



OHIO DEPARTMENT OF TRANSPORTATION

Annual Title VI Goals and Accomplishments Report 2018 - 2019

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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, 2017 and September 30, 2018 and identifies goals to be initiated between October 1, 2018 and September 30, 2019. It provides an overview of changes made in procedures and practices within ODOT to ensure nondiscrimination in all 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 April 2013, the United States Department of Transportation issued DOT Order No. 1050.2A updating the Standard DOT Title VI Assurances.

In November 2014, following the issuance of DOT Order No. 1050.2A, ODOT updated and executed its Standard Title VI/Nondiscrimination Assurances accordingly. A notice was sent to all ODOT districts and divisions with the updated assurances in March 2015.

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.

In September 2018, upon receiving additional guidance from FHWA, ODOT updated and executed its Standard Title VI/Nondiscrimination Assurances for the 2019 Federal fiscal year (FFY). ODOT will update its Standard Title VI/Nondiscrimination Assurances annually in accordance with the guidance it received from FHWA. A copy of ODOT's executed Standard Title VI/Nondiscrimination Assurances for FFY 2019 is included as an appendix in its 2019 Title VI/Nondiscrimination Program Implementation Plan.

Technical Assistance Provided

Office or Sub-Recipient	Date Assistance Was Provided
Ohio Rail Development Commission	October 2017
Office of Transit	October 2017
Greater Cleveland Regional Transit Authority	November 2017
Office of Chief Legal Counsel	August 2018

Planned Activities/Goals

Description	Target Timeframe
Update and execute Standard Title VI/Nondiscrimination Assurances pursuant to DOT Order No. 1050.2A	Annually
Send notice to all ODOT Districts and Divisions with the updated assurances when language is updated, or the Title VI Coordinator determines a refresher on the required language is necessary	As needed
Continue providing technical assistance to offices that execute contracts to ensure applicable instruments are compliant with Title VI assurance language requirements	Ongoing
Survey ODOT Districts and Divisions to determine which offices execute contracts when there are structural changes or changes to the administration of ODOT programs, services and activities	As needed
Update list of all offices that execute contracts and the types of contracts executed	As needed
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 its civil rights program areas, including designating Aisha Powell as Title VI Coordinator.

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

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.

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 are conducted of key functional areas.

Completed Activities/Accomplishments

Description	Completion Date
Updated and distributed tailored program area review questionnaires to each key program area initiating the annual review process	August 31, 2018
Conducted program area reviews	August 31 - September 21, 2018

Planned Activities/Goals

Program area reviews are conducted annually. The annual assessments are initiated through a Title VI compliance questionnaire that is distributed to each program area on August 1. The questionnaire is to be completed and returned to the Title VI Coordinator by September 1. The Title VI Coordinator reviews 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 are held in November. Relevant findings or suggested corrective actions are relayed to division heads and included in the annual Title VI Goals and Accomplishments Report.

Summary of Key Findings and Recommendations

Office of Environmental Services (OES)

Observations

- OES is aware of the requirement to include Title VI assurance language in applicable instruments. OES does not execute any applicable instruments.
- OES has implemented guidance to ensure traditionally underserved populations are made aware of projects and any potential impacts that may occur early in the process, as well as soliciting comments on the project and/or impacts.
- OES is aware of ODOT's Title VI complaint procedure. OES has not been contacted by anyone alleging a Title VI violation.
- OES conducts live in-person and online training for environmental staff and consultants who endeavor to perform work on ODOT projects.
- OES does not collect demographic data on training participants.
- OES conducts public outreach and community involvement activities on all projects.
- OES does not collect demographic data on public meeting participants.
- OES does take steps to address either low participation or poor representation of a potentially impacted group by reaching out to locals to help adjust the way the public is receiving information in an effort to better reach the affected groups.
- OES does obtain data for the purpose of conducting impact analyses. Environmental staff utilizes census data from the US EPA and incorporates that data into the Transportation Information Mapping System. This allows the districts and consultants to search for the project via the Project Identification Number and the project area and view it along with the census information. This is the first step in identifying any potential affected populations.
- OES conducted four impact analyses this reporting period and found no disparate impacts or trends that required action.

Recommendations

- OES may want to consider collecting demographic data on training participants to ensure there are no disparate impacts in training opportunities.
- OES may want to consider collecting demographic data on public meeting participants to determine the level of representation of underserved populations at public events to assist with addressing either low participation or poor representation of a potentially impacted group.

Office of Local Programs (OLP)

Observations

- OLP includes nondiscrimination assurance language in its applicable instruments.
- OLP takes steps to ensure its policies, procedures, instructional manuals and guidance documents use language and imagery inclusive of all groups as appropriate. These documents are also reviewed to ensure they are

nondiscriminatory and nothing facially neutral will result in an adverse impact on any particular group.

- OLP is aware of ODOT's Title VI complaint procedure. OLP has not been contacted by anyone alleging a Title VI violation.
- OLP's data collection is limited to ensuring DBE participation on LPA projects.

Recommendations

- OLP should report data on LTAP training activities, specifically those trainings that include instruction on nondiscrimination or inclusion of underserved populations as it relates to a program or activity of ODOT or its sub-recipients. For example, OLP/LTAP require LPAs to take an e-learning module on Title VI for Sub-Recipients before they can participate in ODOT's local-let program. This data should be reported to the Title VI Coordinator annually.
- OLP should evaluate its programs, services and activities for opportunities to collect and analyze data to ensure there are no adverse impacts or trends that require action.

