



OHIO DEPARTMENT OF TRANSPORTATION

Annual Title VI Goals and Accomplishments Report 2017 - 2018

Jerry Wray
Director

Lauren Purdy
Deputy Director
Opportunity, Diversity & Inclusion

Aisha Powell
Title VI Program Manager

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, 2016 and September 30, 2017 and identifies goals to be initiated between October 1, 2017 and September 30, 2018. 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

In October 2015, ODOT updated its Title VI/Nondiscrimination Policy to reflect the designation of a new Title VI Coordinator; submitted the updated policy to the ODOT Director for approval and signature; and, published the updated policy on the ODOT internet site. No further updates have been required.

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

In November 2014, ODOT updated and executed Standard Title VI/Nondiscrimination Assurances pursuant to DOT Order No. 1050.2A. As of March 2016, the Title VI Coordinator made sure all offices that execute contracts received a copy of the updated assurance language and guidance on incorporating the updated language into their applicable instruments. On an ongoing basis, the Title VI Coordinator provides technical assistance to those offices on ensuring applicable instruments are compliant with Title VI assurance language requirements. As of October 2016, the Title VI Coordinator began reviewing compliance activities pertaining to the inclusion of assurance language in applicable instruments as part of the program area review process. Review-related activities for this implementation item have been incorporated into the Program Area Reviews section of this report.

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 roles to effectively implement its Title VI program.

Completed Activities/Accomplishments

In July 2015, 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 comprised of: the Office of Equal Opportunity; the Office of Small & Disadvantaged Business Enterprise; and, the Office of Outreach.

In October 2015, the Office of Equal Opportunity (OEO) designated program managers for all of its civil rights program areas, including designating Aisha Powell as Title VI Coordinator.

ODI continues to assess its structure and staffing needs to ensure ODOT maintains its ability to implement a robust Title VI/Nondiscrimination Program. When a need is identified, it is addressed with ODOT's Executive Leadership Team.

Description	Completion Date
OEO hired an ADA/504 & Title VI Specialist to assist the Title VI Coordinator with implementing ODOT's Title VI/Nondiscrimination Program	August 7, 2017

Planned Activities/Goals

Description	Target Timeframe
Evaluate organizational structure to ensure ODOT maintains its ability to implement a robust Title VI/Nondiscrimination Program	Ongoing

Program Area 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
Conducted Program Area Review of the Office of Statewide Planning & Research and the Office of Program Management	October 6, 2016
Conducted Program Area Review of the Office of Environmental Services (OES) *At the time of its review, OES was developing some Title VI-related guidance and preparing an environmental assessment that were subject to the review. Those additional items did not become available for review until March 29, 2017 and May 30, 2017, respectively.	October 18, 2016
Conducted Program Area Review of the Office of Local Programs and the Local Technical Assistance Program	October 24, 2016
Conducted Program Area Review of the Office of Transit	October 27, 2016
Conducted Program Area Review of the Office of Real Estate	November 3, 2016
Completed preliminary program area review analysis and drafted report on preliminary findings with recommendations for each area	November 21, 2016
Conducted Program Area Review of the Division of Opportunity, Diversity & Inclusion	December 1, 2016
Conducted Program Area Review of the Office of Small & Disadvantaged Business Enterprise and the Office of Contract Sales	December 6, 2016
Completed final program area review analysis and prepared report on findings with recommendations for each area	April 28, 2017

Planned Activities/Goals

Program area reviews will be conducted annually. The annual assessments will be initiated through a Title VI compliance questionnaire that is distributed to each program area on September 1. The questionnaire will be completed and returned to the Title VI Coordinator by October 1. The Title VI Coordinator will review the responses to identify additional information that is needed, any recommended actions to be taken by the program area and any program area specific training needs that may exist. Meetings to review the Title VI Coordinator’s findings with each program area will be held in November. Relevant findings or suggested corrective actions will be relayed to division heads and included in future Title VI Goals and Accomplishments Reports.

Summary of Key Findings and Recommendations

Office of Environmental Services

Ensure public outreach and involvement activities are conducted in a non-discriminatory manner and ensure the participation of protected groups (49 CFR Part 21.5(a)(1))

Observations

- Per its Public Involvement Manual, the Office of Environmental Services (OES) organizes public events and seeks public input as part of its project development efforts for Paths 3, 4 and 5 projects. OES has developed a public involvement manual that follows federal guidance.
- A review of OES public involvement project files in EnviroNet suggests that:
 - Mechanisms are already in place to track event participants but do not currently track demographic profiles of participants;
 - OES has documentation for submitted comments, not for oral comments raised by participants during the meetings;
 - Title VI-related materials (brochure, LEP form, Title VI complaint form) are not currently provided at the meetings; and,
 - There is no documentation on whether meeting locations have ADA ramps.

Recommendations

- Track information on public meeting participant profiles by event and in the aggregate;
- Analyze participant data to determine representation of minority and low-income populations at public events;
- Develop a process for addressing the results of such analyses and document steps taken to address either low participation or poor representation of all populations;
- Provide an informational table at each public event, where participants can take copies of the Title VI brochure, LEP brochures in multiple languages (where appropriate) and Title VI complaint forms;
- Distribute voluntary and anonymous demographics cards at each public event;
- Post public involvement resource documents and brochures on ODOT's website on the Public Involvement page; and,
- Train staff on Title VI data collection during project-related events.

Conduct analyses of populations being impacted by projects and relocations

Observations

- OES currently conducts project-related impact analyses as part of the NEPA review process for certain projects, per its CE Guidance.

- OES does not have a process in place for conducting analyses of Title VI protected groups (specifically on minorities, by race or national origin) on projects where a NEPA review is not conducted.

Recommendations

- Develop a process for conducting impact analyses that satisfy Title VI requirements, by looking at the impacts on different minority groups, in addition to the existing NEPA review process.

