



OHIO DEPARTMENT OF TRANSPORTATION

Annual Title VI Goals and Accomplishments Report 2015 – 2016

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An Equal Opportunity Employer and Provider of Services

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OVERVIEW

As a recipient of federal financial assistance, the Ohio Department of Transportation (ODOT), including its direct grant recipients and sub-recipients, is obligated to adhere to, and is committed to achieving full compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and all related nondiscrimination laws. ODOT incorporates the principles of Environmental Justice (EJ) (Executive Order 12898) into its programs, policies, and activities to ensure there are no transportation system-related disproportionate adverse impacts particularly to low-income and minority populations. Executive Order 13166 on Limited English Proficiency (LEP) is also included to ensure meaningful access is provided to persons who are limited in the English language. The basic philosophy of Title VI is that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance” (42 U.S.C. Section 2000d).

The Annual Title VI Goals and Accomplishments Report summarizes ODOT’s Title VI Program implementation and compliance activities for the one-year period following the last annual update.

This Report covers accomplishments achieved between October 1, 2014 and March 31, 2016 and identifies goals to be initiated between January 1, 2016 and December 31, 2016. It provides an overview of changes made in procedures and practices within ODOT to ensure nondiscrimination in all of ODOT’s programs, services and activities.

SUMMARY OF ACCOMPLISHMENTS AND GOALS

Policy Statement

It is the policy of ODOT to provide an environment of equity and access in its delivery of services to the public and beneficiaries. Through its Title VI/Nondiscrimination Program, ODOT aims to ensure that no person will be denied the benefits of or be excluded from participation in or be subjected to discrimination under any program, service, or activity on the basis of race, color, national origin, sex, age, disability, low-income status, or limited English proficiency. To this end, ODOT has executed a Title VI/Nondiscrimination Policy.

Completed Activities/Accomplishments

Description	Completion Date
Updated Title VI/Nondiscrimination Policy in accordance with recommendations made by FHWA and FTA; submitted updated policy to the ODOT Director for approval and signature; published updated policy on the ODOT internet site	December 2014
Updated Title VI/Nondiscrimination Policy to reflect the creation of a new ODOT division that is responsible for Title VI compliance activities; submitted updated policy to the ODOT Director for approval and signature; published updated policy on the ODOT internet site	July 2015
Updated Title VI/Nondiscrimination Policy to reflect the designation of a new Title VI Coordinator; submitted updated policy to the ODOT Director for approval and signature; published updated policy on the ODOT internet site	October 2015

Planned Activities/Goals

Description	Target Timeframe
Update Title VI/Nondiscrimination Policy to reflect changes	As needed
Submit updated policy to the ODOT Director for approval and signature	As needed
Publish updated policy on the ODOT internet site	As needed

Assurances

ODOT has entered into a Nondiscrimination Agreement, Title VI Assurances, with the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). The assurances set forth ODOT's commitment to comply with Title VI in all its programs and activities.

Completed Activities/Accomplishments

Description	Completion Date
Updated and executed Standard Title VI/Nondiscrimination Assurances pursuant to DOT Order No. 1050.2A	November 3, 2014
Sent notice to all ODOT Districts and Divisions with the updated assurances	March 10, 2015
Surveyed Central Office Divisions to determine which offices execute contracts. Central Office Divisions were provided a copy of the signed assurances. Central Office Divisions were also provided the required assurance language in multiple formats for ease of	March 2016

inclusion in draft contract templates. Central Office Divisions were given guidance on incorporating assurance language into all applicable instruments. The Title VI Coordinator used survey responses to develop a list of all offices that execute contracts and the types of contracts executed. This list is being incorporated into the Title VI Program Area Reviews to ensure assurance language is included in executed contacts and updated as necessary.	
Provided technical assistance to the Office of Chief Legal Counsel (CLC) by developing a reference chart of the required Title VI assurance language and applicable instruments for use when CLC reviews contracts for other offices, divisions and districts within ODOT to help ensure Title VI assurance language is included in all applicable instruments	March 14, 2016
Provided technical assistance to the Office of Chief Legal Counsel through updating Personal Service Contract templates to include assurance language	March 21, 2016