Office of Small & Disadvantaged Business Enterprise (OSDBE)

Observations

- OSDBE includes nondiscrimination assurance language in its applicable instruments.
- OSDBE takes steps to ensure its policies, procedures, instructional manuals and guidance documents use language and imagery inclusive of all groups as appropriate. These documents are also reviewed to ensure they are nondiscriminatory and nothing facially neutral will result in an adverse impact on any particular group.
- OSDBE is aware of ODOT's Title VI complaint procedure. When OSDBE receives Title VI complaints, they are forwarded to the Title VI Coordinator.
- OSDBE conducts training programs for small & disadvantaged businesses to ensure they have the opportunity to participate on ODOT projects, including hosting DBE boot camps twice a year.
- OSDBE conducts public outreach and community involvement activities when it sets its triennial overall DBE goal. OSDBE also performs outreach when there are changes to its administration of the DBE program that have the potential to impact its stakeholders.
- OSDBE does not collect demographic data on public meeting participants.
- OSDBE does take steps to address either low participation or poor representation of a potentially impacted group in public meetings. OSDBE considers alternative ways to get information out to potentially impacted stakeholders, including working with community groups to get the word out, dropping off fliers at community centers, churches and other community organizations where more people will have access to the information.

- OSDBE collects demographic data on participants in its supportive services program. OSDBE does not analyze the data collected to identify potential adverse impacts on program participants or trends that require action.
- OSDBE posted a Spanish version of the Uniform Certification Application on its website and utilizes bilingual employees to communicate with LEP individuals. This need has presented when conducting wage interviews with Spanish speaking employees.

Recommendations

- OSDBE may want to consider collecting demographic data on public meeting participants to determine the level of representation of underserved populations at public events to assist with addressing either low participation or poor representation of a potentially impacted group.
- OSDBE may want to consider expanding its data collection efforts to include certification, prompt payment, termination/replacement, and commercially useful function reviews.
- OSDBE should analyze the data it collects to identify potential adverse impacts on program participants or trends that require action.

Office of Real Estate (ORE)

Observations

- ORE includes nondiscrimination assurance language in its applicable instruments.
- ORE takes steps to ensure its policies, procedures, instructional manuals and guidance documents use language and imagery inclusive of all groups as appropriate. These documents are also reviewed to ensure they are nondiscriminatory and nothing facially neutral will result in an adverse impact on any particular group. These documents are reviewed by the Ohio Attorney General's Office and approved by FHWA before they are implemented.
- ORE is aware of ODOT's Title VI complaint procedure. ORE has not been contacted by anyone alleging a Title VI violation.
- ORE does not collect or analyze data on its program participants, including relocatees. ORE has performed relocations during this reporting period. ORE maintains a list of the projects where relocations occurred. ORE follows the Uniform Act, Ohio Revised Code and Ohio Administrative Code when performing relocations which helps ensure the process is neutral and will not result in any adverse impacts to any particular group.

Recommendations

- ORE may want to consider collecting and analyzing data on its program participants, especially relocatees, to ensure there are no adverse impacts or trends that require action.

Office of Statewide Planning & Research and Office of Program Management
(SWP/PM)

Observations

- SWP/PM includes nondiscrimination assurance language in its applicable instruments.
- SWP/PM take steps to ensure their policies, procedures, instructional manuals and guidance documents use language and imagery inclusive of all groups as appropriate. These documents are also reviewed to ensure they are nondiscriminatory and nothing facially neutral will result in an adverse impact on any particular group.
- SWP/PM are aware of ODOT's Title VI complaint procedure. SWP/PM have not been contacted by anyone alleging a Title VI violation.
- SWP/PM conduct public outreach and community involvement activities for the biennial STIP development process and the Access Ohio long-range transportation planning process.
- SWP/PM do not collect demographic data on public meeting participants.
- SWP includes a socio-demographic profile of Ohio in its statewide transportation plan (Access Ohio). The profile includes population, age, sex, race, income, disability, and LEP data. The principal data source for this data is the 2010 U.S. Census. The statewide plan update process identifies regional socio-demographic trends based on these data sets. The plan update process assesses transportation policy and programmatic responses to these trends.
- PM completes an Environmental Justice analysis on the biennial STIP projects listing. Pursuant to Executive Order 12898, EJ analyses address minority and low-income populations. The 2018-2021 STIP EJ analysis did not identify any disproportionate or adverse impacts to these populations with the STIP program of projects.

Recommendations

- SWP/PM may want to consider collecting demographic data on public meeting participants to determine the level of representation of underserved populations at public events to assist with addressing either low participation or poor representation of a potentially impacted group.

Office of Transit

Observations

- Transit includes nondiscrimination assurance language in its applicable instruments.
- Transit takes steps to ensure its policies, procedures, instructional manuals and guidance documents use language and imagery inclusive of all groups as appropriate. These documents are also reviewed to ensure they are nondiscriminatory and nothing facially neutral will result in an adverse impact on

any particular group. Generic language is intentionally used in guidance documents and manuals to the greatest extent possible to ensure nondiscrimination.

- Transit is aware of ODOT’s Title VI complaint procedure. Transit has not been contacted by anyone alleging a Title VI violation.
- Transit collects data from its sub-recipients on elderly and disabled passengers based on ridership demographics. Transit does not analyze the data collected to identify potential adverse impacts or trends that require action.

Recommendations

- Transit may want to consider expanding its data collection efforts to include funding allocations.
- Transit should analyze the data it collects to identify potential adverse impacts on program participants or trends that require action.