Office of Real Estate/Right of Way

Include Title VI language and assurances in all published documents (23 CFR Part 200.9(a) and (b)(8))

Observations

- Real Estate currently works with ODI to update and ensure all its documents include Title VI assurances. ODI typically lets Real Estate know when changes need to be made to the language and will provide staff with the necessary language. ODI currently tracks the incorporation of such assurances.

Recommendations

- Title VI language should also be included in public event-related materials. Specifically, relocation brochures (residential or non-residential) should be accompanied by a Title VI brochure, LEP brochure/flyer in multiple languages (as appropriate), and Title VI complaint form.

Conduct analyses of populations being impacted by projects and relocations

Observations

- OES currently conducts project-related impact analyses, but Real Estate does not see those ahead of relocation activities.
- Real Estate no longer tracks sociodemographic data on relocatees in its Paradox database.

Recommendations

- Real Estate should obtain a summary of the project-related impact analyses conducted by OES.
- Real Estate should develop a mechanism to include information about protected populations as it tracks relocations.

Office of Local Programs/LTAP

Provide assistance and training to sub-recipients (49 CFR Part 21.5(b)(2) and 23 CFR Part 200.9(b)(13))

Observations

- LTAP is currently providing Title VI training to local public agencies (LPAs) through the pre-qualification process. Additional training is also available for other sub-recipients through LTAP's e-Learning system.

Recommendations

- Once the new LPA Title VI monitoring tools are implemented, LTAP will need to update its Title VI training to include information on updated technical assistance tools, the process for conducting compliance reviews, and the implications of compliance activities for LPA Title VI Coordinators.

Monitor sub-recipients for compliance with Title VI (23 CFR Part 200.9(b)(7))

Observations

- Local Programs currently asks LPAs to self-certify that they comply with Title VI and other nondiscrimination requirements in the LPA Participation Review Form. However, Local Programs does not currently collect assurances from LPAs or monitor LPAs for compliance with Title VI.

Recommendations

- Local Programs and the Title VI Coordinator are working together to conduct an initial baseline assessment of LPA compliance with Title VI and incorporate Title VI compliance items into the LPA Participation Review Form and the Partnering Reviews.
- Local Programs and the Title VI Coordinator will track compliance issues noted in the LPA responses to Title VI compliance items.
- Local Programs and the Title VI Coordinator will follow-up on compliance issues by providing additional Title VI training and resources.

Conduct analyses of populations impacted by ODOT activities and trainings

Observations

- LTAP does not have a list of event and training participants showing sociodemographic profiles.

Recommendations

- LTAP may want to consider adding the Title VI protected classes to its event tracking by including optional questions on socio-demographics to the event registration page.

Offices of Statewide Planning & Research and Program Management

Include Title VI language and assurances in all published documents (23 CFR Part 200.9(a) and (b)(8))

Observations

- Planning issues biennial MPO/RTPO transportation planning contracts. Title VI assurance language is included in these contracts.

Recommendations

- Planning will ensure all required nondiscrimination assurance language is current and is included in its contracts.

Provide technical assistance (49 CFR Part 21.5(b)(2) and 23 CFR Part 200.9(b)(13)) and monitor sub-recipients for compliance with Title VI (23 CFR Part 200.9(b)(7))

Observations

- Planning currently prepares a Title VI Baseline Assessment report annually summarizing MPO responses to a Title VI and contract compliance questionnaire.

Recommendations

- Planning and the Title VI Coordinator are working together to update the Title VI Baseline Assessment tool and to include RTPOs in monitoring activities.
- Planning and the Title VI Coordinator will track compliance issues noted in the MPO/RTPO responses to Title VI compliance items.
- Planning and the Title VI Coordinator will follow-up on compliance issues by providing additional Title VI training and resources.

Ensure the statewide planning process is consistent with Title VI requirements (49 CFR Part 21.5(b)(2); 23 CFR Part 200.9(b)(4) and (13))

Observations

- Planning has developed an impact analysis technical memo as part of its Access Ohio 2040 long-range plan which identifies the impacts of different scenarios on minority and low-income populations. Planning looks at EJ populations. Title VI

populations are not identified separately, such as by race or national-origin. Other underserved populations, such as the disabled or elderly, are also not separately examined.

- The STIP includes an EJ Chapter which looks at funding allocation to counties and concentrations of minority and low-income populations. The analyses conclude that counties receive project funding proportionately. Title VI populations are not identified separately, such as by race or national-origin. Other underserved populations, such as the disabled or elderly, are also not separately examined.

Recommendations

- Consider conducting analyses for Title VI protected populations, such as different races or national-origins, as part of existing EJ analyses, as a separate section.

Ensure public outreach and involvement activities are conducted in a non-discriminatory manner and ensure the participation of protected groups (49 CFR Part 21.5(a)(1))

Observations

- Planning and Program Management organize public events and seek public input as part of the STIP and Access Ohio as well as other planning efforts. Each of these planning efforts have their own public involvement and outreach requirements, and those activities must be conducted following federal requirements to ensure nondiscrimination.
- A review of planning documents and public involvement documentation suggests that:
 - Mechanisms are already in place to track event participants but do not currently track demographic profiles of participants;
 - Planning takes into account written comments but does not appear to have a formal process in place for addressing other comments raised by participants during the meetings;
 - STIP-related public events combine public officials and citizens in rural areas and, while common, may not always be conducive to open discussion;
 - Title VI-related materials are not provided during public meetings; and,
 - There is no documentation on whether STIP-related event locations are ADA-accessible.

