NET RMA
North East Texas
Regional Mobility Authority



AMERICANS WITH DISABILITIES ACT (ADA)/ SECTION 504

TRANSITION PLAN

Implemented October 9, 2026

North East Texas Regional Mobility Authority

Americans with Disabilities Act (ADA)/Section 504 Transition Plan

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1. Introduction

1.1 Background

The North East Texas Regional Mobility Authority (NET RMA) is committed to creating accessible programs, policies, and services in accordance with the Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act. This section will review background information to support this document regarding the NET RMA and the ADA and Section 504 of the Rehabilitation Act of 1973.

The NET RMA is an independent government agency established in October 2004 to enhance mobility and create economic opportunities in the North East Texas Region. The NET RMA is challenged with the statewide issue of finding creative funding resources to finance much-needed transportation projects. Pooling the resources of each member county, local Metropolitan Planning Organizations (MPOs), the Texas Department of Transportation (TxDOT), and various cities and counties, the NET RMA is working to make North East Texas a better place to live, work, and raise a family.

The NET RMA is overseen by a 21-member Board of Directors. The Governor appoints the Chairman, and each member county appoints a member or members to serve on the Board.

The NET RMA employs a very small staff led by Executive Director Glenn H. Green. Currently, the NET RMA has nine employees, with three of those being in the maintenance department. The NET RMA utilizes private sector contractors with specialized expertise for additional support, to provide staffing assistance for individual projects.

The NET RMA regularly provides planning, design, construction services, and/or financing to complete transportation projects and works to ensure compliance with the Americans with Disabilities Act (ADA), while these projects are in development.

The ADA prohibits discrimination against individuals with disabilities in all areas of public life, including transportation facilities and places that are open to the public. The purpose of the law is to ensure that people with disabilities have the same rights and opportunities as everyone else. Title II of the ADA requires that public agencies perform a self-evaluation and create a transition plan that details barriers identified in the agency's assets and communicates an action plan for improving accessibility.

Title II of the ADA

The ADA requires state and local governments to make their programs and services accessible to persons with disabilities to ensure that the fundamental goals of the ADA are met. This requirement extends not only to physical access at facilities, programs, and events, but also to policy changes that governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of the state and local governments. Furthermore, governmental entities must ensure effective communications, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic life.

1.2 ADA Transition Plan Requirements

A transition plan must provide a path to a future that is inclusive and accessible to all. It should contain a set of objectives based on priorities that are SMART: Specific, Measurable, Achievable, Relevant, and Time-bound. The plan should "set forth the steps necessary to complete such changes" (§35.150(d)(1)). Regulations originally required public entities with 50 or more employees to develop a transition plan; however, the NET RMA recognizes the importance of being compliant with federal law and having policies, plans, a website, and a facility that are inclusive of all people and as accessible as possible.

In order to truly have transparency, it is imperative to give ownership of the plan to all stakeholders. Disabled people are the ones best suited to make decisions about or for people with disabilities. Participation from people with disabilities is imperative for the plan to be relevant.

The regulation states, "A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection. (§35.150(d)(1)).

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern the administration of the entity's programs, activities, and services. This evaluation includes all public areas, such as facilities, buildings, shared use paths (SUP) within a right-of-way (ROW) and a roadway owned or operated by the NET RMA.

The Transition Plan, minimally, must (§35.150.(d)(3)):

- Evaluate programs, services, activities, communication and rights-of-way per the ADA
- Identify physical and other barriers that may limit access to programs and services
- Propose potential compliant solutions or methods that will be used to make barriers accessible
- Determine the estimated cost and the responsible party to implement solutions
- Develop a schedule for implementation

In addition, the ADA requires the NET RMA to:

- Designate an ADA Coordinator responsible for overseeing compliance
- Develop an ADA grievance procedure
- Maintain the self-evaluation and transition plan for public inspection for 3 years

1.3 Undue Burden

The ADA states that access to each service, program, or activity is to be "viewed in its entirety" and that program access does not require each facility to be made physically accessible in all instances. Equal access can be made available through a creative solution.

Additionally, there are instances in which the ADA permits non-compliance. For example, the NET RMA is not required to incur undue financial or administrative burdens to comply with the ADA. The determination that ADA compliance would result in an undue burden must be made by the head of the public entity. The Executive Director of the NET RMA is granted this authority, provided that such determination is made by a written statement which includes justification.

2. Self-Evaluation

2.1 Self-Evaluation Approach

Title II of the ADA provides that public entities with 50 or more employees must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern the administration of the entity's programs, activities, and services. Although the NET RMA has nine full-time employees, TxDOT has adopted policies for subrecipients with advance funding agreements, such as the NET RMA, to ensure compliance with ADA. Finally, the NET RMA is a government agency that needs to uphold its responsibility and civic duty to work towards achieving ADA compliance.

The following list includes the primary spaces utilized by the NET RMA.

- Leased office and meeting space at 1011 Pruitt Place, Tyler, Texas 75703
- Maintenance Yard at 15401 CR 1148, Tyler, Texas 75703

The following list includes the roadways owned, operated, and maintained by the NET RMA.

- Toll 49 – from US69 north of Lindale to US110 East of Tyler

The following list includes the NET RMA's shared bicycle and pedestrian right-of-way.

- Toll 49 and the intersection of FM 2493, which includes a shared-use path that is part of the Tyler Legacy Trails System. This is under the jurisdiction of the City of Tyler.

Roadways, bicycle and pedestrian facilities owned, operated, and maintained by the Authority are designed and constructed to be compliant with the ADA. The NET RMA utilizes TxDOT Standard Specifications during design and follows TxDOT's Roadway Design Manual and guidelines developed by the American Association of State Highway and Transportation Officials to ensure compliance.

When applicable, the Texas Department of Licensing and Regulation (TDLR) conducts independent inspections on NET RMA roadways following the completion of construction projects. These inspections are performed to verify compliance with state standards and regulations related to safety, structural integrity, accessibility and public use. TDLR inspectors typically review features such as pedestrian facilities, sidewalks, curb ramps, and other public infrastructure to ensure compliance with Texas Accessibility Standards (TAS) and applicable codes. The independent review process serves as an added layer of accountability and quality control, helping ensure that all public-facing elements are safe and accessible for all users before the facilities achieve final acceptance.