Sub-Recipient Reviews

ODOT expects its sub-recipients to comply with nondiscrimination requirements as an integral part of doing business with ODOT. Thus, ODOT conducts 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 - Monitoring

Description	Completion Date
Conducted a technical assistance review of Morgan County Public Transit	October 4, 2017
Conducted a technical assistance review of Ashland Public Transit	October 25, 2017
Conducted a technical assistance review of Knox Area Transit	November 14-15, 2017
Conducted a technical assistance review of Columbiana County	December 13-14, 2017
Updated draft compliance questionnaires for sub-recipient reviews, including preparing different sets of questions and document requests for the initial baseline assessment, annual reviews and onsite interviews; drafted procedures for conducting each type of review for each type of sub-recipient; distributed questionnaires and procedures for review and comment by the following offices: Statewide Planning & Research, Transit and Local Programs	December 2017
Implemented updated Title VI compliance questionnaire for Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Organizations (RTPOs) to be completed every year and submitted with their annual work programs	December 2017

Received annual report from the Office of Statewide Planning & Research on MPOs Title VI compliance activities for State fiscal year 2018	January 2018
Received feedback from the Office of Transit on proposed Title VI compliance questionnaire and procedures for monitoring Transit sub-recipients	January 2018
Met with the Office of Local Programs to discuss the plan to monitor Local Public Agencies (LPAs), including working with Local Programs to add Title VI questions to the LPA Participation Requirements Review Form and the LPA Partnering Review Discussion Points	January 2018
Implemented Title VI compliance questions in the Transit grant application process for 5310 recipients	January 2018
Conducted a technical assistance review of Mary Mcleod-Bethune Intervention & Enrichment Center	January 24, 2018
Implemented Title VI questions in the LPA Participation Requirements Review Form	February 2018
Finalized the baseline assessment survey questionnaire for Transit sub-recipients	March 2018
Conducted a technical assistance review of RTC Industries	March 6-7, 2018
Conducted a technical assistance review of Union County Agency Transportation Services	March 15, 2018
Conducted a technical assistance review of South East Area Transit	March 27, 2018
Conducted a technical assistance review of TAC Industries	April 4, 2018
Conducted the baseline assessment survey on Title VI compliance activities of Transit sub-recipients	April 4-18, 2018
Conducted a technical assistance review of Sandusky Transit System	April 24-25, 2018
Finalized the baseline assessment survey questionnaire for LPAs	April 2018
Conducted the baseline assessment survey on Title VI compliance activities of LPAs	May 14 - June 11, 2018
Conducted a technical assistance review of Huron County Transit	June 20-21, 2018
Conducted a technical assistance review of Guernsey County Senior Citizens Center	June 28, 2018
Finalized the report and recommendations on the baseline assessment survey of Transit sub-recipients	July 3, 2018
Conducted an onsite review of the City of Fairborn	July 10, 2018
Conducted a technical assistance review of Carroll County Transit	July 11-12, 2018
Conducted a technical assistance review of Allen County Regional Transit Authority	July 25, 2018
Conducted an onsite review of Athens County	July 30, 2018

Finalized the report and recommendations on the baseline assessment survey of LPAs	August 3, 2018
Received the annual report from the Office of Statewide Planning & Research on MPOs and RTPOs Title VI compliance activities for State fiscal year 2019	August 3, 2018
Implemented Title VI compliance questions in the Transit grant application process for 5311 recipients	August 14, 2018
Conducted a technical assistance review of Ottawa County Transportation Agency	August 14-15, 2018
Conducted an onsite review of the City of Steubenville	August 21, 2018
Conducted an onsite review of the City of Zanesville	September 11, 2018
Conducted an onsite review of the Toledo Area Metro Park District	September 25, 2018
Conducted a technical assistance review of Washington County/Community Action Bus Lines	September 25-26, 2018

Completed Activities/Accomplishments - Training and Technical Assistance

Description	Completion Date
Reviewed and provided comments on the Office of Statewide Planning & Research's draft MPO Manual Section on Title VI, including Environmental Justice and Limited English Proficiency	December 2017
Reviewed and provided comments to Eastgate Regional Council of Governments on its Draft Title VI Plan	February 13, 2018
Provided technical assistance to the Ohio-Kentucky-Indiana Regional Council of Governments	February 13, 2018
Provided training to the RTPOs on the Title VI responsibilities of sub-recipients	February 21, 2018
Provided technical assistance to the Mid-Ohio Regional Planning Commission	February 26, 2018
Provided technical assistance regarding Title VI Plans to Logan Union Champaign Regional Planning Commission	March 19, 2018
Updated and distributed the Title VI Program Requirements for Sub-Recipients guidance document to all LPAs participating in ODOT's local-let program	May 1, 2018
Reviewed and provided comments to Buckeye Hills Regional Council on its Draft Title VI Plan	May 10, 2018
Hosted a webinar for LPAs on Title VI program requirements	May 15, 2018
Began working with the Office of Local Programs & Local Technical Assistance Program on developing additional technical assistance tools for LPAs including: updating the Title VI eLearning module; adding a Title VI Chapter to the LPA Manual; and, developing a Title VI Plan template for LPAs	June 4, 2018

Reviewed and provided comments on the new Title VI Chapter being added to the LPA Manual	July 23, 2018
Provided guidance regarding Title VI Program Requirements for Sub-recipients to Athens County following its onsite review	August 1, 2018

Planned Activities/Goals

Metropolitan Planning Organizations (MPOs) & Regional Transportation Planning Organizations (RTPOs)

Reviews of each MPO & RTPO are conducted annually. The annual reviews are initiated through the Office of Statewide Planning & Research (SWP) each December in conjunction with the annual work program submittal process. Each MPO & RTPO is required to submit responses to a detailed Title VI compliance questionnaire with its final work program in May. A copy of the responses is forwarded to the Title VI Coordinator in August with the Annual MPO/RTPO Title VI Compliance Report prepared by SWP.

The Title VI Coordinator reviews the responses to identify additional information that is needed, any recommended actions to be taken and any training needs that may exist. Relevant findings or suggested corrective actions are relayed to SWP and the MPO/RTPO so technical assistance can be provided. Key findings and recommendations are included in the annual Title VI Goals and Accomplishments Report.

Transit Grantees

Reviews of each Transit grantee are conducted annually. The annual reviews are initiated through the Office of Transit in conjunction with the annual transit grant application process. Each awardee is required to submit responses to a Title VI requirements questionnaire prior to execution of the grant. The Title VI submissions are forwarded to the Title VI Coordinator for review and recommendations. Relevant findings or suggested corrective actions are relayed to Transit and the grantee so technical assistance can be provided. Key findings and recommendations are included in the annual Title VI Goals and Accomplishments Report.