Planned Activities/Goals

Description	Target Timeframe
Update and execute Standard Title VI/Nondiscrimination Assurances pursuant to DOT Order No. 1050.2A	As needed
Send notice to all ODOT Districts and Divisions with the updated assurances	As needed
Survey ODOT Districts and Divisions to determine which offices execute contracts	Annually
Update list of all offices that execute contracts and the types of contracts executed	Annually
Review executed contracts to ensure assurance language is included	Annually

Organization & Staffing

ODOT is committed to establishing an independent Civil Rights Unit which has the structure to carry out required responsibilities and adequately staffing the Civil Rights Unit with clearly defined responsibilities to effectively fulfill its Title VI responsibilities.

Completed Activities/Accomplishments

Description	Completion Date
In an effort to promote diversity and provide equitable opportunities both internally and externally, ODOT created the Division of Opportunity, Diversity & Inclusion (ODI). ODI is	July 1, 2015

comprised of: the Office of Equal Opportunity; the Office of Small & Disadvantaged Business Enterprise; and, the Office of Outreach. See ODOT's Title VI Plan document for a complete description of this Division.	
Aisha Powell was designated Title VI Coordinator. The Title VI Coordinator has easy access to the ODOT Director on Title VI issues and is responsible for monitoring ODOT's Title VI activities, as well as preparing required reports.	October 1, 2015

Planned Activities/Goals

Description	Target Timeframe
Evaluate organizational structure to ensure ODOT maintains its ability to implement a robust Title VI/Nondiscrimination Program *ODOT has engaged a consultant which, as one of its tasks, will be evaluating ODOT's organizational structure in furtherance of this goal. ODOT plans to execute the contract by April 15, 2016. The timeline of completion for all items the consultant will be tasked with is April 30, 2017.	April 30, 2017

Program Reviews

*(*This includes special emphasis program areas and directives)*

In furtherance of developing and implementing tools to ensure ODOT's beneficiaries have access to and receive services in an equitable manner, assessments will be conducted of key functional areas.

Completed Activities/Accomplishments

Description	Completion Date
Established monthly meetings between Executive Leadership and the Title VI team to address any issues that may arise in the delivery of ODOT's programs and services to its beneficiaries	January 2016
Proposed engaging Title VI/industry experts scoped with the following: <ul style="list-style-type: none"> • Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance; • Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and, • Develop an internal monitoring plan and assist ODOT in implementing 	January 2016

Published Request for Proposals (RFP)	March 2, 2016
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Planned Activities/Goals

Description	Target Timeframe
Review and score submissions	April 6, 2016
Award contract	April 15, 2016
<p>Work with the selected consultant to:</p> <ul style="list-style-type: none"> • Identify which divisions, offices and/or sections within ODOT should be designated key functional areas for the purpose of conducting program area reviews • Identify personnel in all key functional areas that can serve as Title VI liaisons on an Interdisciplinary Team • Develop program area review procedures • Conduct program area reviews/assessments of key functional areas • Conduct a review of all written materials to determine whether there are Title VI implications • Determine which documents would be considered vital documents that should be translated into other languages in accordance with LEP requirements • Identify any program areas that should be designated as special emphasis program areas • Identify data collected in each key functional area that can be used to identify trends or patterns of discrimination • Conduct an analysis of data in the special emphasis program areas to identify trends or patterns of discrimination that is repeatable, sustainable and efficient and recommend an action plan to address any trends or patterns of discrimination in the special emphasis program areas that are identified • Identify any and all sub-recipients in each key functional area (e.g. - local public agencies, metropolitan planning organizations, universities, etc.); how the list of sub-recipients is kept current; whether any reviews of the sub-recipients are conducted; if so, how often the reviews occur, when the reviews occur, what subject matter the review covers, whether a Title VI assessment could be added to the review • Develop an internal monitoring plan 	May 1, 2016 – April 30, 2017
In future submissions of its Annual Goals and Accomplishments Report, ODOT plans to include a summary providing the number	October 1, 2016

of reviews conducted, common deficiencies/results found, and planned follow-up with target timeframes.	
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Sub-Recipient Reviews

ODOT expects its sub-recipients to comply with nondiscrimination requirements as an integral part of doing business with ODOT. Thus, ODOT will conduct reviews of sub-recipients to ensure such compliance.

