person Denise Bulat Email dbulat@bistateonline.org Phone (309) 793-6300

Many people with disabilities use assistive technology such as screen readers, text enlargement software, and programs that enable people to control the computer with their voice, eyes or nose. Access problems occur when website designers assume that everyone sees and accesses a webpage in the same way. Accessible website design recognizes these differences and does not require people to see, hear, or use a standard mouse in order to access the information and services provided.

Questions		Comments	Next Steps
1. Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	ADA Program Access Plan for Bi-State Regional Commission	
2. Are the staff and contractors who are responsible for webpage and content development aware of the policy?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Monitor WCAG standards
3. Are the staff and contractors who are responsible for webpage and content development knowledgeable about these standards?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
4. Has the website been tested for compliance with either of these standards?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
5. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Utilized compliance software test	
6. Is there a plan for making the existing web content accessible?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	ADA Program Access Plan for Bi-State Regional Commission	

Questions		Comments	Next Steps
7. Is there a plan for making future web content accessible?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	ADA Program Access Plan for Bi-State Regional Commission	
Other:	Yes <input type="checkbox"/> No <input type="checkbox"/>		

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## Appendix

### *Acronyms generally used in the transportation planning process*

ADA.....Americans with Disabilities Act of 1990

ASL.....American Sign Language

BSRC.....Bi-State Regional Commission

DOT.....Department of Transportation

FFC.....Federal Functional Classification

FHWA.....Federal Highway Administration

FTA.....Federal Transit Administration

IA.....Iowa

IL.....Illinois

LRTP.....Long Range Transportation Plan

MPO.....Metropolitan Planning Organization

MSA.....Metropolitan Statistical Area

NHS.....National Highway System

PPP.....Public Participation Plan

RTAG.....Regional Transportation Advisory Group

RTIG.....Regional Transit Advisory Group

TIP.....Transportation Improvement Plan

U.S.....United States

WCAG.....Web Content Accessibility Guidelines