Recommendations

- Track information on public meeting participant profiles by event and in the aggregate;
- Collect and track sociodemographic data from STIP informational outposts;

- Collect and analyze data as it relates to future Customer Preference Survey respondents, with information on race, color, national origin, gender, disability status or LEP status;
- Document language assistance provided during the Customer Preference Survey and any other instruments seeking public input into Access Ohio or the STIP;
- Analyze event, meeting or STIP outpost/kiosk participant data to determine representation of minority and low-income populations, address accordingly and document steps taken to remediate either low participation or poor representation of all populations, when applicable;
- Event/kiosk materials should be accompanied by a Title VI brochure, with LEP brochure/flyer in multiple languages (where appropriate), and Title VI complaint form. Such a packet should also be accessible at informational kiosks for the STIP and available on ODOT's website on the Public Involvement page; and,
- Train Planning, Program Management, District staff, MPOs, RTPOs and consultants on Title VI data collection during the Access Ohio and STIP processes.

Office of Transit

Provide technical assistance (49 CFR Part 21.5(b)(2) and 23 CFR Part 200.9(b)(13)) and monitor sub-recipients for compliance with Title VI (23 CFR Part 200.9(b)(7))

Observations

- Transit provides sample notices, complaint forms, complaint process instructions and other required Title VI documents to its sub-recipients.

Recommendations

- Transit and the Title VI Coordinator are working together to conduct an initial baseline assessment of Transit grantees' compliance with Title VI and incorporate Title VI compliance items into the grant application process and Technical Assistance Reviews.
- Transit and the Title VI Coordinator will track compliance issues noted in the grantee responses to Title VI compliance items.
- Transit and the Title VI Coordinator will follow-up on compliance issues by providing additional Title VI training and resources.

Offices of Small & Disadvantaged Business Enterprise and Contract Sales

Include Title VI language and assurances in all published documents (23 CFR Part 200.9(a) and (b)(8))

Observations

- Construction and purchasing contracts include nondiscrimination language and assurances.

Recommendations

- Contract Sales will work with ODI to ensure all required nondiscrimination and assurance language is current and remains included in construction and purchasing contracts.

Ensure nondiscrimination in activities

Observations

- The Offices of Small and Disadvantaged Business Enterprise (OSDBE) and Contract Sales are monitoring prime contractors' efforts to include DBEs in contracts, and how those prime contractors work with those DBE subcontractors.
- ODOT contracts include a clause for prompt subcontractor payment.
- OSDBE provides training on compliance-related topics, including prompt payment, DBE goal attainment, good faith efforts, commercially useful function and prevailing wage.

Recommendations

- Track SDBE certification applications received and certifications approved or denied, by race, color and national origin of the applicant; and,
- Track data compiled on subcontractor prompt payments, by business owner's race, color, and national origin.

Ensure public outreach and involvement activities are conducted in a non-discriminatory manner and ensure the participation of protected groups (49 CFR Part 21.5(a)(1))

Observations

- ODI (OSDBE and the Office of Outreach) organizes public events as part of its certification efforts and race-neutral measures.

Recommendations

- Track information on event participant profiles, by event and in the aggregate; and,
- Train staff on Title VI data collection at events.

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. ODOT's Sub-Recipient Monitoring Procedures are detailed in its Title VI/Nondiscrimination Program Implementation Plan.

Completed Activities/Accomplishments

Description	Completion Date
ODI staff participated in multiple LPA Days events, including presenting on "LPA Title VI/Nondiscrimination Program Responsibilities"	October - December, 2016
Drafted monitoring plans for each type of sub-recipient	November 21, 2016
Presented an update on the ODOT Title VI Program as well as guidance on contract language requirements to MPOs and RTPOs at the Title VI Workshop held at ODOT	December 7, 2016
Distributed Title VI Baseline Assessment Tool to MPOs to be completed with work program submissions	December 15, 2016
Provided technical assistance to NOACA on its revision to its Title VI complaint process	January 23, 2017
Attended Eastgate Regional Council of Governments' quarterly board meeting and presented on Title VI	January 30, 2017
Provided technical assistance to Erie County MPO on incorporating assurance language into its applicable instruments	March 2017
Attended the annual Title VI and ADA Summit for sub-recipients hosted by Indiana DOT to identify best practices in monitoring sub-recipient compliance	May 2017
Revised draft monitoring plans developed for each type of sub-recipient	June 2017
Drafted compliance questionnaires, developed proposed processes for conducting reviews of each type of sub-recipient and identified which sub-recipients need to be included in the monitoring program	July 2017
Circulated proposed sub-recipient monitoring plans to the offices that oversee each type of sub-recipient for review and comment	July 21, 2017

Began updating the Title VI Program Requirements for Sub-recipients technical assistance tool	August 2017
Attended the scheduled LPA Partnering Review with City of Tipp City to determine whether/how to incorporate Title VI	September 12, 2017

Planned Activities/Goals

Description	Target Timeframe
Finalize update of Title VI compliance questionnaire for MPOs/RTPOs	December 31, 2017
Finalize Title VI compliance questionnaire for Transit grantees, including compliance information and documentation to be gathered during the grant application process and Technical Assistance Reviews	December 31, 2017
Finalize Title VI compliance questionnaire for LPAs, including compliance information and documentation to be gathered during the local-let qualification process and Partnering Reviews	December 31, 2017
Conduct initial baseline assessment of sub-recipients	March 31, 2018
Attend LPA Partnering Reviews	June - November, 2018
Include a summary providing the number of reviews conducted, common deficiencies/results found, and planned follow-up with target timeframes in future submissions of this report	October 31, 2018

Data Collection/Analysis/Reporting

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
Drafted procedures for improved data collection and reporting	March 2017
Developed guidance on improved data collection and reporting, including templates to address data gaps and guidelines on the types of analyses that should be conducted and when	April 2017
Evaluated available data to identify any potential trends or patterns of discrimination in the special emphasis areas and developed recommendations to address such	June 2017
Finalized recommendations and tools for improved data collection, analysis and reporting	June 22, 2017