Completed Activities/Accomplishments

Description	Completion Date
Presented on the ODOT Title VI Program to MPOs and RTPOs at the Environmental Justice Training Program held at the Mid-Ohio Regional Planning Commission	December 2015
Participated in the certification review for the Toledo Metropolitan Area Council of Governments	January 2016
Surveyed Local Public Agencies (LPAs) on their knowledge of, training on and compliance with Title VI	February 24, 2016 – March 31, 2016
Proposed engaging Title VI/industry experts scoped with the following: <ul style="list-style-type: none"> • Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance; • Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and, • Develop an internal monitoring plan and assist ODOT in implementing 	January 2016
Published Request for Proposals (RFP)	March 2, 2016

Planned Activities/Goals

Description	Target Timeframe
Review and score submissions	April 6, 2016
Award contract	April 15, 2016
Work with the selected consultant to: <ul style="list-style-type: none"> • Identify any and all sub-recipients in each key functional area (e.g. – local public agencies, metropolitan planning organizations, universities, etc.); how the list of sub-recipients is kept current; whether any reviews of the sub- 	May 1, 2016 – April 30, 2017

recipients are conducted; if so, how often the reviews occur, when the reviews occur, what subject matter the review covers, whether a Title VI assessment could be added to the review	
<ul style="list-style-type: none"> Develop an external monitoring plan 	
Conduct reviews of sub-recipients	March 31, 2017
Partner with the Office of Local Programs to ensure Title VI is part of the local-let qualification process for LPAs	March 31, 2017
In future submissions of its Annual Goals and Accomplishments Report, ODOT plans to include a summary providing the number of reviews conducted, common deficiencies/results found, and planned follow-up with target timeframes.	October 1, 2017

Data Collection/Reporting/Analysis

ODOT will conduct data collection and analysis activities to identify trends and demonstrate that it is providing its programs and services in a nondiscriminatory manner.

Completed Activities/Accomplishments

Description	Completion Date
Proposed engaging Title VI/industry experts scoped with the following: <ul style="list-style-type: none"> Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance; Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and, Develop an internal monitoring plan and assist ODOT in implementing 	January 2016
Published Request for Proposals (RFP)	March 2, 2016

Planned Activities/Goals

Description	Target Timeframe
Review and score submissions	April 6, 2016
Award contract	April 15, 2016
Work with the selected consultant to: <ul style="list-style-type: none"> Identify data collected in each key functional area that can be used to identify trends or patterns of discrimination 	May 1, 2016 - April 30, 2017

<ul style="list-style-type: none"> • Develop a system ODOT can utilize going forward to collect and analyze data from key functional areas • Conduct an analysis of data in the special emphasis program areas to identify trends or patterns of discrimination that is repeatable, sustainable and efficient and recommend an action plan to address any trends or patterns of discrimination in the special emphasis program areas that are identified 	
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Training

In furtherance of its goal to have Title VI considerations engrained in how ODOT conducts business and how it provides its services, ODOT has taken steps to ensure its employees and sub-recipients receive Title VI training.

Completed Activities/Accomplishments

Description	Completion Date
<p>361 individuals took the online training course on Title VI and Environmental Justice that was developed in partnership with the Local Technical Assistance Program (LTAP) for sub-recipients and anyone else interested in taking the course</p> <p>*The LPA Training Program consists of 12 modules including one module on Title VI, entitled "Title VI for LPAs." The number of individuals completing the course is tracked by LTAP and will be reported to the Title VI Program annually for inclusion in this Report.</p>	2015
<p>Presented <i>Best Practices in Title VI & ADA Investigations</i> at the Southern Transportation Civil Rights Training Symposium: Waves of Opportunity, Drivers of Change!</p> <ul style="list-style-type: none"> • Facilitator: Sarah Johnson, former Title VI & ADA/504 Specialist • Location: Fort Lauderdale, FL • Total Attendees: 30 	August 2015
<p>Proposed engaging Title VI/industry experts scoped with the following:</p> <ul style="list-style-type: none"> • Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance; • Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and, 	January 2016