The Office of Transit also conducts Technical Assistance Reviews (TARs) of its sub-recipients on an annual basis. The TARs include an evaluation of the data collection and reporting processes, public participation policy, civil rights complaint procedures, notice of rights, LEP assessment and language assistance plan, and Title VI program documentation submitted during the application process.

Local Public Agencies (LPAs)

Reviews of a sampling of six to eight LPAs are conducted annually. The annual reviews are initiated through the Office of Local Programs as part of its annual Partnering

Review process. The LPAs selected for review each year are required to provide information on their Title VI compliance activities during an onsite review that includes the Title VI Coordinator and/or ADA/504 & Title VI Specialist. Relevant findings or suggested corrective actions are relayed to the LPA during the onsite review. Following the review, additional technical assistance may be provided. Key findings and recommendations are included in the annual Title VI Goals and Accomplishments Report.

Summary of Key Findings and Recommendations

Metropolitan Planning Organizations (MPOs) & Regional Transportation Planning Organizations (RTPOs): Annual Compliance Review

Observations

The 23 MPO and RTPO agencies completed the SFY 2019 Title VI Compliance Questionnaire and submitted them to ODOT as part of their SFY 2019 work program. The responses to the questions from each agency were compiled into a matrix, included as Appendix B in the SWP SFY 2019 MPO/RTPO Title VI Compliance Questionnaire Report. For SFY 2019, an updated questionnaire was sent out with a set of questions different from previous years. These questions deal with the topics of general Title VI policy and organization, public involvement, Limited English Proficiency (LEP) and language assistance, Title VI training, data collection and analysis within Transportation Planning, and technical assistance. It should be noted that for the purposes of this Title VI questionnaire, the Central Ohio Rural Planning Organization (CORPO) shared the same response as the Mid-Ohio Regional Planning Commission (MORPC).

All MPOs currently have either a Title VI Program Plan or Policy. Additionally, all MPOs have written complaint procedures and have made the public aware of the right to file a complaint. All MPOs provided written Title VI assurances to ODOT and they are included in contract language whenever applicable, and none of the MPOs have been named in any Title VI or discrimination complaints or lawsuits. The RTPOs were less consistent in keeping up with Title VI regulations.

Looking at the responses to the questionnaire from the MPOs and RTPOs, some notable responses were observed:

- All MPOs have a Public Participation Plan and only 1 MPO indicated they do not coordinate with local community groups to reach minorities and low-income populations. Only 3 MPOs indicated that meeting participants ever requested special assistance for a public event in the past year.
- 7 MPOs indicated that they do not currently have an LEP Plan and/or a Language Assistance Plan (LAP).
- All but 3 MPOs indicated they would provide free translation services in languages other than English. Almost every MPO noted that it was highly unlikely

such a request would ever arise based on population data of native English speakers.

- The number of staff and frequency of which each MPO was trained in Title VI varied greatly. Five MPOs indicated they would not like Title VI training or technical assistance from ODOT. Only 1 RTPO indicated they would not like Title VI training from ODOT.
- One MPO indicated they did not maintain documentation describing procedures for incorporating Title VI requirements into the region's transportation planning program.
- All but 4 MPOs do not track demographic information of participants in transportation planning program public involvement events.
- Only 1 RTPO has a Title VI Program or Policy and written Title VI complaint procedures and form.
- Three RTPOs have contract language that include Title VI and other non-discrimination assurances.
- Three RTPOs have a Public Participation Plan. Four RTPOs coordinate with local community groups.
- No RTPO has yet developed an LEP or Language Assistance Plan.

As noted above, the responses to the questions from each agency were compiled into a matrix which is included as Appendix B in the SWP SFY 2019 MPO/RTPO Title VI Compliance Questionnaire Report. The response matrix makes it clear that the RTPOs require some time and assistance as they fully incorporate Title VI processes and outcomes in their transportation planning programs.

Recommendations

The most recent ODOT-conducted trainings were the MPO/RTPO Title VI Workshop in conjunction with the FHWA in December of 2016 as well as a training on Title VI responsibilities and the new questionnaire in February of 2018. A majority of the responses from the MPOs/RTPOs indicated that future trainings are needed, and would be welcomed, for Title VI and nondiscrimination responsibilities. To that end, the goal for the following year involves the Title VI Coordinator and ADA/504 & Title VI Specialist working with SWP and LTAP to develop a professional webinar, some form of web-based training, that can be used by any and all agencies that need Title VI/nondiscrimination training or refresher training. This form of training will provide the means to ensure all MPOs/RTPOs receive up to date Title VI training in the most convenient manner possible. ODOT will contact each MPO and RTPO to reiterate the range of Title VI and other nondiscrimination policies and practices they need to incorporate into their transportation planning programs.

Transit Grantees: Baseline Assessment Survey

Observations

In furtherance of implementing a Title VI monitoring program of ODOT's transit sub-recipients, the Title VI Coordinator conducted an initial baseline assessment of all current transit sub-recipients to gain an understanding of their knowledge of Title VI requirements, current level of compliance, and technical assistance needed.

The online survey was conducted with the 67 current Transit grantees, including 36 rural transit systems (5311 grantees) and 31 awardees of the specialized transportation program (5310 grantees).

Positive Compliance Elements:

- Respondents seemed very familiar with the questions provided, with few “Don’t know” answers, showing some knowledge of the Title VI requirements.
- Almost all respondents have a Title VI policy statement, complaint process and form available online, even when a Title VI plan is not available.
- All have identified a Title VI Coordinator.
- Only two respondents do not notify the public of its Title VI rights.
- Only six respondents do not have a Title VI complaint process or form posted online.
- A majority of the respondents provide notices of public participation opportunities.
- While most of these agencies are very small, 11 have a list of staff who speak a language other than English and only seven do not provide free translation services (three of which do not know whether they do).

