

# **TITLE VI PLAN**

(Optional)



# Title VI Implementation Plan

## FFY 2023



Oregon Department of Transportation  
Office of Civil Rights  
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Salem, OR 97301-4792

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## INTRODUCTION TO ODOT

The Oregon Department of Transportation's (ODOT) mission is to provide a safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive.

ODOT's Values inform decision making and guide our actions in working with each other, our partners and the communities we serve:

- **Integrity:** We are accountable and transparent with public funds and hold ourselves to the highest ethical standards.
- **Safety:** We share ownership and responsibility for ensuring safety in all that we do.
- **Equity:** We embrace diversity and foster a culture of inclusion.
- **Excellence:** We use our skills and expertise to continuously strive to be more efficient, effective and innovative.
- **Unity:** We work together as One ODOT to provide better solutions and ensure alignment in our work.

ODOT was established to bring together programs that meet the objectives of contributing to the growth and economy of the state by providing for the movement of persons and goods rapidly, safely, and economically. ODOT develops and administers Oregon's system of highways and their infrastructure; public transportation services; rail passenger and freight systems; bicycle and pedestrian paths and routes; ports and marine transportation; pipelines; transportation safety programs; driver and vehicle licensing and registration; and the enforcement of statutes, policies, and procedures relating to commercial motor carriers.

ODOT divides its operations into five geographical regions. Each region is responsible for developing and managing transportation construction projects and maintaining state, federal, and interstate highways and other transportation infrastructure within its boundaries. This map depicts the boundaries of the five ODOT regions:



Region 1: Portland Metro

Region 2: Willamette Valley, North and Mid-Coast

Region 3: Southern Oregon and South Coast

Region 4: Central Oregon

Region 5: Eastern Oregon

In 2019, ODOT Director Kris Strickler announced the reorganization of ODOT into four major organizational areas: Revenue, Finance & Compliance; Delivery and Operations; Government & External Relations; and Social Equity. As this document illustrates, ODOT's commitment to nondiscrimination and implementation of Title VI of the Civil Rights Act of 1964 spans across the organization and is an example of the agency's "ONE ODOT" approach to living our Values and implementing our Mission.

## ODOT'S COMMITMENT TO NONDISCRIMINATION

ODOT is a recipient of federal financial assistance. As a condition of receiving these funds, the Department must comply with various nondiscrimination laws and regulations, including **Title VI of the Civil Rights Act of 1964**. Title VI provides that:

“[n]o 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 assistance.” 42 U.S.C. § 2000d.

Subsequently, federal authorities extended these protections to include sex, age, disability, income level, and Limited English Proficiency. As a result, public or private entities that receive federal assistance (called recipients) from any federal agency, including the Federal Highway Administration (FHWA), must take concrete steps to ensure nondiscrimination in their programs and activities.

**It is the Oregon Department of Transportation's policy to assure that no person shall, on the grounds of race, color, national origin, age, sex, disability, income level or Limited English Proficiency as provided by Title VI of the Civil Rights Act of 1964 and related authorities, be excluded from participation in, be denied the benefit of, or be otherwise discriminated against under any of the programs or activities it administers.**

## THIS TITLE VI PLAN & ASSURANCES

Title 23, CFR Part 200.0 (b) (11) and the Federal Highway Administration (FHWA) specifically requires recipients of Federal-Aid Highway Program funds, including ODOT, to prepare a Title VI Implementation Plan. Title VI plans should describe the roles, responsibilities, and procedures for assuring compliance with Title VI of the Civil Rights Act of 1964 and related regulations and directives by the state transportation agency.

The **ODOT Office of Civil Rights (OCR) Title VI Program** measures compliance and implementation of Title VI federal directives. This document outlines ODOT's Title VI implementation processes and procedures, including information about the ODOT organization and staff structure, program monitoring, compliance review of external agencies in receipt of Federal-aid Highway Program funds through ODOT, the investigation and disposition of discrimination complaints, and other Title VI activities and assurances.

**This Title VI Implementation Plan additionally provides guidance regarding language access for individuals with Limited English Proficiency (LEP)** and referral for additional information to ODOT's Limited English Proficiency Plan. Executive Order 13166 on *Improving Access to Services for Persons with Limited English Proficiency* requires Federal agencies to examine the services they provide, identify any need for services to LEP individuals, and develop, and implement a system to provide those services in such a way that LEP persons can have meaningful access to them. FHWA requires ODOT to take the necessary actions to ensure that LEP persons are provided an equal opportunity to benefit from or have access to ODOT programs, facilities, and services. The access of LEP persons is regarded as a component of Title VI implementation under the protection from discrimination based on national origin. Together, the Title VI Program and the language access principles described in the LEP Plan, advance the inclusion of marginalized community members and protect against discrimination.