2.2 Self-Evaluation and Findings

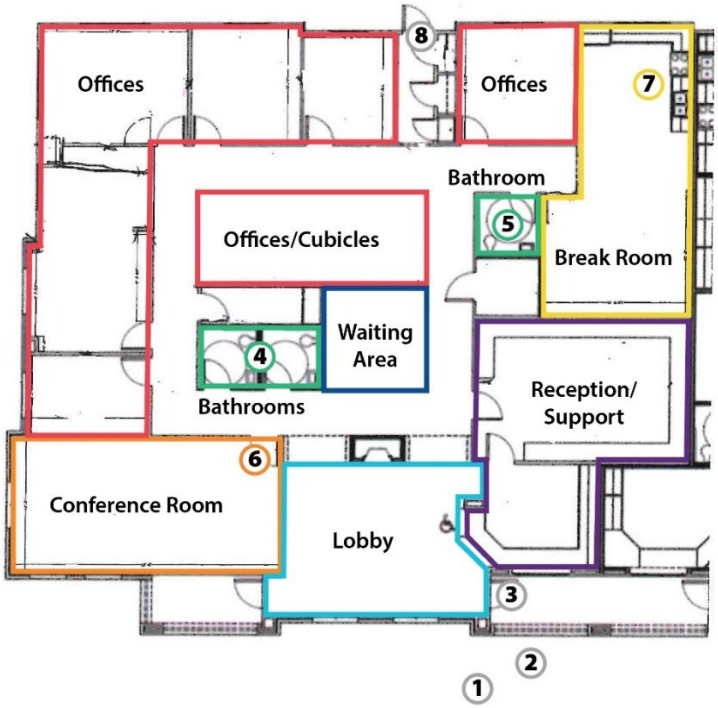
Office Assessment: Background

NET RMA leases office space at 1011 Pruitt Place in Tyler, Texas. The office space is located within a single-story, multi-tenant building with shared surface parking. The NET RMA office is within Unit 1 of the Pruitt Phase 2 Condominium, with an adjoining Unit 2 in the subject building. Smith County Land Records indicate that the subject building was built in 2010 with the condominium declaration made in 2011. A review of lease documents, construction plans, recording plans, permits and other documents relating to the office space and surrounding office buildings were not within the scope of this evaluation.

Summary of Results

The office assessment includes NET RMA's parking facilities and associated exterior areas, as well as all interior spaces. According to Section 35.150 of the ADA Title II Regulations*, in existing facilities public entities shall operate the program so it's readily accessible and usable by individuals with disabilities when viewed in its entirety. A public entity is not required to make structural changes where other methods are effective in achieving compliance.* If any new additions or renovations were to be made, the entire space would be required to comply with the accessibility requirements in the TAS, according to the Texas Government Code 469.003 and TAS 201.1.

All spaces were assessed for the office's current compliance with the TAS and other relevant guidelines. Instances of noncompliance were observed and documented in Figure 2 and summarized in Table 1 below. Items noted as non-compliant are based on the requirements of current standards that may not have been in force when constructed. Projects constructed in compliance with the April 1, 1994 TAS may enjoy safe harbor and not required to be retrofitted to current standards. More details regarding each observation are discussed in the following "Detailed Results" section.



Above: Diagram of NET RMA Office with Noncompliance Observations Noted

Table 1: Summary of Noncompliance Observations in NET RMA Office

Observation	Location	Description
1.	Parking Lot	- ADA space and access aisle have faded or missing markings. (Parking lot has been re-striped as of this writing, Oct 5, 2026.) - ADA space is missing required signage.
2.	Sidewalks	- Wood spacer in sidewalk is too high. - Some gaps in sidewalk are too large.
3.	Front Entry	- Bench obstructing front door clear floor space.
4.	Front Bathrooms	- Vanity obstructing required toilet clear floor space. - Furniture obstructs required turning space. - Sink does not have required toe and knee clearance. - No signage indicating accessible bathroom.
5.	Back Bathroom*	- Vanity obstructing required toilet clear floor space. - Vanity does not have required toe and knee clearance. - No signage indicating accessible bathroom.
6.	Conference Room	- Required door opening width is not met if one of the double doors is kept closed. Furniture is obstructing door's required clear floor space.
7.	Break Room*	- Accessible counter space is not provided.
8.	Emergency Exit	- Floor transition at door is too high. - Corridor does not allow for required door clearance on interior side.

**Not a public space.*

Detailed Results

a. Parking

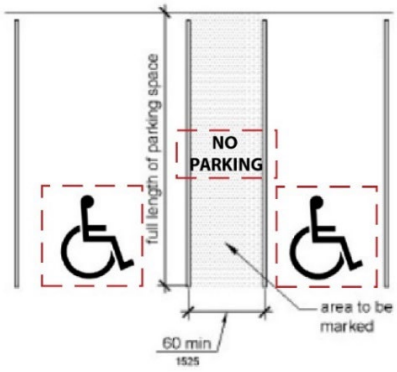
Relevant standards for this observation are TAS 208.2 for required number of accessible spaces, and Texas Administrative Code (TAC) 68.104 and TAS 703.2.1 for required accessible space elements.

Parking for the NET RMA office is provided in a shared-use lot for the condominium complex. One accessible parking space is required per twenty-five parking spaces for the first one hundred parking spaces in a parking lot (TAS 208.2). This requirement is met in this facility. The required markings and associated signage for the accessible spaces and access aisle closest to the NET RMA office are either missing, faded, and/or outdated. Current accessibility guidelines include providing "No Parking" markings inside access aisles (TAC 68.104), which is missing. Signage for each accessible space indicating it as an accessible space and outlining the consequences for parking illegally in spaces and access aisles is also required (TAC 68.104) but is missing for one of the accessible spaces.

The painted ground markings that are currently provided – the accessibility symbol required to indicate the space (TAS 703.2.1) and access aisle striping – are faded and hard to see. The picture on the right displays updated markings for the accessible spaces as of October 5, 2026.







Accessible spaces have faded markings and are missing some requirements for accessible spaces. The space on the left of the access aisle is missing required signage, and "No Parking" markings in the access aisle (seen in the diagram) are missing. ***The picture on the right displays updated markings for the accessible spaces.***

b. Sidewalks

Relevant standards for this observation are TAS 303.2 for maximum allowed change in level of ground surface, and TAS 302.3 for maximum allowed openings in ground surface.

