



# Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

November 23, 2020

## CIRCULAR LETTER 2020-19

### IDOT POLICY AND PROCEDURE FOR COMPLETING DELINQUENT NBIS INSPECTIONS

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.

#### **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 10 in 2011, 2013, 2014, 2015, 2018, and 2019. 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 firm 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) Deploy an on-call consultant firm to perform delinquent inspection(s) after notification in Step 1 fails to result in the performance of the delinquent inspection(s);
- 3) Bill the entity with maintenance responsibility for services in Step 2; and
- 4) Coordinate with the applicable District Bureau of Local Roads & Streets (BLRS) to have a non-authorization order placed on the entity's motor fuel tax, general maintenance, or other funds until the bill in Step 3 is paid in full.

#### **Policy and Procedure for Completing Delinquent NBIS Inspections:**

While IDOT Bridge Inspection Policy allows up to 90 days for the update of Structure Inventory & Appraisal (SI&A) data, it is imperative for bridge inspections to be entered in the Bridge Inspection System (BIS) as soon as possible. For inspection intervals  $\geq$  6-months, the inspection information should be entered within 30 days of the inspection. For inspection intervals less than 6-months, the inspection information should be entered within 7 days of the inspection. These timeframes allow the BM&I Unit to accurately monitor delinquencies and when necessary provide notification to the responsible parties.

Each month the BM&I Unit generates a delinquency report to monitor bridges which have delinquent NBIS inspection(s). The delinquency report is distributed to the Agency Designated NBIS Program Managers and the IDOT District BLRS.

Based on the number of days delinquent from the Inspection Interval Date, the following actions will be taken.

**1. 45 Days Delinquent from Inspection Interval Date**

- a. The BM&I Unit will verify, via email, the District BLRS has not received the delinquent bridge inspection report(s) for entry into the BIS.
- b. If the delinquent bridge inspection report(s) has(have) been received by the District BLRS and has(have) yet to be entered in the BIS, the BM&I Unit will request the information be entered as soon as possible to remove the bridge(s) from the delinquency report.
- c. If the delinquent bridge inspection report(s) has(have) not been received by the District BLRS, the BM&I Unit will send email notification to the entity having maintenance responsibility of the bridge(s) with inspection delinquency, and the Designated NBIS Program Manager, if applicable. The email notification will indicate the delinquent bridge inspection(s) must be performed immediately, the information entered in the BIS by the entity or submitted to the District BLRS for entry within 30 days, and failure to do so will result in the Department having the delinquent bridge inspection(s) completed by a consultant firm and hold the entity accountable for all costs incurred.

If the delinquent bridge inspection(s) has(have) been completed but the information has not been entered in the BIS by the entity or submitted to the District BLRS for entry, the entity will be urged to do so as soon as possible to remove the bridge(s) from the delinquency report.

**2. 60 Days Delinquent from Inspection Interval Date**

- a. The BM&I Unit will contact the Department's on-call consultant firm to request a cost estimate to perform the delinquent bridge inspection(s). The consultant firm is required to submit the cost estimate within 5 days. The BM&I Unit will instruct the on-call consultant to deploy and perform the delinquent bridge inspection(s) on the date the inspection(s) is(are) 75 days delinquent unless otherwise notified by the BM&I Unit.

The BM&I Unit will also contact the District BLRS to coordinate the non-authorization of Motor Fuel Tax funds in Step 1c. This is to be effective on the date the inspection(s) is(are) 75 days delinquent.

- b. Upon the completion of Step 2a, the BM&I Unit will provide notification to the entity having maintenance responsibility of the bridge(s) with inspection delinquency, and the Agency Designated NBIS Program Manager if applicable, of the estimated cost to perform the delinquent bridge inspection(s). Furthermore, if the delinquent

bridge inspection(s) is(are) not performed before the date the inspection(s) is(are) 75 days delinquent and the information entered into the BIS, the Department's on-call consultant firm will perform the inspection(s) and the entity will be responsible for the cost incurred as stated in Step 1c. The entity, and the Agency Designated NBIS Program Manager, if applicable, will be notified via phone and email.

If the BM&I Unit receives notification the delinquent bridge inspection(s) has(have) been performed and the information entered in the BIS, the on-call consultant firm will be contacted immediately to cancel deployment.

**3. 75 Days Delinquent from Inspection Interval Date**

- a. The Department's on-call consultant is deployed to perform the delinquent bridge inspection(s) as stated in Step 2a. The inspection reports are to be completed and submitted to the BM&I Unit within 15 days for entry into the BIS.
- b. Effective on the date the inspection(s) is(are) 75 days delinquent, the District BLRS will not authorize the entity to expend Motor Fuel Tax funds from their account until such time that the Department has been fully reimbursed for the cost incurred for work associated with the bridge inspection(s) performed in Step 3a.

**4. 90 Days Delinquent from Inspection Interval Date**

- a. The BM&I Unit will provide the bridge inspection report(s) to the entity having maintenance responsibility of the bridge(s) with inspection delinquency.
- b. Once the delinquent bridge inspection(s) has(have) been completed by the consultant firm, the Department will be invoiced by the consultant firm for all manhour, equipment, and material costs associated with the bridge inspection(s). The Department will reimburse the consultant firm for all costs incurred and then forward the invoice to the entity having maintenance responsibility of the bridge(s) with inspection delinquency. The entity, using their own funds, is then required to reimburse the Department for the invoiced amount. Furthermore, prior to reimbursing the Department for the bridge inspection(s) and in accordance with Section 6-4.04 of the Bureau of Local Roads and Streets Manual, the entity will not receive authorization to expend Motor Fuel Tax funds from their account until such time that the Department has been fully reimbursed for the cost incurred for work associated with the bridge inspection(s).

CIRCULAR LETTER 2020-19

Page 5

November 23, 2020

- c. Once the entity having maintenance responsibility of the bridge(s) has(have) fully reimbursed the Department for having the delinquent bridge inspection(s) performed, the BM&I Unit will notify the District BLRS and the entity can receive authorization to expend Motor Fuel Tax funds.
- d. The Statewide NBIS Program Manager for Illinois will review the Agency Designated NBIS Program Manager's role in the entity's failure to perform the bridge inspection(s) in a timely fashion. If found to be uncooperative or to have otherwise inhibited the completion of the bridge inspection(s), the Agency Designated NBIS Program Manager's certification will be revoked immediately.

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,



Stephane B. Seck-Birhame, P.E., PTOE  
Acting Engineer of Local Roads and Streets



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

RJP/

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