Noted Overall Concerns:

- 34% of the transit sub-recipients surveyed failed to complete the survey and provide information on their Title VI plan implementation.
- More than half of the respondents who indicated they have a Title VI plan did not provide a copy of it and/or it cannot be found online.
- The respondents that have Title VI plans in place do not address all the federal requirements.
- A quarter of the respondents indicated they do not include Title VI and other nondiscrimination assurances in their contracts (half of which do not know if they do).
- Of those respondents that organize public meetings, 21 do not have a public participation plan (nine of which do not know).
- More than one-third of the respondents either do not have an LEP plan or identified that they have one but did not provide it and it cannot be found online.
- Two respondents that receive requests for language assistance more than once per year have not identified vital documents to be translated.

- No sub-recipient conducts Title VI training annually.
- Fewer than one-half of the respondents have a demographic map of their beneficiaries on file.
- Almost none of the sub-recipients collect Title VI-related event data.

Recommendations

The Title VI Coordinator and ADA/504 & Title VI Specialist will work with the Office of Transit to provide Title VI training and technical assistance, including providing examples of what the documents and processes should look like by highlighting some best practices from other transit grantees, to all transit sub-recipients on the following topics:

- Content and approval of a Title VI plan, and dissemination of Title VI information;
- Best practices in public participation processes;
- LEP four-factor analysis and language assistance processes;
- Event-related data collection and public involvement packet; and,
- Sample training program.

Local Public Agencies (LPAs): Baseline Assessment Survey and Onsite Reviews

Baseline Assessment Survey

Observations

In furtherance of implementing a Title VI monitoring program of ODOT's local-let program participants, the Title VI Coordinator conducted an initial baseline assessment of all current local-let program participants to gain an understanding of their knowledge of Title VI requirements, current level of compliance, and technical assistance needed.

The online survey was conducted with 216 LPAs.

Positive Compliance Elements:

- Only eleven respondents could not name a Title VI Coordinator.
- More than half of the respondents have nondiscrimination assurances in their contracts.
- A majority of respondents have a process for gathering public input (26 do not).

Noted Overall Concerns:

- 55% of the LPAs surveyed failed to complete the survey and provide information on their Title VI plan implementation.
- Only seven respondents appear to have a Title VI plan (19 of those indicating they do either provided a different nondiscrimination policy and/or it cannot be found online).
- Thirty-nine respondents have none of the following: Title VI plan, LEP

plan, public participation plan and assurances of nondiscrimination in their contracts (or do not know).

- Thirty-six respondents do not know if they receive requests for special assistance (13 of which left the answer blank).
- Only 10 respondents provide Title VI training to their staff.
- Only 17 respondents collect data on protected groups.
- Only 17 respondents conduct impact analyses when a project or service change occurs.

Recommendations

In the process of conducting the survey as well as reviewing the results, it is clear the majority of ODOT's local-let program participants require training and additional technical assistance on Title VI from ODOT.

The Title VI Coordinator and ADA/504 & Title VI Specialist will work with the Office of Local Programs and the Local Technical Assistance Program to provide Title VI training and technical assistance, including providing examples of what the documents and processes should look like by highlighting some best practices from other local governments, to all local-let program participants on the following topics:

- Content and approval of a Title VI plan, and dissemination of Title VI information;
- Best practices in public participation on federally-assisted projects;
- LEP four-factor analysis and language assistance processes; and,
- Sample training program.

Onsite Reviews

Observations

Overall, the LPAs that were subject to a partnering review this year were unfamiliar with Title VI and their requirements under Title VI as sub-recipients of federal financial assistance. None of the LPAs appeared to have Title VI programs in place at the time of their review.

Some of the LPAs provided they had a general complaint process in place that was used to receive Title VI complaints. Some of the LPAs indicated they engage in public involvement activities when a need arises and take steps to engage residents that may be impacted by a project or road closure including using social media to make sure constituents are informed.

In most instances, ODOT was meeting with City or County Engineers some of whom indicated another branch of the local government was responsible for carrying out Title VI responsibilities. Since the City or County Engineers Office receives federal-aid highway funds through ODOT and provides programs and services to their beneficiaries, it was relayed that they have Title VI responsibilities.

Recommendations

The Title VI Coordinator and/or ADA/504 & Title VI Specialist provided brief education on Title VI at the onsite review and offered technical assistance. The Title VI Coordinator and ADA/504 & Title VI Specialist are currently working with the Office of Local Programs and the Local Technical Assistance Program on developing technical assistance tools for LPAs to better educate them on Title VI and their Title VI responsibilities as sub-recipients of federal financial assistance.

Data Collection/Analysis/Reporting

ODOT conducts 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
Obtained and reviewed feedback from each program area on the recommendations and tools for improved data collection, analysis and reporting and making any necessary adjustments to ensure the methods of collection and the data being collected is appropriate and meaningful	October 17-26, 2017
Finalized the methods and types of data to be collected, analyzed and reported	July 3, 2018
Trained program area staff on the methods and types of data to be collected, analyzed and reported	August 31, 2018
Collected and analyzed data to identify trends and demonstrate ODOT is providing its programs and services in a nondiscriminatory manner	October 1, 2017 - September 30, 2018

Planned Activities/Goals

Description	Target Timeframe
Adjust methods and types of data collected, analyzed and reported to ensure the methods of collection and the data being collected remains appropriate and meaningful	As needed
Conduct refresher training with program area staff on the methods and types of data to be collected, analyzed and reported	Annually
Collect and analyze data to identify trends and demonstrate ODOT is providing its programs and services in a nondiscriminatory manner	Ongoing

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 - ODOT Employee Training Activities