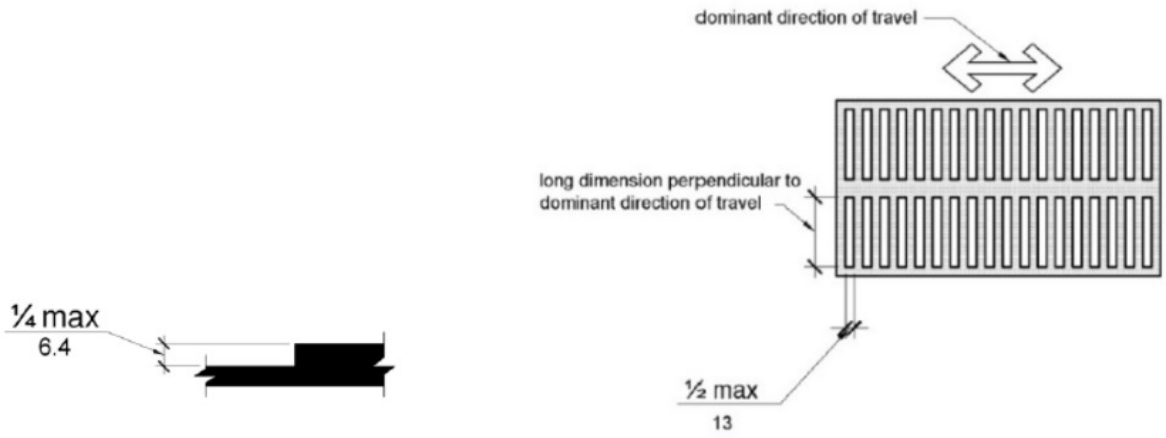
Noncompliant elements were observed on the sidewalk between the accessible parking space and access aisle and the front entrance. There is a wood spacer in a joint between two pavement sections that protrudes an inch above the walking surface, higher than the ¼" maximum allowed by the TAS (TAS 303.2). At another nearby location there is a joint between two pavement sections with a 1" gap, which is larger than the ½" maximum allowed by the TAS (TAS 302.3).



Wood extends up from walking surface 1" (above); more than the ¼" maximum allowed by TAS (below).



Gap in sidewalk is 1" (above); larger than the ½" maximum allowed by TAS (below).



c. Front Entrance

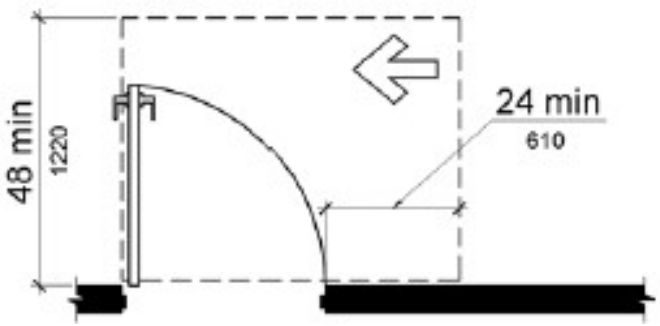
The relevant standard for this observation is TAS 404.2.4.1, which outlines clear space requirements at doors.

The main entry door does not have the required clearance space on the exterior side due to a bench. The bench is currently bolted down in place. The TAS requires a minimum of 48” of clear floor space outwards from the door for a latch side approach on the pull side of the door (TAS 404.2.4.1), but currently there is only 41” between the door opening and the bench.





Clear floor space between front entrance and bench is 41”; 48” minimum is required by TAS .

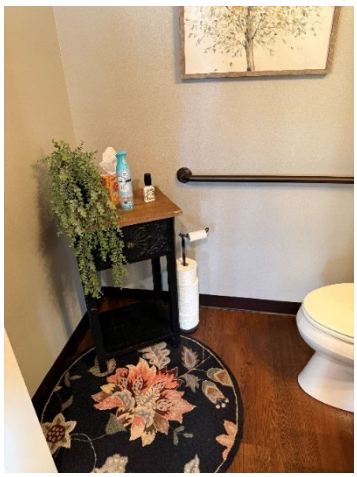


d. Front Bathrooms

Relevant standards for this observation are TAS 213.2 for accessible bathroom designation requirements, TAS 304.3.1 for clear turning space requirements, TAS 404.2.4.1 for clear space requirements at doors, TAS 604.3 for toilet clear space requirements, TAS 306.2.3 and TAS 306.3.3 for toe and knee clearance requirements, and TAS 216.8 for accessible bathroom signage requirements.

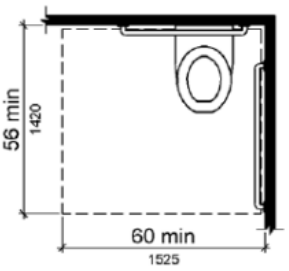
The two bathrooms designated for public use are located next to each other. Per the TAS, just one of them must comply with the guidelines if they are designated as single occupancy (TAS 213.2 Exception 4). If they remain gender-designated bathrooms, as they are currently, both must comply. Both bathrooms were assessed for this study.

Both bathrooms have the same layout, and both do not meet all the necessary floor clearances required in the TAS. The required toilet clear floor space – 60” minimum from the side wall and 56” minimum from the back wall (TAS 604.3) – is obstructed by the vanity to the left of the toilet and a furniture piece in front. The bathroom door opens into the bathroom, and the vanity obstructs the required door clearance space (TAS 404.2.4.1). The furniture piece obstructs the required 60” clear turning space (TAS 304.3.1). The vanity has 12” of toe clearance, less than the 17” minimum required (TAS 306.2.3), and a maximum 6” of knee clearance, less than the 8” minimum required (TAS 306.3.3). Finally, there is no signage to designate either of the bathrooms as accessible, which is a requirement for accessible bathrooms in the TAS (TAS 216.8).



60” turning radius is required by TAS. Furniture fixture in the corner currently obstructs the turning radius.



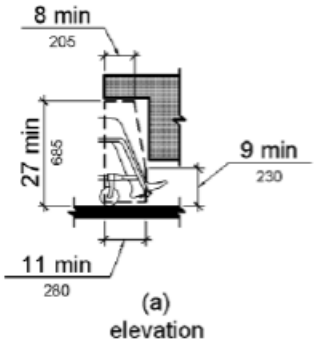


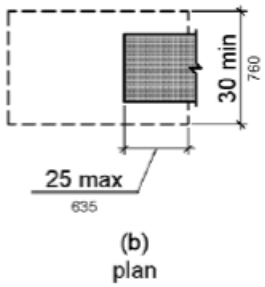
Clear space between side wall to sink at the toilet is 41” (middle). 60” minimum is required by TAS (right).