Circulated recommendations and tools for improved data collection, analysis and reporting to program areas for review and comment	September 27, 2017
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Planned Activities/Goals

Description	Target Timeframe
Obtain and review feedback from each program area on the recommendations and tools for improved data collection, analysis and reporting and make any necessary adjustments to ensure the methods of collection and the data being collected is appropriate and meaningful	November 30, 2017
Finalize the methods and types of data to be collected, analyzed and reported	December 31, 2017
Train program area staff on the methods and types of data to be collected, analyzed and reported	January 31, 2018
Collect and analyze data to identify trends and demonstrate ODOT is providing its programs and services in a nondiscriminatory manner for inclusion in future Title VI plans and reports	September 30, 2018

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
ODI staff participated in multiple LPA Days events, including presenting on “LPA Title VI/Nondiscrimination Program Responsibilities”	October - December, 2016
Presented an update on the ODOT Title VI Program as well as guidance on contract language requirements to MPOs and RTPOs at the Title VI Workshop held at ODOT	December 7, 2016
ODI staff participated in the Construction staff meeting and presented on “Title VI and Construction”	January 2017
Attended Eastgate Regional Council of Governments’ quarterly board meeting and presented on Title VI	January 30, 2017
OEO Training Program Manager conducted mandatory Title VI Overview Training for 1,253 ODOT employees in small groups over 20 dates to facilitate participation	January - June, 2017

Began drafting a framework for program area specific training, including proposed training modules	April 2017
Reviewed existing training and developed recommendations for supplementing or revising existing training courses	July 2017
Transit conducted Regulatory Compliance Training for Transit Grantees for 82 sub-recipient representatives	August 3, 2017
Drafted customizable slides for each program area on Limited English Proficiency, data collection and analysis and sub-recipient monitoring	September 2017
OES conducted mandatory Public Involvement Training, which includes instruction on engaging stakeholders in underserved populations, for 70 participants in a one-day training course offered twice this year	September 2017
OES conducted mandatory Categorical Exclusion Training, which includes instruction on nondiscrimination requirements, for 87 participants in a two-day training course offered twice this year	September 2017
OES conducted mandatory NEPA Training, which includes instruction on nondiscrimination requirements, for 33 participants in a one-week training course offer twice this year	September 2017
OES conducted Project Development Process Training, which includes instruction on nondiscrimination requirements, for 142 participants	September 2017

Planned Activities/Goals

Description	Target Timeframe
Continue Title VI Overview Training for all ODOT employees	Ongoing
Circulate proposed training modules to interdisciplinary team for review and comment	November 30, 2017
Finalize program area specific training modules	December 31, 2017
Conduct program area specific training courses with each program area	January 31, 2018
Develop a brochure or card on Title VI that will be available to all employees	June 30, 2018
Develop a web-based training course for all employees	June 30, 2018

Complaints

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

Summary of Complaints

No formal Title VI complaints were filed during the time period encompassing this report. However, the following ADA/504 complaints and Title VI incidents were raised or remained pending during the time period encompassing this report.

Robert and Cynthia Madej v. 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 submitted its report and recommendations to FHWA.

Wendy Jarrett v. City of Huber Heights

- On January 30, 2017, Wendy Jarrett filed a complaint with ODOT alleging the City of Huber Heights Engineer's Office had discriminated against her based on her disability when it was unresponsive to her repeated requests regarding the timing of the pedestrian traffic device located at the intersection of Brandt Pike and Chambersburg Road as well as to her request to have "disabled persons crossing" signs installed near the referenced intersection. ODOT undertook an investigation into the above-referenced allegations. Based on ODOT's investigation, it appeared the City had addressed Ms. Jarrett's concerns but failed to properly communicate such to her. During the course of the investigation, the City took further corrective action to install Audible Push devices at the intersection, adjust the timing further to add additional seconds to the crossing when the button was pushed, and install additional "disabled persons crossing" signs. ODOT completed its investigation and submitted its report and recommendations to FHWA. After receiving additional guidance from FHWA Ohio Division, ODOT issued its finding that the evidence obtained during its investigation did not support the allegations of discrimination raised in the complaint.

Anonymous v. Jefferson County Airpark

- On December 27, 2016, the Federal Aviation Administration (FAA) received an anonymous complaint alleging Jefferson County Airpark refused to rent hanger space to minorities and other persons based on their sexual orientation. The FAA, in consultation with ODOT, undertook an investigation into the allegations raised by the anonymous complainant. The FAA's report concluded there was no evidence to substantiate the claims of discrimination. However, the investigation uncovered instances where leases for hanger space were not negotiated consistently. As a result, the Jefferson County Regional Airport

Authority adopted a Title VI/Nondiscrimination Policy as well as a Title VI Complaint Procedure.

Jackie Green v. Portage Area Regional Transit Authority (PARTA)

- On May 17, 2017, Jackie Green contacted ODOT and indicated she was having issues with the transportation services provided by PARTA. Specifically, Ms. Green provided that PARTA ran a student bus service her son depended on to get to school and the service was being discontinued before the end of the school year without notice to the customers. Ms. Green also noted the replacement service carried a cost and additional travel time. Because PARTA receives federal financial assistance directly from FTA, and not through ODOT, ODOT did not initiate an investigation into any potential Title VI implications connected to the apparent deficiencies in the public involvement process as it related to the service change. However, ODOT did provide Ms. Green with the complaint procedures for PARTA and FTA.

Quality Traffic Data v. The Ohio Department of Transportation

- On May 22, 2017, Danny G, Quality Traffic Data, alleged ODOT discriminated against him and his company when it did not provide what he considered an acceptable response to his public records request seeking information and documents pertaining to contract/solicitation No. 097-17. On May 24, 2017, ODOT contacted Mr. G to notify him of his right to file a complaint against ODOT and inform him that his concerns had been referred to FHWA for action deemed appropriate.

