

PLAN YEAR 1 (2025-2026)

INDEPENDENT MONITOR ANNUAL REPORT

Assessment of City of Chicago Performance Under Remedial Plan Order

Relative to the City's Obligation to Provide Accessible Pedestrian Signals (APS)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN COUNCIL OF THE BLIND OF
METROPOLITAN CHICAGO, et al.,

Plaintiff,

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

THE CITY OF CHICAGO,

Defendant.

Case No. 19 C 6322

Honorable LaShonda A. Hunt

PREPARED FOR

Honorable Judge LaShonda A. Hunt
United States District Court
Northern District of Illinois
219 S. Dearborn Street
Chicago, IL 60604
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Project #: 1MGS25004
Report #: 1
Date: July 1, 2026

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GENERAL DISCLAIMER

The development of this Annual Report, associated report appendices, and any related duties or activities conducted by the Independent Monitor are consistent with technical work products of a certified accessibility professional. The Independent Monitor is not an attorney and does not provide legal consultation or opinions.

NOTICE ON ACCESSIBILITY OF THIS REPORT

Reasonable efforts have been made to make this report accessible, including use of headings for navigation and alternative text to describe images, figures, and graphs. Information provided in the Appendices, including assessment checklists, may not be easily understood or comprehensible using screen reader technology. The Independent Monitor welcomes any requests for additional information, documents in alternative formats, and recommendations to increase accessibility of future reports.



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Common Abbreviations Used in this Report

Full Name or Reference	Abbreviation
Americans with Disabilities Act	ADA
Accessible Pedestrian Signal(s)	APS
Community Advisory Committee	CAC
Chicago Department of Transportation	CDOT
Certified Orientation and Mobility Specialist	COMS
Department of Justice	DOJ
Docket	DKT
Disability Rights Advocates	DRA
Exclusive Pedestrian Phase(s)	EPP
Federal Highway Administration	FHWA
Independent Monitor	IM
Jensen Hughes	JH
Leading Pedestrian Intervals	LPI
Mid-Block Pedestrian Crossings	MPS
Mayor's Office for People with Disabilities	MOPD
Manual on Uniform Traffic Control Devices	MUTCD
National Cooperative Highway Research Program	NCHRP
Public Right-of-Way Accessibility Guidelines	PROWAG
Protected Turn Phase	PTP
Remedial Plan Order	RPO
Quality Control	QC
Service Requests	SR
T-Shaped Intersections	TSI
Traffic Signal Modernization	TSM

1.0 Introduction

On September 23, 2019, Plaintiff, a class of blind and low-vision pedestrians in Chicago, brought action alleging, among other things, the City of Chicago (the “City” or “Defendant”) violated Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act by failing to provide Accessible Pedestrian Signals (APS) at the vast majority of its pedestrian signalized intersections. *American Council of the Blind of Metropolitan Chicago v. City of Chicago*; (Dkt. 1).

On April 14, 2021, the Court granted the United States’ unopposed motion to intervene as a Plaintiff. (Dkt. 77).

On March 31, 2023, the Court entered a Memorandum Opinion and Order, among other things, finding the City of Chicago liable for violating the ADA and Rehabilitation Act by failing to provide meaningful access to its network of pedestrian signals. (Dkt. 248).

On May 29, 2025, the Court issued a Remedial Plan Order (Dkt. 365) setting forth the Court’s rulings as to the remedy necessary to bring the City into compliance with the above statutes, including the appointment of an Independent Monitor.

The Court ordered the Parties to submit a proposed order of appointment for Independent Monitor by June 18, 2025. On June 20, 2025, Michael G. Shaw was appointed as Independent Monitor for this case. (Dkt. 368). On this date, Michael Shaw was authorized to begin work as the Independent Monitor and to proceed with all reasonable diligence to assess the City’s compliance with the Remedial Plan Order.

The Independent Monitor’s authority and duties indicated in the Court’s Remedial Plan Order (Dkt. 365) in Sections VIII (A)(2), VIII (B), and X.

Under Section VIII (B)(4)(b) of the Remedial Plan Order, the Independent Monitor shall file with the Court annual written reports regarding City of Chicago’s performance under the Remedial Plan Order. Such reports, at a minimum, must include the following information:

1. The number of APS installations conducted in the prior twelve (12) months;
2. Whether those installations complied with the Manual on Uniform Traffic Control Devices (MUTCD);
3. Whether installations complied with the prioritization required under the Remedial Plan Order;
4. Whether City of Chicago complied with the Communication, Community Involvement, and Maintenance provisions of [the] Remedial Plan Order; and
5. Recommendations for improving implementation of the Remedial Plan Order.

This Annual Report includes the analyses and documentation required under Section VIII (B)(4)(b) and supplemental information that supports the Independent Monitor assessment of the City’s compliance with the Remedial Plan Order.

In accordance with Section VIII (B)(4)(b) of the Remedial Plan Order, the Independent Monitor respectfully submits this Annual Report to the Court.

1.1 ABOUT THE ANNUAL REPORT

This Annual Report is the primary instrument the Independent Monitor uses to communicate to the Court the City's compliance under the Remedial Plan Order for each Plan Year.

The report is organized in the following manner with descriptions of each reporting section:

- + **Section 2.0 – Independent Monitor Authority and Duties** – This section identifies the authority and primary ongoing objectives of the Independent Monitor, including the development of the Annual Report and other related duties that assist in the compliance assessment.
- + **Section 3.0 – The City's Compliance with the Remedial Plan Order** – This section includes the Independent Monitor's minimum required reporting of the City's performance under the Remedial Plan Order for the Plan Year, including APS installation, compliance with the MUTCD, APS prioritization, and other obligations. Each subsection details the relative requirements of the Remedial Plan Order, the City's responsive reporting, and the Independent Monitor analysis.

This section also includes the Independent Monitor's recommendations for improving the implementation of the Remedial Plan Order
- + **Section 4.0 – Dispute Resolution for the Plan Year** – This section details any dispute resolution activities that have occurred in the Plan Year in cases where Plaintiffs believe that the City of Chicago has not complied with the Remedial Plan Order.
- + **Section 5.0 – Conclusion** – The Independent Monitor's closing remarks.
- + **Section 6.0 – General References** – This section lists weblinks to key technical standards, guidelines, and other material referenced in this report or that supported the development of this report.
- + **Section 7.0 – List of Report Appendices** – This section lists and provides descriptions for the appendices attached to and supplementing this Annual Report for the Plan Year.

1.2 CONTACT INFORMATION

Please contact the Independent Monitor with questions about this report and related efforts:

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Please contact CDOT for questions about the City's APS Program and related efforts:

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1.3 EXECUTIVE SUMMARY

The City of Chicago is off to a strong start in Plan Year 1 in demonstrating compliance with the Remedial Plan Order. In this, CDOT has excelled in the areas of APS installation for the Plan Year and has developed several excellent processes and procedures to support the implementation of the Order. The City has also provided a robust response to communication and community involvement requirements, developing an APS website and continuing to provide leadership and ownership of the APS Program through the APS Community Advisory Committee. CDOT and the COMS have been working well together, including regularly occurring meetings and detailed coordination efforts, to assist with technical compliance and engineering judgment considerations.

Below is a summary of the City's compliance with the Remedial Order for Plan Year 1 as assessed by the Independent Monitor, including specific concerns identified through his analysis.

The Independent Monitor has provided recommendations throughout this report and in [Section 3.5](#) for consideration.

Summary of the City's Compliance with the Remedial Plan Order

+ APS Installation Compliance (Plan Year 1):

- ✓ In Plan Year 1, the City accomplished its primary goal of installing APS at 78 intersections, 8 more than the required annual commitment.
- ? The City will need to continue solid efforts to deliver additional APS installations in Plan Year 2 to meet the minimum requirement of 110 intersections, 8 of which can be applied from Plan Year 1.

+ APS Installation (Phase I):

- ✓ In total, the City has determined that 165 intersections are now equipped with APS, representing 6.1% of the total number of signalized intersections for Phase I.
- ✗ Many of the intersections being counted towards this requirement do not currently comply with all applicable provisions of the MUTCD, as discussed below.

+ MUTCD Compliance:

- ✓ CDOT has demonstrated exemplary efforts pursuant to technical compliance in many areas in Plan Year 1, including the drafting of APS policy, development of technical check sheets used to design and inspect APS installations, and working diligently with the COMS on design and engineering judgment considerations.

- ✗ While the processes around technical compliance developed are sound, the implementation of compliance with the MUTCD may be an ongoing concern. In his on-site inspections of APS installations in 2025, the Independent Monitor did not find pre-Order installations to be within compliance with the MUTCD, with additional concerns identified for a relatively limited number of Plan Year 1 installations observed. Of the 103 intersections inspected, including installations prior to the Remedial Plan Order and Plan Year 1 installations, 0 were found to be in full compliance with the MUTCD as assessed.

- ? The Independent Monitor plans to assess all remaining Plan Year 1 installations in 2026. If it is determined that the City is substantially compliant with the MUTCD upon completion of those assessments, the Independent Monitor supports a reduction of oversight in this area in the future.

+ APS Prioritization Compliance:

- ✓ CDOT has developed a thorough APS Prioritization Methodology, which provides a solid foundation for prioritizing APS installations moving forward.

- ✓ The City is generally in compliance with respect to prioritizing APS installations as required, with specific focus on Public Requests and Particularly Dangerous Conditions in Plan Year 1.

CDOT reports that the APS installations at the 78 Plan Year 1 intersections were prioritized as such: 18 were responsive to Public Requests, 28 were installed at intersections with Particularly Dangerous

- ? Conditions, and 32 were noted as Capital Improvement projects with no indication of priorities addressed. Through his analysis, the Independent Monitor found that more priorities may have been addressed than what CDOT has reported.

- ? While the City installed APS at 18 locations responsive to Public Requests in Plan Year 1, it is noted that there is a backlog of requests in the queue. As 69 total requests have been submitted for APS on or after March 9, 2025, CDOT will need to ramp up efforts to deliver on these requests in Plan Year 2. The City notes that they are still working on and making progress on requests made prior to March 9, 2025.

- ? In addition, there is concern that Public Requests for APS installations may not occur within the 12 month allowance from the time the request is received. While CDOT has generally complied with this provision, there are 2 locations that may not have been completed in time, with many more due soon.

- ? The Independent Monitor feels that reporting around prioritization of APS needs to be more clear, specifically addressing priorities identified in the Remedial Plan Order, including access to public transportation and public facilities. The Independent Monitor has made notes regarding minor discrepancies in prioritization reporting quantities between the information provided in the Semi-Annual Report(s) and supplemental data provided for review by the Independent Monitor.

+ Communication, Community Involvement, and Maintenance Compliance:

- ✓ Responses to requirements related to Communication, Community Involvement, and Maintenance compliance with the Order have been sound in Plan Year 1. The City's APS website development and management of the APS Community Advisory Committee have been largely successful efforts. The systems in place to respond to Public Requests for APS are adequate and typically occur within the required response times.

- ✓ In Plan Year 1, the City reports that 60 requests for APS maintenance or repair were submitted in Plan Year 1, all of which have been resolved.

- ? The Independent Monitor has recommended that CDOT make specific details on requests for maintenance or repair be made available to the public and included on the APS and 311 websites. The City should confirm that any responses to APS requests for maintenance or repair are occurring within 5 business days as required.

+ Dispute Resolution:

- ✓ No formal dispute resolution activities occurred in Plan Year 1.

2.0 Independent Monitor Authority and Duties

In the development of this report, the Independent Monitor is authorized to carry out specific duties outlined in this section to assist in the determination of compliance under the Remedial Plan Order. The Independent Monitor's responsibilities identified in the Remedial Plan Order are as follows.

Section VIII (A)(2): Reporting: City of Chicago must submit regular reports at least every six (6) months (or another period agreeable to the parties) addressing compliance with [the] Remedial Plan Order to counsel for Plaintiffs and United States, the COMS, and the Independent Monitor. Upon request of the Independent Monitor for relevant documents or information, the City of Chicago shall promptly provide such documents and information regarding its compliance with [the] Remedial Plan Order.

Section VIII (B)(2): Authority: The Monitor shall have the power and right to retain consultants, consult with City personnel and COMS, and inspect APS installations. The Independent Monitor shall have access to City records and information about the City of Chicago's APS program. The Independent Monitor may identify any deficiencies and attempt to resolve them in consultation with the parties, including by recommending corrective action. The Independent Monitor shall report to the Court, City of Chicago, the Plaintiffs, and the United States to the extent that they identify material issues with the City of Chicago's performance under [the] Remedial Plan Order.

Section VIII (B)(3): Communication: The Independent Monitor may communicate *ex parte* with any party and the COMS.

Section VIII (B)(4)(a): Duties (Oversight): The Independent Monitor shall proceed with all reasonable diligence to oversee the City of Chicago's compliance with [the] Remedial Plan Order.

Section VIII (B)(4)(b): Duties (Reporting): The Monitor shall file with the Court annual written reports regarding City of Chicago's performance under [the] Remedial Plan Order.

Section VIII (B)(4)(c): Duties (Meetings): The Independent Monitor shall meet semiannually with the APS Community Advisory Committee, CDOT personnel, and COMS.

Section VIII (B)(5): Fees and Expenses: Independent Monitor shall submit annual budgets and applications for fees and expenses for approval. City of Chicago shall pay the Independent Monitor's reasonable fees and expenses. Within thirty (30) days of entry of this Order, counsel for Plaintiffs, the United States, and City of Chicago shall submit a joint proposed order setting forth procedures for approval of the Independent Monitor's budgets, fees, and expenses.

Section VIII (B)(6): Term: The Independent Monitor shall serve for a term of five (5) years, subject to requests for extension, replacement, or termination.

Section X: Dispute Resolution: If Plaintiffs or the United States believe that City of Chicago has not complied in any material respect with [the] Remedial Plan Order, they shall provide written notice to all parties and the Independent Monitor outlining the ways they believe the City of Chicago is in non-compliance. Following notice of potential non-compliance, the parties must confer in good faith for a period of up to 30 days to resolve the dispute, with any assistance from the Independent Monitor. If the parties are unable to resolve a dispute, any Party may make a motion for the Court to enforce the Remedial Plan Order.

Refer to attached **APPENDIX A: REMEDIAL PLAN ORDER (DKT. 365)** for the Remedial Plan Order in its entirety.

The role and authority of the Independent Monitor, requirements for his Annual Report submittals to the Court, and miscellaneous terms of his appointment are further detailed in the Order Appointing Michael G. Shaw as Independent Monitor (Dkt. 368). Language in this Order provides clarifications on the Independent Monitor's duties, responsibilities, and authority but are not itemized in this report.

Refer to attached **APPENDIX B: ORDER APPOINTING MICHAEL G. SHAW AS INDEPENDENT MONITOR (DKT. 368)** for the Order Appointing Michael G. Shaw as Independent Monitor in its entirety.

Key dates related to Independent Monitor reporting and associated activities for each Plan Year are indicated below in Table 2.0.

Table 2.0
Key Independent Monitor Yearly Dates

Activity	Dates
Plan Year Defined Period	May 29 th – May 28 th
Data Collection Period	July 1 st – June 30 th
Annual Report due each Plan Year	July 1 st
Proposed Budget Submittal to Court	July 1 st (w/ 2 weeks for opposition by City)
Submission of Itemized Statements	Every 90 days
Submission of No Conflict Statement	July 1 st
APS Community Advisory Committee Meetings	4 times per year (2 in-person, 2 virtual), TBD

Sections 2.1 through 2.7 detail the Independent Monitor's processes used to determine the City's compliance under the Remedial Plan Order. Supplemental information is provided on associated activities, including public meetings and coordination efforts, dispute mediation(s), associated fees and expenses, and other administrative considerations.

2.1 DATA AND DOCUMENT COLLECTION AND ANALYSIS

Under Section III (B) of the Remedial Plan Order, the City is required to install a minimum number of APS for each Plan Year that are prioritized according to the Order. Below are the processes employed by the Independent Monitor to collect APS field data and review prioritization of installations consistent with the requirements of the Remedial Plan Order.

2.1.1 On-Site Inspections

The primary means for collecting APS data in efforts to gather, review, and analyze information to neutrally assess the City's compliance with the material requirements of the Remedial Plan Order include on-site accessibility inspections of APS devices installed by the City or its contractors. These inspections, also referred to as assessments in this report, are generally conducted by Jensen Hughes staff, with the option of employing contractor assistance if necessary. All APS assessments and associated activities are conducted by or directly overseen by the Independent Monitor.

2.1.1.1 Data Collection: Initial Planning

The Independent Monitor relies on APS installation information provided by the City of Chicago and CDOT. To date, CDOT has typically sent the Independent Monitor lists of locations of APS installations directly by means of a working spreadsheet. In addition, installation information is provided via the City's [APS website](#) in the form of lists and an interactive map.

Each year, the Independent Monitor plans for travel to Chicago to assess APS devices installed. The number of trips planned each year varies and is dependent on the number of APS devices planned to be assessed. Refer to [Section 3.2.4](#) for current Plan Year assessment approach.

These assessments, typically planned in the summer and fall of each year, are intended to capture information on installations for the prior Plan Year. Each assessment trip, typically a working week in duration, includes the assessment of APS devices installed at approximately twenty (20) intersections. To the extent possible, assessments are planned to minimize travel required between locations for efficiency. For example, a planned site assessment may focus on one area of the City where installations have occurred in the Plan Year (e.g., downtown or other neighborhoods or wards).

2.1.1.2 Data Collection: Existing APS Checklist Development and Implementation

Documentation of existing APS conditions employs the use of APS checklists, developed by the Independent Monitor in accordance with requirements indicated in the MUTCD. The checklists have been created with a primary focus on APS pole or pushbutton location respective to varying intersection configurations that can impact access to all users. The checklists are less focused on APS device issues that can be variable in the field (e.g., volume, frequencies, optional APS programming) that can be resolved more simply and readily through maintenance or programming of the devices.

The 2009 edition of the MUTCD has been referenced to determine compliance to date. The determination to use the 2009 edition for the checklist development was based on discussions with Parties in 2025 regarding applicable standards or guidelines under the Remedial Plan Order. Refer to [Section 3.5](#) for detailed recommendations regarding this concern and others related, including use of the 11th Edition of the MUTCD for inspections moving forward.

Refer to attached **APPENDIX C: APPLICABLE 2009 MUTCD REQUIREMENTS** for the sections of the MUTCD relative to APS.

Select features from MUTCD sections 4E.08 – 4E.12 of the 2009 MUTCD have been used to develop the checklist used by the assessors.

Checklist development generally focuses on applicable standards or requirements relative to APS pushbutton placement and accessibility required under the MUTCD. The checklists also include MUTCD supporting language, guidance, or optional considerations per recommendations made by Plaintiffs based on concerns they have discussed previously with the City.

Not all requirements in these sections of the MUTCD apply to the physical assessments of accessibility features of APS devices. Some technical audible features of APS devices were not reviewed or confirmed as the assessors did not have equipment available to accurately check for compliance (e.g., decibel levels, frequencies of audible tones, etc.). Supplemental checklist notes have been provided if audible features are not functional, if volume appears inadequate, or if other issues are identified.

Finally, it should be noted that some interpretations have been made by the Independent Monitor on the applicable requirements. For example, the “level” all-weather surface identified in Section 4E.08 (04)(A) has been interpreted to mean that the surface be sloped no more than 2%, consistent with the ADA Standards for Accessible Design (ADAS), the model building codes, and most, if not all, other accessibility guidelines or standards.

If CDOT, the Parties, or others with vested interest feel that the checklists developed are not reflective of what is required per the Remedial Plan Order, the Independent Monitor recommends that technical discussions are initiated to resolve any identified concerns.

Refer to attached **APPENDIX D: EXISTING APS CHECKLIST (2009 MUTCD) – SELECT FEATURES** for additional information on the APS checklists developed by Jensen Hughes, including samples of completed checklists.

These checklists are completed to analyze existing conditions at each corner or pedestrian crossing including APS devices within the intersections identified by the City. A checklist is completed for each APS device assessed within these identified intersections, including locations where APS devices appear to be missing, significantly damaged, or not functional. Checklists are completed as accurately as possible in the field by the assessor(s); results expected are within a reasonable margin of error.

Each checklist provides key information, including:

- + Name(s) of the assessor(s)
- + Date of assessment
- + Location of the intersection and the APS device assessed
- + Photos of the APS device in context and a close-up of each device
- + One query for each MUTCD item reviewed (query responses in green comply, responses in red do not)
- + Any supplemental comments needed for clarification or additional concerns (provided at the end of the checklist)

Please note that checklists to date have been populated manually in the field, but in the future, digital capabilities may be employed, including the use of laptops or tablets to collect information more efficiently.

2.1.1.3 Data Collection: Processes

In addition to initial planning and the use of the assessment checklists, the Independent Monitor has developed assessment processes to support efficient and safety-focused assessments. Efficient assessment planning, coordination, documentation, and other related efforts are conducted by or directly overseen by the Independent Monitor.

Assessments to date have involved teams of two Jensen Hughes qualified and certified accessibility professionals dispersed to locations in the City where APS devices had been installed in the Plan Year identified in this report. One assessor is dedicated to collecting site information (measurements, photographs, etc.) and the other assessor records field notes and completes assessment checklists.

To effectively complete assessment checklists and document existing conditions, assessors use appropriate site assessment tools, including but not limited to:

- + Analog or Digital Existing APS Checklists: see above for information.
- + Digital Cameras: to capture images of APS devices and contextual images of the associated intersection and public right-of-way used for accessible pedestrian access.
- + Digital Levels: to assess ground slopes for accessible pedestrian routes approaching APS devices and required clear or ground floor slopes required serving APS devices.
- + Tape Measures: to check for required mounting heights or locations of APS devices, clearances required, and other measurements relative to the positioning of APS devices in relation to crosswalks.
- + Measuring Wheel: to measure accessible pedestrian routes or crosswalk features that exceed the limits of a typical tape measure.
- + Safety Vests: to provide adequate visibility of assessors by motorists, pedestrians, or others.

2.1.1.4 Data Collection: Analysis

Upon completion of APS site assessments in the field, additional back-end administrative and analytical activities are needed to prepare the data collected for inclusion in the Annual Report.

After each site assessment trip is conducted, the following data collection activities and analyses are performed:

- + Locations and quantities of APS devices assessed are confirmed against the list of APS locations provided by CDOT.
- + Site photographs are downloaded and organized by intersection for reference.
- + Field notes are transferred to final APS checklists to be included in the Annual Report, followed by a quality control (QC) review of the final APS checklists.
- + Final APS checklists are organized by intersection, in order of review in the field, and inserted into the Annual Report.

2.1.2 Prioritization Review

Under Section III of the Remedial Plan Order, the City is obligated to prioritize APS installations at signalized intersections with pedestrian signals based on the criteria developed in National Cooperative Highway Research Program (NCHRP), Accessible Pedestrian Signals: A Guide to Best Practices. This document is intended to address complexity of intersections and other considerations when determining priorities for APS installations.

Refer to the NCHRP document [Accessible Pedestrian Signals: A Guide to Best Practices](#) for additional information.

In addition, the Remedial Plan Order requires prioritization consideration under the following conditions:

1. Newly Pedestrian Signalized Intersections
2. Existing Signalized Intersections
 - a. Public Requests
 - b. New Signal Equipment
 - c. Particularly Dangerous Conditions
 - d. Public Transportation
 - e. Public Facilities

Refer to [Section 3.3](#) for detailed descriptions of the above priorities.

Prioritization Review: Processes

The Independent Monitor is tasked with confirming Plan Year APS installations are prioritized as required under the Remedial Plan Order. Below are the Independent Monitor's processes for confirming prioritization requirements are met:

- + Review CDOT APS prioritization methodology. *Confirm that prioritization methodology developed by CDOT in 2025 (or any updates thereafter) are in alignment with the NCHRP APS guide.*
- + Review newly pedestrian signalized intersections planned. *Confirm that new signalized intersections include APS and are prioritized as required. This review is dependent upon CDOT's provision of information specific to new installations.*
- + Review modifications to and priorities of existing signalized intersections. *Confirm that existing signalized intersections are to be provided with APS as prioritized in the Remedial Plan Order (see above). This review is dependent on CDOT's provision of information specific to existing signalized intersections, public requests, planned alterations, and other considerations.*

2.1.3 Other Data and Document Reviews

While not specifically addressed in the Remedial Plan Order or in the authorities and duties identified in [Section 2.0](#) of this report, additional data or document review or coordination with the Parties may be required to assist the Independent Monitor in assessing the City's compliance under the Remedial Plan Order.

Under Section VIII (B)(3) of the Remedial Plan Order, the Independent Monitor may communicate *ex parte* with any Party and the COMS to generally coordinate or to request documents or additional information. The Independent Monitor may require or request additional information if it is needed to assist in determining the City's compliance.

If the Independent Monitor is given supplemental data or documentation for analysis, he will review the material and provide an appropriate response(s), if necessary. Reviews could include, but are not limited to:

- + Supplemental reports or documents not provided in CDOT Semi-Annual Reports

- + Additional prioritization documentation or methodologies
- + Technical Documents, Standards, or Guidelines
- + Website additions/modifications
- + Memoranda
- + Other data or documents: lists, spreadsheets, charts, diagrams, or other

These reviews will be conducted by the Independent Monitor within reason and without extending beyond his scope of work.

Please note that review of the City's APS and/or 311 websites for compliance with Web Content Accessibility Guidelines (WCAG) is not within the Independent Monitor's scope of work. A general review of the website provisions required under the Remedial Plan Order is provided in [Section 3.4](#).