Description	Completion Date
Developed program area specific Title VI training	July 3, 2018
Developed train-the-trainer manual for those who may be tasked with delivering program area specific Title VI training to staff specialists and consultants to ensure content remains consistent	July 3, 2018
<p>Conducted Title VI Overview Training for ODOT employees as follows:</p> <ul style="list-style-type: none"> ➤ District 4: November 13-16, 2017 <ul style="list-style-type: none"> ▪ 199 employees received training ➤ District 1: November 20-28 <ul style="list-style-type: none"> ▪ 173 employees received training ➤ District 1: December 4-5 & 13 <ul style="list-style-type: none"> ▪ 145 employees received training ➤ District 9: March 19, 23 & 26-30 <ul style="list-style-type: none"> ▪ 258 employees received training ➤ District 5: April 2-5, 9 and 12-13 <ul style="list-style-type: none"> ▪ 297 employees received training ➤ District 7: April 17-20, 23-24 and 26-27 <ul style="list-style-type: none"> ▪ 309 employees received training ➤ District 6: May 1-4, 7-11, 14 and 17 <ul style="list-style-type: none"> ▪ 397 employees received training ➤ District 6: June 4-6 <ul style="list-style-type: none"> ▪ 23 employees received training ➤ District 7: June 18 <ul style="list-style-type: none"> ▪ 7 employees received training 	See description
OES conducted Underserved Populations Training. This is a new online training course focused solely on how to properly engage traditionally underserved populations during the NEPA process. The course is mandatory.	Ongoing
OES conducted Public Involvement Training. This is a mandatory 1-day training class that provides an overview of public involvement as it relates to the NEPA process and ODOT's project development process. Discussion includes why public involvement is necessary and public involvement requirements as well as methods and best practices.	Twice a year
OES conducted Categorical Exclusion Training. This is a mandatory 2-day training focused on ODOT's Categorical	Twice a year

Exclusion Process including regulatory requirements and preparation of CEs using the EnviroNet system. Subject matter experts also present on specific resource areas that must be considered under NEPA. 64 people received this training this year.	
OES conducted NEPA Training. This is a mandatory one-week class designed to help Project Managers gain a better understanding of the various aspects of planning and project development and to guide them in making better NEPA process decisions when working on transportation projects. Environmental staff are also required to take this course.	Twice a year
OES conducted Project Development Process (PDP) Training. This is an optional course that provides a comprehensive view of ODOT's PDP and provides participants with an understanding of the decision elements of the PDP and how to make project decisions within the PDP structure. 54 people attended this training this year.	Twice a year

Completed Activities/Accomplishments - Sub-Recipient Training Activities

Description	Completion Date
Provided training to the RTPOs on the Title VI responsibilities of sub-recipients	February 21, 2018
Hosted a webinar for LPAs on Title VI program requirements	May 15, 2018

Planned Activities/Goals

Description	Target Timeframe
Conduct program area specific Title VI training with interdisciplinary team members and make sure they have the tools needed to deliver training to staff specialists and consultants working in their respective areas on matters that have Title VI implications	Annually
Continue Title VI Overview Training for all ODOT employees	Ongoing
Continue providing training to ODOT's sub-recipients to ensure they are carrying out their Title VI responsibilities	As needed

Complaints

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

Summary of Complaints

The following Title VI complaint was filed with ODOT during the time period encompassing this report.

Stephanie Rogers v. Erie Insurance

- On November 13, 2017, ODOT received a Title VI complaint from Stephanie Rogers. In her complaint, Ms. Rogers alleged her insurance company, Erie Insurance, sold her car without her consent after it was totaled following a car accident. Ms. Rogers indicated she wanted the car returned to her because it had sentimental value. Ms. Rogers believed the insurance agent handling her matter had discriminated against her based on her race, gender and low-income status. Erie Insurance is a publicly held insurance company that offers automobile, home, commercial and life insurance through a network of independent insurance agents. Because ODOT lacked jurisdiction over Erie Insurance and its agent, Ms. Rogers was directed to contact Erie Insurance's corporate offices to initiate a complaint against the agent whom she believed she was treating her in a discriminatory manner.

Completed Activities/Accomplishments

Description	Completion Date
Developed an online Title VI complaint form that includes a valid signature feature and can be accessed and submitted via ODOT's internet site	May 24, 2018

Planned Activities/Goals

Description	Target Timeframe
Continue taking steps to ensure ODOT's beneficiaries are aware of, and have access to, ODOT's Title VI complaint process by providing information on the complaint process to internal customers through program area reviews and training and to external customers through web-based content and outreach events	Ongoing

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 has also taken 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.

Completed Activities/Accomplishments

Description	Completion Date
Updated ODOT's Title VI website to include the current approved Title VI Program Plan and all recent Title VI Goals & Accomplishments Reports to ensure the public has access to information on ODOT's Title VI activities	January 2018
Updated ODOT's Title VI Notice to the Public poster and displayed it in the lobby for public viewing	May 7, 2018
Worked with the Office of Communications to add information and links to the Title VI Program on the ODOT website homepage	May 14, 2018
Ordered and received 500+ copies of the updated Title VI Notice to the Public poster for distribution to all ODOT facilities and sub-recipient facilities	August 9, 2018
Updated ODOT's Title VI website to include the updated Title VI Notice to the Public poster, online complaint form and updated Title VI Requirements for Sub-Recipients guidance document	September 12, 2018

Planned Activities/Goals

Description	Target Timeframe
Update ODOT's Title VI website to include the current approved Title VI Program Plan and Title VI Goals & Accomplishments Report to ensure the public has access to information on ODOT's Title VI activities	Upon approval by FHWA
Distribute copies of the updated Title VI Notice to the Public poster to all ODOT facilities and sub-recipient facilities	December 31, 2018