Anderson Paint Store v. The Ohio Department of Transportation

- On March 9, 2017, Marcus Anderson, Anderson Paint Store LLC (certified DBE, home state Michigan), alleged ODOT discriminated against him when it rejected the bid of Panther Painting Industrial LLC (Panther) for ODOT Project 17-0015 CUY IR 090 07.04. Panther submitted Anderson Paint Store as a supplier on the project to meet the DBE goal. Anderson Paint Store was not approved to be used toward the DBE goal on the project based on commercial useful function issues because Anderson was arranging for Panther to purchase the paint from a local (Ohio) paint store and would not actually be supplying the paint for the project. Panther was also not able to demonstrate that it made good faith efforts to meet the DBE goal. Thus, its bid was rejected. When ODOT became aware of Mr. Anderson's allegations, it advised Mr. Anderson of his right to file a complaint and provided him with a copy of its Title VI complaint form. On March 13, 2017, ODOT referred the matter to FHWA.

Infrastructure Unlimited v. The Ohio Department of Transportation

- On May 8, 2017, during a project dispute meeting regarding labor inefficiency, Gloria Lovece, Infrastructure Unlimited, alleged ODOT discriminated against her by interfering with her company's performance on ODOT Project 16-0356. Upon discussing the allegations with Ms. Lovece, based on the nature and breadth of the complaint, it was determined the matter should be referred to

FHWA for action deemed appropriate. On August 8, 2017, Ms. Lovece was notified of her right to file a complaint and provided information on doing so. She was also informed that ODOT had referred her concerns to FHWA.

Completed Activities/Accomplishments

Description	Completion Date
Met with the Office of Communications to discuss establishing 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	March 2017
Developed a public involvement packet with a checklist and materials to be made available at public meetings to inform beneficiaries of the Title VI Program, including the complaint process	June 2017
Distributed the public involvement packet to each program area as well as a questionnaire to ensure the public is made aware of our Title VI complaint process and that any allegations of discrimination are being appropriately addressed	September 2017

Planned Activities/Goals

Description	Target Timeframe
Continue working with the Office of Communications to 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	June 30, 2018
Perform outreach and provide education to ensure ODOT beneficiaries are aware of ODOT’s Title VI complaint process *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.	June 30, 2018

Dissemination of Title VI Information

ODOT currently makes Title VI information available through its internet site, upon request, and in public areas in its Central Office and all district headquarter locations. ODOT is also taking steps to make Title VI information available at public meetings. As Title VI information is developed and/or updated, it will continue to be disseminated to the general public and, where appropriate, in languages other than English.

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
Updated ODOT's LEP Plan to include a revised Factor One analysis	November 21, 2016
Drafted an LEP assessment tool to evaluate frequency and type of contact with LEP individuals in furtherance of updating the Four-Factor Analysis that is part of ODOT's LEP Plan and developing a Language Assistance Plan	November 21, 2016
Developed a program area review questionnaire that incorporated the LEP assessment tool in furtherance of performing an LEP self-assessment of each program area	July 2017
Developed an LEP Reporting Form for program areas to use to track and report encounters with LEP individuals to ensure those individuals have meaningful access to ODOT's programs, services and activities	July 25, 2017
Began developing a Language Assistance Plan and language assistance tools	August 2017
Disseminated the LEP self-assessment survey and LEP reporting form to each program area	September 2017
Distributed flyers in English and Spanish to promote seasonal job opportunities in ODOT Districts 6 and 12	September 2017

Planned Activities/Goals

Description	Target Timeframe
Complete and disseminate the Language Assistance Plan and train employees in using language assistance tools to ensure LEP individuals have meaningful access to ODOT's programs, services and activities	June 30, 2018
Develop a Foreign Language Aid for Incident Responders to be used by ODOT's State Farm Safety Patrol	June 30, 2018
Use the results of the LEP self-assessment survey to update the Four-Factor Analysis that is part of ODOT's LEP Plan	September 30, 2018

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
Reviewed the Guidance on Identifying Underserved Populations to ensure Title VI considerations are incorporated into Environmental reviews	March 2017
<p>Program Management conducted a series of public involvement meetings for the biennial STIP development process</p> <p>The meetings were publicized in the following media:</p> <ul style="list-style-type: none"> • Ohio MBE newspaper advertisement • Radio One network banner advertisement • Facebook notice • Twitter notice • I-Heart Radio STIP coordinator interview podcast • Flyers at Ohio Public Libraries • ODOT statewide media release • Various ODOT contacts lists <p>The meetings were held in centralized locations with considerations for:</p> <ul style="list-style-type: none"> • Parking availability • Transit service, if regionally available • Afternoon/early evening times • Disabled accessibility • Meeting location familiarity 	March & April, 2017
Program Management completed an EJ analysis on biennial STIP projects listing which did not identify any disproportionate or adverse impacts to minority or low-income populations	July 1, 2017

Planned Activities/Goals

Description	Target Timeframe
Through the activities of the Office of Environmental Services, in consultation with the Title VI Coordinator, continue working 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	Ongoing

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
Drafted recommendations on potential compliance issues, opportunities for improvement and suggested solutions to be reviewed and used to develop and implement procedures to address and eliminate discrimination and resolve program deficiencies	September 2017

Planned Activities/Goals

Description	Target Timeframe
Develop and implement procedures to address/eliminate discrimination	June 30, 2018
Develop and implement procedures to resolve program deficiencies	June 30, 2018

TITLE VI ACTION PLAN

In August 2014, FHWA conducted a review of ODOT’s civil rights programs, including Title VI, and made recommendations for improvement. As a result, in April 2015, ODOT developed its plan to implement those improvements. Below is a copy of the most recent monthly submittal on ODOT’s progress toward implementing improvements to its Title VI Program.