2.2 PUBLIC MEETINGS AND OTHER COORDINATION EFFORTS

2.2.1 APS Community Advisory Committee Meetings

APS Community Advisory Committee meetings occur four (4) times per year, including CDOT personnel, the Certified Orientation and Mobility Specialist (COMS), the Independent Monitor, and other interested parties or advocates.

Under Section VIII (B)(4)(c) of the Remedial Plan Order, the Independent Monitor is required to meet semiannually with the APS Community Advisory Committee. The Independent Monitor, to the best of his ability, will attend all APS Community Advisory Committee meetings. The Independent Monitor has and will continue to plan to attend at least two (2) APS Community Advisory Committee meetings in person in Chicago. Efforts will be made to combine these planned trips to attend meetings with any site assessments or other planned activities in Chicago to support efficiency. The Independent Monitor will participate in virtual meetings in instances when he is not attending in person.

Refer to [Section 3.4](#) for additional information on APS Community Advisory Committee meetings.

2.2.2 Other Coordination or Meetings

While not specifically addressed in the Remedial Plan Order or in the authorities and duties identified in [Section 2.0](#) of this report, additional coordination or meeting with the Parties may be required to assist the Independent Monitor in assessing the City's compliance under the Remedial Plan Order.

Under Section VIII (B)(3) of the Remedial Plan Order, the Independent Monitor may communicate *ex parte* with any Party and the COMS to generally coordinate or meet to discuss compliance with the Remedial Plan Order or to address tangential concerns.

The Independent Monitor has an unofficial "open door" policy extended to the Parties to facilitate any needed coordination. He has and will continue to promote private technical consultation meetings for both the Defendant and Plaintiffs, allowing for coordination outside of the APS Community Advisory Committee meetings and other events open to the public.

Currently, the Independent Monitor meets regularly with Plaintiffs and associated parties. The Independent Monitor has met with CDOT on multiple occasions on an as-needed basis, and encourages ongoing, if not regularly scheduled, coordination.

The Independent Monitor is open to any other coordination or meetings that may be useful, including the Parties, the COMS, advocates, persons with disabilities, and any others interested.

2.3 MEDIATION OF DISPUTES

Under Section X of the Remedial Plan Order, the Independent Monitor has obligations to assist in dispute resolution in cases when the Plaintiff or the United States believe that the City of Chicago has not complied with the Remedial Plan Order.

The Independent Monitor will provide support to move towards any dispute resolution necessary on a case-by-case basis. Response and coordination may be as simple as email exchanges, but could be more complicated, requiring supplemental documentation. The Independent Monitor may request additional information from the Parties to aid in the resolution of disputes.

While not specifically required to be included in this report, information relative to any Plan Year dispute resolution(s) is provided in [Section 4.0](#).

Please note that the Independent Monitor's assistance in any dispute resolution is limited to technical consultation. The Independent Monitor is not an attorney or a certified mediator. Refer to the General Disclaimer at the beginning of this report for additional information.

2.4 INDEPENDENT MONITOR REPORTS

2.4.1 Annual Report Generation

The Independent Monitor will generate the Annual Report(s) consistent with the requirements identified in the Remedial Plan Order. At a minimum, the Annual Reports will include the required reporting of the City's compliance with the Remedial Plan Order identified in the [Introduction](#) to this report.

Refer to [Section 3.0](#) for the Independent Monitor's assessment of the City's compliance under these minimum reporting requirements.

To supplement this report, additional information has been provided indicating the Independent Monitor's authorities and duties, processes for determining compliance, and other supporting material.

Report appendices have been developed to support the Annual Report, listed in [Section 7.0](#), that include pertinent court docket entries, technical requirements, report checklists, and other supplemental information.

Annual Report Generation: General Processes

The Independent Monitor is solely responsible for the generation of each Annual Report. Support from other Jensen Hughes staff is limited to assistance with site assessments and associated checklists completed in the field, and services related to a quality control (QC) review of the Annual Report.

The Annual Report is generally developed throughout the course of the associated Plan Year, with specific focus on finalization of each report in May and June of each Plan Year prior to the report due date of July 1. This reporting period follows the data and documentation collection processes that occur throughout each Plan Year.

Upon the completion of each Annual Report draft, a QC review is performed by a certified accessibility professional at Jensen Hughes before the final report is submitted to the Court.

2.4.2 Other Reports

Per Section III of the Order Appointing Michael G. Shaw as Independent Monitor, the Independent Monitor may file additional reports regarding the City's compliance with the Court's Remedial Plan Order at his discretion.

The Independent Monitor does not currently anticipate the need for additional report filings, as this Annual Report is intended to be comprehensive in nature. Should the need arise for additional reporting, the Independent Monitor will act accordingly if said additional reporting is within the scope of work.

2.5 ASSOCIATED FEES AND EXPENSES

Per Section IV of the Remedial Plan Order, the City is responsible for paying the Independent Monitor's reasonable fees and expenses so that he may fulfill his duties pursuant to assessing the City's compliance. The Independent Monitor will submit documentation related to fees and expenses to the Court as required and are included in this report for reference.

2.5.1 Annual Budget

On July 1 of each year of the term served, the Independent Monitor will submit his annual estimate of his anticipated fees, costs and expenses necessary to evaluate the City's compliance with the Remedial Plan Order for the coming Plan Year. This proposed budget is subject to review and opposition from the City.

Please note that the Independent Monitor Plan Year budget typically extends from July 1 of the preceding calendar year through July 1 of the then-current year to accommodate the completion of each Independent Monitor Annual Report. The Plan Year under the Remedial Plan Order is defined as running from May 29th of the preceding calendar year through May 28th of the then-current year.

The proposed budget for each year includes pertinent information relative to the scope of services provided, associated estimated fees, and staff billing rates. Typical budget estimates include but are not limited to the following activities:

- + Preparation and planning for the upcoming Plan Year site assessments
- + Site assessments (including travel and associated expenses)
- + APS Community Advisory Committee meetings
- + Annual Report development
- + General coordination or mediation (if necessary)

Please note that fees, costs, and expenses detailed are estimates only and are subject to change.

If the Independent Monitor believes that activities are requested and not included within the scope, he will communicate with the Parties and may recommend an amendment to the Plan Year approved budget. Similarly, if the Independent Monitor believes that he cannot complete all necessary duties within budget for the Plan Year, he will do his best to provide ample notice to the Parties and will work to find appropriate resolution.

Refer to attached **APPENDIX E: INDEPENDENT MONITOR APPROVED PLAN YEAR BUDGET** for the approved budget for the Plan Year associated with this report.

2.5.2 Submission of Itemized Statements

The Independent Monitor will submit to the Court and the City itemized statements of fees and expenses incurred relative to the evaluation of the City's compliance with the Remedial Plan Order every ninety (90) days.

Refer to attached **APPENDIX F: INDEPENDENT MONITOR PLAN YEAR INVOICES** for the invoices submitted to the Court and the City for the Plan Year.

2.6 TERM: REPLACEMENT, EXTENSION, AND TERMINATION

Per Section VIII of the Remedial Plan Order, the Independent Monitor shall serve for a term of five (5) years, subject to requests for extension, replacement, or termination.

The Independent Monitor confirms the current term of service of five (5) years and acknowledges that requests may be made with respect to his extension of services, replacement, or termination. To the best of his ability, the Independent Monitor will perform his duties of reporting neutrally on the City's compliance with the Remedial Plan Order without providing cause for replacement or termination.

2.7 PROTECTION AGAINST POTENTIAL CONFLICTS OF INTEREST

Per Section VI of the Order Appointing Michael G. Shaw as Independent Monitor, the Independent Monitor is subject to removal for a conflict of interest, personal bias, or prejudice concerning a party.

The Independent Monitor will submit to the Parties and the Court each Plan Year, at the time the Annual Report is submitted, a list of any current or potential work he or his employer might be involved with relating to the City of Chicago, CDOT, the APS design and management consultant used by CDOT, and any APS device manufacturer providing APS devices to the City.

Refer to attached **APPENDIX G: FEDERAL RULE 53(B)(3) AFFIDAVIT OF MICHAEL SHAW** for the Independent Monitor's declaration of eligibility for the Plan Year to serve as the Independent Monitor without any potential conflicts.

Further, the Independent Monitor will not make any public statements, press releases, or interviews or issue findings regarding any act or omission of the Parties or their agents, representatives, or employees, or disclose non-public information provided to the Independent Monitor pursuant to the Remedial Plan Order.

The Independent Monitor also acknowledges that he may testify before the Court with jurisdiction over the Remedial Plan Order, but will not testify in any other litigation or proceeding with regard to any policy or practice, act or omission of the City related the Remedial Plan order or regarding any matter or subject that the Independent Monitor may have received knowledge of as a result of performance under the Order.

3.0 *The City's Compliance with the Remedial Plan Order*

Section 3.0 of this report details the Independent Monitor's assessment of City of Chicago compliance under the Remedial Plan Order for the Plan Year. The five (5) reporting sections (**Section 3.1** through **Section 3.5**) are categorized in alignment with the minimum required Independent Monitor written report information identified in Section VIII (B)(4)(b) of the Remedial Plan Order.

As required in Section VIII (A)(2) of the Remedial Plan Order, the City is required to submit regular reports at least every six months to Plaintiffs, the COMS, and the Independent Monitor. In these reports, the City provides updated information on APS installation progress for the Plan Year and other general responses to the requirements of the Remedial Plan Order. The Independent Monitor reviews these reports and associated appendices to evaluate progress with compliance under the Remedial Plan Order in this section.

Refer to attached **APPENDIX H: CDOT APS PROGRAM SEMI-ANNUAL REPORTS** for additional information.

The Independent Monitor has and will request additional information or material from CDOT as needed and if not included in the Semi-Annual Report(s) to support the development of this Annual Report.

Each reporting section details the relative requirements of the Remedial Plan Order, the City's responsive reporting, and the Independent Monitor analysis for the following categories:

- + **Section 3.1** – APS Installation Compliance for Plan Year
- + **Section 3.2** – MUTCD Compliance for Plan Year
- + **Section 3.3** – APS Prioritization Compliance for Plan Year
- + **Section 3.4** – Communication, Community Involvement, and Maintenance Compliance
- + **Section 3.5** – Recommendations for Improving the Implementation of the Remedial Plan Order

Please note that CDOT indicates, in the Semi-Annual Report, there are 64 distinct requirements to comply with under the Remedial Plan Order, 44 of which are "currently relevant" and work on these provisions has been initiated or completed.

While the Independent Monitor is responsible for assessing and reporting compliance with the material requirements of the Remedial Plan Order, he did not review or confirm 64 distinct requirements as part of his analysis.

3.1 APS INSTALLATION COMPLIANCE FOR PLAN YEAR

3.1.1 General Requirements Under the Remedial Plan Order

Section II (C) of Remedial Plan Order defines the overall scope of required APS installations under General Provisions. The scoping is identified by two distinct phases, “Phase I” and “Phase II” that are detailed below. Scoping requirements for compliance under Phase I and Phase II are indicated in percentages as well as annual Plan Year installation obligations.

Applicable scoping requirements were originally based on the percentage of 2,703 existing signalized intersections with pedestrian signals as determined by the Declaration of Daniel Burke (Dkt. 278), dated November 2, 2023. This number will increase as the City adds signalized intersections with pedestrian signals, as indicated in CDOT’s APS Program Semi-Annual Report(s).

3.1.1.1 Phase I: General Requirements

Under Section III (B) of the Remedial Plan Order, the City of Chicago shall install APS at a minimum of approximately 71% of signalized intersections with pedestrian signals by December 31, 2035 in Phase I. Per Section III (B)(1), “signalized intersections at which APS is already installed and are MUTCD compliant at the time of installation (but not including audio-only APS) shall count toward this requirement.”

3.1.1.2 Phase I: Yearly Minimum Requirements

During Phase I, City of Chicago shall install APS, at the following minimum number of signalized intersections with pedestrian signals each Plan Year:

Table 3.1.1.2
Yearly Minimum Installation Requirements

Plan Year	Number of Signalized Intersections with Pedestrian Signals
Year 1	70 Intersections
Year 2	110 Intersections
Year 3	135 Intersections
Year 4	154 Intersections
Year 5	185 Intersections
Year 6	220 Intersections
Year 7	235 Intersections
Year 8	245 Intersections
Year 9	245 Intersections
Year 10	245 Intersections
Total:	1,844 Intersections

Per Section III (B)(3) of the Remedial Plan Order:

To the extent that City of Chicago fails to meet a given year's total despite having acted in good faith, any underperformance shall be made up in the subsequent year. To the extent that City of Chicago exceeds the minimum requirement in a given year, the excess may be applied to the following years' minimum totals. APS installations at newly signalized intersections with pedestrian signals shall be counted in calculating the APS installations for any given year.

3.1.1.3 Phase II: General Requirements

Under Section III (C) of the Remedial Plan Order, the City of Chicago shall install APS at all remaining signalized intersections with pedestrian signals without APS in Phase II.

During Phase II, City of Chicago shall install APS at a consistent rate over five years to ensure that all signalized intersections with pedestrian signals will be equipped with APS by December 31, 2040, unless that deadline has been eliminated or extended based on a showing of meaningful access.

3.1.2 CDOT Reporting on APS Installations

According to the most recent CDOT APS Program Semi-Annual Report, dated June 12, 2026, APS devices are installed at 165 intersections of the City's current inventory of 2,722 signalized intersections equipped with pedestrian signals for Phase I to date, resulting in 6.1% of the total. Of these, 78 intersections were installed in Plan Year 1. CDOT has met or exceeded the minimum required number of APS installations of 70 intersections in Plan Year 1 by 8 intersections, with the surplus installations to be applied to Plan Year 2 commitments.

Table 3.1.2 (1)
CDOT APS Installation Reporting (Phase I)

Plan Year	Number of Signalized Intersections with Pedestrian Signals Installed
Prior to RPO	87 Intersections
Plan Year 1	78 Intersections
Total:	165 Intersections (6.1% of Total)

Table 3.1.2 (2)
CDOT APS Installation Reporting (Plan Year 1)

Plan Year	Number of Signalized Intersections with Pedestrian Signals Installed
Plan Year 1 Min.	70 Intersections
Plan Year 1	78 Intersections
Total Applied to Plan Year 2:	8 Intersections

3.1.3 Independent Monitor Analysis

In review of the list of the 165 total installations indicated in Appendix A of the Semi-Annual Report, the Independent Monitor found CDOT's reporting accurate, with minor adjustments to totals indicated below in the analysis of the data for Phase I and Plan Year 1 of the Remedial Plan Order.

In addition to the information provided in the Semi-Annual Report, the Independent Monitor requested additional information from CDOT to gain a better understanding of how APS installations are planned and what priorities CDOT may be responsive to under the Remedial Plan Order. The Independent Monitor reviewed this additional information, provided in the form of multiple spreadsheets, to further analyze APS installations in Chicago to date, with particular focus on the 78 Plan Year 1 installations. The information in this section of the report is intended to complement the APS prioritization compliance analysis found in [Section 3.3](#).

The table below identifies the APS location and installation date, the ward(s) where the installation occurred, and a key number that identifies one or more of the applicable priority considerations identified at each location. Where provided by CDOT, specific information is included indicating additional priority considerations at existing signalized intersections identified in Section III (A)(2) of the Remedial Plan Order.

Installations occurring prior to or after the current Plan Year are shaded in gray to differentiate them from Plan Year 1 installations.

Table 3.1.3 (1)
General APS Installation Reporting

Key Numbers:

0 – Installed Prior to the Remedial Plan Order

1 – Plan Year 1 Installations: New Installation

2 – Plan Year 1 Installations: Existing Signalized Intersections

2(a) – Public Requests

2(b) – New Signal Equipment (Traffic Signal Modernization)

2(c) – Particularly Dangerous Conditions

2(d) – Serving Public Transportation

2(e) – Serving Public Facilities

3 – Plan Year 2 Installations

No.	Location	Install Date	Ward(s)	Key
01	N PULASKI RD & N ELSTON AVE	10/13/2004	39	0
02	N LINCOLN AVE & W CATALPA AVE	9/12/2006	40	0
03	N SHERIDAN RD & W THORNDALE AVE	12/31/2015	48	0
04	S WESTERN BLVD & W 48 TH PL	1/11/2018	15	0
05	N LIEB AVE & N ELSTON AVE	6/25/2018	39	0
06	N LAKE SHORE DR & W ROSCOE ST	8/17/2018	44	0
07	S WENTWORTH AVE & W CERMAK RD	10/9/2019	11	0
08	S WENTWORTH AVE & S ARCHER AVE	10/23/2019	11	0
09	S PRINCETON AVE & S ARCHER AVE & W CERMAK RD	11/5/2019	11	0
10	N EDENS RAMP & W FOSTER AVE	6/10/2020	39	0
11	S ABERDEEN ST & W 87 TH ST	9/11/2020	17, 21	0

No.	Location	Install Date	Ward(s)	Key
12	S MORGAN ST & W 119 TH ST	9/22/2020	21	0
13	N PULASKI RD & W THORNDALE AVE (PVT)	11/19/2020	39	0
14	S AVENUE O & E 122 ND ST	2/8/2021	10	0
15	S DR MLK JR DR & E OAKWOOD BLVD	3/23/2021	3	0
16	S PULASKI RD & W 35 TH PL	7/23/2021	22	0
17	N CALIFORNIA AVE & W HOWARD ST	8/24/2021	50	0
18	S PULASKI RD & W 36 TH ST	10/7/2021	22	0
19	S LOOMIS ST & W ROOSEVELT RD	12/2/2021	28	0
20	S WOOD ST & W ROOSEVELT RD	12/12/2021	27, 28	0
21	S ST LOUIS AVE & W 51 ST ST	12/15/2021	14	0
22	S MORGAN ST & W ROOSEVELT RD	1/11/2022	28	0
23	S BLUE ISLAND AVE & W ROOSEVELT RD	2/10/2022	28, 34	0
24	2420 S HALSTED ST	2/18/2022	11	0
25	N DAMEN AVE & W HOWARD ST	3/29/2022	49	0
26	N CLARK ST & W BRYN MAWR AVE	4/14/2022	40, 48	0
27	S HALSTED ST & W 37 TH ST	9/15/2022	11	0
28	N LEAVITT ST & W DIVERSEY PKWY	11/17/2022	32	0
29	S STONY ISLAND AVE & E 69 TH ST	1/27/2023	5	0
30	N ASHLAND AVE & W CATALPA AVE	4/21/2023	40	0
31	N ELSTON AVE & N MAGNOLIA AVE & W BLACKHAWK	6/13/2023	27	0
32	S RACINE AVE & W HARRISON ST	6/14/2023	34	0
33	S RICHARDS DR & E HAYES DR	6/27/2023	5	0
34	W LAKE ST & N RIVERSIDE PLAZA	7/21/2023	34, 42	0
35	S LAKE SHORE DR & E HAYES DR & S COAST GUARD	8/22/2023	5	0
36	2132 N ELSTON DRIVEWAY	9/20/2023	32	0
37	432 W ADAMS GATEWAY CROSSING	9/22/2023	42	0
38	N KILBOURN AVE & W IRVING PARK RD	10/19/2023	30, 45	0
39	N SOUTHPORT AVE & W WELLINGTON & N LINCOLN	11/8/2023	32	0
40	N GREENVIEW AVE & N LINCOLN AVE & W BARRY AVE	11/9/2023	32	0
41	N ASHLAND AVE & N LINCOLN AVE & W BELMONT AVE	11/16/2023	32	0
42	N SEMINARY AVE & W BELMONT AVE	12/13/2023	44	0
43	N ASHLAND AVE & S ASHLAND AVE & W MADISON ST	12/21/2023	27	0
44	N ASHLAND AVE & W GRACE ST	1/18/2024	47	0
45	S ASHLAND AVE & W HARRISON ST	1/25/2024	27, 28	0
46	S HYDE PARK DR & E 57 TH ST	2/21/2024	5	0
47	S CORNELL DR & E 57 TH ST	2/22/2024	5	0
48	S DAMEN AVE & W 48 TH ST	2/29/2024	15	0
49	S COMMERCIAL AVE & E 91 ST ST	4/11/2024	10	0
50	432 W MADISON GATEWAY CROSSING	4/24/2024	42	0
51	N ROCKWELL ST & W GRAND AVE	5/28/2024	27, 36	0
52	N ASHLAND AVE & W WASH. BLVD & W WASH. ST	5/30/2024	27	0
53	N CALIFORNIA AVE & W GRAND AVE	6/4/2024	36	0

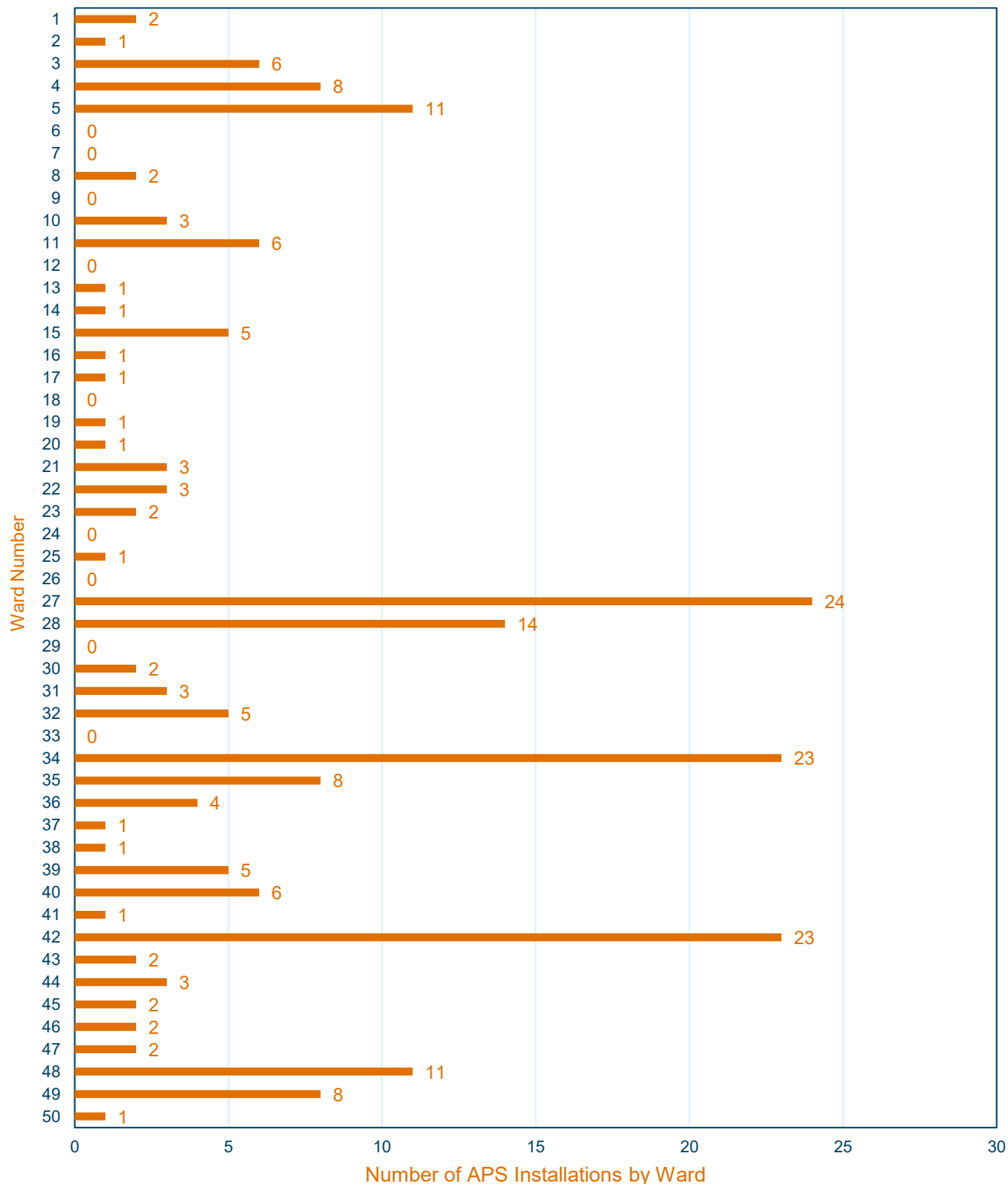
No.	Location	Install Date	Ward(s)	Key
54	N ASHLAND AVE & W WARREN BLVD	6/5/2024	27	0
55	N OAKLEY BLVD & W GRAND AVE	6/6/2024	27, 36	0
56	N SHERIDAN RD & W AINSLIE ST	6/7/2024	46, 48	0
57	N DAMEN AVE & W GRAND AVE	6/11/2024	27, 36	0
58	S ASHLAND AVE & W ADAMS ST	6/12/2024	34	0
59	N WESTERN AVE & W GRAND AVE	6/13/2024	1, 27	0
60	S ASHLAND AVE & W MONROE ST	6/18/2024	34	0
61	S ASHLAND AVE & W OGDEN AVE	6/26/2024	27, 34	0
62	S ASHLAND AVE & W JACKSON BLVD	7/1/2024	34	0
63	S ASHLAND AVE & W CONGRESS PKWY	7/2/2024	27, 28, 34	0
64	900 W TAYLOR CROSSING	7/2/2024	27	0
65	S COMMERCIAL AVE & E 92 ND ST	7/9/2024	10	0
66	S ASHLAND AVE & W VAN BUREN ST	7/10/2024	27, 34	0
67	1818 W IRVING PARK CROSSING	7/17/2024	47	0
68	N KIMBALL AVE & W BELMONT AVE	7/18/2024	35	0
69	S STONY ISLAND AVE & E 64 TH ST	7/30/2024	5	0
70	N ASHLAND AVE & S SCHREIBER AVE & N CLARK ST	8/27/2024	40, 49	0
71	S ST LAWRENCE AVE & E 51 ST ST	8/29/2024	20	0
72	S STONY ISLAND AVE & E 63 RD ST & E HAYES DR	9/4/2024	5	0
73	S STONY ISLAND AVE & E 62 ND ST	9/5/2024	5	0
74	N ASHLAND AVE & W DEVON AVE & N CLARK ST	9/6/2024	40, 48, 49	0
75	N LA SALLE ST & W LAKE ST	9/10/2024	42	0
76	S KEELER AVE & W 31 ST ST	10/3/2024	22	0
77	S ELLIS AVE & E 43 RD ST	10/17/2024	4	0
78	S STONY ISL. AVE & E MIDWAY PLAISANCE & E 60 TH ST	10/24/2024	5	0
79	S DR MARTIN LUTHER KING JR DR & E 41 ST ST	11/7/2024	3	0
80	N ORLEANS ST & W LOCUST ST	11/22/2024	1, 27	0
81	S DAMEN AVE & W 57 TH ST	11/26/2024	15	0
82	S DAMEN AVE & W 61 ST ST	12/11/2024	16	0
83	N STONY ISL. AVE & E MIDWAY PLAISANCE & E 59 TH ST	1/18/2025	5	0
84	S STATE ST & E 53 RD ST	2/27/2025	3	0
85	S WABASH AVE & E 29 TH ST	4/30/2025	3	0
86	N EAST RIVER RD & W BRYN MAWR AVE	5/3/2025	41	0
87	N HALSTED ST & N BROADWAY & W GRACE ST	5/29/2025	46	2(c)
88	N CLINTON ST & W WASHINGTON BLVD & W WASH. ST	6/11/2025	34, 42	2(c)(d)(e)
89	S ASHLAND AVE & W FLOURNOY ST	6/11/2025	27, 28	2(e)
90	N GLENWOOD AVE & W DEVON AVE	6/12/2025	48, 49	2(d)
91	N LEAVITT ST & S LEAVITT ST & W MADISON ST	7/8/2025	27	2(e)
92	N KOLIN AVE & W CHICAGO AVE	8/12/2025	37	1, 2(c)
93	N HAMLIN AVE & N HAUSSEN CT & N MILWAUKEE AVE	8/26/2025	31, 35	1
94	S MICHIGAN AVE & E ROOSEVELT RD	8/26/2025	4, 34	2(c)(d)(e)
95	S WABASH AVE & E ROOSEVELT RD	8/26/2025	4, 34	2(c)(d)(e)

