

# **Title VI Nondiscrimination Program (Federal Highway Administration)**

**Presentation by ADOT Civil Rights Office  
June 24, 2020**

# **ADOT Civil Rights Office Title VI Team**



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# Purpose for a Title VI Implementation Plan

Title VI Implementation Plan represents the standard operating procedures for implementation of your Agency's Title VI program.

# Title VI Assurances

- Annual signature of the FHWA Title VI Assurances with Appendices A, B, C, D, and E
  - signed by head of Agency (head of the operating administration)
    - Attach Appendix [A](#) and [E](#) to all contracts that are federally funded
    - Attach Appendix [B](#), [C](#), & [D](#) when applicable (Real Estate)

# The Assurances document includes three sections and Appendices A through E.

Assurance section	Description
Standard and Regulatory Authorities	a. states that your agency will not engage in discriminatory practices
General assurance	b. clauses related to property and property rights
Specific assurances	c. describe proactive steps your agency must take to ensure nondiscrimination
Appendices A & E	d. legal acts, regulations, and Executive Orders that prohibit discrimination
Appendices B, C, & D	e. General nondiscrimination clauses

# Organization & Staffing

- Title VI Coordinator
  - Has access to the head of the Agency
  - Responsible for initiating and monitoring Title VI activities and preparing required reports
- Organizational chart
- Outline the roles and responsibilities of the Title VI Coordinator

# Connecting the Dots



Title VI  
Assurances

Organization  
& Staffing

# Data Collection & Analysis

- collection of statistical data for all FHWA funded projects and activities
  - Race, color, sex, & national origin

**Title VI data collection is the cornerstone of effective  
Title VI enforcement.**

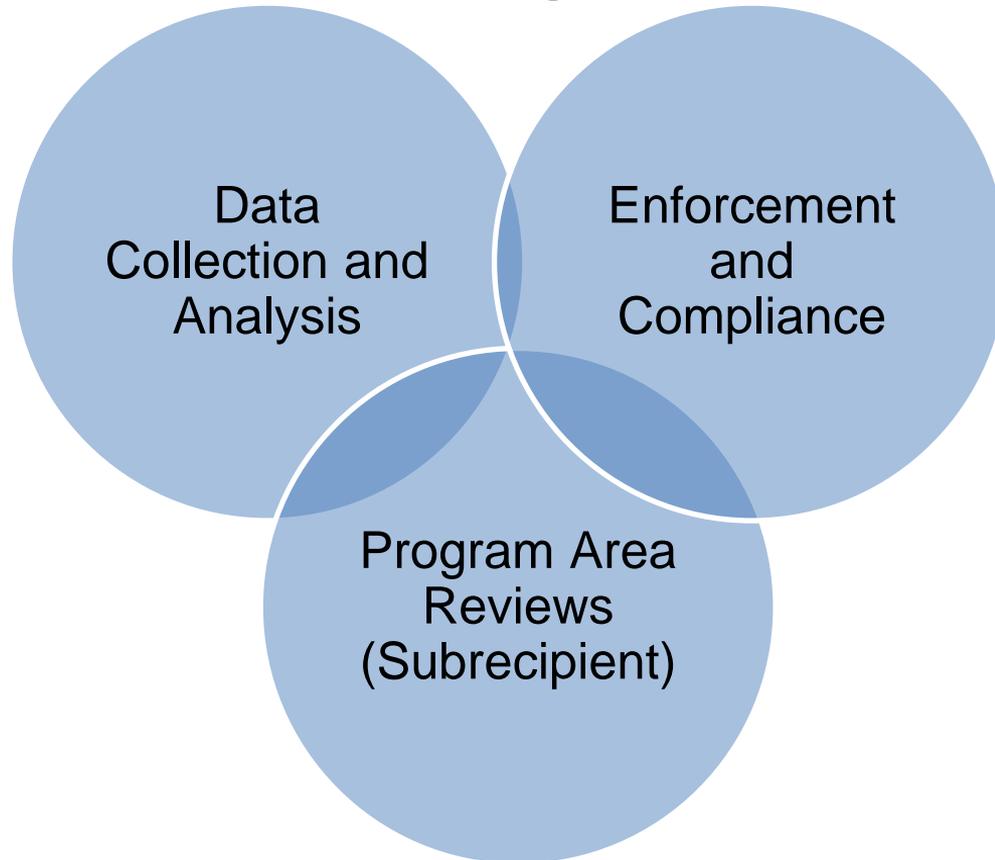
# Program Area Review Procedures

- Conduct Title VI reviews of program areas
- Conduct annual review to determine the effectiveness of the Title VI program on Agency activities