<ul style="list-style-type: none"> Develop an internal monitoring plan and assist ODOT in implementing 	
Presented on Title VI and the commitment needed from every district and division to ensure ODOT's programs and services are delivered in a nondiscriminatory manner at the Senior Leadership meeting	January 21, 2016
Developed live Title VI Overview training course for all employees	February 2016
Created a short Title VI overview video that was distributed to all ODOT employees and posted to the ODOT Title VI internet page. The video included a message from the Director emphasizing ODOT's commitment to delivering its programs and services in a nondiscriminatory manner as well as messages from the Title VI Coordinator and Training Program Manager.	February 4, 2016
Conducted Title VI Overview Training for ODOT Executive Leadership, Central Office Division Deputy Directors and Office Administrators	February 11 & 12, 2016
Published Request for Proposals (RFP)	March 2, 2016

Planned Activities/Goals

Description	Target Timeframe
Designate a dedicated Training Program Manager for civil rights program areas who will ensure Title VI training is provided to all ODOT employees and sub-recipients	April 4, 2016
Review and score submissions	April 6, 2016
Provide Title VI Overview Training to all District employees *Small group training sessions will be scheduled in each county until all employees have been trained, then refresher training will begin	Beginning April 14, 2016
Award contract	April 15, 2016
Work with the selected consultant to: <ul style="list-style-type: none"> Develop Title VI training for key functional areas that is repeatable, sustainable and efficient for those employees tasked with these responsibilities or daily tasks 	May 1, 2016 - April 30, 2017
Develop a brochure or card on Title VI that will be available to all employees	October 1, 2016
Develop a web-based training course for all employees	December 31, 2016

Complaints

ODOT has an established complaint procedure that describes a prompt process for investigations and disposition of Title VI complaints.

No formal Title VI complaints were filed during the time period encompassing this Report. However, the following ADA/504 complaints were raised during the time period in question.

Robert and Cynthia Madej v. the Athens County Engineer's Office

- On October 28, 2015, Robert and Cynthia Madej filed a complaint with ODOT alleging that Ms. Madej's rights were violated based on her disability when the Athens County Engineer's Office completed a chip and seal paving project on portions of the road on which her home is located without providing proper notice to her prior to beginning work on the project. The Madej's also have an ongoing court case regarding same. ODOT has been in contact with the County Engineer and the County Prosecutor regarding this matter. ODOT undertook an investigation into the above-referenced allegations. ODOT has completed its investigation and will be making recommendations to FHWA as to its findings.

Mark Dabney v. the Greater Cleveland Regional Transit Authority (GCRTA)

- On March 18, 2016, Mark Dabney filed a complaint with ODOT alleging that, due to his disability, he had been subjected to sexual assaults at GCRTA facilities. ODOT determined it lacked jurisdiction to investigate the allegations for the following reasons: 1) ODOT has no jurisdiction to investigate criminal acts such as the sexual assault allegations contained in the correspondence and outlined in one of the police reports provided; and, 2) GCRTA is a direct recipient of federal funding through the Federal Transit Administration (FTA). As such, ODOT forwarded the matter to local law enforcement. On March 22, 2016, such was communicated to Mr. Dabney in writing along with complaint filing information for GCRTA and FTA and the matter was closed.

Completed Activities/Accomplishments

Description	Completion Date
Updated Title VI/Nondiscrimination Complaint Form	December 2014
Updated complaint process to ensure Title VI Program personnel are notified of complaints filed under Title VI in order to properly report such to FHWA and FTA	December 2014

Planned Activities/Goals

Description	Target Timeframe
Establish a process that will enable beneficiaries to submit a Title VI complaint online via the ODOT internet site for external users as well as the ODOT intranet site for internal users	July 31, 2016
Perform outreach and provide education to ensure ODOT beneficiaries are aware of ODOT's Title VI complaint process	December 31, 2016

*ODOT plans to provide information internally through program reviews and training and externally through web-based content and outreach events to ensure ODOT beneficiaries are aware of, and have access to, ODOT's complaint process.	
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Dissemination of Title VI Information

ODOT currently makes Title VI information available through its internet site.

