



FRAME FOR MOBILITY · POLICY PAPERS

PART IV — THE INNOVATION FRONTIER

Innovation as structure: permanent delivery authority, a paratransit pilot with a binding performance contract, and standards for a connected network.

The Framework for Rebuilding America's Mobility Economy (FRAME) Act, as presented in the FRAME Policy Paper (January 2026)

PART IV

THE INNOVATION FRONTIER

The Policy Paper defines innovation against the gadget: it is the structural ability of an agency to adapt, deliver and modernize its service to meet the actual needs of the public. Part IV therefore works through regulatory design rather than procurement. It makes the Environmental Review Assignment Program permanent (Sec. 501) and funds the state capacity to use it (Sec. 502). It creates a Paratransit Modernization Pilot Program (Sec. 601) in which regulatory waivers (Sec. 603) are exchanged for a quantifiably superior service under a binding performance contract (Sec. 604). And it prepares the physical network for connected and autonomous vehicles through AV-Ready Infrastructure Standards (Sec. 607) and a national Vehicle-to-Everything Deployment Strategy (Sec. 608).

THE POLICY

Three policies share one premise: the constraint on a modern mobility system is institutional design. On delivery, the policy is that a state with the technical capacity should be able to carry federal environmental review responsibility permanently, not under a provisional arrangement, and that the federal role is to fund the expertise that makes assumption of responsibility possible for every state. On accessible service, the policy is that regulatory flexibility is earned: waivers are available, but only against a demonstrated, measurable improvement in the service riders actually receive. On network readiness, the policy is that infrastructure standards must anticipate the vehicles coming onto the system — machine-readable markings and signals, and digital representations of the network — rather than trail them.

WHAT IT WILL DO

Sec. 501 makes environmental review assignment permanent. States may assume the federal government's responsibilities under the National Environmental Policy Act, removing a layer of federal redundancy from project review. The paper is explicit about the expected effect and its limit: timelines can fall significantly — in some cases by years — without compromising the rigour of the review itself. Sec. 502 provides Capacity-Building Grants so state departments of transportation can hire the legal and technical experts required to manage those responsibilities; the design intent is that no state is left behind for want of staff.

Secs. 601–604 run the paratransit pilot. The Secretary may provide regulatory waivers to transit agencies that commit to a “quantifiably superior service” (Sec. 603), and the commitment takes the form of a binding performance contract (Sec. 604). Agencies must demonstrate measurable reductions in trip wait times compared to previous

service levels; deploy modern, on-demand dispatching technology so travel can be more spontaneous; expand service areas; and achieve higher reliability.

Sec. 607 establishes AV-Ready Infrastructure Standards covering machine-readable pavement markings, digitally readable traffic control devices, and the creation of Digital Twins of the highway system for real-time simulation and management. Sec. 608 advances a national V2X Deployment Strategy, incentivising roadside units that communicate directly with vehicles — allowing a car to “see” around a blind corner or “talk” to a traffic signal to optimise flow. The paper states the safety stake: V2X technology has the potential to eliminate up to 80 percent of road accidents caused by human error.

Note the pattern across the three policies: each exchanges a federal control for a demonstrated result. Assignment exchanges federal performance of environmental review for a permanent state responsibility, with capacity funded so the exchange is available beyond the largest agencies. The paratransit pilot exchanges regulatory relief for contracted, measurable service improvement — the waiver is the consideration, the performance contract is the price. The readiness standards exchange the assumption that infrastructure is purely physical for a definition that includes markings, signals and digital twins the coming fleet can use. In each case the Act legislates the terms of the exchange in advance, so agencies know what flexibility is available and what it costs.

WHAT IT SOLVES

Each mechanism answers a named failure. Delivery answers the “time tax”: years lost to bureaucratic inertia and repetitive reviews between planning and construction. The paratransit pilot answers a service model the paper describes as an exercise in frustration for riders with disabilities — day-ahead booking, long and unpredictable wait windows, access that amounts to a ride rather than mobility. The readiness provisions answer a divergence: vehicles are becoming autonomous and connected while infrastructure remains “dumb,” unable to be read by the machines now using it. The common thread is that none of these failures is primarily a funding failure; each is a failure of assignment, permission or standards, and Part IV legislates at that level.

PLANNED AND MEASURABLE OUTCOMES

STATED IN THE PAPER

- Permanent state assumption of NEPA responsibilities by capable states (Sec. 501), with review timelines reduced significantly — in some cases by years — and rigour uncompromised.
- Capacity-Building Grants enabling state DOTs to hire required legal and technical experts (Sec. 502).
- Measurable reductions in paratransit trip wait times against previous service levels (Sec. 603).
- On-demand dispatching, expanded service areas and higher reliability delivered under binding performance contracts (Secs. 603–604).
- AV-Ready standards for markings, traffic control devices and highway Digital Twins (Sec. 607); a national V2X deployment strategy (Sec. 608).
- The paper’s stated V2X potential: elimination of up to 80 percent of road accidents caused by human error.

