

## **SUB-RECIPIENT TITLE VI ASSURANCES, PLANS, AND REPORTING**

### Assurances

- All sub-recipients are required to submit Title VI assurances to ODOT as defined in 49 CFR 21.7.

A Non-Discrimination Agreement can serve as assurances to meet this requirement

See Standard DOT Assurances and Non-Discrimination Agreement Template at:

[http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/titlevi/title\\_vi.shtml](http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/titlevi/title_vi.shtml)

### Plans

- A sub-recipient with a service area with a population under 200,000 can adopt ODOT's Title VI plan (a declaration in writing is required) or may use a Non-Discrimination Agreement (Title VI Assurances) which serves as an abbreviated Title VI Plan;
- A sub-recipient with a service area with a population over 200,000 must submit a Title VI Plan for approval to ODOT (plan template will be provided);

### Reporting

- Local governments with populations under 200,000 are required to prepare and maintain on file an annual Title VI Accomplishment Report;
- Local governments with populations over 200,000 are required to prepare and submit to the ODOT Title VI Program Manager an annual Title VI Accomplishment Report;

## **TITLE VI REQUIREMENTS OF ALL SUB-RECIPIENTS (SUMMARY)**

- Appoint a Title VI coordinator;
- Obtain Title VI training for coordinator and other key staff;
- Proactively prevent discrimination as defined in Title VI and related authorities; Disseminate Title VI program information to the public;
- Include Title VI compliant language in all contracts to second tier sub-recipients;
- Obtain and maintain data on race, ethnicity, age, gender, disability, limited English proficiency, and income of populations in service area;

- Proactively include traditionally under-represented populations (hard to reach through traditional notification process) in public involvement and informational processes;
- Analyze the benefits and burdens of activities and projects on the service area Title VI protected population;
- Perform periodic self-assessments for Title VI compliance;
- Develop periodic Title VI reports (MPO's and sub-recipients with populations over 200,000 submit annual reports to ODOT);
- Respond to periodic Title VI reviews by ODOT;
- Correct any deficiencies identified through a review or complaint;

## **COMPLAINTS**

1. Provide the public access to a defined complaint process and a complaint form (ODOT's can be used);
2. Maintain a complaint log;
3. Refer complaints to ODOT when complaint is against ODOT sub-recipient;
4. Submit completed complaint investigations (lodged against second tier sub-recipients) to ODOT;