No.	Location	Install Date	Ward(s)	Key
96	S ASHLAND AVE & W ROOSEVELT RD	8/26/2025	27, 28	2(c)(d)(e)
97	S PAULINA ST & W ROOSEVELT RD	8/26/2025	27, 28	2(c)(e)
98	S DAMEN AVE & W ROOSEVELT RD	8/26/2025	27, 28	2(c)(d)(e)
99	S OAKLEY AVE & W OGDEN AVE & W ROOSEVELT RD	8/26/2025	27, 28	2(c)
100	S STONY ISLAND AVE & E 89 TH ST	9/9/2025	8	2(c)
101	S CICERO AVE & S ARCHER AVE	9/9/2025	23	2(a)(c)(d)
102	S STONY ISLAND AVE & S CHICAGO AVE & E 79 TH ST	9/9/2025	8	2(c)(d)
103	N HALSTED ST & W HUBBARD ST	10/8/2025	27	1, 2(c)
104	N HALSTED ST & W BLACKHAWK ST	10/16/2025	2, 27	1, 2(c)
105	N KILBOURN AVE & N MILWAUKEE AVE	10/28/2025	30	2(b)(c)(d)(e)
106	N KEDZIE AVE & N MILWAUKEE AVE NORTH	10/29/2025	35	1, 2(c)
107	N KEDZIE AVE & N MILWAUKEE AVE SOUTH	11/6/2025	35	2(b)(c)(d)(e)
108	N MILWAUKEE AVE & W LOGAN S DR & W LOGAN	11/6/2025	35	2(b)(c)
109	N KEDZIE BLVD & W LOGAN BLVD	11/6/2025	35	2(b)
110	S HALSTED ST & W 45 TH ST	11/13/2025	11, 15	2(b)(c)(d)(e)
111	N KIMBALL AVE & N MILWAUKEE AVE & W DIVERSEY	12/2/2025	35	2(b)(c)(d)
112	N HALSTED ST & N LINCOLN AVE & W FULLERTON	12/3/2025	43	2(c)(d)(e)
113	N PINE GROVE AVE & W DIVERSEY PKWY	12/3/2025	43, 44	2(e)
114	N CICERO AVE & N MILWAUKEE AVE & W IRVING PK	12/3/2025	45	2(c)(d)(e)
115	N CENTRAL PARK AVE & N MILWAUKEE AVE	12/16/2025	35	2(b)(c)(e)
116	N KIMBALL AVE & W ARDMORE AVE	12/18/2025	39	2(b)(c)
117	S STATE ST & W 29 TH ST	1/22/2026	3	2(b)(c)(e)
118	S WESTERN AVE & W 48 TH PL	2/18/2026	15	1, 2(c)
119	N CANAL ST & S CANAL ST & W MADISON ST	2/19/2026	42	2(a)(c)(d)(e)
120	S MICHIGAN AVE & E CONGRESS PKWY	3/19/2026	42	2(c)(d)(e)
121	N CLINTON ST & S CLINTON ST & W MADISON ST	3/19/2026	34, 42	2(a)(c)(d)(e)
122	N WABASH AVE & E LAKE ST	3/19/2026	34, 42	2(c)(d)(e)
123	N CANAL ST & W WASHINGTON BLVD / ST	3/19/2026	42	2(c)(d)(e)
124	S STATE ST & CONGRESS PKWY	3/19/2026	4	2(c)(d)(e)
125	E JACKSON BLVD & E JACKSON DR & S MICHIGAN	3/19/2026	34, 42	2(c)(d)(e)
126	840 S CANAL CROSSING	3/24/2026	28	2(c)(e)
127	S WESTERN AVE & W 18 TH ST	3/24/2026	25, 28	2(a)(c)(d)(e)
128	500 S HALSTED CROSSING	3/24/2026	28	2(c)(e)
129	S DEARBORN ST & W ADAMS ST	3/24/2026	34	2(a)(c)(d)(e)
130	432 W WASHINGTON GATEWAY CROSSING	3/26/2026	42	2(c)(d)
131	N WACKER DR & S WACKER DR & W MADISON ST	3/26/2026	42	2(a)(c)
132	432 W MONROE GATEWAY CROSSING	3/26/2026	42	2(c)(d)
133	432 W JACKSON GATEWAY CROSSING	3/26/2026	34, 42	2(c)(d)
134	420 W RANDOLPH RIVERSIDE CROSSING	3/26/2026	42	2(c)
135	S THROOP ST & W 95 TH ST	4/8/2026	21	1
136	N NATCHEZ AVE & W IRVING PARK RD	4/9/2026	38	2(c)(e)
137	S SHERIDAN RD & W ARTHUR AVE & W LOYOLA AVE	4/9/2026	49	2(d)(e)

No.	Location	Install Date	Ward(s)	Key
138	N SHERIDAN RD & N SHERIDAN RD @ 6420 N (N INT.)	4/9/2026	48, 49	2(c)(e)
139	N SHERIDAN RD & W DEVON AVE (MAIN INT.)	4/9/2026	48, 49	2(c)(d)(e)
140	N / E SHERIDAN RD & W DEVON AVE (E INT.)	4/9/2026	48, 49	2(c)(d)(e)
141	N ASHLAND AVE & W BERWYN AVE	4/14/2026	40	1
142	N CLYBOURN AVE & W DIVISION ST	4/17/2026	27	2(a)(c)
143	3000 N CENTRAL EDGEBROOK GOLF COURSE DW	4/21/2026	31	2(c)
144	4640 W DIVERSEY DRIVEWAY	4/21/2026	31	2(c)(e)
145	N SHERIDAN RD & W ARGYLE ST	4/21/2026	48	2(a)(c)
146	S CHARLES ST & W 95 TH ST	4/22/2026	19	1, 2(c)
147	400 N WABASH TRUMP TOWER CROSSING	4/24/2026	42	2(c)(e)
148	435 N MICHIGAN TRIBUNE CROSSING	5/7/2026	42	2(c)(d)(e)
149	N MICHIGAN AVE - BRICKHOUSE	5/7/2026	42	2(c)(e)
150	N WACKER DR & W RANDOLPH ST	5/7/2026	42	2(c)
151	S WACKER DR & W MONROE ST	5/7/2026	42	2(c)
152	848 W HARRISON CROSSING	5/11/2026	34	2(c)(d)(e)
153	5150 W 55 TH ST DRIVEWAY	5/20/2026	13, 23	2(c)
154	5150 S LAKE PARK DRIVEWAY	5/20/2026	4, 5	2(c)(e)
155	S STATE ST & W ROOSEVELT RD	5/20/2026	3, 4, 34	2(a)(c)(d)(e)
156	S MICHIGAN AVE & E 9 TH ST	5/20/2026	4	2(a)(c)(d)(e)
157	N / S S DESPLAINES ST & W MADISON ST	5/20/2026	34	2(a)(c)
158	N STATE ST & W WASHINGTON ST & W WASH. BLVD	5/22/2026	34	2(a)(c)(d)(e)
159	N LA SALLE ST & W WASH. ST & W WASH. BLVD	5/22/2026	34, 42	2(a)(c)(d)(e)
160	N SHERIDAN RD & W NORTH SHORE AVE	5/22/2026	49	2(a)(d)(e)
161	N SHERIDAN RD & W BALMORAL AVE	5/22/2026	48	2(a)(d)
162	N BROADWAY & W BALMORAL AVE	5/22/2026	48	2(a)(d)(e)
163	S COTTAGE GROVE AVE & E 35 TH ST	5/28/2026	4	2
164	E WASH. ST & N WABASH AVE & W WASH. BLVD	5/28/2026	34	2
165	S WABASH AVE & E IDA B WELLS DR	6/11/2026	4	3

In Figure 3.1.3 (1) below, all APS installations to date are indicated by the ward in which they were installed. Please note that many (43) of the intersections with APS installed serve multiple wards. The graphic may indicate entire intersections or partial intersections where APS devices have been installed in a particular ward.

Figure 3.1.3 (1)
APS Installations by Ward



Per the analysis of the APS installation data provided, the Independent Monitor concurs with the numbers of APS installations provided by the City, except for one intersection that was installed in Plan Year 2.

Table 3.1.3 (2)

APS Installation Reporting (Phase I)

Plan Year	Number of Signalized Intersections with Pedestrian Signals Installed
Prior to RPO	86 Intersections
Plan Year 1	78 Intersections
Plan Year 2	1 Intersection
Total:	165 Intersections (6.1% of Total)

Table 3.1.3 (3)

APS Installation Reporting (Plan Year 1)

Plan Year	Number of Signalized Intersections with Pedestrian Signals Installed
Plan Year 1 Min.	70 Intersections
Plan Year 1	78 Intersections
Total Applied to Plan Year 2:	8 Intersections

Table 3.1.3 (4)APS Installation Reporting at Newly Pedestrian Signalized Intersections
and Existing Signalized Intersections (Plan Year 1)

Intersection Priority	Number of Signalized Intersections with Pedestrian Signals Installed
Total New Installations	9 Intersections
Total Existing Signalized Intersections	69 Intersections
Existing - Public Requests*	16 Intersections (23.1%)
Existing - New Equipment*	9 Intersections (13.0%)
Existing - Part. Dangerous Conditions*	58 Intersections (84.1%)
Existing - Public Transportation*	38 Intersections (55.1%)
Existing - Public Facilities*	44 Intersections (63.8%)
Existing - Undetermined	2 Intersections (2.9%)
Total:	78 Intersections

* Installations may be responsive to multiple priorities.

Figure 3.1.3 (2)

Existing Signalized Intersections: Priority Response Distribution
(Installations may be responsive to multiple priorities)

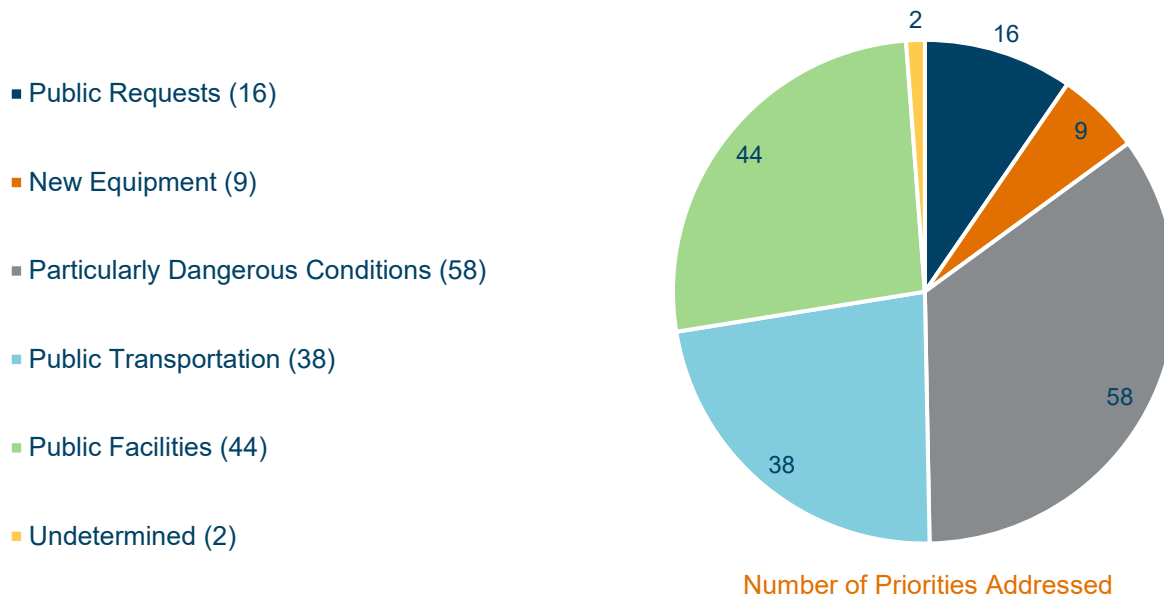
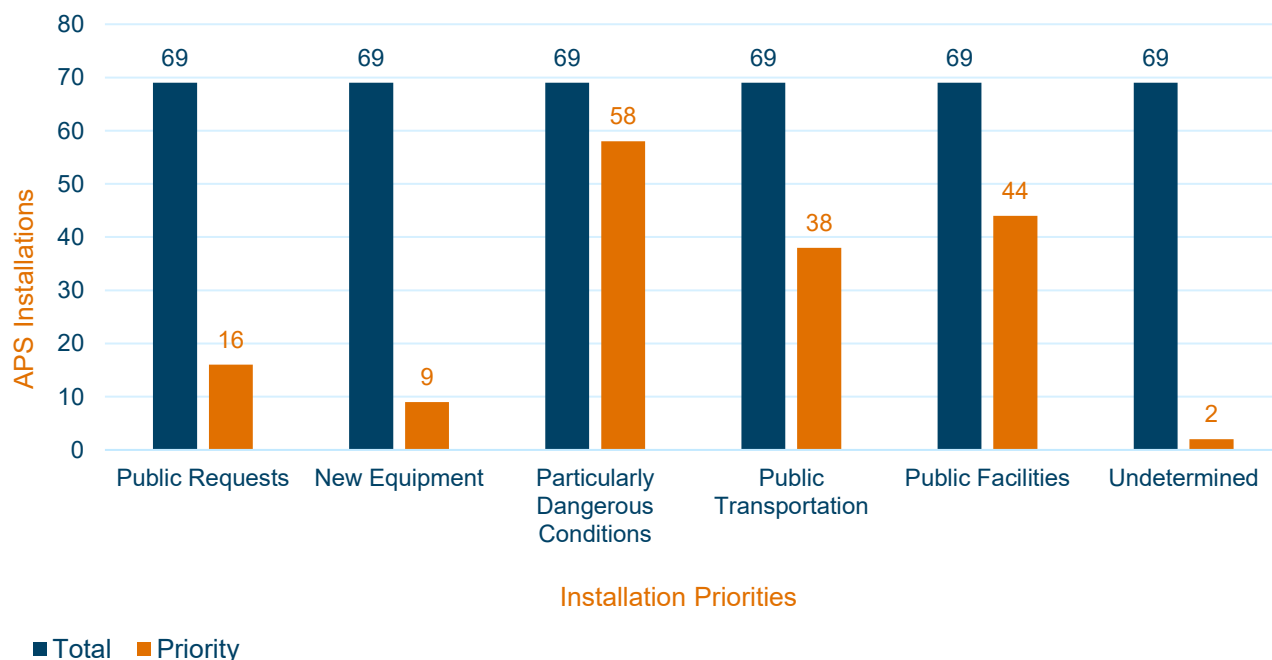


Figure 3.1.3 (3)

Existing Signalized Intersections: Priority Responses by Category



3.1.3.1 Independent Monitor Summary on the City's APS Installation Compliance

The City has met or exceeded its required commitment of at least 70 APS installations in accordance with Plan Year 1 obligations. With the total installation of 78 APS installations in Plan Year 1, the City is permitted to apply the 8 additional installations to Plan Year 2 (110 APS installations required).

The City has determined that 165 total intersections are now equipped with APS, resulting in 6.1% of the total current number of 2,722 signalized intersections with pedestrian signals for Phase I. This total number of intersections includes 86 APS installations prior to the Remedial Plan Order. Per Section III (B)(1) of the Remedial Plan Order, "signalized intersections at which APS is already installed and are MUTCD compliant at the time of installation (but not including audio-only APS) shall count toward this requirement."

While the quantities of APS installations prior to the Remedial Plan Order, new installations, and modifications to existing signalized intersections are good indicators of compliance and progress in Plan Year 1, the Independent Monitor notes that compliance with the MUTCD is a significant ongoing concern for all installations to date. In fact, the Independent Monitor identified, through site assessments in 2025 of APS devices installed at 103 intersections, no intersections that fully comply with the MUTCD. Refer to [Section 3.2.3](#) and [Section 3.2.4](#) for additional information.

Because pedestrians with visual and/or hearing impairments rely on MUTCD compliant APS devices for independent access and may refer to listed and mapped APS locations on the City's website to plan accessible travel in the City, the Independent Monitor urges the City to review the deficiencies identified at these installations and make repairs or modifications as necessary. In the opinion of the Independent Monitor, until the time that each APS device or intersection is confirmed as compliant, they should not be included in the total quantity or listed or mapped on the City's website.

3.2 MUTCD COMPLIANCE FOR PLAN YEAR

3.2.1 *General Requirements Under the Remedial Plan Order*

Section II (B) of the Remedial Plan Order defines the applicable engineering compliance standards of required APS installations under General Provisions. In this:

The City of Chicago shall install and maintain APS in compliance with the then-current Manual on Uniform Traffic Control Devices (“MUTCD”) (“then-current” defined to be the version of the MUTCD adopted by the State of Illinois at a given time), including all APS installed and maintained by third-party contractors.

3.2.1.1 Compliance

Section IV of the Remedial Plan order specifically identifies actions that must be taken by CDOT to ensure compliance with the MUTCD below:

To ensure that all APS are installed and maintained in compliance with MUTCD standards, City of Chicago shall promptly establish and implement an APS compliance program that proves effective at ensuring that APS are installed and maintained in compliance with the MUTCD and any succeeding standards, regulations, or changes in the law setting forth the required specifications. An effective compliance program in this context is one that contains at least the following material elements:

1. An effective, on-site inspection system to assess, at the time of installation, whether each APS unit has been installed and programmed in compliance with the MUTCD;
2. An annual, post-installation inspection program that is effective to identify maintenance and programming issues that arise post-installation and confirm continued compliance with the MUTCD;
3. An effective system to solicit, compile, analyze, and generate reports on complaints and repair requests made by members of the public with regard to existing APS installations; and
4. An effective system to promptly repair and correct the maintenance and compliance issues identified by members of the public and the City of Chicago’s own inspectors.

3.2.1.2 Discretion

The Remedial Plan Order addresses the City’s discretion that may be applied when considering compliance with the Remedial Plan Order and the MUTCD in Section II (E):

City of Chicago shall have the right to use reasonable and good faith discretion in implementing the terms of this Remedial Plan Order including to (i) create efficiencies in the design, approval, bidding, and construction of APS installations, (ii) respond to material and/or labor shortages, (iii) group similar intersections when placing projects for bid; (iv) re-prioritize intersections for construction to respond to delays arising from approvals issues, underground utility reviews, redesign issues, and a lack of acceptable bids; and (v) exercise engineering judgment and discretion in designing and installing APS to the extent permitted by the MUTCD.

When City of Chicago exercises “engineering judgment” to deviate from MUTCD Guidance in a manner provided for by the MUTCD, it shall contemporaneously document in writing the reason

and support for such engineering judgment and deviation. In addition, City of Chicago shall, on at least a monthly basis, provide the Certified Orientation and Mobility Specialist (“COMS”), as defined in Section VIII.A.1, *infra*, with identification of all instances where engineering judgment was used to deviate from MUTCD Guidance, with supporting documentation, and the COMS shall review, provide feedback, and levy objections when appropriate. Should the City and/or the COMS identify conditions where engineering judgment is repeatedly exercised, the City shall adopt written procedures and criteria established by an engineer and in consultation with the COMS to be applied in the exercise of such engineering judgment.

Such discretion may not otherwise excuse the City from non-compliance with the requirements of this Order, including those requirements regarding prioritization and yearly minimum requirements (as set forth below).

3.2.2 CDOT Reporting on Compliance with the MUTCD

In the most recent CDOT APS Program Semi-Annual Report submitted, dated June 12, 2026, the City generally confirms that APS designs have and will continue to be in accordance with the MUTCD. The City currently designs APS in accordance with the 11th Edition of the MUTCD as of its statewide adoption on March 2, 2026. Prior to this date, APS design was in accordance with the 2009 Edition of the MUTCD (with Revisions 1 and 2, dated May 2012).

3.2.2.1 Discretion and Engineering Judgment

In the Semi-Annual Report, CDOT states that engineering judgment and discretion, as the MUTCD permits, are regularly applied when designing and installing APS. It is acknowledged that the Order permits the City to use discretion in its implementation of APS to:

- i. Create efficiencies in the design, approval, bidding, and construction of APS installations;
- ii. Respond to material and/or labor shortages;
- iii. Group similar intersections when placing projects for bid;
- iv. Re-prioritize intersections for construction to respond to delays arising from approvals issues, underground utility review issues, redesign issues, and lack of acceptable bids; and
- v. Exercise engineering judgment and discretion in design and installing APS to the extent permitted by the MUTCD.

CDOT states in the Semi-Annual Report that engineering judgment is a fundamental principle in the design of traffic control devices (TCDs), including APS. It is noted that the MUTCD provides Standard, Guidance, and Option statements, as defined in the Report:

- + **Standard Statements** – required practices
- + **Guidance Statements** - recommended practices in typical situations with deviations permitted through engineering judgment
- + **Option Statements** – permitted but not required practices

While the MUTCD does not require documentation of engineering judgment when deviating from Guidance statements, CDOT has documented the application of engineering judgment for APS designs developed and approved in Plan Year 1 in accordance with Section II (E) the Remedial Plan Order. Per the Semi-Annual

Report, 49 of the 78 intersections with Plan Year 1 APS installations were developed and approved prior to the Remedial Plan Order and do not have documentation for deviations from MUTCD Guidance statements.

To assist with engineering judgment documentation, CDOT has developed a design check sheet to “document cases on an intersection-by-intersection basis where engineering judgment is applied in the deviation from MUTCD Guidance” statements. This APS Design Check Sheet template is available for review in Appendix B of the Semi-Annual Report.

CDOT states in the Semi-Annual Report that any APS designs incorporating engineering judgment since the implementation of the Remedial Plan Order have been submitted to the COMS for review and feedback. CDOT typically meets with COMS bi-weekly to discuss instances where engineering judgment has been applied.

Finally, CDOT notes that typical identified conditions where engineering judgment has been repeatedly exercised have not been identified yet, and therefore no written procedures or criteria have been developed for such issues.

3.2.2.2 Compliance and Maintenance

In response to the compliance requirements indicated in Section IV of the Remedial Plan Order, CDOT has established an APS Compliance Program in Plan Year to ensure compliance with the MUTCD. The program is responsible for:

- i. Documenting compliance during the design phase;
- ii. Inspecting APS at the time of installation to identify and correct compliance deficiencies;
- iii. Conducting annual inspections of all APS locations which were installed in the previous Plan Year or earlier;
- iv. Maintaining a system to receive, track and address requests for APS repair and maintenance.