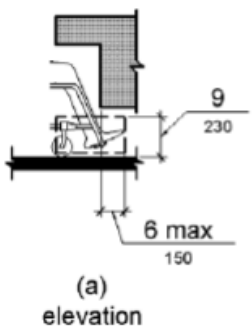


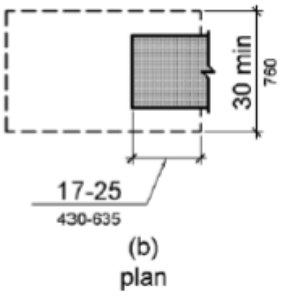
Bathroom sink fixture does not comply with required knee (below left) and toe clearances (below right) and obstructs required clearance space for toilet.

Bathrooms do not have required signage indicating them as ADA.









e. Back Bathroom*

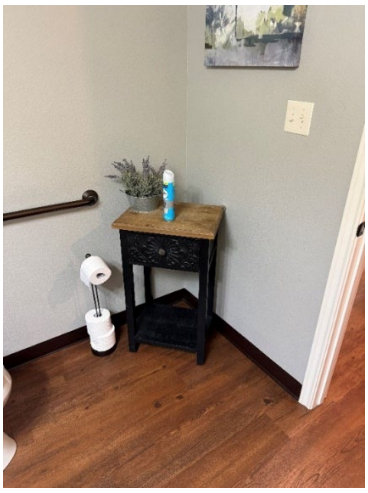
*Not a public space.

Relevant standards for this observation are TAS 604.3 for toilet clear space requirements, TAS 306.2.3 and TAS 306.3.3 for toe and knee clearance requirements, and TAS 216.8 for accessible bathroom signage requirements.

The third bathroom in NET RMA's offices has a slightly larger footprint than the other two bathrooms. The clear turning space requirement is not an issue in this bathroom unlike in the other two. However, the toilet's clear floor space is obstructed by the sink fixture (TAS 604.3). The vanity has a similar design to those in the other two bathrooms, so it also has the same issues with toe and knee clearance (TAS 306.2.3; TAS 306.3.3). The knee and toe clearances are the same as the vanities in the other bathrooms, at 6" maximum and 12", respectively. There is no signage to designate the bathroom as accessible (TAS 216.8).



Required toilet clearance space is obstructed by vanity in back bathroom. Vanity's knee and toe clearances are below the minimum amount required.



Required toilet clearance is obstructed by furniture fixture in back bathroom.

f. Conference Room

Relevant standards for this observation are TAS 404.2.3 for minimum door opening width requirements, and TAS 404.2.4.1 for clear space requirements at doors.

NET RMA's conference room is accessed by double doors with a clear opening width of 55", which more than meets the 32" minimum requirement in the TAS (404.2.3). However, if one of the doors is kept closed, as it is currently, the clear opening is 26" and does not meet the minimum opening requirement. When the second door is opened, there are furniture pieces on the conference room side that obstruct the door's required clear floor space (TAS 404.2.4.1).





TAS required door opening width is not met when only one door is open. Second door's clear floor space is obstructed on the conference room side.

g. Break Room*

*Not a public space

Relevant standards for this observation are TAS 804.3 for counter height requirements and TAS 306.2.3 for toe clearance requirements.

The kitchen in the break room has counter heights that are 37" above the floor. The sink counter height is 34" above the floor. TAS guidelines require at least one 30" wide section of counter space to be a maximum of 34" above the floor to be compliant (TAS 804.3). This is not currently offered in the kitchen. The required toe clearance under the sink is currently obstructed by a wood piece (TAS 306.2.3).



Kitchen in break room does not have a minimum 30" wide section of counter space at 34" max above floor as required by TAS.

h. Emergency Exit

Relevant standards for this observation are TAS 303.2 for maximum allowed change in level of ground surface and TAS 404.2.4.1 for clear space requirements at doors.

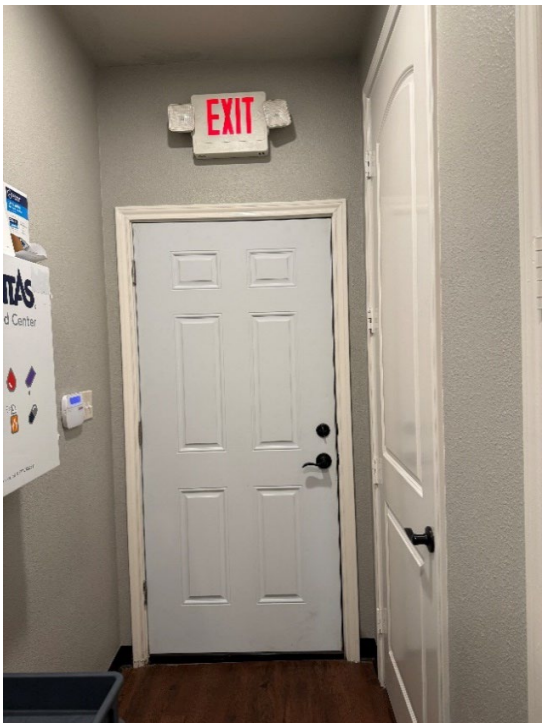
The emergency exit at the back of the building has a floor transition higher than the ¼" or ½" (for beveled edge transition) maximum protrusion height allowed by the TAS (TAS 303.2). This condition was observed on both the interior and exterior sides of the emergency exit.

The required door clearance is not met on the interior side of the exit. The door is approached through a short hallway that is slightly wider than the door opening, however, a minimum of 18" should be maintained from the latch side of the door to the closest obstruction to be compliant with TAS standards (TAS 404.2.4.1). The door currently swings towards the interior side; having the door swing the other direction would allow for required door clearances to be met and be beneficial for fire safety purposes.

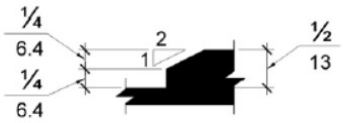




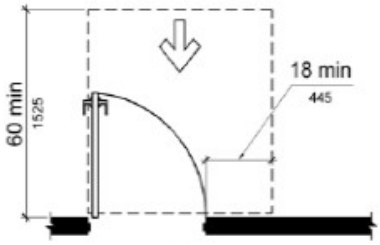
Transition at emergency exit is higher than the ¼" or ½" max allowed by TAS on interior and exterior sides (below left and middle)



Corridor does not allow for required door clearance at emergency exit. 18" min. required on latch side by TAS (below right).







i. Toll 49 Assessment

The Toll 49 assessment focuses on the pedestrian facilities within the Toll 49 right of way. While this portion of the assessment was specifically focused on documenting pedestrian facilities, all intersections along the entirety of the Toll 49 road were documented with photos. This includes intersections at on and off ramps and at cross streets that intersected the toll road at grade. Just one of the intersections – at the on and off ramps meeting FM 2493 – was observed to have pedestrian facilities.