INDICATORS THE PAPER IMPLIES (NOT STATED TARGETS)

- Environmental review durations in assignment states against pre-permanence baselines.
- The number of states assuming NEPA responsibility, and grant uptake under Sec. 502.
- Pilot-agency wait times, booking lead times and on-time performance against pre-pilot service.
- Lane-miles meeting AV-Ready marking standards; roadside units deployed under the Sec. 608 strategy.

FRAME for Mobility is a project supported by the Institute for Civic Service.

THE PROBLEM IN NUMBERS

The problems this Part answers: slow, duplicative project review; connected-vehicle technology stalled at the pilot stage; and paratransit costs that crowd out service.

4.5 years.

The average federal Environmental Impact Statement took 4.5 years from Notice of Intent to Record of Decision (median 3.5 years); a quarter took more than six years, across 1,276 EISs completed 2010–2018.

Council on Environmental Quality, *Environmental Impact Statement Timelines (2010–2018)* fact sheet (2020).

2,355 days.

Ohio DOT's third NEPA Assignment self-assessment estimated 2,355 days of federal review time avoided in a single assessment period under state assumption of NEPA responsibilities — the delivery dividend available when qualified states review their own projects to federal standards.

Ohio Department of Transportation, *NEPA Assignment Self-Assessment #3*.

A plan with targets but no mandate.

USDOT's *Saving Lives with Connectivity* plan (August 2024) sets deployment goals for vehicle-to-everything (V2X) technology — 20 percent of the National Highway System equipped by 2028, 50 percent by 2031, full deployment by 2036 — but it is an explicitly non-binding roadmap with no dedicated funding stream.

U.S. Department of Transportation (2024).

\$29.30 a trip — and rising.

The average ADA paratransit trip cost \$29.30 in 2010, about 3.5 times the \$8.15 cost of a fixed-route trip.

U.S. Government Accountability Office, *ADA Paratransit* (GAO-13-17, 2012).

\$61.97 a trip.

By FY2023, Los Angeles County's Access Services reported an actual cost of \$61.97 per paratransit trip (\$50.06 per passenger) — the cost curve FRAME's paratransit modernization pilot answers.

Access Services, *FY25 Budget Book*. Budget Book.pdf

WHY THIS APPROACH IS THE MODERN ONE

The legacy approach to innovation is permission-based and project-by-project: federal reviewers re-examine state work (figure 1), and new technology advances by pilot and press release. The delivery evidence says delegation works when it is structured: states holding NEPA assignment under 23 U.S.C. 327 — seven of them by 2025 — document substantial time savings with federal standards and audits retained (figure 2), which is why FRAME makes assignment permanent (Sec. 501) and funds state capacity to carry it (Sec. 502) rather than leaving it to episodic memoranda. On connected vehicles, figure 3 is the diagnosis in USDOT's own hand: the technology has a national plan but no statutory footing and no money, so deployment stalls below the network threshold where safety benefits compound. FRAME supplies what the plan lacks — AV-Ready standards and a funded national V2X strategy (Secs. 607–608), and recognition of digital systems as infrastructure in their own right (Sec. 107). On paratransit, figures 4

and 5 show a cost curve no operating budget can outrun; FRAME's pilot (Secs. 601–604) lets agencies substitute measurably better service models under binding performance contracts instead of waiving the obligation.

EVIDENCE CHECK

the NEPA-assignment savings are state self-assessments, not independent evaluations; and V2X safety benefits at national scale are modelled, not measured — the Policy Paper's "up to 80 percent" of human-error crashes is a ceiling of potential, not an observed result, and should be presented that way.

SOURCES

1. https://ceq.doe.gov/docs/nepa-practice/CEQ_EIS_Timeline_Fact_Sheet_2020-6-12.pdf
2. <https://dam.assets.ohio.gov/image/upload/transportation.ohio.gov/environmental-services/nepa/NEPAAssignmentSelf-Assessment3Report.pdf>
3. <https://www.transportation.gov/briefing-room/usdot-releases-national-deployment-plan-vehicle-everything-v2x-technologies-reduce>
4. <https://gao.gov/products/GAO-13-17>
5. <https://accessla.org/sites/default/files/Publications/FY25>



FRAME for Mobility

A project supported by the Institute for Civic Service. This paper presents Part IV of the FRAME Act as set out in the FRAME Policy Paper (January 2026), with the evidence on which it rests. Figures follow the Policy Paper; research figures are attributed to their sources.