CDOT reports the following actions relating to these four responsibilities:

- + **Design Documentation** – CDOT implemented a policy in the fall of 2025 requiring all APS designers to document engineering judgment for any deviations from MUTCD guidelines as part of the standard design review process. This policy has been in place and enforceable since May 29, 2025.
- + **Time of Installation Inspections** – CDOT has developed an APS Installation Check Sheet to ensure all relevant standards and guidelines related to APS are checked as a part of the standard inspection and punch list processes already in place for contractors installing APS. This inspection occurs prior to new signal equipment activation. This APS Installation Check Sheet template is available for review in Appendix G of the Semi-Annual Report.
- + **Annual Inspections** – CDOT notes that 86 intersections included APS installations prior to Plan Year 1, which had been inspected by the City to identify maintenance or programming issues. Of these 86 intersections, 44 were found to have maintenance issues and all but 3 locations had been addressed (due to extenuating circumstances). All APS devices installed in Plan Year 1 or earlier will receive an annual inspection within Plan Year 2.
- + **System to Receive, Track, and Address Complaints and Repairs** – Using the City’s 311 service request system, CDOT receives and tracks APS service requests using new APS service request codes established in the summer of 2025. Maintenance request status is included on the City’s APS website, which is updated monthly to reflect any issues that would preclude APS repair or replacement within five business days. In

Plan Year 1, the City received 60 requests for maintenance or repair, all of which have been addressed. APS Requests are available for review in Appendix H of the Semi-Annual Report.

3.2.3 Independent Monitor Analysis

The Semi-Annual Report acknowledges the City's requirements related to compliance with the applicable edition(s) of the MUTCD and the right to use discretion in implementing the associated terms of the Remedial Plan Order. Good systems have been developed and put into place to support compliance in design through installation and activation of APS.

While the processes and procedures established by CDOT to ensure compliance with the MUTCD are sound in documentation, there remain implementation and compliance concerns based primarily on the Independent Monitor's assessments of APS installations in 2025. None of the 103 intersections inspected, including installations prior to the Remedial Plan Order and Plan Year 1 installations, were found to be in full compliance with the MUTCD as assessed. Refer to [Section 3.2.4](#) for additional information.

The Independent Monitor has additional comments and recommendations provided following in [Section 3.2.3.3](#).

3.2.3.1 Compliance

CDOT has documented solid efforts in response to the four compliance requirements identified in Section IV of the Remedial Plan Order. The Independent Monitor has reviewed these efforts and associated documents and has provided comments and recommendations below for consideration.

- + **Design Documentation** – On October 29, 2025, CDOT issued a Policy Memorandum (APS-2025-001), titled Accessible Pedestrian Signal (APS) Design Documentation. This memorandum is intended to set forth requirements related to APS designs submitted to CDOT for review. In this memorandum, APS designers are directed to provide design documentation of compliance with MUTCD standards and guidance, “including any deviations from such guidance and relevant engineering judgment for such deviations.”

Designers are instructed to complete an APS Design Check Sheet developed by CDOT “for each intersection corner or median where APS is proposed for installation and must be submitted with the APS design for review.” The requirements are applicable to all new APS installations, full traffic signal modernizations (TSM), and APS retrofits to existing signalized intersections. The design check sheet is available at cdotspecs.com and questions can be directed to the CDOT Division of Engineering, Highways Section.

The Independent Monitor fully supports policy development related to APS installations and adherence to applicable technical standards, including the MUTCD as well as the ADA Standards, and commends CDOT for this effort. The Independent Monitor has reviewed the APS policy, and multiple recommendations are provided in [Section 3.2.3.3](#).

- + **Time of Installation Inspections** – Similar to the APS Design Check Sheet, CDOT has also developed an APS Installation Check Sheet to be completed upon installation of APS, prior to signal equipment activation. This check sheet is another effective tool and provides an additional layer of review to ensure that devices are compliant with not only the MUTCD but the design plans as well, which could include applied engineering judgment or other considerations.
- + **Annual Inspections** – CDOT plans to inspect all APS devices installed in Plan Year 1 or earlier within Plan Year 2. The Independent Monitor supports this plan and believes it to be critical to qualifying existing infrastructure as compliant.

It is assumed that all current and future APS installations will be inspected by CDOT at the time of installation as indicated in the Semi-Annual Report.

- + **System to Receive, Track, and Address Complaints and Repairs** – CDOT relies on the City’s 311 service request system as the primary mechanism to receive and track APS service requests and complaints. Refer to [Section 3.4.3](#) for Independent Monitor comments on the City’s 311 service request system.

3.2.3.2 Discretion

CDOT has acknowledged their rights to exercise discretion as defined in Section II (E) of the Remedial Plan Order, with particular focus on applying engineering judgment as permitted under the MUTCD. The Independent Monitor has reviewed these efforts and associated documents and has provided comments and recommendations below for consideration.

- + **Engineering Judgment** – CDOT is actively documenting cases where engineering judgment is applied as required, with support provided from the APS Design Check Sheet developed (see comments and recommendations above). In general, the Independent Monitor is supportive of this comprehensive approach and believes it to be a necessary component of demonstrating compliance with the Remedial Plan Order and the MUTCD.

The Independent Monitor was provided with multiple examples of completed APS Design Check Sheets, documenting cases where engineering judgment has been applied. In the review, the Independent Monitor found the examples to be excellent, demonstrating a solid understanding of the applicable MUTCD and ADA requirements. Deviation justification statements were found to be very thorough, taking into account existing site constraints, adjacent accessibility concerns, and other pertinent considerations.

- + **Coordination with COMS** – Per the Semi-Annual Report, CDOT is regularly coordinating with the COMS on any APS designs where engineering judgment has been applied as required.

The Independent Monitor met with the COMS to confirm that coordination with CDOT is regularly occurring and to discuss processes employed, summarized below:

- Meetings with the COMS occur bi-weekly with additional support as needed. Meetings have been productive and
- In these meetings, designs are reviewed and the COMS makes recommendations based on her expertise.
- CDOT sends designs to the COMS for review on a regular basis, including priority reviews for construction approvals.
- APS design coordination between CDOT and the COMS is recorded in a spreadsheet that details proposed deviations from the MUTCD and associated COMS feedback.

The Independent Monitor reviewed the APS deviation tracking spreadsheet used by CDOT and the COMS to coordinate APS designs and proposed deviations from the MUTCD. The document is an exceptional demonstration of thorough documentation and coordination, with thorough proposed justifications and responsive feedback from the COMS. Comments are tracked and documented through resolution.

In all, the Independent Monitor believes the coordination between CDOT and the COMS exceeds expectations and is a great indicator of a commitment to compliance with the Remedial Plan Order and the MUTCD.

3.2.3.3 Independent Monitor Recommendations

3.2.3.3.1 APS Policy Recommendations

- + The Policy Memorandum should be updated to reference the 11th Edition of the MUTCD to reflect current applicable requirements as indicated in the Semi-Annual Report.
- + It should also be made clear in the Policy Memorandum that the requirements of the ADA Standards also apply and are applicable to pushbutton reach ranges and operation, clear floor or ground space, and accessible routes.
- + It is recommended to provide information to the designers on where the latest City of Chicago APS standard engineering details are located. It should be noted that in review of CDOT's [Rules and Regulations for Construction in the Public Way](#), including Appendix B – ADA Standards, there are no construction details relative to APS design or construction available. The Independent Monitor was provided with several traffic-signal related construction details via email from CDOT for review, but the details are very old and are not reflective of current APS requirements. In addition, the Independent Monitor reviewed other City or CDOT design references, including the City of Chicago Streetscape Guidelines, the City of Chicago Street and Site Plan Design Standards, and the Chicago Building Code and did not find any information related to APS. It should be a priority to update or develop standard APS engineering details.
- + The Policy Memorandum suggests that all proposed APS installations are designed first, using the APS Design Check Sheet developed by CDOT. Please confirm that all APS installations are designed by trained engineers.
- + The APS Design Check Sheet developed by CDOT is a great resource for designers to acknowledge key design considerations. However, this form could be further developed. The Independent Monitor has reviewed the check sheet and can share specific recommended additions or clarifications to CDOT, which generally include:
 - Clarifying accessible route requirements
 - Clarifying pushbutton clear floor/ground space and reach range requirements
 - Addressing pushbutton height and orientation
 - Addressing specific device programming or speech messaging options
- + It is recommended to promote, in the Policy Memorandum or otherwise, consistency in design and application of MUTCD requirements. Consistently placed devices in predictable locations are key considerations for access and usability.
- + The Independent Monitor highly recommends the development of a training component or program to support the APS policy and related technical standards and procedures. Training sessions could benefit designers and installers of APS devices, helping them to better understand accessibility requirements in general, MUTCD standards and optional guidance statements, and design and installation considerations at existing signalized intersections of varying configurations in Chicago.
- + Consider adding information related to CDOT's enforcement of the policy, including any additional responsibilities applicable to designers, contractors, or others involved in the design and installation of APS.
- + Please note that the policy is indicated to be available on the cdotspec.com webpage, but the page is password protected and unable to be accessed.

- + Consider posting this policy, as well as links to all associated technical material and requirements, on the City of Chicago APS website. For an example of what has been done in other cities, refer to the [Seattle Department of Transportation ADA Policies and Design Guidance](#) webpage for a listing of policy and technical memoranda developed in Seattle.

3.2.3.3.2 APS Inspection Recommendations

- + In general, it is the opinion of the Independent Monitor that APS locations or devices that have not been inspected or have not passed inspection should be removed from the City's APS website until deficiencies have been resolved. This includes installations that occurred prior to the Remedial Plan Order. Refer to [Section 3.1.3](#) for additional information.
- + Please confirm that all APS installations are inspected using the APS Installation Check Sheet.
- + Please inform the Independent Monitor and interested parties of the additional standard inspection and punch list processes employed by CDOT when inspecting APS installations.
- + The Independent Monitor has reviewed the APS Installation Check Sheet and can share specific recommended additions or clarifications to CDOT, which generally include:
 - Clarifying accessible route requirements
 - Clarifying pushbutton clear floor/ground space and reach range requirements
 - Pushbutton mounting height appears to be too low at 36" per MUTCD (3.5' required)
 - Clarifying speech messaging requirements
 - Clarifying other specific device programming or speech messaging options
 - Addressing review of approaching accessible routes for potential obstructions
 - Addressing identification of any potential protruding objects
- + As a group, we may want to discuss clearer parameters for APS volume and appropriate audibility levels and how these should be tested and inspected in the field.
- + Similar or in addition to the training recommendations provided above, it is recommended that APS inspectors are adequately trained in procedures and documentation requirements applicable to APS installations.
- + As part of the installation and inspection process, the Independent Monitor also highly recommends that it be verified that any temporary pedestrian detours related to APS installation or adjacent construction activities are accessible as required. Training on temporary accessible routes in accordance with CDOT's Public Way Construction Regulations is recommended for Public Way Inspectors, contractors, utilities, or others performing restorations in the City's public right-of-way.
- + Confirm that Annual Inspections indicated are intended to address ongoing maintenance concerns of existing APS installations as required in Section V (A) of the Remedial Plan Order. If necessary, develop additional APS inspection processes to ensure APS devices are functioning as intended.
- + Confirm that any nonfunctional APS devices identified as part of ongoing Annual Inspections are addressed within 5 business days after the inspection as required in Section V (A) of the Remedial Plan Order.
- + When inspecting existing APS installations as part of the Annual Inspections, consider documenting potential engineering judgment deviations that may have been applied, but not documented, due to existing site constraints.

3.2.3.3.3 Engineering Judgment Recommendations

- + It is recommended to provide the Independent Monitor with locations and information where engineering judgment was applied prior to his on-site inspections.
- + The Independent Monitor observed recurring typical issues as part of his APS site assessments in 2025. The documented recurring issues in this report could be used to assist CDOT in developing written procedures for repeated instances where engineering judgment has been applied.
- + In review of examples of engineering judgment, the Independent Monitor notes that some assumptions are being made regarding accessibility requirements that may not be accurate or advised. It is recommended that a more thorough review of deviations be conducted to ensure that appropriate access is provided. For example, while the ADA Standards permit an accessible route to be 36" minimum, but no less than 32" at a point, is not recommended as sidewalks in the public right-of-way should be 4' minimum in width as per PROWAG.

3.2.3.4 Independent Monitor Summary of the City's Compliance with the MUTCD

The City has taken many good steps to ensure compliance with the MUTCD by developing APS policy, creating design and installation check sheets, implementing a robust APS inspection system, and working diligently with the COMS. The documents developed by CDOT to assist in MUTCD compliant APS design and installation efforts are exemplary, and coordination with the COMS has been consistent and productive.

However, implementation of applicable MUTCD requirements remains in question as a result of the Independent Monitor's on-site inspections. Refer to [Section 3.2.4](#) for additional information.

The Independent Monitor has made several recommendations for CDOT's consideration regarding improvements or additions to APS policy and other supporting documents and efforts.

3.2.4 Independent Monitor On-Site Inspections

In the summer and fall of 2025, the Independent Monitor inspected or assessed all identified existing APS installations in the City of Chicago as of May of 2025 as well as most of the Plan Year 1 installations that had been completed at the time of the assessment(s).

Refer to [Section 2.1.1](#) for detailed information on the data and document collection processes employed by the Independent Monitor.

It is noted that the Independent Monitor's on-site inspections may be somewhat duplicative of the City's inspection processes. However, with the number of observed compliance deficiencies detailed in this report, the Independent Monitor feels that there remains a need to perform independent/neutral inspections until he is confident in the City's efforts to comply with the MUTCD and the Remedial Plan Order. The Independent Monitor currently plans to assess all remaining Plan Year 1 installations (61) in 2026. Based on the City's progress and performance, the Independent Monitor supports a reduction in the number of inspections that he conducts for the coming Plan Year(s).

3.2.4.1 On-Site Inspections: General Information

The Independent Monitor assessed a total of 103 intersections in areas throughout the City, including:

- + 17 intersections with APS installations that occurred within the identified Plan Year
- + 85 intersections with APS installations that occurred prior to the identified Plan Year
- + 1 intersection with APS installations that was not included on the APS list provided by CDOT

As indicated above, only 17 of the City's Plan Year installations have been assessed to date. It is the intent of the Independent Monitor to assess the remaining Plan Year 1 APS installations in the summer and fall of 2026.

While the focus of the site assessments is and will continue to be on new APS installations, the Independent Monitor opted to review installations prior to the Remedial Plan Order in this first Plan Year for two main reasons:

1. Existing APS locations, installed prior to the Remedial Plan Order, are listed on the City's APS website that may be referenced by pedestrians or orientation/mobility specialists to plan accessible routes. Non-functional, missing, and non-compliant APS devices should be identified and should be corrected if advertised and available for use, similar to other components of a signalized intersection. In addition, per Section III (B)(1) of the Remedial Plan Order, existing APS intended to be counted towards the Phase I requirement must comply with the MUTCD (at the time of installation). Refer to [Section 3.1.3.1](#) for additional information.
2. To assist in determining specific areas of concern for typical APS installations in Chicago and general compliance with the MUTCD. See supporting data analysis and information below.

In addition, the City should be aware that any existing barriers to accessing publicly available services, programs, or activities should be identified in an ADA Transition Plan consistent with the requirements of [Title II of the ADA, Subpart B § 35.150](#). The Independent Monitor's on-site inspection data could potentially be used to help support City barrier documentation and removal efforts, if needed.

3.2.4.2 On-Site Inspections: General Data Analysis

Of the total 103 intersections assessed by the Independent Monitor in 2025, 0 intersections were found to be fully compliant with the MUTCD respective to APS requirements, based on site assessment checklists developed and used by the Independent Monitor (Refer to [Section 2.1.1](#)).

Table 3.2.4.2

Intersections Assessed: General Data

Number of Intersections Assessed	Number of Intersections Fully Compliant with the MUTCD
Plan Year 1 Installations: 17	0
Pre-2025 Installations: 85	0
Other: 1	0
Total: 103	0

Refer to attached **APPENDIX I: COMPLETED APS INSPECTIONS FOR PLAN YEAR** for additional information, including locations (intersections) assessed by the Independent Monitor, installation dates, and other supporting documentation.

Please note that the Independent Monitor assessments to date have not considered any engineering judgment that may have been applied in the design and installation of these APS devices, as this information had not been provided to the Independent Monitor at the time of the assessments.

3.2.4.3 On-Site Inspections: APS Device Data Analysis

As part of the review of the total 103 intersections assessed, APS checklists were completed for each APS device observed or location where an APS device may be missing. Data was compiled and reviewed for 794 checklists completed in 2025. Of the 794 locations, APS devices were provided at 756 of these locations. Of the 756 APS devices assessed, 91 APS devices were found to be fully compliant with the MUTCD.

For the review of the 17 intersections assessed for Plan Year 1, of the 156 APS devices assessed, 20 APS devices were found to be fully compliant with the MUTCD.

Table 3.2.4.3
APS Device Assessments: General Data

APS Devices Assessed: General Data Analysis (All Locations)	Quantities / %
Total Number of APS Locations Assessed	794
Total Number of APS Devices Provided	756
Percentage of APS Devices Provided at Locations Assessed	95%
Total Number of Fully Compliant APS Devices Assessed	91
Percentage of Fully Compliant APS Devices Assessed	11%
Total Number of APS Devices Significantly Damaged or Missing	38
Total Number of Generally Non-Functional APS Devices	42
Total Number of Non-Compliant or Missing APS Devices Assessed	703
Percentage of Non-Compliant or Missing APS Devices Assessed	89%
APS Devices Assessed: General Data Analysis (Plan Year 1 Only)	
Total Number of APS Locations Assessed	157
Total Number of APS Devices Provided	156
Percentage of APS Devices Provided at Locations Assessed	99%
Total Number of Fully Compliant APS Devices Assessed	20
Percentage of Fully Compliant APS Devices Assessed	13%
Total Number of APS Devices Significantly Damaged or Missing	1
Total Number of Generally Non-Functional APS Devices	14
Total Number of Non-Compliant or Missing APS Devices Assessed	136
Percentage of Non-Compliant or Missing APS Devices Assessed	87%

Additional data analysis is provided for common issues observed below.

Refer to attached **APPENDIX J: COMPLETED APS CHECKLISTS FOR PLAN YEAR** for detailed information on all APS devices assessed by the Independent Monitor.

Please note that checklist template used in 2025 had a deficiency numbering system of items 1 through 31. Some previous queries were removed prior to assessment commencement, and the numbering was not adjusted accordingly. The checklist has been updated/corrected for 2026 and moving forward to indicate deficiency items 1 through 24 as shown in the current checklist template.

3.2.4.4 On-Site Inspections: Common Issues Observed

In addition to the critical issues identified in the table above (missing and non-functional APS devices), the Independent Monitor recorded deficiencies in compliance with the MUTCD for 665 of the total 756 APS devices observed. In total, 1,789 deficiencies were recorded, with supplemental comments or issues provided for 705 of the APS devices observed.

For the review of the 17 intersections assessed for Plan Year 1, deficiencies in compliance with the MUTCD were recorded for 136 of the 156 APS devices observed. In total, 443 deficiencies were recorded, with supplemental comments or issues provided for 137 of the APS devices observed.

Table 3.2.4.4 (1)
 APS Device Assessments: Specific Data (All)

APS Devices Assessed: Specific Deficiencies Data Analysis (All Locations)	Quantities / %
Total Number of APS Devices Provided	756
Total Number of APS Checklist Items Reviewed (28 per Checklist)	21,168
Total Number of Compliant Checklist Items Recorded	19,379
Percentage of Checklist Items Recorded Compliant	92%
Checklist Deficiency 1 (APS Signs)	0
Checklist Deficiency 2 (Pushbuttons and Legends)	1
Checklist Deficiency 3 (Pilot Light Illumination)	42
Checklist Deficiency 4 (Pilot Light Illumination)	42
Checklist Deficiency 5 (Pilot Light Speech Message)	42
Checklist Deficiency 6a (Unobstructed Pushbutton Access)	196*
Checklist Deficiency 6b (Wheelchair Accessible Route)	86*
Checklist Deficiency 6c (Pushbutton Location Relative to Crosswalk)	108*
Checklist Deficiency 6d (Pushbutton Location Relative to Curb)	373*
Checklist Deficiency 6e (Pushbutton Location Relative to Curb)	88*
Checklist Deficiency 6f (Pushbutton Mounting Height)	139*
Checklist Deficiency 7 (Pedestrian Signal Timing)	41
Checklist Deficiency 8 (Pushbutton Activation)	43
Checklist Deficiency 9 (Pushbutton Separation)	68
Checklist Deficiency 10 (Audible Walk Indications)	43
Checklist Deficiency 11 (Vibrotactile Walk Indications)	43
Checklist Deficiency 17 (Accessible Walk Indication)	43
Checklist Deficiency 18 (Percussive Tone)	63*
Checklist Deficiency 19 (Speech Walk Message)	38*
Checklist Deficiency 20 (Audible Tone Walk Indication)	10
Checklist Deficiency 22 (Speech Message Pattern)	0
Checklist Deficiency 24 (Locator Tone Activation)	43
Checklist Deficiency 25 (Tactile Arrow)	2
Checklist Deficiency 26 (Tactile Arrow Contrast)	0
Checklist Deficiency 27 (Tactile Arrow Alignment)	108*
Checklist Deficiency 28 (Locator Tone)	42
Checklist Deficiency 29 (Locator Tone Duration)	42
Checklist Deficiency 30 (Locator Tone Audibility)	43
Checklist Deficiency 31 (Supplemental Comments)	(705)
Total Number of Deficiencies Recorded	1,789

* Refer to examples below for common deficiencies observed.

Table 3.2.4.4 (2)
 APS Device Assessments: Specific Data (Plan Year 1 Only)

APS Devices Assessed: Specific Deficiencies Data Analysis (Plan Year 1 Only)	Quantities / %
Total Number of APS Devices Provided	156
Total Number of APS Checklist Items Reviewed (28 per Checklist)	4,368
Total Number of Compliant Checklist Items Recorded	3,925
Percentage of Checklist Items Recorded Compliant	90%
Checklist Deficiency 1 (APS Signs)	0
Checklist Deficiency 2 (Pushbuttons and Legends)	0
Checklist Deficiency 3 (Pilot Light Illumination)	14
Checklist Deficiency 4 (Pilot Light Illumination)	14
Checklist Deficiency 5 (Pilot Light Speech Message)	14
Checklist Deficiency 6a (Unobstructed Pushbutton Access)	41*
Checklist Deficiency 6b (Wheelchair Accessible Route)	23*
Checklist Deficiency 6c (Pushbutton Location Relative to Crosswalk)	29*
Checklist Deficiency 6d (Pushbutton Location Relative to Curb)	69*
Checklist Deficiency 6e (Pushbutton Location Relative to Curb)	8*
Checklist Deficiency 6f (Pushbutton Mounting Height)	43*
Checklist Deficiency 7 (Pedestrian Signal Timing)	13
Checklist Deficiency 8 (Pushbutton Activation)	14
Checklist Deficiency 9 (Pushbutton Separation)	13
Checklist Deficiency 10 (Audible Walk Indications)	14
Checklist Deficiency 11 (Vibrotactile Walk Indications)	14
Checklist Deficiency 17 (Accessible Walk Indication)	14
Checklist Deficiency 18 (Percussive Tone)	12*
Checklist Deficiency 19 (Speech Walk Message)	7*
Checklist Deficiency 20 (Audible Tone Walk Indication)	10
Checklist Deficiency 22 (Speech Message Pattern)	0
Checklist Deficiency 24 (Locator Tone Activation)	14
Checklist Deficiency 25 (Tactile Arrow)	0
Checklist Deficiency 26 (Tactile Arrow Contrast)	0
Checklist Deficiency 27 (Tactile Arrow Alignment)	21*
Checklist Deficiency 28 (Locator Tone)	14
Checklist Deficiency 29 (Locator Tone Duration)	14
Checklist Deficiency 30 (Locator Tone Audibility)	14
Checklist Deficiency 31 (Supplemental Comments)	(137)
Total Number of Deficiencies Recorded	443

* Refer to examples below for common deficiencies observed.

As the charts above indicate, select deficiencies recorded in the checklists were more common than others. Below are examples of the most common deficiencies, including descriptions of the issue(s), the relative MUTCD section(s), and a sample photo(s) of the conditions observed. Each common issue observed is identified as an MUTCD applicable Standard, a Guidance statement, or optional.

The Independent Monitor refers to the [2010 ADA Standards](#) in cases where the MUTCD does not clearly define applicable accessibility requirements.

<p>Common Issue Observed: Unobstructed Pushbutton Access Number of Issues Observed: 196 Checklist Deficiency Number: 6a Applicable Section(s) of the MUTCD: 4E.08 (04)(A)</p>	<p>Photo Example(s)</p>
<p>Description of Issue(s): The APS pushbutton is not adjacent to a level surface and/or is not within the required reach range from a level surface or curb ramp landing.</p> <p><i>Excessive slopes were observed both parallel and perpendicular to pushbuttons and pushbutton approaches. Pushbuttons were found to be located directly adjacent to the curb ramp run and out of reach range from the curb ramp landing, making access to users of manual wheelchairs and other mobility devices challenging or impossible. A limited number of pushbuttons were found to be out of required reach ranges due to placement in unpaved areas or similar conditions.</i></p> <p>MUTCD Standard, Guidance, or Option: Guidance: 04 If pedestrian pushbuttons are used, they should be capable of easy activation and conveniently located near each end of the crosswalks. Except as provided in Paragraphs 5 and 6, pedestrian pushbuttons should be located to meet all of the following criteria (see Figure 4E-3):</p> <p>A. Unobstructed and adjacent to a level all-weather surface to provide access from a wheelchair</p>	<div data-bbox="1062 653 1446 940" data-label="Image"> </div> <p data-bbox="1110 949 1396 978">Excessive Slope at APS</p> <div data-bbox="1062 1037 1446 1325" data-label="Image"> </div> <p data-bbox="1110 1333 1396 1362">Excessive Slope at APS</p>
<p>Applicable 2010 ADA Standards: The definition of a 'level' surface required at a clear floor or ground space serving operable parts is sloped no more than 1:48 for a minimum of 30"x48" for either forward or parallel approach to an element (per Section 305).</p> <p>Obstructed side reaches serving operable parts must be limited to 10" maximum over an obstruction (per Sections 308, 309).</p>	<div data-bbox="1062 1419 1446 1707" data-label="Image"> </div> <p data-bbox="1094 1715 1412 1745">APS Beyond Reach Range</p>

Common Issue Observed: Wheelchair Accessible Route

Number of Issues Observed: 86

Checklist Deficiency Number: 6b

Applicable Section(s) of the MUTCD: 4E.08 (04)(B)

Photo Example(s)

Description of Issue(s):

The route from the APS pushbutton to the curb ramp is not accessible.