# Compliance & Enforcement Procedures

- procedures to identify and eliminate discrimination when found to exist
- procedures for promptly resolving deficiency status

# Connecting the Dots

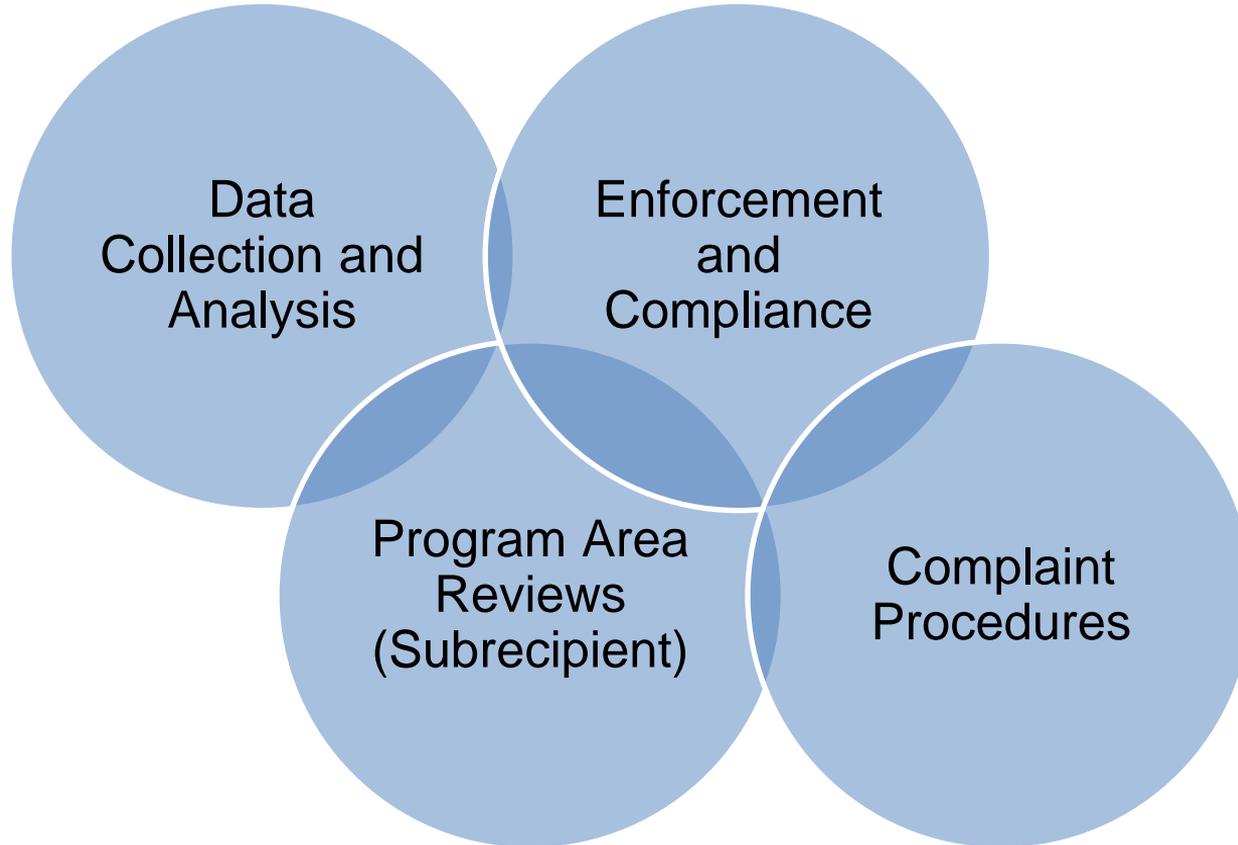


# Complaint Procedures

- A description of the complaint process identifying how and where a complaint would be filed, with which department or person, and all applicable timeframes.
- A description of the process by which the Agency will track the complaints and keep the required data for each complaint received.
- All FHWA Title VI complaints are to be forwarded to ADOT for processing, within 72 hours.