Title VI Action Plan Timeline - 2017¹ Update - REVISED²

*(*update items appear in blue; follows Implementation Plan Checklist)*

Item Number	Item Description	Action Steps	Target Completion Date	Progress Notes
1	Policy Statement	<ul style="list-style-type: none"> • Update Title VI/ Nondiscrimination Policy in accordance with recommendations made by FHWA and FTA • Submit the updated policy to the ODOT Director for approval and signature • Publish the updated policy on the ODOT internet site 	Completed	<ul style="list-style-type: none"> • Item completed as of October 1, 2015
2A	Assurances	<ul style="list-style-type: none"> • Update Title VI Assurances 	Completed	<ul style="list-style-type: none"> • Item completed as of March 10, 2015

¹ This update covers activities from December 1, 2016 – November 30, 2017. For a complete list of activities performed prior to December 1, 2016 in furtherance of this action plan, please refer to the Title VI Action Plan Timeline Update for December 2016.

² Because there are multiple long-term action steps included in each item, this revision breaks down each item and its action steps to provide better information on progress and target completion dates. The revision covers activities from March 1, 2017 – November 30, 2017. For a list of activities completed between December 1, 2016 and February 28, 2017, please refer to the Title VI Action Plan Timeline Update for March 2017.

		<ul style="list-style-type: none"> • Execute updated assurances • Send a notice to all ODOT districts and divisions with the updated assurances 		
2B	Assurances	<ul style="list-style-type: none"> • Ensure required language is included in all applicable instruments <ul style="list-style-type: none"> ➢ Assess which offices execute contracts ➢ Develop and maintain a list of all offices that execute contracts including the types of contracts executed ➢ Work with each office to ensure required language is included in all applicable instruments ➢ Periodically review executed contracts to ensure the language is included and updated as necessary 	Completed	<ul style="list-style-type: none"> • Item completed as of March 21, 2016
3A	Organizational Structure	<ul style="list-style-type: none"> • Create a Division of Opportunity, Diversity and Inclusion to house all civil rights programs areas 	Completed	<ul style="list-style-type: none"> • Item completed as of July 1, 2015
3B	Organizational Structure	<ul style="list-style-type: none"> • Restructure the Office of Equal Opportunity to ensure adequate staffing to carry out all of its civil 	Completed	<ul style="list-style-type: none"> • Item completed as of October 1, 2015

		rights program areas (i.e. - Title VI, Title VII and ADA/504), including but not limited to, designating a new Title VI Coordinator who has easy access to the ODOT Director		
4A	Program Reviews	<ul style="list-style-type: none"> Develop program review procedures, including establishing an Interdisciplinary Team with liaisons in all key functional areas 	Completed	<ul style="list-style-type: none"> Item completed as of September 22, 2016 In March 2017, developed recommendations for internal monitoring improvements.
4B	Program Reviews	<ul style="list-style-type: none"> Conduct review of the Office of Environmental Services 	Completed	<ul style="list-style-type: none"> An initial review has been completed for Environmental Services as of November 30, 2016. There are activities planned for the spring that will be evaluated before its review is finalized. In March 2017, began review of Guidance on Identifying Underserved Populations to ensure Title VI considerations are incorporated into Environmental reviews. In April 2017, the program area review of Environmental Services was finalized.
4C	Program Reviews	<ul style="list-style-type: none"> Conduct review of the Office of Transit 	Completed	<ul style="list-style-type: none"> Item completed as of November 30, 2016
4D	Program Reviews	<ul style="list-style-type: none"> Conduct review of the Office of Local Programs 	Completed	<ul style="list-style-type: none"> Item completed as of November 30, 2016

4E	Program Reviews	<ul style="list-style-type: none"> • Conduct review of the Offices of Statewide Planning & Research and Program Management 	Completed	<ul style="list-style-type: none"> • Item completed as of November 30, 2016
4F	Program Reviews	<ul style="list-style-type: none"> • Conduct review of the Office of Real Estate 	Completed	<ul style="list-style-type: none"> • Item completed as of November 30, 2016
4G	Program Reviews	<ul style="list-style-type: none"> • Conduct review of the Offices of Small & Disadvantaged Business Enterprise and Contracts Sales 	Completed	<ul style="list-style-type: none"> • Item completed as of December 31, 2016
4H	Program Reviews	<ul style="list-style-type: none"> • Conduct review of the Division of Opportunity, Diversity & Inclusion 	Completed	<ul style="list-style-type: none"> • Item completed as of December 31, 2016
5A	Special Emphasis Program Areas	<ul style="list-style-type: none"> • Identify special emphasis program areas 	Completed	<ul style="list-style-type: none"> • Item completed as of September 22, 2016
5B	Special Emphasis Program Areas	<ul style="list-style-type: none"> • Identify any trends or patterns of discrimination in the special emphasis program areas 	Completed	<ul style="list-style-type: none"> • Through the program area reviews and data collection and analysis, any potential trends or patterns of discrimination in the special emphasis program areas will be identified and addressed. • In June 2017, ODOT, through its consultant, evaluated available data to identify any potential trends or patterns of discrimination in the special emphasis program areas and developed recommendations to address such.