Routes between the pushbutton and the curb ramps were observed with excessive running and/or cross slopes.

MUTCD Standard, Guidance, or Option:

Guidance:

04 If pedestrian pushbuttons are used, they should be capable of easy activation and conveniently located near each end of the crosswalks. Except as provided in Paragraphs 5 and 6, pedestrian pushbuttons should be located to meet all of the following criteria (see Figure 4E-3):

- B. Where there is an all-weather surface, a wheelchair accessible route from the pushbutton to the ramp

Applicable 2010 ADA Standards:

The maximum allowable running slope on an accessible route is 1:20 (per Section 403.3).

The maximum allowable cross slope on an accessible route is 1:48 (per Section 403.3). Where turning is required, the cross slope on an accessible route cannot exceed 1:48 in any direction.



Excessive Slope on Route



Excessive Slope on Route

Common Issue Observed: Pushbutton Location Relative to Crosswalk

Number of Issues Observed: 108

Checklist Deficiency Number: 6c

Applicable Section(s) of the MUTCD: 4E.08 (04)(C)

Description of Issue(s):

The APS pushbutton is located more than 5' from the outer crosswalk line or is located on the interior side of the crosswalk.

APS pushbuttons should be located consistently for predictability of placement by users, preferably adjacent to the curb ramp landing and at a point no further than 5' from the outer crosswalk line. Placement on the interior side of the crosswalk is not preferred.

There were many instances observed where either the APS pushbutton was located too far from the outer crosswalk or located on the interior side of the corner.

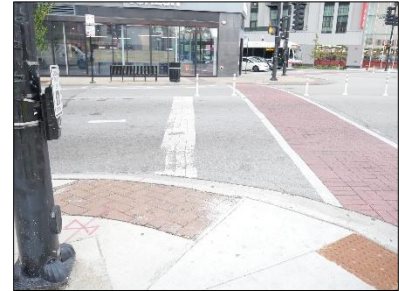
MUTCD Standard, Guidance, or Option:

Guidance:

04 If pedestrian pushbuttons are used, they should be capable of easy activation and conveniently located near each end of the crosswalks. Except as provided in Paragraphs 5 and 6, pedestrian pushbuttons should be located to meet all of the following criteria (see Figure 4E-3):

- C. Between the edge of the crosswalk line (extended) farthest from the center of the intersection and the side of a curb ramp (if present), but not greater than 5 feet from said crosswalk line

Photo Example(s)

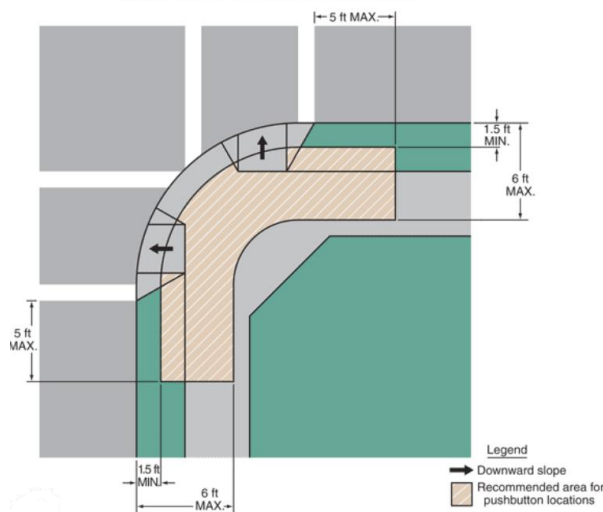


APS > 5' from Outer Crosswalk



APS Located on Interior Side

Figure 4E-3. Pushbutton Location Area



Common Issue Observed: Pushbutton Location Relative to Curb

Number of Issues Observed: 373

Checklist Deficiency Number: 6d

Applicable Section(s) of the MUTCD: 4E.08 (04)(D)

Description of Issue(s):

The APS pushbutton is located less than 1.5' from the curb or more than 6' from the curb, but not more than 10' from the curb.

APS pushbuttons should be located consistently for predictability of placement by users, preferably within the range stated above from the curb line.

There were very few instances observed where the APS pushbutton was located too close to the curb. There were an abundant number of APS pushbuttons observed to be greater than 6' from the curb. The Independent Monitor notes that this particular MUTCD guidance can be difficult to achieve while positioning the pushbutton to be accessible from a curb ramp landing, due to the need for the curb ramp to typically run at least 6' to remain at or under the required curb ramp slope under the 2010 ADA Standards (1:12). It is recommended that this issue be further discussed in a technical advisory committee or similar.

MUTCD Standard, Guidance, or Option:

Guidance:

04 If pedestrian pushbuttons are used, they should be capable of easy activation and conveniently located near each end of the crosswalks. Except as provided in Paragraphs 5 and 6, pedestrian pushbuttons should be located to meet all of the following criteria (see Figure 4E-3):

- D. Between 1.5 and 6 feet from the edge of the curb, shoulder, or pavement

Photo Example(s)

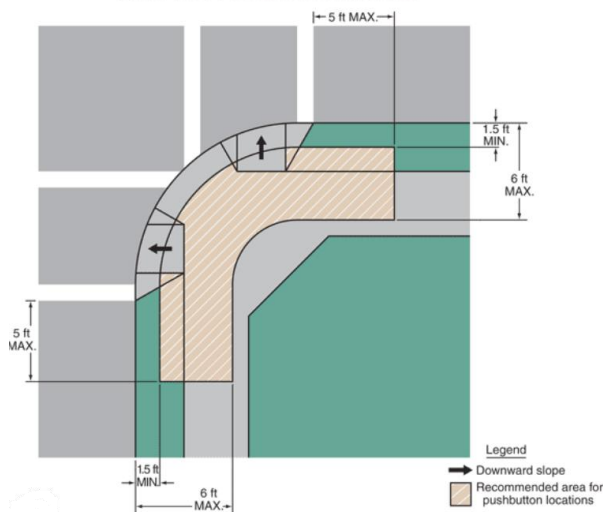


APS > 6' from Curb



APS Placement at Typical 6' Curb Ramp

Figure 4E-3. Pushbutton Location Area



Common Issue Observed: Pushbutton Location Relative to Curb

Number of Issues Observed: 88

Checklist Deficiency Number: 6e

Applicable Section(s) of the MUTCD: 4E.08 (04)(D), 4E.08 (06)

Photo Example(s)

Description of Issue(s):

The APS pushbutton is located more than 10' from the curb.

APS pushbuttons should be located consistently for predictability of placement by users, preferably within 1.5' and 6' from the curb, but not more than 10' from the curb.

All pushbuttons observed in this category were located more than 10' from the curb. Some of these pushbuttons are placed at the top of curb ramps longer than 6' in run, which will make pushbutton relocation challenging.



APS > 10' from Curb

MUTCD Standard, Guidance, or Option:

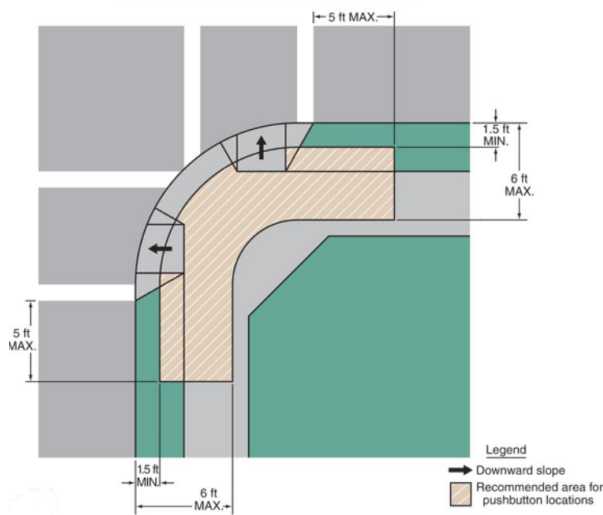
Guidance:

06 Where there are physical constraints that make it impractical to place the pedestrian pushbutton between 1.5 and 6 feet from the edge of the curb, shoulder, or pavement, it should not be farther than 10 feet from the edge of curb, shoulder, or pavement.



APS > 10' from Curb
At Long Curb Ramp

Figure 4E-3. Pushbutton Location Area



Common Issue Observed: Pushbutton Mounting Height

Number of Issues Observed: 139

Checklist Deficiency Number: 6f

Applicable Section(s) of the MUTCD: 4E.08 (04)(F)

Photo Example(s)

Description of Issue(s):

The APS pushbutton is either located too low (less than 3.5') or too high (greater than 4') for access.

Many of the pushbuttons observed were lower than 3.5' to the button centerline, but only marginally (2" or less below 3.5') and would be considered accessible under the 2010 ADA Standards. It is recommended that this issue be further discussed in a technical advisory committee or similar.

A limited number of pushbuttons were found to be located lower than 40", but still above the 15" minimum required under the 2010 ADA Standards.

A limited number of pushbuttons were found to be higher than 48", which does not comply with the MUTCD guidance or the 2010 ADA Standards.



APS Pushbutton too Low



APS Pushbutton too High

MUTCD Standard, Guidance, or Option:

Guidance:

04 If pedestrian pushbuttons are used, they should be capable of easy activation and conveniently located near each end of the crosswalks. Except as provided in Paragraphs 5 and 6, pedestrian pushbuttons should be located to meet all of the following criteria (see Figure 4E-3):

- F. At a mounting height of approximately 3.5 feet, but no more than 4 feet, above the sidewalk.

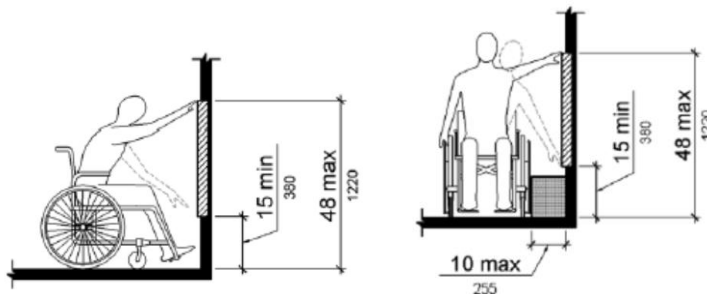
Applicable 2010 ADA Standards:

An unobstructed high forward reach is 48" maximum and the low forward reach is 15" minimum above the ground (per Section 308.2.1).

An unobstructed high side reach is 48" maximum and the low side reach is 15" minimum above the ground (per Section 308.3.1).



APS Pushbutton too High



Common Issue Observed: Percussive Tone or Speech Walk Message

Number of Issues Observed: 63, 38 (101 total)

Checklist Deficiency Numbers: 18, 19

Applicable Section(s) of the MUTCD: 4E.11 (07)

Description of Issue(s):

Two APS pushbuttons are located more than 10' apart with a speech message provided (instead of percussive tone) or are located less than 10' apart with no speech message provided.

Most of the issues observed included APS pushbuttons located more than 10' apart without percussive tones provided. It is noted that some of these locations may be responsive to service requests (or similar) to provide speech messages at key locations. It is recommended that this issue be further discussed in a technical advisory committee or similar.

MUTCD Standard, Guidance, or Option:

Standard:

07 Where two accessible pedestrian signals are separated by a distance of at least 10 feet, the audible walk indication shall be a percussive tone. Where two accessible pedestrian signals on one corner are not separated by a distance of at least 10 feet, the audible walk indication shall be a speech walk message.

Photo Example(s)



APS > 10' Apart,
Speech Message Provided



APS < 10' Apart,
No Speech Message Provided

Common Issue Observed: Tactile Arrow Alignment

Number of Issues Observed: 108

Checklist Deficiency Number: 27

Applicable Section(s) of the MUTCD: 4E.12 (01)

Photo Example(s)

Description of Issue(s):

The tactile APS pushbutton is not aligned parallel to the direction of travel on the associated crosswalk.

APS pushbutton alignment is a critical concern as it can assist users in orientation or alignment with the intended path of travel or crosswalk. Misalignment can potentially lead pedestrians into unintended areas or even into the center of the intersection.

Most of the issues observed involved a minor misalignment of APS pushbuttons with their associated crosswalks. However, a number of pushbuttons were observed to be significantly misaligned. Some APS pushbuttons were found to be pointed to the center of the intersection or even to heavily trafficked and signalized driveways.

In a very limited number of locations, APS devices were found so loosely attached to the pole that the assembly could rotate around the pole, affecting the tactile arrow alignment.

MUTCD Standard, Guidance, or Option:

Standard:

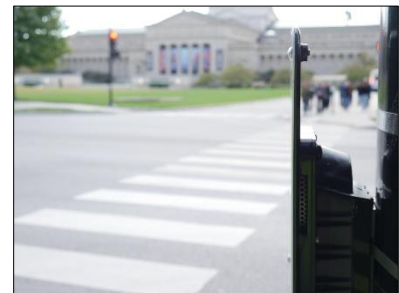
01 To enable pedestrians who have visual disabilities to distinguish and locate the appropriate pushbutton at an accessible pedestrian signal location, pushbuttons shall clearly indicate by means of tactile arrows which crosswalk signal is actuated by each pushbutton. Tactile arrows shall be located on the pushbutton, have high visual contrast (light on dark or dark on light), and shall be aligned parallel to the direction of travel on the associated crosswalk.



Pushbutton Alignment (Minor)



Pushbutton Alignment (Major)



Pushbutton Alignment (Major)

3.2.4.5 On-Site Inspections: Other Issues Observed

In addition to specific items identified to be in non-compliance with the MUTCD, the Independent Monitor notes below other considerable issues observed that may be impacting access to APS devices and adjacent accessible routes.

<p>Other Issue Observed: APS Device Significantly Damaged or Missing Checklist Deficiency Number: Additional Comments/Concerns Applicable Section(s) of the MUTCD: N/A</p>	<p>Photo Example(s)</p>
<p>Description of Issue(s): APS device is significantly damaged and unavailable for use or is missing from an intersection otherwise equipped with APS.</p> <p><i>In some locations, APS poles were observed to been significantly damaged or completely removed from the pole foundation, likely due to being struck by a vehicle.</i></p> <p><i>In a limited number of locations, APS poles, pushbuttons, or housing were found to be significantly damaged or vandalized, limiting or precluding device functionality.</i></p> <p><i>In several isolated cases, single APS devices were found missing from corners or crossings at intersections otherwise equipped with APS.</i></p>	<div data-bbox="1062 575 1446 863" data-label="Image"> </div> <p data-bbox="1133 873 1370 905">APS Pole Damaged</p> <hr/> <div data-bbox="1062 957 1446 1245" data-label="Image"> </div> <p data-bbox="1089 1255 1419 1287">APS Missing at One Corner</p>
<p>Other Issue Observed: APS Device Generally Non-Functional Checklist Deficiency Number: Additional Comments/Concerns Applicable Section(s) of the MUTCD: N/A</p>	<p>Photo Example(s)</p>
<p>Description of Issue(s): The APS device is generally non-functional and without working audible or vibrotactile features.</p> <p><i>Single APS devices were found to be non-functional in various locations. In some isolated cases, most or all devices at an entire intersection were found to be non-functional.</i></p> <p><i>In more rare cases, the vibrational feature was not functioning, but the audible components were.</i></p>	<p>N/A</p>

Other Issue Observed: Limited or No APS Device Access in Areas Under Construction

Checklist Deficiency Number: Additional Comments/Concerns
 Applicable Section(s) of the MUTCD: N/A

Description of Issue(s):

Access to APS devices is limited or not provided due to adjacent construction activities.

Some corners and even entire intersections with APS devices observed were unable to be fully accessed or assessed due to construction activities.

In some cases, corners were closed to pedestrians, which were visually, but not audibly, redirected to bypass the corner(s). Not all temporary pedestrian detours observed appeared to be accessible.

In a few instances, APS devices adjacent to construction areas were operational, but an accessible route to the pushbutton was not provided.

In a limited number of cases, access to APS devices was obstructed due to temporary construction material, signage, or debris.

Applicable 2010 ADA Standards:

In general, the ADA Standards apply to both temporary and permanent buildings and facilities (per Section 201.3).

Photo Example(s)



APS Device Behind Construction Fence



No Accessible Route to APS Device



APS Device Obstructed by Construction Material

Other Issue Observed: Accessible Route to Corner and APS Device

Checklist Deficiency Number: Additional Comments/Concerns

Applicable Section(s) of the MUTCD: N/A

Photo Example(s)

Description of Issue(s):

The accessible route approaching the corner and APS pushbutton is less than 36" in width or is not provided.

Routes are required to be at least 36" minimum in width, or 32" at a point, to allow for wheelchair users and users of other mobility assistive devices adequate width to maneuver or pass through confined spaces.

A limited number of routes were found to be less than 36" in width, obstructed by utility poles, APS poles, landscaping encroachments, or other obstructions.

In very few instances, an accessible route was not provided to the corner or the associated APS devices.

Applicable 2010 ADA Standards:

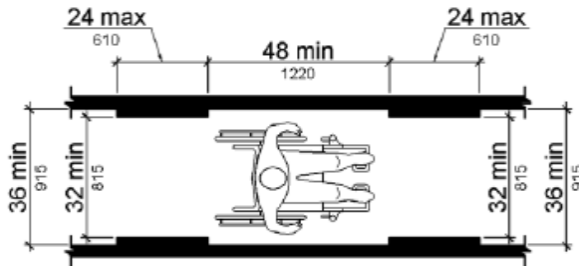
The minimum clear width of walking surfaces shall be 36" minimum (per Section 403.5.1). The clear width may be reduced to 32" minimum for a length of 24" maximum.



Accessible Route < 36" in Width



No Accessible Route Provided



Note: the minimum width of a pedestrian access route in the public right-of-way, per the Public Right-of-Way Accessibility Guidelines (PROWAG), is 48" minimum.

Other Issue Observed: Protruding Objects

Checklist Deficiency Number: Additional Comments/Concerns

Applicable Section(s) of the MUTCD: N/A

Description of Issue(s):

Objects protrude into the circulation path without adequate warning or cane detection.

Pedestrians that are blind or with low vision need the opportunity to detect protrusions by cane before there is body contact with an element.

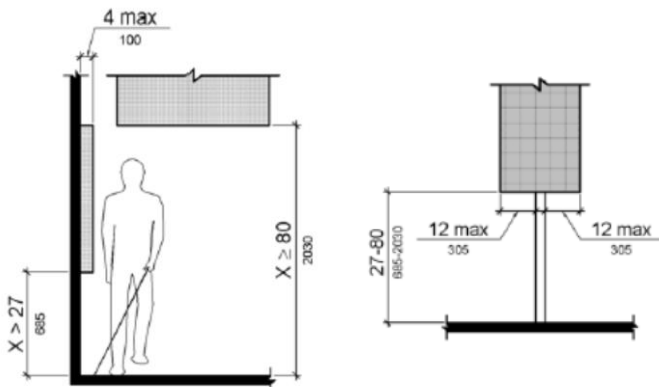
In two instances, the APS assembly and extension arm from the utility pole was found to be a protruding object, extending more than 12" from the pole without adequate cane detection below.

While these issues found were extremely rare, it is important to acknowledge these requirements when mounting devices or equipment from utility poles or adjacent walls or fences.

Applicable 2010 ADA Standards:

Objects with leading edges more than 27" and not more than 80" above the ground shall protrude 4" maximum horizontally into the circulation path (per Section 307.2).

Objects mounted on posts or pylons shall overhang circulation paths 12" maximum when located between 27" and 80" above the ground (per Section 307.3).



Note: post-mounted objects in the public right-of-way, per the Public Right-of-Way Accessibility Guidelines (PROWAG), cannot protrude more than 4" into the pedestrian circulation path.

Photo Example(s)



APS Assembly and Extension is a Protruding Object



Object Protrudes > 12" from Pole or Foundation

Other Issue Observed: APS Pole or Foundation Located on Curb Ramp or Curb Ramp Landing

Checklist Deficiency Number: Additional Comments/Concerns
 Applicable Section(s) of the MUTCD: N/A

Photo Example(s)

Description of Issue(s):

APS poles, flanges, or foundations are located on the curb ramp run or curb ramp landing.

In several instances, APS poles were found to be located or partially located on curb ramp runs or landings.

While this is a relatively minor issue, curb ramp runs must remain clear for the required minimum width, and curb ramp landings must be clear of any obstructions for 36" minimum in length. Installing a pole on the landing is considered an obstruction and could impact a mobility device user's ability to maneuver as needed.



APS Pole in Curb Ramp Landing

Applicable 2010 ADA Standards:

Landings shall be provided at the tops of curb ramps. The landing clear length shall be 36" minimum. The landing width shall be at least as wide as the curb ramp (per Section 406.4).

Other Issue Observed: APS Sign Visibility

Checklist Deficiency Number: Additional Comments/Concerns
 Applicable Section(s) of the MUTCD: N/A

Photo Example(s)

Description of Issue(s):

Signs are vandalized or faded and difficult to see or read.

In several cases, and at some entire intersections, APS signs were found to be heavily vandalized to the point where the signage information was difficult or impossible to see or read.

Similarly, some faded signs were observed that were difficult to see or read.



Vandalized APS Sign



Faded APS Sign

3.3 APS PRIORITIZATION COMPLIANCE FOR PLAN YEAR

3.3.1 *General Requirements Under the Remedial Plan Order*

Section II (D) of the Remedial Plan Order addresses general priority obligations under General Provisions. Phase I and II APS installations are to be prioritized as required per the Remedial Plan Order, specifically including intersections subject to public requests, new signal equipment, public transportation, and public facilities (Sections III (B)(2) and III (C)(2)).

Specific prioritization requirements are detailed further under Implementation, Section III (A):

Within six (6) months, City of Chicago, in consultation with Plaintiffs, United Staes, the Independent Monitor, and the APS Community Advisory Committee, shall establish a mechanism that utilizes the criteria set forth in the in the National Cooperative Highway Research Program (“NCHRP”), Accessible Pedestrian Signals: A Guide to Best Practices for APS Location Selection, and considers the complexity of intersections, to prioritize the installation of APS at signalized intersections with pedestrian signals consistent with the priority categories set forth below. City of Chicago is not required to score each individual intersection. For all intersections that do not fall within these priority provisions, City of Chicago has discretion to select the order of APS installation to meet its minimum yearly requirements. City of Chicago shall make reasonable efforts to install APS equitably across the city.

1. Newly Pedestrian Signalized Intersections.

City of Chicago shall install APS at all newly signalized intersections (i.e., any time that an intersection is provided with pedestrian signals that did not previously have pedestrian signals).

2. Existing Signalized Intersections.

City of Chicago shall install APS at all signalized intersections with pedestrian signals but without APS based on the following priorities.

a. Public Requests

Within twelve (12) months of the date of this Order, City of Chicago shall install APS at all intersections for which there was an outstanding public request to install APS as of March 9, 2025. Before doing so, City of Chicago shall attempt to confirm that each such requestor still desires APS installation to occur (such that City of Chicago does not prioritize installation where there is no unique, immediate need, as where the requestor has moved). This 12-month timeframe is contingent upon City of Chicago’s evaluation of the adequacy of existing infrastructure at each intersection to support APS installation without other significant additional upgrades, including, but not limited to, full traffic signal modernization (“TSM”) (defined as the simultaneous replacement of all or substantially all of the traffic signal infrastructure at the intersection); in such cases a 12-month timeframe may be impossible. If the request cannot be fulfilled within 12 months, City of Chicago must consult with the COMS to consider ways to minimize the impact for blind pedestrians.

City of Chicago shall review and respond to public requests to install APS at a signalized intersection with pedestrian signals received during the pendency of this

Remedial Plan Order within six (6) months of receipt. Where possible to do so, City of Chicago must install APS at the intersection within twelve (12) months of receipt of the request. If City of Chicago believes that the installation cannot be completed within twelve (12) months of receipt of the request, it must install APS at the intersection within twenty-four (24) months of receipt of the request. This 24-month timeframe is contingent upon City of Chicago's evaluation of the adequacy of existing infrastructure at each intersection to support APS installation without other significant additional upgrades, including, but not limited to, full TSM; in such cases a 24-month timeframe may be impossible. If the request cannot be fulfilled within 24 months, City of Chicago must consult with the COMS to consider ways to minimize the impact for blind pedestrians.

If City of Chicago receives more than twenty-five (25) requests during a calendar year, it may file a motion seeking relief from the requirement to prioritize such requests exceeding twenty-five (25) per calendar year if such prioritization would impair meeting the other targets and goals set in the Remedial Plan Order.

b. New Signal Equipment

City of Chicago shall install APS at all signalized intersections with pedestrian signals that undergo a TSM, defined as the simultaneous replacement of all or substantially all of the traffic signal infrastructure at the intersection.

