



Sub-Recipient Title VI Baseline Assessment Tool

23 Code of Federal Regulations (CFR) Part 200 requires that the Oregon Department of Transportation (ODOT) conducts periodic reviews of cities, counties, planning agencies and other recipients of federal-aid highway funds to ensure they are complying with Title VI of the Civil Rights Act of 1964. Title VI simply states that “no person in the United States shall be excluded from participation, denied the benefits of, or be subjected to discrimination in any Federally-funded program, policy or activity on the basis of race, color or national origin.”

ODOT has developed this baseline assessment as a first step to help its sub-recipients understand their Title VI responsibilities. Your responses are important because this will assist ODOT in planning future training and technical assistance.

This assessment is for information-gathering ONLY. It is NOT a compliance review and neither ODOT nor FHWA will take any corrective actions based on your responses.

It should only take a few minutes of your time. Please return the completed questionnaire by:

We appreciate your cooperation and request that you save your responses and e-mail the document as an attachment to:

Gregory.P.Azure@odot.state.or.us

Greg Azure
Title VI Program Manager
Office of Civil Rights
Oregon Department of Transportation

If you have any questions you may call Greg Azure at: (503) 986-3169.

ODOT SUB-RECIPIENT SAMPLE REVIEW QUESTION TEMPLATE

- 1. Who is the Title VI contact person for your agency? Does this person accept complaints from the public? If not, who does? Please include title, email and telephone number for each person listed.**
- 2. In the past three years, has your agency been named in a discrimination complaint or lawsuit? If so, when and what was the nature of the complaint or lawsuit and the outcome?**
- 3. Does your agency have a written complaint process? If so, please provide a copy as an attachment.**
- 4. Has your agency made the public aware of their right to file a complaint? If so, by what mechanism?**
- 5. Has your agency provided free translation services for persons with Limited English Proficiency (LEP)?**
- 6. In recent years, what has your agency done to receive and consider input from all citizen groups, especially minority, low income, disabled and transit-dependent?**
- 7. Does your agency have a method to collect racial and ethnic data on citizens impacted by your projects? If so, please describe.**
- 8. Has your agency provided written Title VI Assurances to ODOT?**
- 9. Does your agency include the required DBE assurance language at 49 CFR 26.13 (a) and (b) verbatim in all financial agreements, contracts and subcontracts?**
- 10. Does your agency physically include the Civil Rights Special Provisions (FHWA-1273) in all contracts and ensure they are included in all sub-contracts, including the third-tier?**
- 11. Does your agency monitor DBEs on construction projects to ensure they are performing a commercially useful function (CUF)? If so, where is this documented? If a DBE is not performing a CUF, what actions or steps have you taken? Who do you notify?**
- 12. Do you have any questions regarding this assessment of Title VI? Please include them here along with your email address or phone number and an ODOT representative will respond.**

- 13. Number of full-time and part-time employees:**
- 14. Would your agency like Title VI training or other Civil Rights technical assistance from ODOT? If yes, please explain.**
- 15. Please provide the Name, Title and contact information of the person who completed this baseline assessment.**
- 16. May we contact you for follow-up?**