Completed Activities/Accomplishments

Description	Completion Date
Updated the Notice to Beneficiaries and published it on the ODOT internet site	February 10, 2016

Planned Activities/Goals

Description	Target Timeframe
Continue to develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English	As needed

Limited English Proficiency

ODOT will take reasonable steps to make its programs, services, and activities accessible to persons with LEP.

Completed Activities/Accomplishments

Description	Completion Date
After benchmarking with the Ohio Turnpike Commission, ODOT began the process of developing a Foreign Language Aid for Incident Responders to be used by ODOT's State Farm Safety Patrol.	March 2016
Provided technical assistance to the Office of Environmental Services and District 8 as it related to a project impacting a predominantly Spanish speaking community in which public involvement documents were being translated into Spanish to ensure the impacted community had meaningful access to participate in the planning process for the project	March 2016

Planned Activities/Goals

Description	Target Timeframe
Develop a Foreign Language Aid for Incident Responders to be used by ODOT's State Farm Safety Patrol	October 31, 2016

Environmental Justice

ODOT is tasked to ensure the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Completed Activities/Accomplishments

Description	Completion Date
As part of the disproportionate EJ impacts on the Opportunity Corridor project in Cleveland, Ohio, ODOT provided \$750,000 toward mitigating measures for those impacted individuals. The \$750,000 is being used to assist residents in the impacted communities by providing training for jobs in high demand industries.	2015
Proposed engaging Title VI/industry experts scoped with the following: <ul style="list-style-type: none">• Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance;• Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and,• Develop an internal monitoring plan and assist ODOT in implementing	January 2016
Published Request for Proposals (RFP)	March 2, 2016
Provided technical assistance to the Office of Environmental Services and District 8 as it related to a project impacting a predominantly Spanish speaking community in which public involvement documents were being translated into Spanish to ensure the impacted community had meaningful access to participate in the planning process for the project	March 2016

Planned Activities/Goals

Description	Target Timeframe
Review and score submissions	April 6, 2016

Award contract	April 15, 2016
<p>Work with the selected consultant and in partnership with ODOT districts and divisions to ensure ODOT is:</p> <ul style="list-style-type: none"> Assessing the benefits and adverse effects of transportation activities among different population groups and developing procedures, goals, and performance measures appropriately Ensuring its activities satisfy the letter and intent of Title VI requirements and EJ principles Enhancing public involvement activities to ensure the meaningful participation of minority and low-income populations Working with federal, State, local, and transit planning partners to create and enhance intermodal systems, and support projects that can improve the natural and human environments for low-income and minority communities 	May 1, 2016 – April 30, 2017

Compliance and Enforcement Procedures

ODOT is committed to implementing compliance and enforcement procedures to eliminate and address discrimination and resolve deficiencies when noncompliance occurs.

Completed Activities/Accomplishments

Description	Completion Date
<p>Proposed engaging Title VI/industry experts scoped with the following:</p> <ul style="list-style-type: none"> Conduct assessments of the key functional areas, including reviews of all written materials for Title VI compliance; Provide a written report of recommendations to ODOT's Title VI Program Manager on any potential compliance issues, opportunities for improvement and suggested solutions; and, Develop an internal monitoring plan and assist ODOT in implementing 	January 2016
Published Request for Proposals (RFP)	March 2, 2016

Planned Activities/Goals

Description	Target Timeframe
Review and score submissions	April 6, 2016

Award contract	April 15, 2016
Work with the selected consultant to: <ul style="list-style-type: none"> • Develop and implement procedures to address/eliminate discrimination • Develop and implement procedures to resolve program deficiencies 	May 1, 2016 – April 30, 2017

Disadvantaged Business Enterprise

ODOT is committed to ensuring nondiscrimination in the award and administration of DOT-assisted contracts; helping to remove barriers to the participation of DBEs in DOT-assisted contracts; and, assisting in the development of firms that can compete successfully in the marketplace outside of the DBE program.