If City of Chicago modifies a signalized intersection to install exclusive pedestrian phases ("EPP"), it shall not begin using or otherwise "turn on" that feature before the APS at that intersection are installed and operating.

c. Particularly Dangerous Conditions

Along with public requests, City of Chicago shall first prioritize installation of APS at all signalized intersections with pedestrian signals that are equipped with EPP, mid-block pedestrian crossings ("MPS"), T-shaped intersections ("TSI"), three or distinct streets or have other complex geometry (as defined to be the 100 most complex intersections in the City of Chicago's Complex Intersection Study, a list of which are attached as Appendix A [of the Remedial Plan Order] hereto. After APS is installed at all intersections with EPP, MPS, TSI, and those with intersections of three or more distinct streets and other complex geometry, City of Chicago must prioritize installing APS at intersections with LPI and PTP as early in Phase I as possible.

If there is a public request for APS at an intersection with EPP or leading pedestrian intervals ("LPI"), and the request cannot be immediately fulfilled, City of Chicago must consult with the COMS to consider ways to minimize the impact for blind pedestrians until APS are installed and MUTCD compliant.

d. Public Transportation

City of Chicago shall prioritize signalized intersections with pedestrian signals within 1/8 mile of public transportation, specifically CTA stations, Metra stations, PACE stations, bus route to bus route transfer points, and streets that pass under elevated train lines.

e. Public Facilities

City of Chicago shall prioritize signalized intersections with pedestrian signals within 1/8 mile of public facilities such as hospitals, police stations, major pedestrian attractions (e.g., major shopping areas, major cultural venues, and educational campuses), organizations serving people with visual disabilities and seniors, and government buildings, including those facilities specifically listed in Appendix B* attached hereto. Should City of Chicago require assistance prioritizing within this category, it shall consult with the COMS and the APS Community Advisory Committee.

3.3.2 CDOT APS Prioritization Compliance Reporting

In November of 2025, CDOT issued a memorandum to Plaintiffs, the Independent Monitor, and the Chicago APS Community Advisory Committee that details the proposed prioritization methodology to be employed by the City when APS installations are planned and executed. This memorandum was submitted within six months of the formalization of the Remedial Plan Order as required under Section III (A). In February of 2026, CDOT provided a revised prioritization memorandum based on input received from Plaintiffs. This proposed methodology has been reviewed by the Independent Monitor and comments are provided below.

Refer to attached **APPENDIX K: CDOT APS INSTALLATION PRIORITIZATION METHODOLOGY** for the Memorandum in its entirety for the City's approach to meeting prioritization requirements under the Remedial Plan Order. The appendix includes the original and revised memoranda.

In general, the prioritization memorandum is responsive to the requirements in Section III (A) of the Remedial Plan Order, addressing APS priority considerations for new and existing intersections with pedestrian signals. Language in the memorandum is indicative of a solid understanding of the key identified priorities as well as critical pedestrian accessibility considerations in complex, existing urban environments.

The prioritization memorandum identifies the following priority categories, establishing the foundation of the prioritization methodology:

1. Newly Pedestrian Signalized Intersections
2. Existing Signalized Intersections with pedestrian signs but without APS, which are to be prioritized based on:
 - a. Public Requests
 - b. New Signal Equipment
 - c. Particularly Dangerous Conditions
 - d. Public Transportation
 - e. Public Facilities

The prioritization memorandum has been developed utilizing criteria set for in the National Cooperative Highway Research Program (NCHRP), *Accessible Pedestrian Signals: A Guide to Best Practices* ("APS Guide"), taking into consideration the complexity of intersections. In the APS Guide (Appendix D) is a Prioritization Tool that can be used to score intersections in effort to prioritize the most complex intersections first. It is noted in the memorandum that CDOT prioritization of APS installations "is based off points given by the Prioritization Tool as required by the Order. Full intersection and crosswalk scoring will not be performed.

CDOT prioritizing reporting is detailed below for Newly Pedestrian Signalized Intersections and Existing Signalized Intersections, with methodology developed using the APS Guide, the requirements of the Remedial Plan Order (Section III (A)), and “other guidance criteria based on the relative difficult for blind pedestrians to navigate the intersection.”

CDOT reporting in this section is based on information provided in the most recent CDOT APS Program Semi-Annual Report, dated June 12, 2026.

3.3.2.1 Newly Pedestrian Signalized Intersections

In the prioritization memorandum, it is acknowledged that Newly Pedestrian Signalized Intersections are “required to incorporate APS as part of their standard equipment and therefore do not need to be prioritized” in accordance with Section III (A)(1) of the Remedial Plan Order.

In Plan Year 1, CDOT installed new pedestrian signals equipped with APS at 9 intersections, all the result of newly signalized intersections.

3.3.2.2 Existing Signalized Intersections

Section III (A)(2) of the Remedial Plan Order details prioritization requirements for Existing Signalized Intersections and are addressed in the prioritization memorandum under the following categories: Public Requests, New Signal Equipment, Particularly Dangerous Conditions, and Public Transportation and Public Facilities.

3.3.2.2.1 Public Requests

In the prioritization memorandum, it is acknowledged that Public Requests for installation of APS are “generally required to be installed within twelve (12) months of receipt of request. Therefore, when an intersection receives a public request, design priority will be escalated to accommodate this timeline.”

In Plan Year 1, CDOT installed APS at 18 intersections responsive to Public Requests.

Since March 9, 2025, CDOT has received valid requests for APS installation at 69 intersections. The status of these requests is as follows:

- + APS have been installed at 5 locations requested.
- + APS are under construction at 2 locations requested.
- + Five locations were found to have inadequate infrastructure for APS installation and are taking longer to install than expected; all will be issued for construction in 2026 and completed within 24 months of the request.

In addition to the 69 requested noted above, the City also notes that approximately 386 additional APS location requests were submitted in 2025. These requests are believed to be from a single requestor and “do not support the goals of the Order to aid the blind community.” These requests were removed from the request queue by order of the Court.

CDOT is also working to address 64 APS requests received prior to March 9, 2025. The status of these requests is as follows:

- + APS have been installed at 23 locations requested.
- + APS are under construction at 16 locations requested, with completion dates ranging from summer of 2026 to 2027 or later.

- + Twelve locations were found to have inadequate infrastructure for APS installation and are taking longer to install than expected.
- + Eight location requests were found to be duplicates.
- + Three location requests were made in error.
- + Two location requests were found to be invalid requests as the signalized intersections do not have pedestrian signals.

3.3.2.2.2 New Signal Equipment

In the prioritization memorandum, it is acknowledged that Existing Signalized Intersections with New Signal Equipment are “also required to incorporate APS as part of their standard equipment and therefore do not need to be prioritized.”

In Plan Year 1, CDOT completed Traffic Signal Modernizations (TSMs) at 9 intersections, all of which resulted in the installation of APS.

3.3.2.2.3 Particularly Dangerous Conditions (Priority Categories 1 & 2)

In the prioritization memorandum, CDOT has acknowledged Particularly Dangerous Conditions in two separate categories to address APS installation priorities relative to intersection geometry, signal phasing and equipment, and proximity to pedestrian generators.

Category 1: Particularly Dangerous Conditions (EPP, MPS, TSI, 3+ Streets, and Complex Intersections) Signalized intersections with pedestrian signals equipped with Exclusive Pedestrian Phases (EPP), are T-Shaped Intersections (TSI), have three or more distinct streets, or have other complex geometry.

The memorandum references the APS Guide Prioritization Tool scoring associated with these features:

Midblock Location	14 points
5 or More Legs	12 points
Exclusive Ped Phase	8 points
Skewed Crosswalk	7 points

Category 2: Other Particularly Dangerous Conditions (LPIs and PTPs) Signalized intersections with pedestrian signals equipped with Leading Pedestrian Intervals (LPI) and Protected Turn Phases (PTP).

The memorandum references the APS Guide Prioritization Tool scoring associated with these features:

Leading Pedestrian Intervals	8 points
Protected Turn Phases	3 or 7 points

In Plan Year 1, CDOT installed APS at 28 intersections at Particularly Dangerous Intersections identified under priority Category 1.

In supplemental data provided to the Independent Monitor, CDOT notes that 14 Public Requests for APS at intersections with LPI have been completed, 3 of which were in Plan Year 1.

CDOT is consulting with the COMS at locations where requests cannot be immediately fulfilled, including locations with EPP and/or LPI.

In addition, CDOT has conducted a review of the 100 most complex intersections in the City of Chicago (Appendix A of the Remedial Plan Order). In this review, CDOT has determined that this list ultimately results in 141 signalized intersections. The list was adjusted as some intersections were found to be non-signalized, while others represented a cluster of nearby intersections.

3.3.2.2.4 Public Transportation & Public Facilities (Priority Category 3)

In the prioritization memorandum, CDOT has acknowledged access to Public Transportation and Public Facilities priorities for “signalized intersections with pedestrian signals within 1/8 mile of public transportation” and “signalized intersections with pedestrian signals within 1/8 mile of public facilities.”

The memorandum references the APS Guide Prioritization Tool scoring associated with these features:

Transit Facility	1, 3, or 5 points
Public Facility (for Visually Impaired)	Up to 10 points
Public Facility (Major Pedestrian Attraction)	Up to 5 points

In Plan Year 1, CDOT did not indicate any APS installations specifically serving public transportation and public facilities in the Semi-Annual Report or the prioritization memorandum.

3.3.2.2.5 Other Noted Priorities and Efforts

In the prioritization memorandum, it is acknowledged in accordance with Section III (A) of the Remedial Plan Order that “for all intersections that do not fall within these priority provisions, City of Chicago has discretion to select the order of APS installation to meet its yearly requirements. City of Chicago shall make reasonable efforts to install APS equitably across the city.” These intersections are considered Priority Category 4.

CDOT notes that within the Priority Categories, additional “sub-category” prioritization considerations may be applied when selecting APS installation locations with the goal of prioritizing intersections that “represent a wide mix of complexities.” CDOT will “strive to prioritize intersections that meet multiple prioritization criteria, as defined in the Order, over those that have fewer such criteria.”

In APS planning and prioritizing, CDOT will strive to ensure APS installations are distributed equitably in Chicago, considering areas that may be underserved, where economic conditions recommend improvements, or where the density of transportation infrastructure is sparse. To assist in these efforts, the City’s Mobility and Economic Hardship (MOBEC) Index will be referenced to evaluate and better understand the needs of communities or areas within Chicago, including those areas with a higher percentage of people with disabilities.

CDOT anticipates that prioritization in the early years of the Order will be driven by Public Requests, Priority 1 locations, and minimum annual installation requirements. CDOT will continue to work with Plaintiffs, the United States, the Independent Monitor, and the APS Community Advisory Committee to assist with prioritization efforts for lower priority categories.

3.3.2.2.6 Summary

In analyzing the information provided in the Semi-Annual Report and the prioritization memorandum, the Independent Monitor has quantified the prioritized APS installations in Plan Year 1 as indicated by CDOT.

Table 3.3.2.2.6 (1)
CDOT Prioritized APS Installation Reporting for Plan Year 1

Intersection Priority	Number of Signalized Intersections with Pedestrian Signals Installed
Public Requests	18 Intersections
Particularly Dangerous Conditions	28 Intersections
Other – Capital Improvement Projects	32 Intersections
Total:	78 Intersections

It is noted in the Semi-Annual report that Plan Year 2 APS designs are prioritized in the following order:

1. Public Requests received to date.
2. Priority 1 intersections (EPP, mid-block crossings, T-shaped intersections, intersections with three or more distinct streets, and the top 100 intersections listed in CODT's Complex Intersection Study).

CDOT intends to continue prioritizing the installation of APS based on criteria established in the APS Guide, including considerations such as "intersection geometrics, signal timings, and more that make crossings particularly difficult for people who are visually impaired to navigate as well as factors that make them more likely to use a crosswalk."

In the prioritization memorandum, a summary and chart provided detailing the general prioritization approach to APS installations. The following intersection types are listed in the memorandum in order of priority, matched with the corresponding Section of the Remedial Plan Order:

Table 3.3.2.2.6 (2)
CDOT General Prioritization of APS Installations

Remedial Plan Order Section	Intersection Type
Section III (A)(1)	Newly Pedestrian Signalized Intersections
Section III (A)(2)(b)	Existing Signalized Intersections with New Signal Equipment
Section III (A)(2)(a)	Public Requests prior to 3/9/25
Section III (A)(2)(a)	Public Requests received after 3/9/25
Section III (A)(2)(c)	Particularly Dangerous Conditions
Section III (A)(2)(c)	Other Particularly Dangerous Conditions
Section III (A)(2)(d)	Intersections near Public Transportation
Section III (A)(2)(e)	Intersections near Public Facilities
Section III (A)	All other intersections (City discretion)

3.3.3 Independent Monitor Analysis

In combination, the Semi-Annual Report and the Prioritization Methodology memorandum demonstrate a solid understanding of the APS prioritization requirements in Section III (A) of the Remedial Plan Order.

In addition to specific efforts detailed below for each priority, CDOT is clearly committed to continuing to work and coordinate with Plaintiffs, the Independent Monitor, and the APS Community Advisory Committee to assist with prioritization efforts. CDOT is dedicated to an equitable distribution of APS installations where locations do not fall within the priority provisions of the Remedial Plan Order.

As required, CDOT has used the NHCRP APS Guide Prioritization Tool to assist in APS prioritization efforts, but full intersection or crosswalk scoring is not performed. Each of the priority provisions under Section III (B)(2) of the Order have been identified, including public requests, new signal equipment, particularly dangerous conditions, public transportation, and public facilities for Phase I, Plan Year 1.

The Independent Monitor has additional comments and recommendations provided following in [Section 3.3.3.5](#).

3.3.3.1 Public Requests

CDOT has acknowledged Public Request response and associated APS installation requirements, including the typical 12-month allowance for installation from the time the request(s) is received, applicable to requests received as of March 9, 2025. However, the Independent Monitor notes that the APS website indicates APS installation requests will be addressed within 12-24 months.

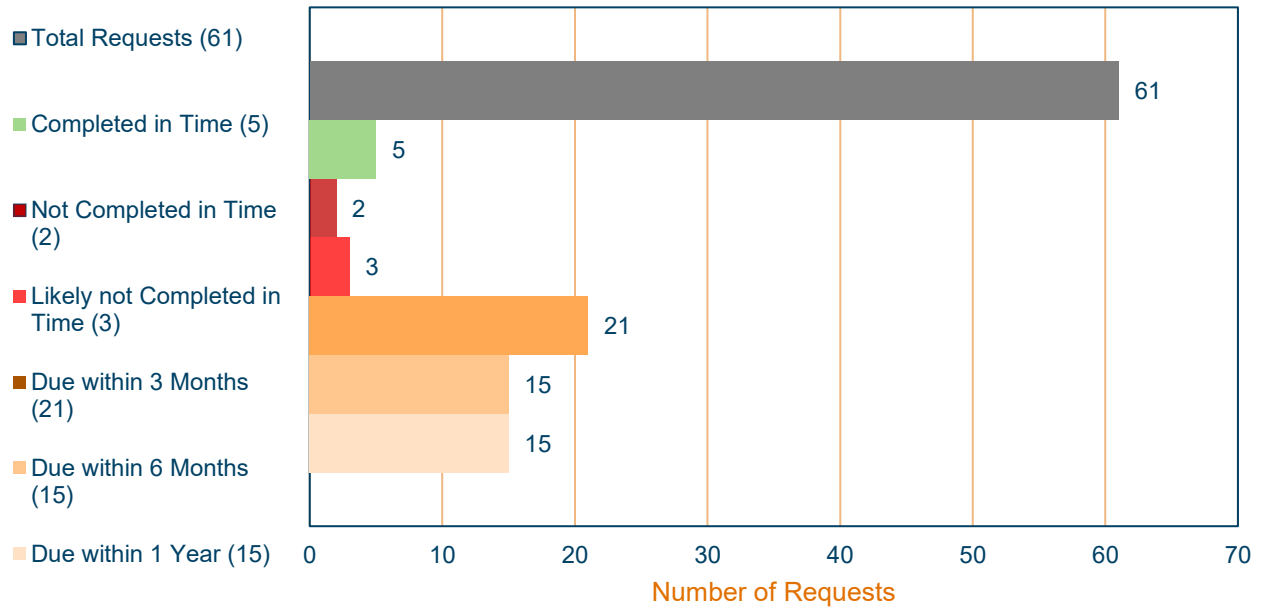
The Independent Monitor concurs with this general approach but believes that full compliance with Section III (A)(2)(a) of the Remedial Plan Order for Public Requests may be in question due to the timeline concerns indicated below.

In the Semi-Annual Report, CDOT indicates that 18 Public Requests for new APS installations were completed in Plan Year 1. It is not clear in the report if the 18 fulfilled requests were submitted prior to or on or after March 9, 2025. Per the report, only 5 of the 69 of the Public Requests made since March 9, 2025, have been completed. CDOT did not provide specific updates on the Plan Year 1 requests that remain in the queue. It is recommended to provide thorough and clear reporting around Public Requests moving forward (see recommendations below).

Notes have been provided by CDOT indicating Public Request fulfillments that are expected to take more than 12 months to install, but no more than 24 months as required. The Independent Monitor plans to track these requests in detail to ensure they are installed within the required timeframes. In review of the APS request list provided by CDOT, it is noted that some requests made in June of 2025 are still in design may have exceeded the 12 month installation requirement.

The list of Public Requests provided indicates the status of 61 requests made since March 9, 2025. It is unclear why this list does not include all 69 requests identified in the Semi-Annual Report. Most of these requests (46) utilized the City's 311 system, but the APS website was used, and letters were submitted to the City for additional requests. In analyzing the data, the Independent Monitor has summarized the status of these requests in the figure below.

Figure 3.3.3.1 (1)
Public Requests for APS Installation Status

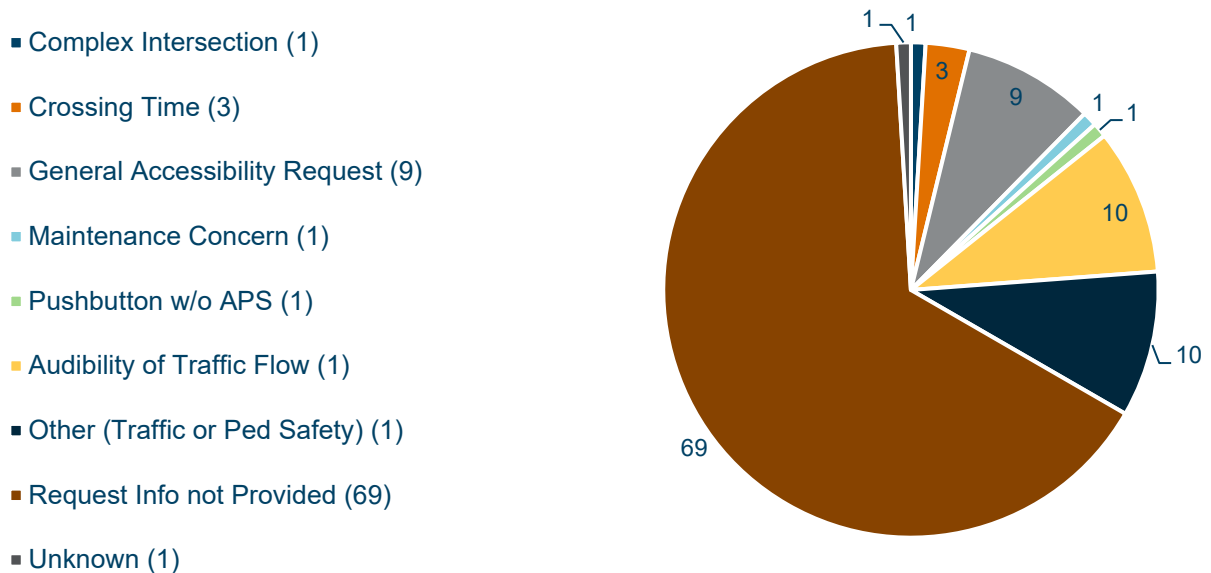


There is a confirmed delay to 7 of the requests due to existing constraints and CDOT is working on appropriate solutions and is coordinating with the COMS as necessary.

The Independent Monitor acknowledges that CDOT is continuing to address Public Requests for APS prior to March 9, 2025, and supports these efforts. While it is understood that resources are limited, response to these requests is important. Some requestors have likely been waiting for APS installation for a long time. CDOT is encouraged to continue to reach out to these requestors, providing updates and ensuring that current levels of access are adequate for these individuals until the time the devices can be installed.

In review of all Public Requests for APS available, including 105 total requests before or after March 9, 2025, the Independent Monitor notes the nature of requests made in the figure below. It is not clear why the list did not include information on all 133 requests identified in the Semi-Annual Report.

Figure 3.3.3.1 (2)
Public Requests for APS Installation by Description



Refer to [Section 3.4.3.3](#) for Public Requests related to APS maintenance.

3.3.3.2 Newly Pedestrian Signalized Intersections & New Signal Equipment

New traffic signal installations and new signal equipment installations are planned as needed by CDOT and are not considered APS priority considerations.

The Independent Monitor concurs with this general approach and believes that it satisfies the obligations of Section III (A)(1) and Section III (A)(2)(b) of the Remedial Plan Order for Newly Pedestrian Signalized Intersections & New Signal Equipment.

In Plan Year 1, CDOT has identified 9 new traffic signal installations including APS and 9 Traffic Signal Modernizations (TSMs), also including APS.

3.3.3.3 Particularly Dangerous Conditions

Particularly dangerous intersections have been established as the highest APS priorities by CDOT, identified as Category 1 and Category 2 priorities. CDOT has outlined the primary considerations for each Category, including intersection scoring criteria from the APS Guide.

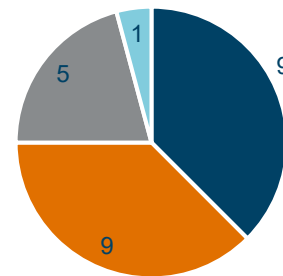
The Independent Monitor concurs with this general approach and believes that it satisfies the obligations of Section III (A)(2)(c) of the Remedial Plan Order for Existing Signalized Intersections with Particularly Dangerous Conditions.

In Plan Year 1, CDOT prioritized and installed APS at 28 intersections with particularly dangerous conditions identified under Category 1.

In review of additional documentation provided by CDOT as requested by the Independent Monitor, it was found that priority responses to Particularly Dangerous Conditions included more than 28 intersections, including both Category 1 and Category 2 considerations. The Independent Monitor found that a total of 24 installations were responsive to Category 1 priorities and 44 installations were responsive to Category 2 priorities. In total, 58 installations were responsive to Category 1 and/or Category 2 priorities for existing signalized intersections with pedestrian signals. In addition, it is noted that 6 new APS installations addressed Category 1 and/or Category 2 priorities.

Figure 3.3.3.3 (1)
 Particularly Dangerous Conditions: Category 1 Distribution
 (24 Priorities Addressed)

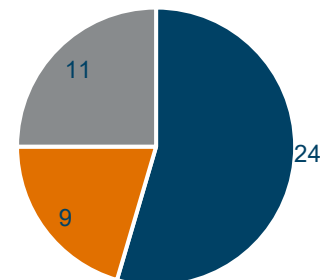
- Mid-Block Crossings (MPS) (9)
- T-Shaped Intersections (TSI) (9)
- Complex Intersections or Serving 3+ Streets (5)
- Multiple Priorities (EPP, TSI) (1)



Number of Priorities Addressed

Figure 3.3.3.3 (2)
 Particularly Dangerous Conditions: Category 2 Distribution
 (44 Priorities Addressed)

- Protected Turn Phase (PTP) (24)
- Leading Pedestrian Interval (LPI) (9)
- Multiple Priorities (PTP, LPI) (11)



Number of Priorities Addressed

It is noted that in Plan Year 1, only 5 intersections were installed responsive to priorities based on complex geometry of intersections or intersections that serve three or more distinct streets. It is generally recommended to focus more on this priority in future Plan Years.

In review of the supplemental data provided to the Independent Monitor, it is confirmed that CDOT is continuing to work with the COMS for support in instances where Public Requests for installations at intersections with EPP and/or LPI cannot be fulfilled immediately.

3.3.3.4 Public Transportation & Public Facilities

CDOT has identified access to public transportation and public facilities as APS prioritization Category 3, where signalized intersections with pedestrian signals are located within 1/8 mile from said facilities. CDOT has included intersection scoring criteria from the APS Guide.

The Independent Monitor concurs with this general approach and believes that it satisfies the obligations of Section III (A)(2)(d) and Section III (A)(2)(e) of the Remedial Plan Order for Existing Signalized Intersections serving Public Transportation facilities and Public Facilities. However, CDOT is encouraged to report these priority considerations accordingly when submitting Semi-Annual reports or other documents. See below for additional information on reporting recommendations.

In Plan Year 1, CDOT did not indicate any APS installations specifically serving public transportation and public facilities in the Semi-Annual Report or the prioritization memorandum.