Limited English Proficiency

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

Completed Activities/Accomplishments

Description	Completion Date
Developed a Language Assistance Plan	June 5, 2018
Finalized the contract with Vocalink Global for language assistance services including onsite and telephone interpretation and document translation	July 25, 2018
Met with the Office of Communications to discuss developing ODOT-branded "I Speak" cards as well as a communication roll-out of the Language Assistance Plan including instructions on	August 24, 2018

requesting interpretation and translation services through the Office of Equal Opportunity's contract with Vocalink Global	
Obtained translation services for Safe Routes to School pedestrian safety marketing campaign	August 24, 2018
Developed an "I Speak" poster to be used to facilitate language assistance when LEP individuals are encountered	September 10, 2018
Developed instructions for ODOT users to request language assistance services	September 17, 2018
Updated the Language Assistance Plan to include the "I Speak" poster and instructions to request language assistance services	September 20, 2018
Distributed language assistance information to the Office of Environmental Services to ensure its incorporation into the project-level public involvement process	September 20, 2018
Established a shared mailbox to receive requests for language assistance services	September 21, 2018
Used the results of the LEP self-assessment survey to update the Four-Factor Analysis that is part of ODOT's LEP Plan	September 2018

Planned Activities/Goals

Description	Target Timeframe
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	December 31, 2018
Update the Four-Factor Analysis that is part of ODOT's LEP Plan	September 30, 2019
Update the Language Assistance Plan	As needed
Obtain language assistance services when a need is identified	As needed

Public Involvement Activities

*(*This includes activities related to Environmental Justice.)*

ODOT is tasked to ensure the fair treatment and meaningful involvement of all people regardless of race, color, or national origin in the implementation of its programs, services, and activities.

Completed Activities/Accomplishments

Description	Completion Date
Participated on the Access Ohio 2045 Steering Committee to ensure Title VI considerations were part of the long-range transportation plan for Ohio	Committee convened on: <ul style="list-style-type: none"> ▪ October 2, 2017

	<ul style="list-style-type: none"> ▪ February 28, 2018 ▪ August 1, 2018
OES organized over 46 public involvement activities this year, including: 3 in District 1; 4 in District 2; 4 in District 3; 8 in District 4; 4 in District 5; 7 in District 6; 4 in District 7; 6 in District 8; 1 in District 9; and, 5 in District 12.	October 1, 2017 - September 30, 2018
<p>SWP conducted a series of 8 regional public meetings as a part of the Access Ohio 2045 statewide long-range transportation plan update. Two meetings were held per day in each location. The first meeting was an early afternoon meeting with public officials. The second meeting was a late afternoon/early evening meeting for the general public. A total of 120 local leaders and 154 members of the public attended the meetings.</p> <p>Meetings were publicized as follows:</p> <ul style="list-style-type: none"> • ODOT Facebook notice • Direct email notices from ODOT Communications’ “interested public” list serve. • Direct email notices from the meeting location - host agencies’ list serves. • A045’s 45 Steering Committee members promoted meetings through their constituent networks. <p>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 <p>In addition to the public meetings, an online survey was available and publicized for those unable to attend who wanted to provide input on the long-range transportation plan. There were 874 survey respondents from a period between May 7 - June 4, 2018. The survey questions mirrored those asked at the meetings.</p>	May 2018

Planned Activities/Goals

Description	Target Timeframe
Continue participating on the Access Ohio 2045 Steering Committee to ensure Title VI considerations remain part of the long-range transportation plan for Ohio	Future convenings of

	the Committee planned for: <ul style="list-style-type: none"> December 6, 2018
Continue working to ensure the fair treatment and meaningful involvement of all people regardless of race, color, or national origin in the implementation of ODOT programs, services, and activities.	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
Participated in the FTA's State Management Review of ODOT through providing information to the FTA's reviewers on ODOT's Title VI Program and compliance activities. The review found that ODOT is in compliance with FTA's Title VI requirements.	June 6, 2018

Planned Activities/Goals

Description	Target Timeframe
Update procedures to address/eliminate discrimination	As needed
Update procedures to resolve program deficiencies	As needed

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. As of May 31, 2018, ODOT completed all the items identified in its action plan and implemented measures to sustain the improvements it made to its Title VI Program. Going forward, ODOT commits to detailing its continued measures in its annual Goals and Accomplishments Report as well as its annual Title VI/Nondiscrimination Program Implementation Plan submitted each October 1.

Below is a copy of the final monthly submittal demonstrating ODOT’s completion of all action items identified in its Title VI Action Plan.

Title VI Action Plan Timeline – 2018 Update

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

Item Number	Item Description	Action Steps	Target Completion Date	Progress Notes
6C	Sub-recipient Reviews	<ul style="list-style-type: none"> Conduct reviews of sub-recipients 	Completed	<ul style="list-style-type: none"> ODOT plans to conduct an initial baseline assessment of its sub-recipients in February 2018. Following the initial baseline assessment, ODOT will conduct annual reviews of its sub-recipients, including onsite reviews of a sampling that meet the established criteria for an onsite review. In December 2017, updated draft compliance questionnaires for sub-recipient reviews, including preparing different sets of questions and document requests for the initial baseline assessment, annual reviews and onsite interviews; drafted procedures for conducting each type of review for each