The intersection with FM 2493 includes a shared use path that is part of the Tyler Legacy Trails system. This path and related components, including but not limited to the clear width of the path, slopes and cross slopes, crosswalks, detectable warning surfaces, and pedestrian refuge islands, were assessed for

compliance with PROWAG guidelines. No compliance issues were observed after completing the survey of this facility.



Trail connections at Toll 49 on and off ramps at FM 2493.



In accordance with Title II of the ADA, the Authority is committed to conducting a self-evaluation of the areas that are open to the public. As a first step in the process, the NET RMA has evaluated the primary spaces utilized and the website. The NET RMA will update this section as self-evaluations are conducted in the future.

Table 2: Summary of facility/program with ADA barriers and resolutions identified.

Facility / Program	Barriers Identified	Remedy Proposed
Leased office at 1011 Pruitt Place Tyler TX	Please see previous pages for a full, detailed report.	Issues will be coordinated with the building management, as the property owner.
Maintenance Yard*	None Identified (not a public space)	If complaints are received, the ADA coordinator will follow the grievance procedure.
Netrma.org	Website and PDF files are not ADA compliant.	The NET RMA has been advised the website and PDF documents are not compliant. These will be remedied in a two-part process. The first ('26-'27) will be to update the website with the provider. The second ('27-'28) will be worked on next year. The budget allocated to ADA web site enhancements for the next two years is $260K (for website and PDF changes.) If complaints are received, the ADA coordinator will follow the grievance procedure.
Mobility Authority meetings	Not ADA compliant.	Translation and interpretation services are now available upon request. Complaints will be coordinated with the building management, as the property owner.
Signage on the roads	Signs are routinely evaluated and replaced with signs that have increased reflectivity.	This is being handled as part of the routine maintenance of roadway signs. Signs are being routinely replaced, as needed. This is coming out of the maintenance budget, which is over and above the $260K budget that was allocated to the website.
NET RMA toll tag program**		**The North Texas Tollway Authority (NTTA) ensures ADA compliance on its website by adhering to the Web Content Accessibility Guidelines (WCAG) 2.1 AA standards**, which include making all web content accessible to individuals with disabilities. This involves regular evaluations and updates to their website to meet accessibility requirements.
NET RMA payment program**		NTTA provides accessible payment options through electronic tags and various customer service resources to assist individuals with disabilities. They also ensure compliance with the Americans with Disabilities Act (ADA) to enhance accessibility across their services.

**Not a public space ** NTTA administers this program*

2.3 NET RMA Community Partners

The NET RMA works closely with its partner agencies, cities, counties, the MPOs to help implement regional transportation plans. The NET RMA can partner with various local entities on financing or transportation projects, which may include the following entities:

- United States Department of Transportation (USDOT)
- Texas Department of Transportation (TxDOT)
- Texas Councils of Governments
    - North Central Texas Council of Governments
    - East Texas Council of Governments
    - Ark-Tex Council of Governments
- Tyler MPO
- Longview MPO
- Texarkana MPO
- Bowie County (and all cities within it)
- Camp County (and all cities within it)
- Cass County (and all cities within it)
- Cherokee County (and all cities within it)
- Gregg County (and all cities within it)
- Harrison County (and all cities within it)
- Kaufman County (and all cities within it)
- Panola County (and all cities within it)
- Rusk County (and all cities within it)
- Smith County (and all cities within it)
- Titus County (and all cities within it)
- Upshur County (and all cities within it)
- Van Zandt County (and all cities within it)
- Wood County (and all cities within it)

Should the NET RMA receive a complaint on a project that is ultimately owned by a partner entity, the NET RMA would forward the complaint to the appropriate entity for remedy.

3. Compliance

a. NET RMA's ADA Policy

The NET RMA ensures access to policies, notices, and assurances are implemented and available online at https://www.netrma.org/net-rma-policies/ADAprogram/. These documents are developed to ensure no discrimination against people living with disabilities. The NET RMA's Policy on Americans with Disabilities can be found in Appendix A.

b. NET RMA's ADA Coordinator

The NET RMA has identified its ADA coordinator as its Director of Engineering:

Deanne Simmons
ADA/504 Coordinator
1011 Pruitt Place
Tyler, Texas 75703
903.630.7894
ADAHelp@netrma.org

c. NET RMA Authority Statements, Notices, and Assurance

In accordance with the requirements of Title II of the ADA, the NET RMA will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. The NET RMA nondiscrimination statement can be found in Appendix B, the ADA-504 Assurance can be found in Appendix C, and the ADA-504 notice can be found in Appendix D. As mentioned above, all resources are also available online at https://www.netrma.org/net-rma-policies/ADAprogram/.

d. NET RMA ADA Grievance Procedure

The Title II regulation in 28 CFR 35.107(b) requires a public entity to adopt and publish a grievance procedure providing for the prompt and equitable resolution of complaints alleging discrimination based on disability access to any governmental facility, program, service or activity provided by the entity. The NET RMA grievance procedure can be found in Appendix G.

e. NET RMA ADA Transition Plan Implementation

Because the NET RMA has leased office space and significant infrastructure in its website, it is not possible to remove all barriers to accessibility immediately. Barriers will be removed systematically and in phases to ensure equality among NET RMA programs. It is the intent of the NET RMA to address barriers to accessibility on an ongoing basis. Implementing improvements is contingent upon immediate necessity, degree of complexity, overall cost, and budget approval.

The NET RMA reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in Authority programs, ongoing evaluations, funding constraints, and opportunities.

The schedule for updates to the ADA Transition Plan will be based on a three-year cycle to ensure any newly identified issues or changing environments in the public right-of-way, facilities or websites can be addressed over time. Updates to the reporting and/or attachments may be made more frequently, as needed. The Authority intends to integrate the accessibility data into ongoing funded capital and maintenance programs, operating budgets, or other development initiatives as appropriate.

f. NET RMA ADA Self-Evaluation & Transition Plan Monitoring

The Transition Plan is considered a living, evergreen document that will continue to be updated as conditions with the NET RMA's roadway system and other projects evolve. The initial schedule is to formally review and update the complete document (main body and appendices) at least once every three (3) years. Updates to the reporting and/or attachments may be made more frequently, as needed. Any substantive updates to the main body of this document will include a public comment period in accordance with NET RMA's public outreach efforts.