3.3.3.5 Independent Monitor Recommendations

While the processes and procedures developed by CDOT with respect to APS installation prioritization are generally sound, the Independent Monitor has recommendations for CDOT's consideration below:

- + **All Priorities Reporting (Confirm Quantities):** Please confirm reporting numbers for APS installations relative to all priorities identified in the Remedial Plan Order. In the spreadsheet provided indicating the reasons for APS installations and priority categories addressed, the Independent Monitor found the numbers to not be in complete alignment with CDOT reporting. For example, CDOT reported 28 APS installations responsive to Particularly Dangerous Conditions in Plan Year 1. In the Independent Monitor's review of the data in the spreadsheet, up to 58 APS installations addressed particularly dangerous conditions, whether Category 1 or 2. Refer to [Section 3.1.3](#) for the Independent Monitor's analysis of APS installations responsive to various priorities.
- + **All Priorities Reporting (Quantities Reporting):** It is recommended that CDOT more clearly communicate APS installation quantities responsive to priorities identified in the Remedial Plan Order. In review of the supplemental data and spreadsheets provided to the Independent Monitor, CDOT is clearly tracking different priority considerations internally, and it would be helpful to inform Plaintiffs and the APS Community Advisory Committee of these specific analyses. It is recommended to provide a table (or similar) that documents and quantifies these priority responses, like the Independent Monitor's Table 3.1.3. (4) in [Section 3.1.3](#). Prioritization reporting for intersections could be responsive to multiple priority considerations.
- + **All Priorities Reporting (Quantities Compliance):** It is not clear to the Independent Monitor if the reported priority installations are adequate as the Remedial Plan Order does not indicate required quantities for prioritization. For example, the City reports 28 installations responsive to Particularly Dangerous Conditions, approximately 36% of the Plan Year total. Discussions are recommended to determine if this is adequate.
- + **All Priorities Reporting (Supporting Data):** It is recommended that CDOT also make available supporting data that documents prioritization and "sub-category" considerations that are detailed in the supplemental data and spreadsheets provided to the Independent Monitor. This data can help support a better understanding of CDOT prioritization evaluations that the APS Guide Prioritization Tool scoring would typically demonstrate.
- + **Prioritization Scoring per APS Guide Prioritization Tool:** The Independent Monitor agrees that scoring of intersections is not required under the Remedial Plan Order, but it is recommended. It would be good for all interested parties to understand why CDOT has opted not to score intersections to assist with prioritization.

Please note that it is unclear why the prioritization memorandum includes intersection scoring values applicable to different conditions as CDOT has indicated that scoring will not be performed. This should be clarified.

- + **Public Requests:** Provide the Independent Monitor with regular updates to Public Requests for APS installations. Multiple locations indicated in the Public Request tracking spreadsheet provided appear to be due for installation within the required 12 month timeline. Please confirm requests made on March 9, 2025, or after are installed within 12 months and document accordingly. In addition, updates on requests made prior to March 9, 2025, would be beneficial. It is recommended that requestors be provided with updates on these requests. It is also requested that detailed Public Request information be included in Semi-Annual Reports, including more thorough updates and projects for requests that remain in the queue.
- + **Particularly Dangerous Conditions:** CDOT's analysis of the 100 most complex intersections should be discussed by the Parties to determine what actions, if any, are recommended.
- + **Public Transportation & Public Facilities:** CDOT did not clearly report any APS installations responsive to access to public transportation and public facilities. The spreadsheet reviewed indicated that up to 44 APS installations were responsive, at least partially, to access to public transportation and public facilities. It is recommended that this information be reported.
- + **Capital Improvement Projects:** Current reporting provides no prioritization considerations for Capital Improvement Projects. In the future, please report on the priorities, if any, that Capital Improvement Projects address.
- + **Additional Prioritization Considerations:** In the effort of distributing APS installations equitably throughout Chicago, please consider the APS installation by ward analysis provided in [Section 3.1.3](#). Per this analysis, it should be noted:
 - As indicated in Figure 3.1.3 (1), current APS distribution by ward appears to be "top-heavy," with a noticeable amount of APS installations concentrated in Wards 25-50. Wards 1-24 are arguably underserved.
 - Wards 6, 7, 9, 12, 18, 24, 26, 29, 33 currently have no APS installations.

3.3.3.6 Independent Monitor Summary on APS Prioritization Compliance

The City is generally in compliance with its obligations to prioritize APS installations as required under the Remedial Plan Order for Plan Year 1. The Prioritization Methodology developed and the information provided in the Semi-Annual Report(s) are reflective of well-constructed processes, but there is room for improvement and a few isolated areas for concern. The Independent Monitor has provided multiple recommendations regarding APS prioritization compliance considerations.

In particular, there is concern that Public Requests for APS installations may not be delivered within the 12 month allowance from the time the request is received.

APS prioritization reporting should be more clear, appropriately quantifying and detailing APS installations responsive to the priorities established in the Remedial Plan Order. The Independent Monitor identified minor discrepancies in reporting between the Semi-Annual Report(s) and supplemental data provided for review. It has been generally recommended that more focus be placed on prioritizing intersections with complex geometry or that serve three or more streets.

3.4 COMMUNICATION, COMMUNITY INVOLVEMENT, AND MAINTENANCE COMPLIANCE FOR PLAN YEAR

3.4.1 *General Requirements Under the Remedial Plan Order*

Miscellaneous requirements under the Remedial Plan Order, including Communication, Community Involvement, and Maintenance compliance are grouped in this section of the report.

3.4.1.1 **Communication**

Section VI of the Remedial Plan Order addresses the City's obligations with respect to Communication as follows:

City of Chicago shall regularly maintain and update an accessible APS website, consistent with Web Content Accessibility Guidelines ("WCAG") 2.1 Level AA, listing intersections with APS, providing contact information of City of Chicago official(s) to contact regarding APS, and permitting community members to make public requests for APS installation, maintenance, or repair and track the progress of such requests.

On the accessible APS website, City of Chicago shall track each request, post the request under a Public Request List for APS within thirty (30) days of the request, and review and respond within six (6) months of receipt, giving an approximate timeline of when the request will be completed and the relative priority of the requested intersections as compared to other requested intersections.

The public must be permitted to submit a request for APS installation in several ways, including online, by telephone, and in person at aldermanic offices or the Mayor's Office for People with Disabilities ("MOPD"). City of Chicago shall ensure that all requests are process through a centralized review.

3.4.1.2 **Community Involvement**

Section VII of the Remedial Plan Order addresses the City's obligations with respect to Community Involvement as follows:

A. APS Community Advisory Committee

City of Chicago shall create and regularly communicate with an APS Community Advisory Committee. The Committee shall include representatives from CDOT (those responsible for implementing the remedial plan), MOPD, and Chicago's blind community, including organizations that serve the blind community. The Committee should meet quarterly and provide feedback to City of Chicago on all issues relating to the remedial plan.

B. Public Requests

City of Chicago shall maintain a program to accept and respond to public requests for the installation of APS as described in Section III.A.2.a of the Remedial Plan Order.

3.4.1.3 **Maintenance**

Section V of the Remedial Plan Order addresses the City's obligations respective to Maintenance as follows:

A. Routine Maintenance

City of Chicago shall routinely perform maintenance inspections of all APS to a degree and on a schedule not less than what is performed with respect to visually based pedestrian signals. City of Chicago shall repair or replace APS that are not functioning as intended within five (5) business days after inspection or another reasonable period thereafter if extenuating circumstances prevent the repair or replacement from being completed.

B. Requests for Maintenance or Repair

City of Chicago shall establish a centralized system for members of the public or City of Chicago officials or employees to submit a request for maintenance or repair of an APS device. City of Chicago shall ensure that requests are logged and accessible to the public through the APS website. City of Chicago shall repair or replace APS that are not functioning as needed within five (5) business days after a request is submitted or another reasonable period thereafter if extenuating circumstances prevent the repair or replacement from being completed. Extenuating circumstances may include, without limitation, where major damage has occurred, where there are prolonged materials shortages, where there is a report of an over-loud APS device that does not implicate safety concerns, or where spoken messages cannot be added or fixed without technical assistance. Should City of Chicago determine extenuating circumstances prevent the repair or replacement from being completed within five (5) business days, it shall include that determination and the reason for the delay within its tracking system accessible on the APS website.

3.4.2 CDOT Reporting on Communication, Community, and Maintenance

In the most recent CDOT APS Program Semi-Annual Report submitted, dated June 12, 2026, the City has reported compliance with various provisions of the Remedial Plan Order, including Communication, Community Involvement, and Maintenance for Plan Year 1.

3.4.2.1 CDOT Communication Compliance Reporting

As indicated in the Semi-Annual Report, CDOT continues to maintain the City's APS website (www.chicagoaps.org) originally established in 2025, which is compliant with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as required. The website lists APS installations to date and provides public contact information for City officials that are responsive to APS concerns or questions.

The APS website also serves as a tool for community members to make Public Requests for installation, maintenance, or repair. In addition, Public Requests may be submitted by phone (via the 311 system), online at the [311 website](#), on mobile devices via the 311 mobile app, or in person at the Mayor's Office for People with Disabilities (MOPD) or at Aldermanic Ward Offices. Public Requests for APS are tracked by CDOT and listed on the APS website within 30 days of receipt. Upon receipt of requests, CDOT reviews and provides a response on the website within 6 months or sooner, providing an appropriate timeline of when the request(s) will be completed. The website is updated monthly at a minimum.

3.4.2.2 CDOT Community Involvement Compliance Reporting

As indicated in the Semi-Annual Report, CDOT continues to meet quarterly with the APS Community Advisory Committee, originally established in the fall of 2025. The Committee includes representatives from CDOT, MOPD, Chicago's blind community, and organizations that serve the blind community. Meeting dates, agendas, and minutes for meetings are available on the APS website and in Appendix I of the Semi-Annual Report.

3.4.2.3 CDOT Maintenance Compliance Reporting

As indicated in the Semi-Annual Report, the City's 311 system and APS website are available mechanisms for submitting and tracking Public Requests for APS maintenance or repair. CDOT acknowledges the obligation to repair or replace nonfunctional APS devices within 5 business days. The APS website states: "APS maintenance requests will be addressed within 5 business days unless otherwise noted. Requests will be prioritized based on date received."

In Plan Year 1, CDOT reports that 60 valid requests for APS repair or maintenance were received, all of which have been addressed. APS locations requested for repair or maintenance are listed in Appendix H of the Semi-Annual report, including the request date and status. It is not clear in the Semi-Annual report or Appendix H if all repairs were conducted within 5 business days as required under the Remedial Plan Order.

3.4.3 Independent Monitor Analysis

The City has generally complied with the various requirements of the Remedial Plan Order related to Communication, Community Involvement, and Maintenance in Plan Year 1.

The Independent Monitor has additional comments and recommendations provided following in [Section 3.4.3.4](#).

3.4.3.1 Communication Compliance

The City has adhered to all Communication compliance provisions in Section VI Remedial Plan Order. Refer to additional sub-category comments and recommendations below.

- + **APS Website** – CDOT has indicated that the City's APS website is accessible and compliant with WCAG as required. The Independent Monitor was informed that CDOT has coordinated with MOPD and Plaintiffs to ensure that the website is accessible and compliant with WCAG as required, including multiple rounds of revision in development to correct identified concerns.

Please note that the Independent Monitor did not review the APS website for compliance with WCAG as he is not trained in web content accessibility and did not feel that it was within his scope of work. If Plaintiffs or others feel this review is an important analysis in determining compliance with the Remedial Plan Order, a review of the website can be coordinated by the Independent Monitor and provided in future Annual Reports.

The website allows community members to make public requests for APS installation, maintenance, or repair and track the progress of such requests.

CDOT has included some additional helpful information or features on the APS website beyond what is required, including:

- Basic information on APS, including an instructional APS video.
- A sortable list and map of locations where APS has been installed.
- Information on the APS Community Advisory Committee, including past meeting minutes and proposed future meeting dates.
- A frequently asked questions (FAQ) section.
- Contact information for additional questions or concerns (CDOTAPS@cityofchicago.org).

- + **Public Requests** – The City has adequately satisfied the requirements of the Remedial Plan Order to provide multiple ways to submit Public Requests for APS installation, maintenance, or repair. Requests can

be made online, by telephone, and in person. Requests can be tracked on the APS website and through the City's 311 service request system.

The City's 311 service request system is the primary mechanism used to receive and track APS requests. The APS website directs requests made for APS installation and maintenance to the 311 website and requests submitted through the mobile app also are directed to the 311 system.

Please note that the Independent Monitor is familiar with the 311 service request system and generally believes it to be a suitable mechanism to process APS requests. The Independent Monitor has not elected to thoroughly review the City's 311 system processes or website as a part of his analysis.

In general, the Independent Monitor feels that the APS website and 311 system and other response systems are adequate but could be improved. See specific recommendations below.

3.4.3.2 Community Involvement Compliance

The City has adhered to all Community Involvement compliance provisions in Section VII Remedial Plan Order. Refer to additional sub-category comments and recommendations below.

- + **APS Community Advisory Committee** – CDOT has successfully developed and maintained ownership of the APS Community Advisory Committee. The Committee meets quarterly and includes representatives from all required parties as required.
- + **Public Requests** – The City has developed multiple methods to accept and respond to Public Requests for APS as required. Refer to Communication Compliance above for additional information.

3.4.3.3 Maintenance Compliance

The City has adhered to all Maintenance compliance provisions in Section V Remedial Plan Order. Refer to additional sub-category comments and recommendations below.

- + **Routine Maintenance** – CDOT has committed to an annual APS inspection program that is detailed in [Section 3.2.2.2](#), including Plan Year 1 reporting on maintenance issues identified as a result of inspections. It is currently unknown if APS repairs or replacements are occurring within 5 business days after inspections.
- + **Requests for Maintenance or Repair** – The City has developed multiple methods to accept and respond to Public Requests for APS as required. Refer to Communication Compliance above for additional information.

The City reports that 60 requests for repair or maintenance were received and completed in Plan Year 1. It should be confirmed that these responses were conducted within 5 business days of receipt of the request as required under the Remedial Plan Order. This information is not provided in the Semi-Annual Report or the supplemental data provided to the Independent Monitor.

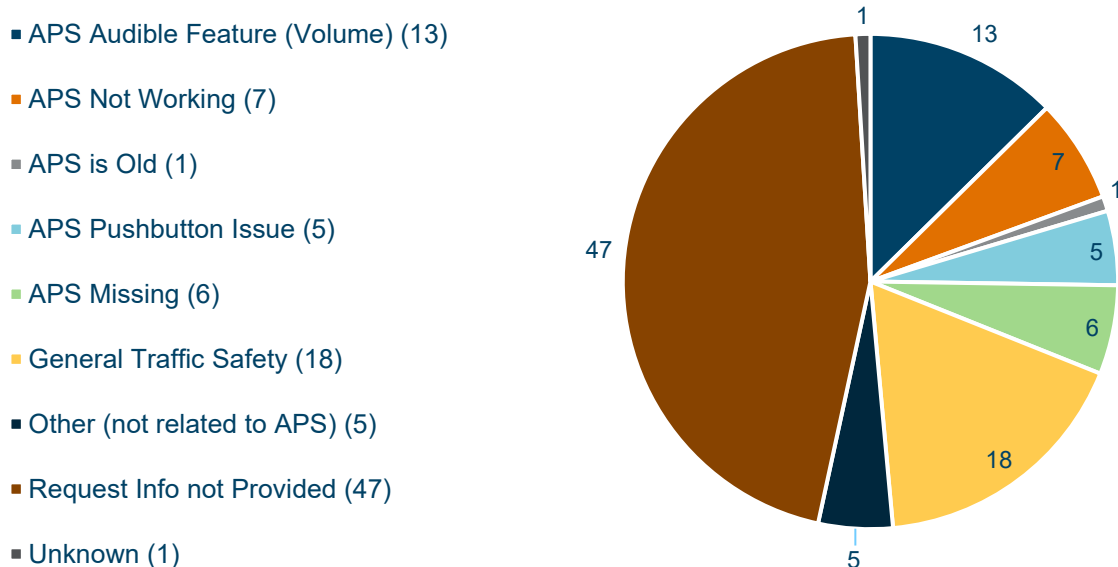
The Independent Monitor was provided with a listing of Public Requests for maintenance or repair not available in the Semi-Annual report or on the City's 311 or APS websites. In review of this data, including descriptions of each request (where provided by the requestor), the following observations were made:

- CDOT is clearly responding to requestors within the 30 day maximum period as required.
- It is not indicated whether the APS repairs or replacements occur within 5 business days as required.
- 103 requests for APS maintenance or complaints were included on the list. It is noted that not all these requests pertain to APS.
- All but 3 of the requests submitted utilized the City's 311 system.

- Of the 103 requests reviewed, many of the request descriptions were blank or not provided by the requestor. A significant number of the requests appeared to be general traffic safety concerns or other issues not directly related to APS.

Figure 3.4.3.3

APS Maintenance Requests or Complaints Distribution by Description



3.4.3.4 Independent Monitor Recommendations

3.4.3.4.1 APS Website Recommendations

- + Provide additional basic APS information on the home page to supplement the general description and helpful video already included on the website. For example, it may be helpful to provide simple diagrams showing where APS devices typically are installed at an intersection (one pushbutton per crossing, note preferred locations), reach range and pushbutton access diagrams, clarification on pushbutton actuation if signals are pre-timed, pushbutton alignment, and speech-messaging or other device programming considerations. While the video provided is very helpful, seeing some simple diagrams or supporting information can help the general public better understand what APS is and why it is needed.
- + Additional informational videos are encouraged. It may be particularly useful to record the use of APS by a blind or DeafBlind pedestrian, clearly demonstrating how the devices are approached and interacted with before crossing.
- + Clarify on the home page of the website that requests can be submitted to the City or CDOT for the installation of new or maintenance or repair of existing APS. It should also be indicated that APS requests for new installations are only permitted at locations with existing signalized intersections.
- + Under the Track APS Installation Requests tab, it is recommended to revise the 12-24 month response time to requests to be in alignment with the requirements of the Remedial Plan Order. The Independent Monitor suggests: "APS installation requests will typically be addressed within 12 months but could take up to 24 months if existing site constraints preclude immediate installation. In these cases, the City will work with requestors to address accessibility needs in the interim until the time that the installation(s) can occur."

- + Provide up-to-date information on the APS installations map when devices are out of service due maintenance or other concerns.
- + If possible, include information on upcoming APS installations for community awareness and future planning of accessible routes. It would be particularly helpful if proposed or planned APS locations could be located on the APS website map.
- + Consider creating an “Accessible Route Planner” map similar to those that have been developed and employed in other cities. This map could include APS installations as well as other accessible features, like curb ramps, sidewalk conditions, accessible parking, access to transit and prioritized facilities, and other considerations. As an example, please refer to the [City of Seattle’s Accessible Route Planner](#) for options to consider for further development of the APS website.
- + On the APS Community Advisory Committee portion of the website, consider providing information to community members that may be interested in participating in future Committee discussions or activities.
- + APS Community Advisory Committee meeting minutes are not yet available for the May 19, 2026, meeting. It is recommended that minutes be posted to the website as soon as possible following the meeting(s).
- + Provide links to include on the website the APS policy developed and any other policies that are related to APS or compliance with Section 504 of the Rehabilitation Act and the ADA. In addition, provide links to any standard engineering details, check sheets, or other technical documents that may be referenced or used to design and install APS. As an example, refer to the [Seattle Department of Transportation ADA Policies and Design Guidance](#) for options to consider for further development of the APS website.
- + Consider attaching the APS “Fact Sheet” distributed to Aldermanic Ward offices to the website. Organizations serving the blind and DeafBlind, disability advocates, and others may have interest in access to the document to print or otherwise make available as a resource to their constituents.

3.4.3.4.2 APS Community Advisory Committee Recommendations

- + It is recommended to create a Committee log or other such document that allows tracking of and follow up on requests, concerns, or recommendations made by the Committee. Several topics initiated at Committee meetings, whether technical in nature or otherwise, included related action items that may not have been addressed at subsequent meetings.
- + Continue to solicit feedback from the community and Committee on the particular APS devices that are being installed throughout the City (whether Guardian or other manufacturer(s)). The Independent Monitor relies on direct community feedback and less so on manufacturer endorsements.
- + Continue to have discussions regarding funding procurement for APS design and construction efforts, including any potential federal grants that may be available.
- + Continue to discuss speech messaging, extended button press options, and other APS programming considerations. It is noted that some Committee members may have certain preferences regarding optional device features, e.g. speech messaging at all intersections. It is important to remember that while it is important to listen to and consider the feedback and preferences of APS device users, the end goal should be a consistently designed and applied system that is predictable in location and with consistent messaging for the highest level of accessibility serving the most people possible.
- + The Committee has expressed interest in training and demonstrations on APS use. This is highly encouraged and experiences learned from this kind of demonstration would be helpful additions to the APS website.

- + Ensure that APS Community Advisory Committee members are provided with meeting agenda and other distributed documents in an accessible format and with at least one week (5 business days) to review prior to the meeting.
- + The primary focus of discussing APS at Committee meetings to date has often been disrupted or limited due to attendee concerns on tangential pedestrian accessibility and mobility issues not directly related to APS. While it is important to give the community an audience to voice concerns, these meetings may not be the best place for open-ended discussions on these other pedestrian access issues. The meeting facilitator(s) should be trained and prepared to limit these discussions to remain focused on the APS agenda. It is recommended that the City consider alternative or additional community meetings so that constituents can voice their other pedestrian accessibility concerns. As an example, refer to the Seattle Department of Transportation's [Pedestrian Access Advisory Committee](#) (PAAC) website for information on what a more general access committee could look like for Chicago.
- + Current and future community members participating in Committee meetings should be educated on the intent of the meetings and their respective roles and expectations as participants.
- + If possible, additional community members that use APS and are interested in contributing to future conversations can be identified through public outreach and information provided on the APS website.
- + While CDOT has done a great job facilitating meetings and has been responsive to the communication needs of people with vision and/or hearing loss, it is encouraged to continue to educate any new staff that may be involved in future meetings, including general accessibility awareness and etiquette.

Maintenance Recommendations

3.4.3.4.3 Maintenance Recommendations

- + While maintenance request and/or complaint responses appear to be happening quickly and successfully, it is recommended to provide more clear reporting around said responses.
- + Ensure that APS devices are repaired or replaced with 5 business days of inspection or receipt of Public Requests as required under the Remedial Plan Order. It is recommended that this information is clearly reported in Semi-Annual Reports or other supporting documents.
- + It is recommended that APS Public Requests for maintenance or repair be listed on the APS website and/or 311 system sooner than the minimum 30 days required, as requests must be fulfilled within 5 business days.
- + Similarly, responses to maintenance or repair requests listed on the APS website and/or 311 system should be provided as quickly as possible, but certainly much sooner than the 6 month allowance permitted under the Remedial Plan Order. Pedestrians planning accessible routes may need more current data than what the APS website may currently provide.
- + CDOT has provided the Independent Monitor with helpful supplemental information regarding the nature of each Public Request for APS maintenance or repair or complaint submitted. It is recommended to provide this kind of detailed information on the APS and 311 websites. Currently, the APS website only provides the request location and date, 311 Service Request number for reference, and the status of the request. The 311 website only identifies the SR as an "APS Pedestrian Signal Complaint" without any additional information on the specific request.

For example, SR25-01486322 is generally identified as an APS complaint with a "Determination Made" without supporting remarks or description provided. See snapshot from 311 website below:


Service Request #: SR25-01486322


Accessible Pedestrian Signal Complaint

COMPLETED

2348 S WESTERN AVE
Chicago Illinois 60608
Submitted on: August 17, 2025

Accessible Pedestrian Signal Complaint - CDOT - Department of Transportation

Average completion times: 0day(s), over the last 12 months 

 **Determination Made**

No Action Taken – See Remarks in Description

Completed On August 18, 2025

3.4.3.5 Independent Monitor Summary on Communication, Community Involvement, and Maintenance Compliance

The City is generally in compliance with miscellaneous provisions of the Remedial Plan Order related to Communication, Community Involvement, and Maintenance for Plan Year 1.

The APS website development is a notable success, and the Independent Monitor has provided multiple recommendations for potential website additions or improvements.

The City's mechanisms in place to process APS Public Requests in general are sound and provide multiple avenues for submitting requests as required. The ability to track requests is provided, but some improvements could be made. The Independent Monitor has provided multiple recommendations for potential improvements to the Public Request processes and associated reporting.

The City's development and management of the APS Community Advisory Committee have generally been successful efforts with some areas that could be improved. The Independent Monitor has provided multiple recommendations for potential improvements for the Committee and CDOT's consideration.

Systems are in place to inspect APS devices and to be responsive to Public Requests for maintenance or repair of APS. It should be confirmed that repairs or replacements of APS devices are occurring within 5 business days of the inspection or receipt of the request as required under the Remedial Plan Order. The Independent Monitor has provided multiple recommendations for potential improvements to the inspection and Public Request response processes and associated reporting.

3.5 RECOMMENDATIONS FOR IMPROVING IMPLEMENTATION OF THE REMEDIAL PLAN ORDER

Section VIII (B)(4)(b)(v) of the Remedial Plan Order permits the Independent Monitor to make recommendations for improving the City's compliance with, or the effective implementation of, the Order.

It is noted that many of the Independent Monitor's recommendations likely go beyond what is required of City to comply with the Remedial Plan Order but should be considered by CDOT as options for increasing accessibility and accessibility awareness in the City of Chicago.

In addition, some of the recommendations below are provided in more detail in various sections of this report and have been referenced accordingly.

3.5.1 General Recommendations

- + The Independent Monitor focused heavily on compliance with the MUTCD in the first Annual Report for Plan Year 1. It is requested that all Parties provide feedback on the Annual Report and make recommendations on particular areas of concern moving forward that have not been addressed in this report.
- + It is generally recommended that there be more coordination between the Independent Monitor, the COMS, and CDOT on technical compliance, engineering judgment application, and prioritization considerations. The Independent Monitor recommends setting up recurring technical coordination meetings or including the Independent Monitor in future planned meetings with the COMS.