5C	Special Emphasis Program Areas	<ul style="list-style-type: none"> Develop and implement an action plan to address any trends or patterns of discrimination in the special emphasis program areas that are identified 	Completed	<ul style="list-style-type: none"> Through the program area reviews and data collection and analysis, any potential trends or patterns of discrimination in the special emphasis program areas will be identified and addressed. In June 2017, ODOT, through its consultant, evaluated available data to identify any potential trends or patterns of discrimination in the special emphasis program areas and developed recommendations to address such.
6A	Sub-recipient Reviews	<ul style="list-style-type: none"> Update list of sub-recipients, that includes type of organization and office(s) in contact with, and develop mechanism to keep such current 	Completed	<ul style="list-style-type: none"> Through the program area reviews, sub-recipients are being identified including the type of organization (e.g. - MPO, LPA, or Transit Authority) and the office of which they are a grantee. In July 2017, drafted compliance questionnaires, developed proposed processes for conducting reviews of each type of sub-recipient and identified which sub-recipients need to be included in the monitoring program.
6B	Sub-recipient Reviews	<ul style="list-style-type: none"> Develop external monitoring plan(s) for sub-recipients 	Completed	<ul style="list-style-type: none"> Draft monitoring plans for each type of sub-recipient were developed as of November 21, 2016. The draft monitoring plans are being revised by the Title VI Consultant to address comments made by the Title VI Coordinator.

				<ul style="list-style-type: none"> • In March 2017, developed recommendations for sub-recipient monitoring improvements. • In April 2017, continued developing procedures for sub-recipient monitoring. • In May 2017, continued developing recommendations for sub-recipient monitoring improvements. Also, attended the annual Title VI and ADA Summit for sub-recipients hosted by Indiana DOT to identify best practices in monitoring sub-recipient compliance. • In June 2017, revised draft monitoring plans developed for each type of sub-recipient. The monitoring plans will be circulated to the offices that oversee each type of sub-recipient and meetings will be held to finalize the monitoring plans and begin reviews. • In July 2017, drafted compliance questionnaires, developed proposed processes for conducting reviews of each type of sub-recipient and identified which sub-recipients need to be included in the monitoring program. • In August 2017, finalized the processes that will be used to conduct reviews of sub-recipients.
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6C	Sub-recipient Reviews	<ul style="list-style-type: none"> • Conduct reviews of sub-recipients 	03/31/2018	<ul style="list-style-type: none"> • Reviews will be conducted once review procedures are established and monitoring tools are developed. • In March 2017, provided technical assistance to Erie County MPO on incorporating assurance language into its applicable instruments. • In June 2017, revised draft monitoring plans developed for each type of sub-recipient. The monitoring plans will be circulated to the offices that oversee each type of sub-recipient and meetings will be held to finalize the monitoring plans and begin reviews. • In July 2017, drafted compliance questionnaires, developed proposed processes for conducting reviews of each type of sub-recipient and identified which sub-recipients need to be included in the monitoring program. • In August 2017, finalized the processes that will be used to conduct reviews of sub-recipients: the Title VI Program Requirements for Sub-recipients technical assistance tool is being updated; in Fall 2017/Winter 2018 a baseline assessment of all sub-recipients will be conducted; thereafter, compliance information will be gathered routinely and annual on-site reviews will be conducted on a selection of sub-recipients.
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				<ul style="list-style-type: none"> • In August 2017, the Title VI Coordinator began participating in the LPA Partnering Reviews. • In September 2017, the Title VI Coordinator attended the scheduled LPA Partnering Reviews to determine whether/how to incorporate Title VI; continued updating the Title VI Program Requirements for Sub-recipients technical assistance tool; and, began finalizing the arrangements to conduct a baseline assessment of all sub-recipients, which is scheduled for January 2018.
7A	Data Collection	<ul style="list-style-type: none"> • Develop a system to collect and analyze data 	Completed	<ul style="list-style-type: none"> • Through the program area reviews, existing data and methods of collection are being identified and evaluated. ODOT, through its Title VI Consultant, is benchmarking with other state DOTs to determine best practices for data collection and analysis of routinely-collected data. Procedures for improved data collection and analysis are being developed as of February 28, 2017. • In March 2017, drafted procedures for improved data collection and reporting. • In April 2017, continued drafting procedures and instructions for improved data collection and reporting, including templates to address data gaps and guidelines on

				<p>the types of analyses that should be conducted and when.</p> <ul style="list-style-type: none"> • In May 2017, continued drafting recommendations for improved data collection, analysis and reporting. • In June 2017, finalized recommendations and developed tools for improved data collection, analysis and reporting. These recommendations and tools will be shared with the program areas to ensure implementation and coordination with the Title VI Program.
7B	Data Collection	<ul style="list-style-type: none"> • Collect and analyze data to identify trends and demonstrate ODOT is providing its programs and services in a nondiscriminatory manner 	Completed	<ul style="list-style-type: none"> • Through the program area reviews, existing data and methods of collection are being identified and evaluated. ODOT, through its Title VI Consultant, is benchmarking with other state DOTs to determine best practices for data collection and analysis of routinely-collected data. Procedures for improved data collection and analysis are being developed as of February 28, 2017. • In June 2017, ODOT, through its consultant, evaluated available data to identify any potential trends or patterns of discrimination in the special emphasis program areas and developed recommendations to address such.

				<ul style="list-style-type: none"> In June 2017, finalized recommendations and developed tools for improved data collection, analysis and reporting. These recommendations and tools will be shared with the program areas to ensure implementation and coordination with the Title VI Program.
8A	Training	<u>Internal Overview Training</u> <ul style="list-style-type: none"> Present Title VI program to Senior Leadership Draft an ODOT Messenger to be disseminated by the Director's Office emphasizing ODOT's commitment to delivering its programs and services in a nondiscriminatory manner Develop a live Title VI overview training course for all employees 	Completed	<ul style="list-style-type: none"> Item completed as of April 14, 2016
8B	Training	<u>Internal Program Area Training</u> <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 	12/31/2017	<ul style="list-style-type: none"> ODOT, through its Title VI Consultant, is benchmarking with other state DOTs to determine best practices for developing program area specific training methods, techniques and curriculum as of February 28, 2017. In April 2017, began drafting a framework for training as well as training modules, including