(END OF ADA/SECTION 504 TRANSITION PLAN)

APPENDIX A- NET RMA Americans with Disabilities Non-Discrimination Policy

Americans with Disabilities Non-Discrimination Policy

Purpose

This policy ensures the NET RMA compliance with the requirements of Title II of the Americans with Disabilities Act (ADA), which guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. As a recipient of federal financial assistance, the NET RMA is also subject to Section 504 of the Rehabilitation Act of 1973 (Section 504). This policy is intended to attain compliance with these important requirements.

Employment Practices

Equal employment opportunity is a fundamental principle of the NET RMA. As an equal opportunity employer, the NET RMA is committed to recruiting, hiring, promoting, and administering all human resource actions in a nondiscriminatory manner and in compliance with all applicable laws and regulations.

The NET RMA will not discriminate against a qualified individual with a disability because of the disability of such a person in job application procedures, hiring, advancement, discharge, compensation, job training, or other terms, conditions, and privileges of employment.

In addition, the NET RMA will make a reasonable accommodation for the known and/or documented physical or mental limitations of an otherwise qualified individual who is an applicant or an employee, unless the accommodation imposes an undue hardship on the operations of the NET RMA or creates a safety issue. A qualified individual with a disability is an individual with a disability who, with or without reasonable accommodations, can perform the essential functions of the position that such individual holds or desires.

No criterion shall be included in employee tests or other selection criteria that would discriminate against an individual with a disability unless such criteria are job-related. As such, any employment test will accurately reflect the skills or aptitude necessary to perform the job. No medical examinations or psychological tests will be given before a conditional offer of employment is made. Reasonable accommodation shall be made for otherwise qualified candidates to enable that candidate to perform the job unless it imposes an undue hardship on the NET RMA. Standard methods will be used in determining reasonable accommodation and undue hardship.

Reasonable Accommodation to People with Disabilities

The ADA prohibits a state or local government from denying services or benefits on specified discriminatory grounds. The ADA mandates an equal opportunity to participate in and benefit from a public entity's services, programs, and activities. All the activities of state and local governmental bodies are covered by the ADA, including but not limited to their public meetings, public transportation facilities, public rights-of-way, and any other facilities operated by the public entity.

Governmental bodies subject to the Act must ensure that their meetings and other communications comply with the ADA. State and local governments may not refuse to allow a person with a disability to participate in a service or program, or refuse to furnish auxiliary aids (including TTD/TTY), when necessary, to ensure effective communication, unless an undue burden or fundamental alteration would result. Public entities must operate their programs so that they are readily accessible to, and usable by, individuals with disabilities.

A public entity must also offer program accessibility, which means it may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible.

NET RMA Responsibilities

The Executive Director or his or her designee shall designate an ADA/Section 504 Coordinator by name. The coordinator's name and contact information will be posted on the NET RMA's website and all related materials. The ADA Coordinator shall ensure compliance with this ADA policy and ensure that each service, program, and activity, when viewed in its entirety, is readily accessible to, and usable by, individuals with disabilities.

The ADA requires that all programs and facilities be evaluated for ADA compliance. In addition, the NET RMA shall provide a grievance procedure for the resolution of an ADA complaint. The coordinator shall be responsible for reviewing and monitoring compliance with the ADA and these complaints.

APPENDIX B- NET RMA Non-Discrimination Statement

ADA Nondiscrimination Statement

Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973 – ADA Policy and Public Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the North East Texas Regional Mobility Authority (NET RMA) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

NET RMA does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

NET RMA will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in NET RMA's programs, services, and activities, including qualified sign language interpreters and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

NET RMA will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcome in the NET RMA office.

Anyone who requires auxiliary aids or services for effective communication, or a modification of policies and procedures to participate in a program, service, or activity of NET RMA, should contact the ADA/504 Coordinator as soon as possible, but no later than 48 hours before the scheduled event.

The Americans with Disabilities Act does not require NET RMA to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden. Complaints that a program, service, or activity of NET RMA is not accessible to persons with disabilities should be directed to the ADA/504 Coordinator.

NET RMA will not charge a fee on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Contact Information: Deanne Simmons ADA Coordinator, 1011 Pruitt Place, Tyler, Texas 75703, 903.630.7894, ADAHelp@netrma.org



APPENDIX C- NET RMA ADA-504 Assurance

ADA Assurance

1011 Pruitt Place Tyler, TX 75703 903.630.7894 www.netrma.org

Americans with Disabilities Act and Section 504 of The Rehabilitation Act of 1973 Assurance

28 Code of Federal Regulations Part 35.130, Title II of the Americans with Disabilities Act prohibits discrimination on the basis of disability by public entities. Subtitle A protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. It extends the prohibition of discrimination in federally assisted programs established by section 504 of the Rehabilitation Act of 1973 to all activities of state and local governments, including those that do not receive federal financial assistance, and incorporates specific prohibitions of discrimination on the basis of disability from Titles I, II, and V of the Americans with Disabilities Act. This rule, therefore, adopts the general prohibitions of discrimination established under section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and a qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.

The North East Texas Regional Mobility Authority (NET RMA), hereby agrees that, as a condition of receiving any federal financial assistance from the U.S. Department of Transportation through the Federal Highway Administration, it is subject to and will comply with all laws and regulations, and hereby gives assurance that no qualified disabled person shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination, including discrimination in employment, under any program or activity that receives or benefits from this federal financial assistance. NET RMA further assures that its programs will be conducted, and its facilities operated, in compliance with all the requirements imposed by or pursuant to 49 CFR Part 27, 28 CFR Part 35, and 42 CFR Section 12101- 12213.

Glenn H. Green, P.E.
Executive Director
North East Texas Regional Mobility Authority

10/9/26
Date

APPENDIX D- NET RMA ADA-504 Notice

ADA Notice

1011 Pruitt Place Tyler, TX 75703 903.630.7894 www.netrma.org

Americans with Disabilities Act and Section 504 of The Rehabilitation Act of 1973
Nondiscrimination Statement

The North East Texas Regional Mobility Authority (NET RMA) does not discriminate against any qualified disabled person solely by reason of his or her disability, exclude from participation in, deny the benefits of, or otherwise subject individuals to discrimination, including discrimination in employment, under any program or activity that receives or benefits from federal financial assistance.