3.5.2 CDOT Reporting Recommendations

- + APS installations should not be included in the CDOT's reporting or on the City's APS website until they have been inspected and any deficiencies with the MUTCD are resolved, where applicable. Refer to [Section 3.1.3](#) for more detail on this recommendation.
- + Ensure that the number of signalized intersections with pedestrian signals, currently listed at 2,722, is updated each year as necessary to accurately track compliance with Phase I requirements under the Remedial Plan Order.
- + APS prioritization reporting should be clearly detailed and address the specific priorities identified in the Remedial Plan Order. Supplemental information should be included in reporting that elaborates on prioritization considerations. Refer to [Section 3.3.3.5](#) for more detail on these recommendations.
- + Multiple additional recommendations have been provided regarding the City's APS prioritization efforts and reporting and are detailed in [Section 3.3.3.5](#).

3.5.3 Compliance with the MUTCD Recommendations

- + Multiple recommendations have been provided regarding compliance with the MUTCD and are detailed in [Section 3.2.3.3](#). Recommendations include, but are not limited to:
 - Continued development of the APS Design Documentation policy.
 - Minor modifications or additions to APS Check Sheets, including specific accessibility considerations for designing and inspecting APS.
 - Development of APS standard engineering details.
 - Training for engineers, contractors, and others involved in APS design and installation.

- Engineering judgment considerations and coordination with the COMS.
- + Compliance reporting with the “then-current” applicable edition of the MUTCD, as identified in the Remedial Plan Order, could be clarified. It is acknowledged that CDOT will design and install APS in compliance with the 11th Edition of the MUTCD as of its recent adoption by the State of Illinois. It is assumed that Annual Inspections of APS designed and installed prior to the adoption of the 11th Edition will be conducted according to the 2009 Edition.
- + It is highly recommended that the City develop standard APS engineering details. Refer to [Section 3.2.3.3](#) for additional information on this recommendation. When and if these details are developed, it should be considered to model the local requirements in a way that may go beyond minimum MUTCD Standards statements, responsive to community needs or preferences. In a similar scenario, CDOT developed its standard curb ramp details to be more stringent than what the ADA Standards require to ensure compliance and maximize accessibility. Providing these details and solidifying any supplemental requirements early in this multi-year effort will help ensure consistency in design and application and will reduce any remediations needed in the future.
- + The Independent Monitor recommends a technical discussion with CDOT, Plaintiffs, and the COMS to clarify what is considered compliance with the MUTCD under the Remedial Plan Order:
 - It is clear that MUTCD Standards statements apply and should be verified for all APS designs and installations.
 - It is also clear that deviation from Guidance statements require documentation of applied engineering judgment.
 - It is unclear to the Independent Monitor whether any Optional or Guidance statements in the MUTCD should be considered as mandatory provisions pursuant to community needs or determinations made by legal counsel in any negotiations leading up to the finalization of the Remedial Plan Order.
 - In addition to the recommendations above, there are additional requirements under the ADA that could supersede the Guidance statements in the MUTCD. For example, the APS pushbutton mounting height in the MUTCD is identified as a Guidance statement. However, any new operable part is required to be located within the required reach range identified in the ADA Standards.
 - As part of these discussions, it is recommended that the group discuss particular ongoing challenges with meeting MUTCD Guidance statements and potential solutions. For example, the MUTCD requires that APS pushbutton be located between 1.5' and 6' from the curb but ideally located adjacent to the curb ramp landing. As curb ramps are typically 6' minimum in length to satisfy required running slope maximums, that would place the APS pole or pushbutton at least 6' from the face of curb.
 - As part of these discussions, it is recommended that the Independent Monitor and CDOT compare installation check sheets / checklists used for APS inspections to be in better alignment with inspections performed.
- + It is highly recommended that engineers, contractors, and anyone involved in the design and installation of APS are trained appropriately in technical compliance with the MUTCD and the ADA, the Remedial Plan Order and its significance, APS policies and procedures developed, and even customer service for those responsive to Public Requests. Refer to [Section 3.2.3.3](#) for more detail on these recommendations. It is noted that CDOT has indicated that discussions are ongoing regarding training opportunities, but none have been initiated to date.

3.5.4 Communication, Community Engagement, and Maintenance Recommendations

- + Multiple recommendations have been provided regarding the City's APS website and are detailed in [Section 3.4.3.4](#).
- + Multiple recommendations have been provided regarding the APS Community Advisory Committee and are detailed in [Section 3.4.3.4](#).
- + Multiple recommendations have been provided regarding Public Requests and are detailed in [Section 3.4.3.4](#). Priority considerations include more detail APS requests on the 311 and APS websites and faster response times indicating action to requestors, particularly for maintenance requests and complaints.
- + Multiple recommendations have been provided regarding Maintenance compliance and are detailed in [Section 3.4.3.4](#).

3.5.5 Other Recommendations

- + It is recommended that education on and enforcement of accessible temporary route requirements due to adjacent construction activities (or other) that result in sidewalk closures or pedestrian detours are provided. Refer to [Section 3.2.3.3](#) for more detail on these recommendations.
- + If the COMS is amendable, it is recommended that CDOT engineers and others involved in APS efforts participate in blind or DeafBlind mobility observations with willing pedestrian participants. In the experience of the Independent Monitor, having the opportunity to see how pedestrians use and interact with APS devices is highly informative and could certainly assist engineers in making informed design decisions based on this experience.
- + The Independent Monitor has reviewed CDOT's APS policy, but requests that any other policy related to APS or compliance with Section 504 of the Rehabilitation Act or the ADA be provided for his review.

4.0 *Dispute Resolution for the Plan Year*

While not specifically required to be included in this report, the Independent Monitor has obligations to assist in dispute resolution in cases when the Plaintiffs or the United States believe that the City of Chicago has not complied with the Remedial Plan Order.

Section X of the Remedial Plan Order details the processes for dispute resolution in cases where it is believed that the City is not in compliance:

If Plaintiffs or the United States believe that City of Chicago has not complied in any material respect with this Remedial Plan Order, they shall provide written notice to all parties and the Independent Monitor outlining the ways they believe City of Chicago is in non-compliance. Following notice of potential non-compliance, the parties must confer in good faith for a period of up to 30 days to resolve the dispute, with assistance from the Independent Monitor. If the parties are unable to resolve a dispute, any Party may make a motion to the Court to enforce the Remedial Plan Order.

The Independent Monitor's assistance in any dispute resolution is limited to technical consultation. The Independent Monitor is not an attorney or a certified mediator. Refer to the General Disclaimer at the beginning of this report for additional information.

4.1 REQUESTS MADE TO THE CITY OF CHICAGO / CDOT

Below are documented requests for action relative to APS installation, maintenance, or other miscellaneous items related to APS that have been submitted to the City by Plaintiffs or the United States, shared with the Independent Monitor for his awareness and tracking.

Of the 9 requests made or documented in this report, 7 have been resolved and 2 remain in progress. Request 06 remains unresolved and is due for a follow-up. Request 09 is relatively recent and is still under review.

The Independent Monitor cannot confirm that the list below includes all requests made by Plaintiffs or the United States. The dates in the table below identify the date the Independent Monitor received information regarding each particular request, not necessarily the date of the original request. The status of each request is typically indicated as "In Progress" or "Resolved."

Request 01 Date: 2025/08/20 Request 01 Originator: Disability Rights Advocates Request 01 Location(s): Multiple locations	Status
<p>Request Information: Disability Rights Advocates (DRA) originally submitted concerns over APS installations including general technical concerns and specific concerns at identified locations in a letter dated January 7th, 2025. This letter and subsequent correspondence were provided to the Independent Monitor via email on August 20th, 2025.</p> <p><u>Technical:</u> tactile arrow alignment; pole placement; missing speech messages; low volume; APS walk indicator tone; reach ranges; maintenance.</p> <p><u>Locations:</u> N Clark / W Bryn Mawr N Lincoln / W Belmont / N Ashland N Pulaski / W Thorndale N Kilbourn / W Irving Park N Lincoln / N Southport / W Wellington N Ashland / W Catalpa.</p> <p>City Response: The City responded by letter on April 2nd, 2025, acknowledging receipt and review of the issues identified. Some adjustments were made to devices based on the issues identified in the original letter from DRA. Explanations were provided regarding the reasons that requests / locations cannot be improved according to the suggestions in the letter. Some locations required further review. An engineering review of N Pulaski Rd and W Thorndale Avenue was due on May 1st, 2025. Refer to Request 02 for additional information.</p>	<p>Resolved</p> <p>(see Request 02)</p>

<p>Request 02 Date: 2025/08/20</p> <p>Request 02 Originator: Disability Rights Advocates</p> <p>Request 02 Location(s): Multiple locations</p>	<p>Status</p>
<p>Request Information:</p> <p>Disability Rights Advocates (DRA) responded by email to the City's response to their original letter dated January 7th, 2025. This response, dated July 30th, 2025, served to follow-up on general technical concerns and specific concerns at identified locations identified in the original letter sent to the City with additional concerns and locations including:</p> <p><u>Technical:</u> pole placement; misaligned arrows; volume issues; countdowns/walk indicators.</p> <p><u>Locations:</u></p> <p>N Lincoln / W Belmont / N Ashland N Pulaski / W Thorndale N Kilbourn / W Irving Park N Lincoln / N Southport / W Wellington N Lincoln / Greenview / Barry N Milwaukee / N Cicero / W Irving Park</p> <hr/> <p>City Response:</p> <p>A response letter from the City's defense counsel was submitted to Plaintiffs via email on September 23, 2025. The response addressed multiple items from Plaintiffs, including each location identified in the original letter. Updates were provided for the following intersections:</p> <p>N Lincoln / W Belmont / N Ashland: CDOT acknowledged the preferred placement of the APS pole but did not have information on why a particular pole was placed as it was. *</p> <p>N Pulaski / W Thorndale: *</p> <p>N Kilbourn / W Irving Park: CDOT acknowledged multiple recommendations made and will incorporate preferences in design when able to while complying with the MUTCD. Engineering judgment may need to be applied at complex intersections or "conditions like these," referring to N Kilbourn and W Irving Park. No planned modifications or improvements to relocate the pole(s) are identified in the response to Plaintiffs.</p> <p>N Lincoln / N Southport / W Wellington: *</p> <p>N Lincoln / Greenview / Barry: CDOT has revised the APS programming at this intersection to recall the audible walk indication when the button is pressed during the associated walk interval.</p> <p>N Milwaukee / N Cicero / W Irving Park: *</p> <p>* CDOT speculates that engineering judgment may have been applied regarding APS pole placement but not documented (previous to the Remedial Plan Order). No planned modifications or improvements to relocate the pole(s) are identified in the response to Plaintiffs.</p> <p>In general, CDOT believes that most of these issues identified were results of designs that preceded the Remedial Plan Order and, in many cases, engineering judgment may have been applied to deviate from MUTCD guidance justifiably due to existing constraints.</p>	<p>Resolved</p>

<p>Request 03 Date: 2025/10/17 Request 03 Originator: Plaintiffs Request 03 Location(s): N Milwaukee / N Cicero / W Irving Park</p>	Status
<p>Request Information: Plaintiffs sent information to the Independent Monitor via email on October 17th, 2025, to follow-up on one of the intersection improvement requests included in the original letter of requests to the City, dated July 30th, 2025 (Request 02). Multiple issues were identified at the intersection of N Milwaukee / N Cicero / W Irving Park, including APS pole locations, misaligned arrows, malfunctioning APS, volume issues, and walk indicators. The Independent Monitor reviewed the list and forwarded it to CDOT for further review on October 29th, 2025.</p> <p>City Response: A response letter from the City's defense counsel was submitted to Plaintiffs via email on September 23, 2025. Refer to Request 02 for additional information.</p>	Resolved (see Request 02)
<p>Request 04 Date: 2025/11/03 Request 04 Originator: Plaintiffs Request 04 Location(s): N Clark and E Bryn Mawr</p>	Status
<p>Request Information: Plaintiffs identified a specific maintenance issue for the APS at N Clark and E Bryn Mawr, at the southwest corner crossing Clark, in an email to defense counsel and the Independent Monitor dated November 3rd, 2025. A community member had been trying since August of 2025 to have the City fix the APS device, which was not producing the rapid tick during the pedestrian crossing phase. At least one Service Request (SR) was submitted to the City (SR25-01419929) in August, and several follow-up calls were made to the alderperson's office.</p> <p>City Response: The City's defense counsel responded to Plaintiffs and the Independent Monitor via email on November 4th, 2025. In this response, the City acknowledged receipt of the response but noted a minor issue with the timing of the request in conjunction with the roll-out of the APS website. CDOT Division of Electrical operations visited the intersection shortly after the request was submitted and found all APS buttons functioning normally. CDOT returned to the location again after receiving additional information from the requestor and again found all APS buttons functioning normally.</p>	Resolved

<p>Request 05 Date: 2025/11/05 Request 05 Originator: Plaintiffs Request 05 Location(s): N Clark and E Bryn Mawr</p>	Status
<p>Request Information: Plaintiffs followed up with defense counsel and the Independent Monitor via email on the APS located at N Clark and E Bryn Mawr on November 5th, 2025. In this email, it was reported to the City that the device was still not operating correctly during the walk phase.</p> <p>City Response: The City's defense counsel responded to the follow-up request via email on the same day. It was determined two days later, on November 7th, 2025, that the device was working properly.</p>	Resolved
<p>Request 06 Date: 2025/11/05 Request 06 Originator: Plaintiffs Request 06 Location(s): APS requests (general, locations vary)</p>	Status
<p>Request Information: Plaintiffs provided a response to an email from defense counsel addressed to Plaintiffs and the Independent Monitor regarding excessive APS request issues. In the original email, it was communicated that one individual or group of individuals had made approximately 701 requests via the City's APS website. The 701 requests were in addition to 29 requests that appear unrelated to the larger request and indicate that the public request system is working as intended. The 701 intersections "greatly exceed the City's current annual capabilities" and "might take more than 5 years to address under the Order..."</p> <p>Plaintiffs responded, urging that CDOT reach out to the requestors to explain the City's limitations and request additional information on a smaller number of intersections that could be prioritized.</p> <p>City Response: The City's defense counsel responded to the follow-up request via email on November 10, 2025. A number of requestors were contacted by the City, but none of the parties communicated with were aware of APS or the requests made. The City is looking into this and will report back.</p>	In Progress

<p>Request 07 Date: 2026/02/05 Request 07 Originator: Plaintiffs Request 07 Location(s): Unknown</p>	Status
<p>Request Information: Plaintiffs forwarded information to the Independent Monitor via email on February 5th, 2026, regarding a request for APS volume adjustment near the home of a concerned party. The original request was submitted to the Court by the concerned part on December 31st, 2025.</p> <p>City Response: A response from the City’s defense counsel was submitted to Plaintiffs and the Independent Monitor on the same day. In the response, it was indicated that CDOT would review the APS devices in question to determine if they were set to the MUTCD’s minimum requirements. Following this review, the concerned party informed CDOT that the adjustment was satisfactory.</p>	Resolved
<p>Request 08 Date: 2026/02/20 Request 08 Originator: Plaintiffs Request 08 Location(s): APS best practices (general, locations vary)</p>	Status
<p>Request Information: Plaintiffs submitted an email request to defense counsel on February 20, 2026, expressing the interest in collaborating with the City to “discuss best practices and community preferences for APS installations on particularly challenging intersections, especially when CDOT has the ability to balance several MUTCD guidance statements.” The email points to recent successes in the NYC APS case where technical discussions occurred to discuss APS pole location placement preferences in particular circumstances. Plaintiffs formally requested a meeting with CDOT, Plaintiffs’ counsel, the Independent Monitor, and the COMS to discuss these challenging scenarios.</p> <p>City Response: The City’s defense counsel responded to the request via email on February 26, 2026. It was indicated in the response that CDOT is “reluctant to commit to a meeting” in addition to ongoing, regular consultation with the COMS on APS device placement. It was also noted that CDOT’s APS-focused personnel do not presently have the capacity to “prepare for, participate in, and follow up” on an additional meeting.</p> <p>Plaintiffs responded on March 2, 2026, indicating general support for a future meeting if CDOT’s interest or capacity changes.</p>	Resolved

<p>Request 09 Date: 2026/05/20 Request 09 Originator: Plaintiffs Request 09 Location(s): N Inner Lakeshore Drive and W Roscoe St; 311 Maintenance (general, locations vary)</p>	Status
<p>Request Information: Plaintiffs submitted an email request to defense counsel on May 20, 2026, detailing an outstanding request to repair an APS device at the intersection of N Inner Lakeshore Drive and W Roscoe St. The APS device in question had been reported to have been broken for over two months, with an inaudible locator tone and no rapid tick walk indicator when the walk sign is on. The community member submitting the request called 311, reported the issue to the Alderman, and emailed CDOT for assistance with the broken APS device.</p> <p>In addition to the specific concern identified, Plaintiffs noted concerns about the 311 maintenance and response processes to the Independent Monitor on May 20, 2026. The Independent Monitor has reviewed general 311 maintenance and response processes as part of this Annual Report (Refer to Section 3.4.3).</p> <p>City Response: The City's defense counsel reported to Plaintiffs, indicating that the APS device had been repaired. This information was relayed to the Independent Monitor by Plaintiffs by email on May 27, 2026.</p> <p>Plaintiffs responded, indicating that the community member reported that the volume on the repaired device was too low. Plaintiffs requested the volume on the device to be increased.</p> <p>The City's defense counsel responded to Plaintiffs' follow-up request via email on June 12, 2026. In this response, counsel reported that the volume was found to be compliant with the MUTCD standard, and that the City "has to balance considerations of too high and too low volume" and that the volume is not planned to be increased."</p>	In Progress

4.2 DISPUTE RESOLUTION

To date, the Independent Monitor has not been required to assist in any dispute resolution activities. Reasonable requests identified above have been responded to by the City in a timely manner without any need for mediation or further review. Items indicated in the table above as “In Progress,” if any, will continue to be monitored and documented, particularly in any case that the need for dispute resolution emerges.

No written notices of City non-compliance have been provided to the Independent Monitor by Plaintiffs or the United States within the Plan Year.

Dispute ## Date: (YYYY/MM/DD) Dispute ## Originator: (Originator) Dispute ## Location(s) or Issue: (Location or Issue)	Status
Dispute Information: N/A	N/A
Independent Mediator Response: N/A	

5.0 Conclusion

The Independent Monitor appreciates the opportunity given to him to contribute to this important effort that will result in a substantially more accessible City of Chicago.

It is acknowledged that this report and associated appendices lack brevity and represent a significant amount of material to review for any interested party. He intends this report to be clear and understandable to the audience, but this is a complex topic with many interwoven considerations. The Independent Monitor appreciates your patience in reviewing this report and welcomes any recommendations on ways to improve future Annual Reports.

The Independent Monitor is available to answer any questions that the Court or Parties may have regarding the report. He is willing to meet privately, as a group, and can review his findings at an APS Community Advisory Committee meeting, if requested.

The Independent Monitor would like to specifically thank the following parties for their support:

- + The Chicago Department of Transportation, for its responsiveness to requests for additional information needed to assess the City's compliance with the Remedial Plan Order. Multiple requests for information were submitted to CDOT, with all responses provided within a day or in some cases, a matter of hours. The information provided to the Independent Monitor was thorough, organized, and highly detailed and these efforts have been appreciated.
- + Plaintiffs and the City's defense counsel, for providing general guidance and support.
- + All Parties and the Court, for the opportunity to contribute to this effort.

In accordance with Section VIII (B)(4)(b) of the Remedial Plan Order, the Independent Monitor respectfully submits this Annual Report to the Court. The information contained in this report, to the best of the Independent Monitor's knowledge and ability, is true and accurate.

Respectfully,

Signed: 

Contact Information: **Michael Shaw, ADAC, APA-BE, ICC**
Independent Monitor
Senior Accessibility Consultant | Manager
Jensen Hughes, Inc.
(312) 391-8744
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Date: July 1, 2026

End of Report

6.0 General References

Below are weblinks to and descriptions of key technical standards, guidelines, and other material that is referenced in or supported the development of this report.

Federal Standards, Guidelines, and Supporting Material

- + **2009 Manual on Uniform Traffic Control Devices**
Minimum standards set by the Federal Highway Administration to ensure uniformity of traffic control devices across the nation (2009 Edition).
- + **2010 ADA Standards for Accessible Design**
Accessibility standards issued by the Department of Justice applicable to newly design and constructed or altered State and local government facilities, public accommodations, and commercial facilities.
- + **Accessible Pedestrian Signals | A Guide to Best Practices**
Product of the National Cooperative Highway Research Program Project 3-62, a research study that used extensive field testing to determine which APS features and locations are most beneficial for blind and visually impaired pedestrians.
- + **ADA.gov**
Department of Justice website resource detailing rights and responsibilities under the Americans with Disabilities Act.
- + **Common Problems Arising in the Installation of Accessible Pedestrian Signals**
A technical assistance guide designed to provide information on common problems that arise in the installation of APS. Part of the NCHRP Project 3-62 research study and provided on the U.S. Access Board website.
- + **Manual on Uniform Traffic Control Devices – 11th Edition**
Minimum standards set by the Federal Highway Administration to ensure uniformity of traffic control devices across the nation (11th Edition).
- + **Public Right-of-Way Accessibility Guidelines**
Proposed guidelines developed by the U.S. Access Board specific to accessibility in the public right-of-way. The guidelines are not adopted standards but are encouraged to be used as current best practice.

State and Local Resources

- + **CDOT Accessible Design Guide**
An accessible design guide, developed in 2012, intended to serve as a supplement to Chicago Department of Transportation's Appendix B – Requirements for Openings, Construction and Repair in the Public Way – ADA Standards.
- + **CDOT Appendix B – Requirements for Openings, Construction and Repair in the Public Way**
Chicago Department of Transportation's ADA Standards for curb ramp design and construction (2009 revision). Current Appendix B – ADA Standards is found in the current Public Way Construction Regulations.
- + **CDOT Regulations for Openings, Construction, and Repair in the Public Way**
Chicago Department of Transportation's Public Way Construction Regulations is a comprehensive manual for planning and executing construction and restoration in Chicago's public way (2019 Edition).

- + **CDOT Street and Site Plan Design Standards**
Chicago Department of Transportation's Street and Site Plan Design Standards serves as a guide for designing streets in the City of Chicago and includes detailed standards and guidance for construction in the public way.
- + **CDOT Traffic Signals / Traffic Lights**
Information on CDOT's Bureau of Electrical Operations and traffic signalized intersections.
- + **Chicago Building Code (2019)**
Regulates the new construction of buildings and structures and other building- and property-related activities.
- + **City of Chicago 311 Service Request**
Website dedicated to service requests in the City of Chicago.
- + **City of Chicago Accessible Pedestrian Signals**
CDOT's dedicated webpage to APS, including existing/installed APS locations, requesting and tracking of APS requests, and additional information on the City's commitment to APS.
- + **City of Chicago Streetscape Guidelines**
City of Chicago's Guidelines for the City of Chicago Streetscape and Urban Design Program assists community leaders, public officials, design consultants, and private developers in making informed decisions in the design of city streets, including issues such as safety, accessibility, and neighborhood identity.
- + **City of Chicago Ward Boundaries (2023)**
Ward boundaries in Chicago from May 2023 onward.
- + **Illinois Accessibility Code (2018)**
Establishes minimum scoping and technical design requirements to ensure that the built environment is accessible to and usable by all.
- + **Illinois Department of Transportation Circular Letter 2026-01**
Letter indicating IDOT's adoption of the 11th Edition of the MUTCD.
- + **Illinois Department of Transportation Accessible Pedestrian Signals Details**
Construction details indicating required APS pushbutton placement.

7.0 List of Report Appendices

Appendices attached and listed below are intended to supplement the Independent Monitor's Annual Report used to communicate to the Court the City's compliance under the Remedial Plan Order for each Plan Year.

APPENDIX A: REMEDIAL PLAN ORDER (DKT. 365)

The Remedial Plan Order in its entirety.

APPENDIX B: ORDER APPOINTING MICHAEL G. SHAW AS INDEPENDENT MONITOR (DKT. 368)

The Order Appointing Michael G. Shaw as Independent Monitor in its entirety.

APPENDIX C: APPLICABLE 2009 MUTCD REQUIREMENTS

Applicable APS requirements from select sections of the 2009 MUTCD (Sections 4E.08 – 4E.12) copied verbatim from the Federal Highway Administration (FHWA) website.

APPENDIX D: EXISTING APS CHECKLIST (2009 MUTCD) – SELECT FEATURES

Checklist developed by the Independent Monitor used in the field to collect data on APS installations to confirm compliance with the 2009 MUTCD (Sections 4E.08 – 4E.12). A checklist template, a sample completed form, and typically used supplemental comments are included.

APPENDIX E: INDEPENDENT MONITOR APPROVED PLAN YEAR BUDGET

Independent Monitor's approved budget for the Plan Year (July 1 – July 1).

APPENDIX F: INDEPENDENT MONITOR PLAN YEAR INVOICES

Independent Monitor's Plan Year invoices submitted to the City and the Court.

APPENDIX G: FEDERAL RULE 53 (B)(3) AFFIDAVIT OF MICHAEL SHAW

Independent Monitor's acknowledgement of no potential conflicts of interest.

APPENDIX H: CDOT APS PROGRAM SEMI-ANNUAL REPORTS

CDOT's required semi-annual reporting on compliance with the Remedial Plan Order.

APPENDIX I: COMPLETED APS INSPECTIONS FOR PLAN YEAR

Independent Monitor's list of APS inspection locations for the Plan Year with supporting information.

APPENDIX J: COMPLETED APS CHECKLISTS FOR PLAN YEAR

Independent Monitor's completed APS inspection checklists for the Plan Year.

APPENDIX K: CDOT INSTALLATION PRIORITIZATION METHODOLOGY

CDOT's APS prioritization methodology memorandum distributed in November of 2025.