Completed Activities/Accomplishments

Description	Completion Date
ODOT revised its good faith efforts (GFE) evaluation process to require contractors to submit DBE commitments and/or GFE at the time of bid as a matter of responsiveness and DBE Affirmations within 5 days of bid opening as a matter of responsibility per revised Proposal Note (PN) 13.	December 2014
ODOT revised its project goal setting process to incorporate the review of a list of pre-qualified DBE firms by work type; list of certified DBE firms; list of DBE subcontractors' previous work type; and, associative knowledge of non-pre-qualified DBE firms.	2015
ODOT established a process whereby Intent to Subcontract (C-92) requests and subcontractor agreements are reviewed and compared to the DBE Commitment documents. C-92 Requests to Sublet must be submitted prior to the DBE beginning work. The prime contractor must submit a copy of the subcontract agreement identifying the specific items of work which the DBE is to be performing. This information is then compared to the DBE Commitment and Utilization forms submitted at the time of bid. If there are any inconsistencies, they are addressed prior to approval of the C-92. A review of the C-92 and subcontract is performed to ensure that the DBE firm maintains the proper NAICS codes to perform the specific items of work listed on the C-92. If adjustments need to be made to goal credit, those will be made at that time and the contractor is instructed on whether it needs to revise its DBE Utilization plan.	2015

<p>To ensure accurate counting of trucking, ODOT revised its DBE Affirmation form to include a list of qualifying questions with regard to trucking with an identified method for tracking trucking participation.</p>	<p>December 23, 2015</p>
<p>ODOT revised PN 13 to require prime contractors to submit their DBE commitments at bid time as a matter of responsiveness. The Apparent Low Bidder must submit affirmation forms from all DBE firms identified on its commitment within 5 days of bid opening as a matter of responsibility. The DBE Affirmation form requires that the specific type of work be identified (if trucking, the firm must state the commodity and where the trucking is occurring), the type of DBE (subcontractor, supplier (manufacturer, regular dealer or broker) consultant, service or other) and a list of qualifying questions for suppliers to determine commercially useful function (CUF) for suppliers.</p>	<p>December 31, 2015</p>
<p>ODOT created a GFE Committee that includes members from the Office of Small and Disadvantaged Business Enterprise, the Office of Contracts, the Construction Claims Coordinator, Construction Partnering and Local Programs Engineer as well as two alternate members representing a construction specialty and consultant/engineering services that will attend meetings on a case by case basis as requested by the Chairperson. A GFE Committee Charter was drafted which outlines the purpose, frequency, members, format and findings of the GFE Committee. The Committee will meet anytime there is a DBE goal shortfall in excess of 20% of the assigned DBE goal. An internal GFE Evaluation Form has been created which will be utilized anytime a GFE evaluation is required in order to document the GFE review process and ensure consistency. This form will be utilized anytime there is a goal shortfall, and not just when the GFE Committee meets. An external form has been drafted which will be posted on-line and available for contractor/consultant utilization.</p>	<p>January 31, 2016</p>
<p>ODOT developed a comprehensive CUF Procedure Manual which was approved by FHWA-Ohio Division.</p>	<p>March 17, 2016</p>
<p>To ensure FHWA Form 1273 is physically incorporated into all ODOT-let contracts, regardless of tier, ODOT created an affirmation within the Civil Rights and Labor (CRL) System where the subcontractor is required to affirm receipt of FHWA Form 1273 in conjunction with the prompt payment affirmation. ODOT drafted and adopted a PN to contractually require the contractor and subcontractors to utilize CRL to affirm prompt payment and receipt of FHWA Form 1273. ODOT provided notice to the</p>	<p>March 24, 2016</p>

contracting industry of this requirement as well as web-based training.	
ODOT revised PN 13 to incorporate procedures regarding joint checks.	March 31, 2016

Planned Activities/Goals

Description	Target Timeframe
Revise contract goal setting procedures in DBE Program Plan to include discussion on various considerations and their relevance in determining contract goals	June 30, 2016
Develop a Quality Assurance Review (QAR) to ensure compliance with all contractor compliance program requirements and adherence with to be developed procedures (e.g., CUF procedures); train Contractor Compliance Officers (CCOs) on the QAR process and requirements; revise ODOT Manual of Procedures (housed in the Division of Construction Management) to reflect the QAR process and requirements	March 31, 2017