Additionally, NET RMA ensures its program will be conducted, and its facilities operated, in compliance with all nondiscriminatory practices and requirements imposed by or pursuant to 49 Code of Federal Regulations (CFR) Part 27, 28 CFR Part 35, and 42 USC Section 12101-12213.

Glenn H. Green, P.E.
Executive Director
North East Texas Regional Mobility Authority

10/9/26
Date

APPENDIX E- NET RMA Complaint Process

How to file a Complaint for Potential ADA Non-compliance

The NET RMA will investigate all complaints from individuals alleging discrimination in the Authority's programs, services, or activities under the Americans with Disabilities Act of 1990 (ADA). Disability complaints alleging discrimination in programs, services, or activities may be filed pursuant to the following procedures.

How to File a Complaint

Any person who believes that the NET RMA has discriminated against them based on their disability may file an ADA complaint, directly or through an authorized representative, by completing and submitting the NET RMA's External Discrimination Complaint Form available on the NET RMA's website in English and Spanish or in person at the NET RMA's office within 60 days of the act of discrimination or when the person became aware of the alleged acts.

The complaint should be filed with:

North East Texas Regional Mobility Authority
Deanne Simmons/ADA Coordinator
1011 Pruitt Place
Tyler, Texas 75703
903.630.78794
ADAHelp@netrma.org

Complaint Acceptance

Within fifteen (15) calendar days of receiving an ADA complaint, the NET RMA will review the submitted information and send the complainant an acknowledgement (letter or email) informing them whether the complaint will be investigated as an ADA complaint.

Investigations

The NET RMA will promptly investigate all valid complaints of alleged discrimination based on disability in its programs, services, and activities within 15 days of receiving a completed and signed complaint. The NET RMA may contact the complainant if more information is needed to resolve the complaint.

The complainant will have ten (10) business days to send the requested information to the NET RMA. The NET RMA may choose to close the complaint if the requested information is not provided by the complainant within the ten (10) business days. The NET RMA may also close the complaint if a complainant no longer wishes to pursue the complaint, or if the complainant fails to cooperate in the investigation of the complaint.

Letters of Findings

After an investigation is conducted (15 calendar days), the NET RMA will make a final decision and issue one of the following letters to the complainant based on the investigation findings:

1. A Closure Letter, summarizing the allegation and indicating that the NET RMA did not find a violation of ADA regulations. This letter closes the case.
2. A Letter of Finding, summarizing the allegations and interviews concerning the alleged incident, and an explanation of any corrective actions, training of NET RMA staff, or other actions that will occur.

Filing Complaints Directly

A person may also file a complaint directly to:

- Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, Texas 78701-2483
- Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102
- U.S. Department of Transportation, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590

Appendix F- NET RMA Website Accessibility Statement

Mobility Authority Website Accessibility Statement

The NET RMA is dedicated to building an intentionally inclusive experience on our website for all people with disabilities.

- The NET RMA acknowledges that the current website and content may have existing accessibility gaps and may not comply with current WCAG guidelines.
- Some content may meet WCAG guidelines. Initiatives are underway to identify and close any accessibility gaps.
- Some PDFs may meet WCAG guidelines. Initiatives are underway to identify & close any accessibility gaps.

The NET RMA is targeting a very specific level of accessibility.

- As part of the 2026 Website Accessibility Remediation initiative, the NET RMA is targeting WCAG AA 2.2.
- Some areas of the site will exceed this accessibility target.
- Some areas outside the NET RMA's control may not be in full compliance.

There are specific tools that will be utilized by the NET RMA to test the site's accessibility.

- Starting in Fall 2026, the NET RMA will use a variety of automated tools, combined with manual testing, to identify current accessibility gaps and develop a plan to close the gaps as part of a larger website remediation effort.
- During remediation, the NET RMA will use additional accessibility tools & manual testing to ensure the future website meets the specified WCAG guidelines.
- Before the new site is launched, a full accessibility testing suite & protocol will be used to ensure the future website meets the specified WCAG guidelines.

Approximate milestones and timelines associated with the implementation plan.

- Late Spring/Early Summer 2026 - Website Remediation Planning / Partner Selection
- Fall 2026 - Full Website Remediation Project Initiated
- Beginning of 2027 - Website Remediation Strategy Complete - Inclusive of Document Remediation & Archiving Strategy
- Fall 2027 - Website Development & Content Remediation Initiatives Complete / Potential Site Launch
- Winter 2027 - Ongoing Testing & Training

Contact

If you use assistive technology and the format of any material on our website interferes with your ability to access the information, please contact us at 903.630.78794 or ADAHelp@netrma.org or at:

North East Texas Regional Mobility Authority
Deanne Simmons/ADA Coordinator
1011 Pruitt Place
Tyler, Texas 75703

Appendix G- NET RMA Grievance Procedure

NET RMA Grievance Procedures

Americans with Disabilities Act Grievance Procedure

This grievance procedure is established to meet the requirements of the ADA. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the North East Texas Regional Mobility Authority (NET RMA).

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number, email address of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted as soon as possible, preferably within 60 calendar days of the alleged violation to:

Deanne Simmons, ADA Coordinator at 1011 Pruitt Place, Tyler, Texas 75703, deannesimmons@netrma.org, 903.630.7894

Within 15 calendar days after receipt of the complaint, (name of ADA Coordinator) will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, (name of ADA Coordinator) will respond in writing, and where appropriate, in format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the NET RMA and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the NET RMA Executive Director or designee.

Within 15 calendar days after receipt of the appeal, the NET RMA Executive Director or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the NET RMA Executive Director or designee will respond in writing, and, where appropriate, in a format that is accessible to the complainant, with a final resolution of the complaint.

Appendix H- NET RMA Customer ADA Accommodation Policy

Overview of ADA Customer Accommodation Policies

The Americans with Disabilities Act (ADA) mandates that businesses provide reasonable accommodations to ensure accessibility for customers with disabilities. These policies are essential for compliance and fostering an inclusive environment.

The purpose of this policy is to:

- Provide employees with a clear and accessible process for responding to customer requests for accommodations.
- Comply with all applicable laws and regulations regarding nondiscrimination and accessibility.
- Ensure accommodations are implemented in a timely, consistent, and confidential manner.