Where are your Title VI complaint procedures posted?

# Connecting the Dots



# Review the Agency's Directives

- Process for reviewing your Agency's directives for Title VI requirements
- Include the process for reconciling issues if Title VI disparities are found

# Environmental Justice (EJ)

## Fundamental principles of Executive Order 12898 from US DOT

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including interrelated social and economic effects, on **minority populations** and **low-income populations**.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by **minority populations** and **low-income populations**.

# Environmental Justice Cont.

- Equitable distributions of benefits and burdens
- FHWA EJ Directive 6640.23A
- Applies to FHWA recipients of funding
- Promote Public information and Participation in minority and low-income communities



Do you recognize  
this card?

How have you  
used it within  
your  
organization?

2004 Census Test		United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD		
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խնդրում ենք նշում կատարելք այս քանակում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্স দাগ দিন।	3. Bengali
<input type="checkbox"/>	ឈ្មោះអ្នកក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	.....	7 Traditional

# Limited English Proficiency

## Add EO 13166

At minimum your Implementation Plan should include:

- Four Factor Analysis conducted on the entire service area
- A process of self-assessment to determine which personnel interact with members of the public
- Process to identify LEP persons service area and on a project-by project

# Connecting the Dots



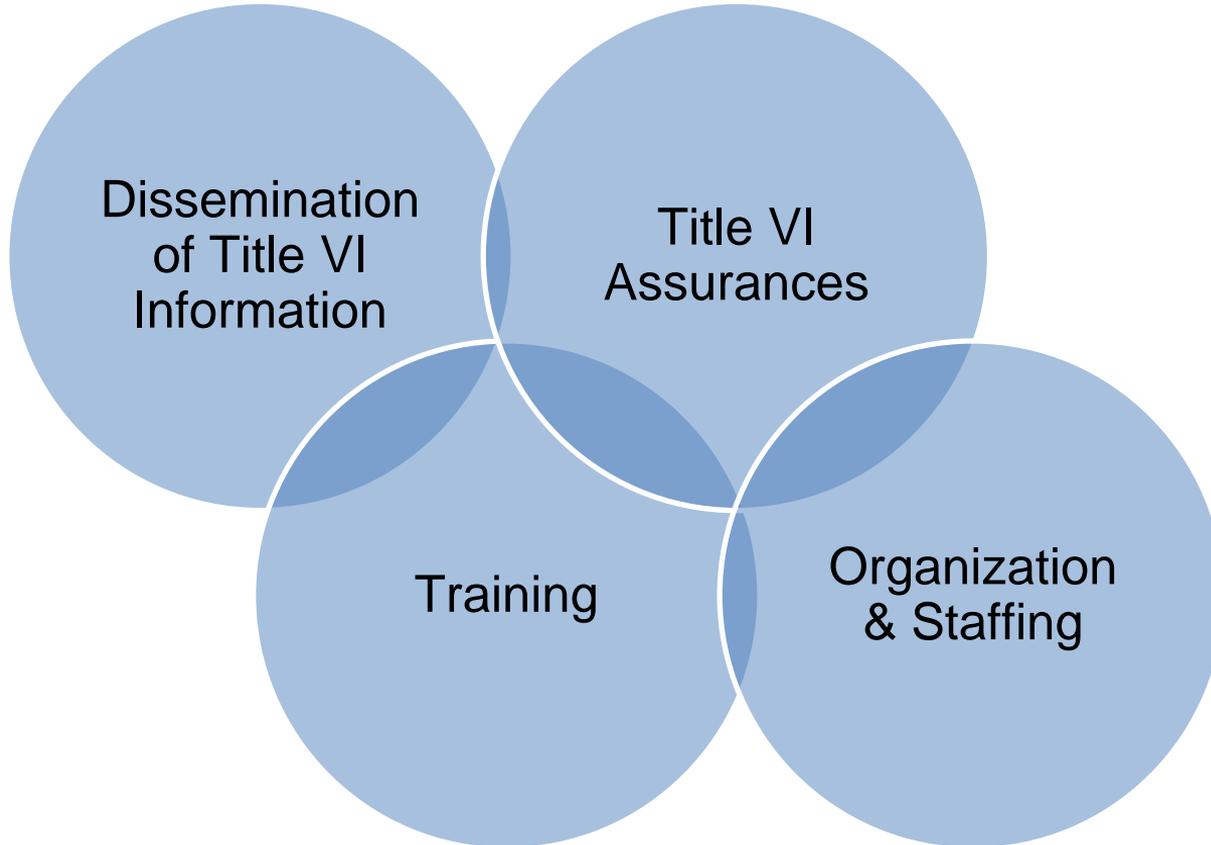
# Dissemination of Title VI Information

- Processes and procedures on educating the public on their Title VI program rights in the Transportation decision-making process
- Include the tools, techniques, and strategies used to involve and educate the public, including Limited English Proficient persons

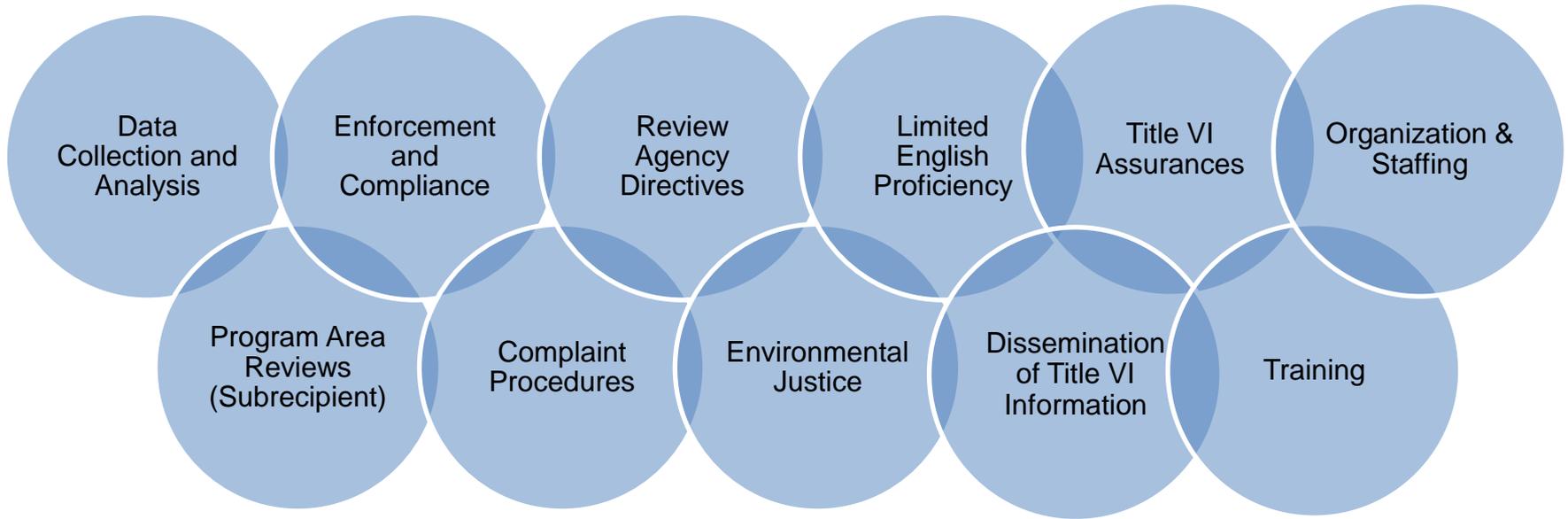
# Training

- Describe how and when members of the following will be trained on Title VI Program requirements and responsibilities:
  - Agency's Civil Rights staff,
  - Title VI liaisons, and
  - Other employees within the agency.
- Include procedures as to how and when training will be conducted for subrecipients and stakeholders

# Connecting the Dots



# Connecting the Dots



# Important Dates

- August 1, 2020
  - Title VI Implementation Plan due date
- July 1, 2020 - June 30, 2021
  - Plan is effective for one year

# Contact Us

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