			<p>type of sub-recipient; distributed questionnaires and procedures for review and comment by Statewide Planning, Transit and Local Programs.</p> <ul style="list-style-type: none"> • In December 2017, reviewed and provided comment on the draft MPO Manual section on Title VI, including EJ and LEP. • In January 2018, the following activities were accomplished. <ul style="list-style-type: none"> ➤ Continued working to update the Title VI Program Requirements document for sub-recipients to be circulated this Spring in advance of reviews being conducted ➤ Received a report from Statewide Planning on MPO Title VI activity for FY 2018 ➤ Received feedback from Transit on compliance questionnaire being developed to review Transit sub-recipients ➤ Met with Local Programs to discuss plan to monitor LPAs <ul style="list-style-type: none"> ▪ Worked with Local Programs to add Title VI questions to the LPA Participation Requirements Review Form ▪ Worked with Local Programs to add Title VI questions to the LPA Partnering Review Discussion Points • In February 2018, the following activities were accomplished.
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				<ul style="list-style-type: none"> ➤ Provided training on Title VI responsibilities to Regional Transportation Planning Organizations ➤ Reviewed and provided comments on Draft Title VI Plan for Eastgate Regional Council of Governments ➤ Provided Technical Assistance to Metropolitan Planning Organizations: Ohio-Kentucky-Indiana Regional Council of Governments and Mid-Ohio Regional Planning Commission • In March 2018, the following activities were accomplished. <ul style="list-style-type: none"> ➤ <u>MPO/RTPO</u>: In December 2017, implemented compliance questionnaire to be completed by each MPO and RTPO every year and submitted with their annual work programs. Draft work programs, including Title VI compliance items, were submitted in March 2018. ➤ <u>Transit</u>: Finalized baseline assessment questionnaire; baseline assessment scheduled to be conducted in April ➤ <u>LPA</u>: Finalizing baseline assessment questionnaire; updated Title VI Requirements for Sub-recipients technical assistance document to be distributed in advance of the baseline assessment being conducted; baseline assessment scheduled to be conducted in May
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				<ul style="list-style-type: none"> • In April 2018, the following activities were accomplished. <ul style="list-style-type: none"> ➤ Baseline Assessment Survey <ul style="list-style-type: none"> ▪ <u>Transit</u>: conducted assessment survey April 4 – 18 ▪ <u>LPA</u>: finalized assessment questionnaire; assessment survey scheduled to be conducted May 14 – 25 ➤ Annual Compliance Questionnaires <ul style="list-style-type: none"> ▪ <u>MPO/RTPO</u>: annual compliance questionnaires distributed in December 2017; draft responses submitted in March 2018; final responses due in May 2018 ▪ <u>Transit</u>: annual compliance questions will be included in the application process for Transit grantees beginning in June 2018 ▪ <u>LPA</u>: added Title VI questions to Participation Review Form as of February 2018 • In May 2018, completed the assessment survey of the Local Public Agencies. As of May 31, 2018, reviews have been conducted of the three categories of sub-recipients ODOT identified as requiring monitoring and procedures have been implemented to continue monitoring these sub-recipients on an annual basis.
8B	Training	<u>Internal Program Area Training</u> <ul style="list-style-type: none"> • Develop Title VI training for key functional areas that is 	Completed	<ul style="list-style-type: none"> • The Title VI Coordinator, Specialist and Training Program Manager are working together to develop a training curriculum

		<p>repeatable, sustainable and efficient for those employees tasked with these responsibilities or daily tasks</p>		<p>tailored to the responsibilities of each program area – particularly as it relates to data collection, analysis and reporting.</p> <ul style="list-style-type: none"> • In February 2018, revised slides for program area specific Title VI training • In March 2018, finalized slides for program area specific Title VI training; working on drafting a train-the-trainer manual for those who may be tasked with delivering training to staff specialists and consultants • As of May 31, 2018, Title VI training for the program areas ODOT identified as key functional areas has been developed. Training sessions for key staff will be completed by July 31, 2018. Refresher training will be conducted on an annual basis in conjunction with the program area reviews.
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 	Completed	<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. • In April 2018, began working with the Office of Asset Inventory & Systems Integration on developing an online complaint form • In May 2018, finalized online complaint form to allow beneficiaries to submit Title VI complaints through ODOT’s internet site. As of May 31, 2018, any person who wishes to file a Title VI complaint with ODOT may do so by submitting a written

				signed complaint online as well as in person, by mail, electronic mail, facsimile or telephone.
<i>Previously Completed Items</i>				
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 • Execute updated assurances • Send a notice to all ODOT districts and divisions with the updated assurances 	Completed	<ul style="list-style-type: none"> • Item completed as of March 10, 2015
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 	Completed	<ul style="list-style-type: none"> • Item completed as of March 21, 2016

		<ul style="list-style-type: none"> ➤ Periodically review executed contracts to ensure the language is included and updated as necessary 		
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 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 	Completed	<ul style="list-style-type: none"> • Item completed as of October 1, 2015
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
4B	Program Reviews	<ul style="list-style-type: none"> • Conduct review of the Office of Environmental Services 	Completed	<ul style="list-style-type: none"> • Item completed as of April 30, 2017
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 	Completed	<ul style="list-style-type: none"> • Item completed as of November 30, 2016

		& Research and Program Management		
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"> Item completed as of June 30, 2017
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"> Item completed as of June 30, 2017
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"> Item completed as of July 31, 2017
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"> Item completed as of August 31, 2017

7A	Data Collection	<ul style="list-style-type: none"> • Develop a system to collect and analyze data 	Completed	<ul style="list-style-type: none"> • Item completed as of June 30, 2017
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"> • Item completed as of June 30, 2017
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
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 30, 2014
9A	Complaints	<ul style="list-style-type: none"> • Update the Title VI/ Nondiscrimination Complaint Form • Update the complaint process to ensure the Office of Equal Opportunity is notified of complaints filed under Title 	Completed	<ul style="list-style-type: none"> • Item completed as of December 31, 2014

		VI in order to properly report such to FHWA and FTA		
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"> Item completed as of October 31, 2017
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"> Item completed as of October 31, 2017
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 development, implementation, and enforcement of environmental laws, regulations, and policies. 	Completed	<ul style="list-style-type: none"> Item completed as of April 30, 2017
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"> Item completed as of April 30, 2017
14	Compliance and Enforcement Procedures	<ul style="list-style-type: none"> Develop and implement procedures to address/eliminate discrimination 	Completed	<ul style="list-style-type: none"> Item completed as of November 30, 2017

		<ul style="list-style-type: none">• Develop and implement procedures to resolve program deficiencies		
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