Effective Date: 05/01/2026
Policy Owner: ADA Coordinator
Last Reviewed: 05/01/2026

Key Components of an ADA Customer Accommodation Policy

1. Purpose and Scope

- **Objective**: To ensure all customers, regardless of their disabilities, have equal access to services and facilities. Provide employees with a clear and accessible process for responding to customer requests for accommodations. Comply with all applicable laws and regulations regarding nondiscrimination and accessibility. Ensure accommodations are implemented in a timely, consistent, and confidential manner.
- **Applicability**: This policy applies to all customers and visitors.

2. Definition of Reasonable Accommodations

- **Examples**:
    - Modifying policies or practices to allow service animals.
    - Providing auxiliary aids, such as sign language interpreters or Braille materials.
    - Ensuring physical accessibility, like ramps or designated parking spaces.

3. Requesting Accommodations

- **Procedure**:
    - Customers can request accommodations at any time.
    - Requests can be made verbally or in writing.
    - Requests should be logged with the customer's name and request, and actions taken. The request should be shared with the ADA Coordinator.
    - Upon email approval, arrangements can be made.
        - Sign-language support can be found at: https://trustoria.com/specialist/Sign-Language-Interpreter/Tyler-TX

4. Evaluation of Requests

- **Assessment**:
    - Each request will be evaluated on a case-by-case basis.
    - Consideration of the nature of the disability and the specific needs of the customer.
    - The ADA Coordinator will determine if the requested accommodation is reasonable or if it poses an undue hardship.

5. Confidentiality

- **Privacy**:
    - All information regarding a customer's disability and accommodation request will be kept confidential.
    - Only necessary personnel will have access to this information.

Appendix I- NET RMA Employee ADA Accommodation Policy

NET RMA Employee ADA Accommodation Policy

Purpose of the Employee Accommodation Policy

The purpose of this policy is to:

- Provide employees with a clear and accessible process for requesting workplace accommodations.
- Comply with all applicable laws and regulations regarding nondiscrimination and accessibility.
- Foster a work environment where employees of all identities, abilities, and backgrounds can thrive.
- Ensure accommodations are implemented in a timely, consistent, and confidential manner.

This policy reflects NET RMA's commitment to inclusion, legal compliance, and employee well-being.

Effective Date: 05/01/2026
Policy Owner: ADA Coordinator
Last Reviewed: 05/01/2026

1. Policy Overview

NET RMA is committed to fostering an inclusive and accessible workplace. We provide reasonable accommodations to qualified employees and job applicants with disabilities, medical conditions, religious obligations, or other protected needs, in accordance with applicable laws.

This policy outlines the process for requesting accommodations and our responsibilities in responding to those requests fairly and promptly.

2. Scope

This policy applies to:

- All employees (full-time, part-time, and temporary)
- Job applicants seeking employment at NET RMA
- Requests related to:
    - Disabilities (physical, mental, cognitive)
    - Chronic health conditions
    - Pregnancy and related medical conditions
    - Religious beliefs and practices
    - Temporary injuries or medical needs
    - Gender-affirming care and identity-related accommodations
    - Any other protected status under applicable law

3. What Is a Reasonable Accommodation?

A reasonable accommodation is any change to the work environment, job duties, or workplace policies that enables an individual with a protected need to perform the essential functions of their role or enjoy equal access to employment opportunities.

Examples may include:

- Adjusted work schedules or remote work options
- Ergonomic equipment or workspace modifications
- Interpreters or assistive technologies
- Modified duties or job restructuring
- Private spaces for prayer, lactation, or medical needs
- Extended or flexible leave for medical treatment

Accommodations must not pose an undue hardship to the company or compromise essential job functions.

4. How to Request an Accommodation

Employees may request an accommodation by:

- Speaking directly with their manager or HR partner
- Emailing the ADA Coordinator

Job applicants may make requests by emailing ADAHelp@netrma.org

Employees do not need to use specific language like “accommodation” or “ADA” to trigger a request — any expression of a need related to a disability, religion, or medical issue will initiate the process.

5. The Interactive Process

After receiving a request, NET RMA will begin an interactive process, which may include:

1. Clarifying the request and understanding the nature of the need.
2. Requesting supporting documentation, if necessary (e.g., from a healthcare provider).
3. Exploring possible accommodations collaboratively with the employee.
4. Evaluating whether the request is reasonable and whether alternatives exist.
5. Confirming the outcome in writing, including implementation timelines.

We aim to review requests within 10 business days of receiving all necessary information.

6. Confidentiality

Appendix J- NET RMA Employee ADA Complaint Process

NET RMA Employee ADA-Compliant Process

Purpose of the Employee Accommodation Policy

The purpose of this policy is to:

- Provide employees with a clear and accessible process for filing an ADA complaint

This policy reflects NET RMA's commitment to inclusion, legal compliance, and employee well-being.

Effective Date: 05/08/2026
Policy Owner: ADA Coordinator
Last Reviewed: 05/08/2026

1. Policy Overview

NET RMA will investigate all complaints from individuals alleging discrimination in the NET RMA's programs, services, or activities under the Americans with Disabilities Act of 1990 (ADA). Disability complaints alleging discrimination in programs, services, or activities may be filed pursuant to the following procedures.

This policy outlines the process for filing and processing an ADA complaint.

2. Scope

This policy applies to:

- All employees (full-time, part-time, and temporary)
- Requests related to:
    - Disabilities (physical, mental, cognitive)
    - Chronic health conditions
    - Pregnancy and related medical conditions
    - Religious beliefs and practices
    - Temporary injuries or medical needs
    - Gender-affirming care and identity-related accommodations
    - Any other protected status under applicable law
- Harassment or exclusion
- Negative performance evaluations based solely on the request

Complaint Acceptance

Within ten (10) business days of receiving an ADA complaint, the NET RMA will review the submitted information and send the complainant an acknowledgement (letter or email) informing them whether the complaint will be investigated as an ADA complaint.

Investigations

The NET RMA will promptly investigate all valid complaints of alleged discrimination based on disability in its program, services, and activities within 60 days of receiving a complete and signed complaint. The NET RMA may contact the complainant if more information is needed to resolve the complaint.

The complainant will have ten (10) business days from the date of contact to send the requested information to NET RMA. The NET RMA may choose to close the complaint if the requested information is not provided by the complainant within ten (10) business days. The NET RMA may also close the complaint if a complainant no longer wishes to pursue it, or if the complainant fails to cooperate in the investigation of the complaint.