



Civil Rights Title VI Presentation
2015 Annual Planning and Programming Meeting
February 4, 2015

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Civil Rights Division

The Civil Rights Division is committed to diversity, fairness, and equitable delivery of VDOT programs and services to its internal and external stakeholders.

Title VI

The Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination based upon race, color, and national origin.

Specifically, Title VI of the 1964 Civil Rights Act states that:

“No person in the United States shall, on the grounds 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.”

Title VI of the Civil Rights Act of 1964, and other directives prohibit agencies and sub-recipients receiving federal assistance from discriminating against anyone or any group in the United States on the grounds of race, color, national origin, sex, age, disability, low-income, or limited English proficiency.

VDOT's Title VI Program: Staff

- ~ The Civil Rights Division has the primary responsibility of implementing VDOT's Title VI program.
- ~ The Civil Rights Administrator has been designated as the Department's Title VI Coordinator and is responsible for ensuring that all matters relating to nondiscrimination are administered effectively.
- ~ District Civil Rights Managers (DCRMs) ensure effective Title VI implementation in their respective districts.
- ~ The Title VI Specialist has the lead responsibility of the day-to-day implementation of the Title VI Program

CR Actions for STIP/TIP Recommendations

Recommendation 1: a) VDOT District offices conduct an annual Title VI Civil Rights Program Review of MPOs, pursuant to VDOT's 2012-2015 Title VI Implementation Plan and b) Copies of completed reviews to be sent to FHWA Virginia Division and FTA Region III Office.

Actions Taken:

- ~ *District Civil Rights Managers convened in November 2014 to review the sub-recipient monitoring process: MPO Reviews were discussed in depth.*
- ~ *A schedule of reviews to be conducted by VDOT's Civil Rights Division during 2015 has been developed.*

Actions to be taken:

- ~ *Reviews of all MPOs will be conducted during 2015.*
- ~ *Copies of completed reviews will be sent to FHWA Virginia Division.*
- ~ *VDOT will leave the submittal of completed reviews to the Federal Transit Administration at the discretion of the FHWA Virginia Division.*
- ~ *Reviews of MPOs will continue to be performed annually. A schedule for MPOs to be reviewed in a particular year will be developed at the beginning of each fiscal year.*

CR Actions for STIP/TIP Recommendations

Recommendation 2: Civil Rights Managers for each VDOT District Office have a documented or institutionalized role in the review and comment of the products and activities of the metropolitan planning and program development process.

Actions taken:

- ~ *The Civil Rights Division and the Transportation Mobility and Planning Division have started working jointly and cooperatively to reinstate the role of the Civil Rights Managers in the review and comment of the products and activities of the metropolitan planning and program development process.*
- ~ *District Civil Rights Managers and District Planners convened in December 2014 to go over the Title VI MPO Review process and the collaborative roles of Civil Rights and TMPD staff regarding Title VI.*

CR Actions for STIP/TIP Recommendations

Actions to be taken:

The MPO and PDC schedule of meetings and the listing of MPO or PDC planning studies programmed for the year will be used as the primary sources to develop the role of the Civil Rights Managers in the planning process.

Potential Title VI Issues to be reviewed/commented on:

- ~ whether an effective public involvement / participation is being followed in the planning process,*
- ~ whether input from minority groups/persons is seriously considered,*
- ~ whether data collection/analysis is adequate,*
- ~ whether social economic and environmental effects and impacts have been identified, described and discussed,*
- ~ whether contracting opportunities for planning studies, corridor studies or other work have been provided to minority and women-owned businesses and minority institutions of higher education.*

MPO TITLE VI REVIEWS

Requirement

In accordance with 23 CFR 200.9 (b)(7), VDOT is required to conduct mandatory reviews of federal funding sub-recipients to determine whether they are implementing their responsibilities under their Title VI Program.

Purpose

The primary purpose of this Compliance Review is to determine the extent to which the MPO has met its Title VI Program Requirements.

The Compliance Review has also the purpose to provide technical assistance and to make recommendations regarding corrective actions, as deemed necessary, in the event that deficiencies in the implementation of the Title VI Program are found.

MPO TITLE VI REVIEWS

The Reviews

- ~ The Title VI Compliance Review will be conducted by District Civil Rights Managers.
- ~ It involves primarily a Desk Review, which consists of the completion of a Title VI Review form and the submittal of supporting documentation to VDOT for review.
- ~ The review may / may not require a Site-Visit.

The Review Process

- ~ Civil Rights District Manager sends out letter to MPO/PDC
- ~ MPO conducts self-assessment and returns form to CRDM
- ~ CRDM reviews document and if needed, conducts a site visit
- ~ Letter of no significant finding is issued or
- ~ Letter of non-compliance issues is released
- ~ Ninety days period provided for corrective actions



MPO TITLE VI REVIEWS – AREAS FOR REVIEW

Areas	Sample questions/ topics to be examined*:
• Title VI Administration	Who is responsible? Training received and accessibility to the top official
• Staffing	Staff with responsibilities in the transportation component Is staff elected or appointed? Affirmative Action Plan
• Public Involvement	Public meetings notices (samples) & locations Use of minority media Process to provide access to LEP individuals Advisory or Citizen's groups Data gathered for transportation related assessments
• American with Disabilities Act	Accessibility to public meetings Telecommunication devices Accessibility related notices
• Environmental Justice	Training Issues Environmental Impact Studies conducted
• Contracting - consultants	Consultant contracts awarded – dollar amount and awards to DBEs Contract provisions DBEs solicitations and resources
• Other	Reviews conducted by other governmental agencies Freedom of Information Act Requests Complaints Complaints process

MPO TITLE VI REVIEWS – 2015 SCHEDULE

MPO	Scheduled start date
Kingsport	June
Bristol	May
Charlottesville - Albermale	March
Fredericksburg	February
Hampton Roads	March
Central Virginia (Lynchburg)	February
Danville	March
National Capital Region	February
Richmond	March
Tri-Cities	April
Roanoke Valley	March
Blacksburg-Christiansburg-Montgomery	March
Harrisonburg-Rockingham	February
Winchester-Frederick	March
Augusta-Waynesboro	March



Civil Rights Division

**FOR MORE INFORMATION
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