				<p>supplementing or revising existing training courses.</p> <ul style="list-style-type: none"> • In July 2017, reviewed existing training and developed recommendations for program area specific training. • In August 2017, developed schedule for conducting the training with program area team members. • In September 2017, drafted customizable slides for each program area on Limited English Proficiency, data collection and analysis and sub-recipient monitoring. The training will be conducted in November. • In October 2017, completed customizable slides for each program area. The slides will be disseminated to the Training Program Manager and the Interdisciplinary Team Members for review and comment, then updated accordingly. Once the training content is finalized, the training methods and schedule will be developed.
8C	Training	<u>Sub-recipient Training</u> <ul style="list-style-type: none"> • Partner with LTAP to develop an online training course for sub-recipients 	Completed	<ul style="list-style-type: none"> • Item completed as of April 2014
9A	Complaints	<ul style="list-style-type: none"> • Update the Title VI/ Nondiscrimination Complaint Form 	Completed	<ul style="list-style-type: none"> • Item completed as of December 2014

		<ul style="list-style-type: none"> Update the complaint process to ensure the Office of Equal Opportunity is notified of complaints filed under Title VI in order to properly report such to FHWA and FTA 		
9B	Complaints	<ul style="list-style-type: none"> Establish a process that will enable beneficiaries to submit a Title VI complaint online via the ODOT/Office of Equal Opportunity internet site for external users as well as the ODOT/Office of Equal Opportunity intranet site for internal users 	12/31/2017	<ul style="list-style-type: none"> The Office of Equal Opportunity will work with the Office of Communications through the roll-out of the new website to establish a process that will enable beneficiaries to submit complaints online. A meeting to discuss this was requested on March 3, 2017.
9C	Complaints	<ul style="list-style-type: none"> Perform outreach and provide education to ensure our beneficiaries are aware of our Title VI complaint process 	Completed	<ul style="list-style-type: none"> The ODOT Title VI webpage was updated in February 2016 with additional Title VI information. However, the Title VI Coordinator plans to identify additional methods to ensure beneficiaries are aware of our Title VI complaint process - including providing information at public information meetings. In June 2017, developed a public involvement packet with a checklist and materials to be made available at public meetings to inform beneficiaries of the Title VI Program, including the complaint process.

				<ul style="list-style-type: none"> • In September 2017, distributed the public involvement packet to each program area as well as a questionnaire to ensure the public is made aware of our Title VI complaint process and that any allegations of discrimination are being appropriately addressed. • In October 2017, made sure each program area has the tools necessary to ensure our beneficiaries are aware of our Title VI complaint process and confirmed allegations of discrimination are being referred to the Title VI Coordinator for proper resolution.
10	Dissemination of Information	<ul style="list-style-type: none"> • Update Notice to Beneficiaries and publish on the ODOT internet site 	Completed	<ul style="list-style-type: none"> • Item completed as of February 10, 2016
11	Limited English Proficiency	<ul style="list-style-type: none"> • ODOT will take reasonable steps to make its programs, services, and activities accessible to persons with LEP. 	Completed	<ul style="list-style-type: none"> • ODOT, through its Title VI Consultant, revised Factor 1 of its LEP Analysis as of November 30, 2016 and developed tools to conduct an LEP self-assessment. The LEP self-assessment will be used to develop a Language Assistance Plan. • In July 2017, developed a program area review questionnaire that will be used to perform an LEP self-assessment as well as an LEP reporting form for program areas to use to document contacts with LEP persons.

				<ul style="list-style-type: none"> • In August 2017, began developing a Language Assistance Plan and language assistance tools. • In September 2017, sent the LEP self-assessment survey and LEP reporting form to each program area. Survey responses are due October 20, 2017. Research continued on language assistance tools and a Language Assistance Plan. Distributed flyers in English and Spanish to promote seasonal job opportunities in ODOT Districts 6 and 12. • In October, updated ODOT's LEP Plan. Additionally, conducted an LEP assessment of each program area's encounters with LEP populations (type, frequency and assistance tools provided). The results confirm ODOT's current plan provides meaningful access to LEP individuals. Nonetheless, ODOT will develop a language assistance plan to enhance its documentation on how we go about ensuring LEP individuals are provided meaningful access to ODOT's programs, services and activities.
12	Environmental Justice	<ul style="list-style-type: none"> • ODOT will ensure the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the 	Completed	<ul style="list-style-type: none"> • Through providing technical assistance and conducting program area reviews, the Title VI Coordinator is working with the Office of Environmental Services to ensure compliance with

		development, implementation, and enforcement of environmental laws, regulations, and policies.		<p>the Executive Order on Environmental Justice.</p> <ul style="list-style-type: none"> • In March 2017, began review of Guidance on Identifying Underserved Populations to ensure Title VI considerations are incorporated into Environmental reviews. • In April 2017, completed review of the Office of Environmental Services, including Environmental Justice requirements, to ensure compliance with the Executive Order.
13	Review of Directives	<ul style="list-style-type: none"> • Conduct a review of all key documents to determine whether there are Title VI implications 	Completed	<ul style="list-style-type: none"> • Through the program area reviews, a review of all key documents is being conducted to determine whether there are Title VI implications. • In April 2017, completed program area reviews which included a review of key documents to determine whether there are Title VI implications.
14	Compliance and Enforcement Procedures	<ul style="list-style-type: none"> • Develop and implement procedures to address/eliminate discrimination • Develop and implement procedures to resolve program deficiencies 	11/30/2017	<ul style="list-style-type: none"> • ODOT engaged a Title VI Consultant tasked with making recommendations on any potential compliance issues, opportunities for improvement and suggested solutions. During and after the engagement, ODOT will use the reports and recommendations provided to develop and implement procedures to address and eliminate discrimination and resolve program deficiencies. • In September 2017, ODOT received a draft report with recommendations on

				<p>potential compliance issues, opportunities for improvement and suggested solutions. The recommendations are being reviewed and used to develop and implement procedures to address and eliminate discrimination and resolve program deficiencies.</p>
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