On April 24, 2013, the Secretary of Transportation signed the **DOT Standard Title VI Assurances and Nondiscrimination Provisions, Order 1050.2A**, requiring that recipients of federal aid assure they will promptly take any measures necessary to implement Title VI as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation, through the Federal Highway Administration, and is subject to and will comply with the following Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

**A copy of the Standard Title VI Assurances and Nondiscrimination Provisions signed by ODOT Director Kris Strickler for Federal Fiscal Year 2023 appears as an appendix at the end of this document.**

**This 2023 Title VI Implementation Plan** can be accessed online here:

[https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non\\_Dis\\_Main\\_List/EditForm/ODOT Title VI Implementation Plan 2023 FINAL.pdf](https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non_Dis_Main_List/EditForm/ODOT Title VI Implementation Plan 2023 FINAL.pdf)

## ORGANIZATIONAL STRUCTURE

The Oregon Department of Transportation Title VI Program is implemented by the Office of Civil Rights and coordinated by the Title VI/Environmental Justice/ADA Program Manager. The Program Manager is responsible for implementing this plan, providing assistance regarding Title VI nondiscrimination information and activities, and monitoring subrecipients of federal financial assistance through ODOT. This position reports to Angela Crain, the Manager of the Office of Civil Rights.

Title VI/EJ/ADA Program Manager: David Morrissey. Telephone: (503) 986-3870.

Contact with the ODOT Office of Civil Rights can be made at:

Oregon Department of Transportation  
Office of Civil Rights  
800 Airport Rd SE  
Salem, Oregon 97301-4792  
Telephone: 503-986-4350

Within the Office of Civil Rights, staff at multiple levels participate in Title VI implementation functions:

### Office of Civil Rights Manager:

- ☐ Works collaboratively with federal and state authorities in communicating Title VI program requirements.
- ☐ Works closely with ODOT's Title VI program staff to implement the Department's Title VI work plan through programs, procedures and ongoing monitoring.
- ☐ Advises Title VI Program staff of Title VI related problems and discrimination complaints.
- ☐ Communicates with the Title VI program staff regarding projects that are in development phases where Title VI issues may arise.
- ☐ Leads OCR reviews of agency directives to determine if there are any Title VI implications.

### Title VI Program Manager:

- ☐ Coordinates Title VI Program Development and Implementation with internal program areas.
- ☐ Provides technical assistance and advice on Title VI matters to program area Subject Matter Experts (SMEs) and program area managers.
- ☐ Conducts Title VI reviews of internal program areas, Metropolitan Planning Organizations (MPOs) and local subrecipients to ensure Title VI compliance.
- ☐ Review ODOT program areas to correct identified Title VI problems, including discriminatory practices of policies.
- ☐ Provides Title VI training for ODOT internal staff and subrecipients.
- ☐ Completes ODOT's Title VI Implementation Plan for submission to FHWA by October 1<sup>st</sup> of each year and the Title VI Annual Accomplishment Report for submission to FHWA by November 1st each year.

- ☐ Manages complaint disposition including investigation, documentation, resolution and, when applicable, interagency case transfer due to jurisdiction or higher authority requirements.
- ☐ Works with program areas to collect and document statistical data.
- ☐ Distributes and, where necessary translates, Title VI documents for the public.
- ☐ Reviews ODOT program manuals, contracts and policy documents to determine whether Title VI is appropriately addressed and implemented department-wide.

#### **Civil Rights Programs Coordinator:**

- ☐ Assists the Title VI/EJ/ADA Manager and the Intermodal Civil Rights Manager with implementation of the nondiscrimination programs within OCR.
- ☐ Provides training support and outreach to ODOT staff and ODOT Stakeholder Groups.
- ☐ Assists with data coordination and analysis, tracking of concerns and requests from stakeholder groups.

#### **Civil Rights Field Coordinators:**

- ☐ A Civil Right Field Coordinator is located in each of the five Oregon geographical regions.
- ☐ Serve as liaison between the Office of Civil Rights and regional Planning and Development, Construction, Maintenance, and Operations staff.
- ☐ Provide assistance, guidance, and training to regional programs pertaining to planning, monitoring, training, evaluation, reporting of Disadvantaged Business Enterprise (DBE), Emerging Small Business (ESB), Equal Employment Opportunity, Title VI, and workforce development.
- ☐ Facilitate internal pre-construction (pre-con) meetings; review affiliated information and document in Civil Rights Compliance Tracking system (CRCT); review DBE forms for accuracy and completion.
- ☐ Assist in responding to inquiries from the partner agencies and the public, including referral of inquiries to OCR Title VI Program staff as necessary
- ☐ Assist in fact-finding as necessary during investigations and taking action to mitigate potential Title VI complaints in their region.

Additionally, **Title VI Subject Matter Experts (SMEs)** based within key ODOT organizational sections and program units participate in Title VI implementation, monitoring and reporting in collaboration with OCR staff. Functions and objectives for this role are discussed in the next section in this document under the *Program Area Review Procedures* section.

**The Director of ODOT has ordered that the Title VI Program Manager has direct and unfettered access to contact and/or meet with them when there is a civil rights concern that needs to be brought to their attention, whether internal to ODOT or through our external partners, customers or contractors.** Under this policy, these designated officials need not obtain any other organizational or managerial approval and will have the full support of their staff to work directly with the Director of ODOT to address civil rights matters. Additionally, the Title VI Coordinator will receive the full participation and



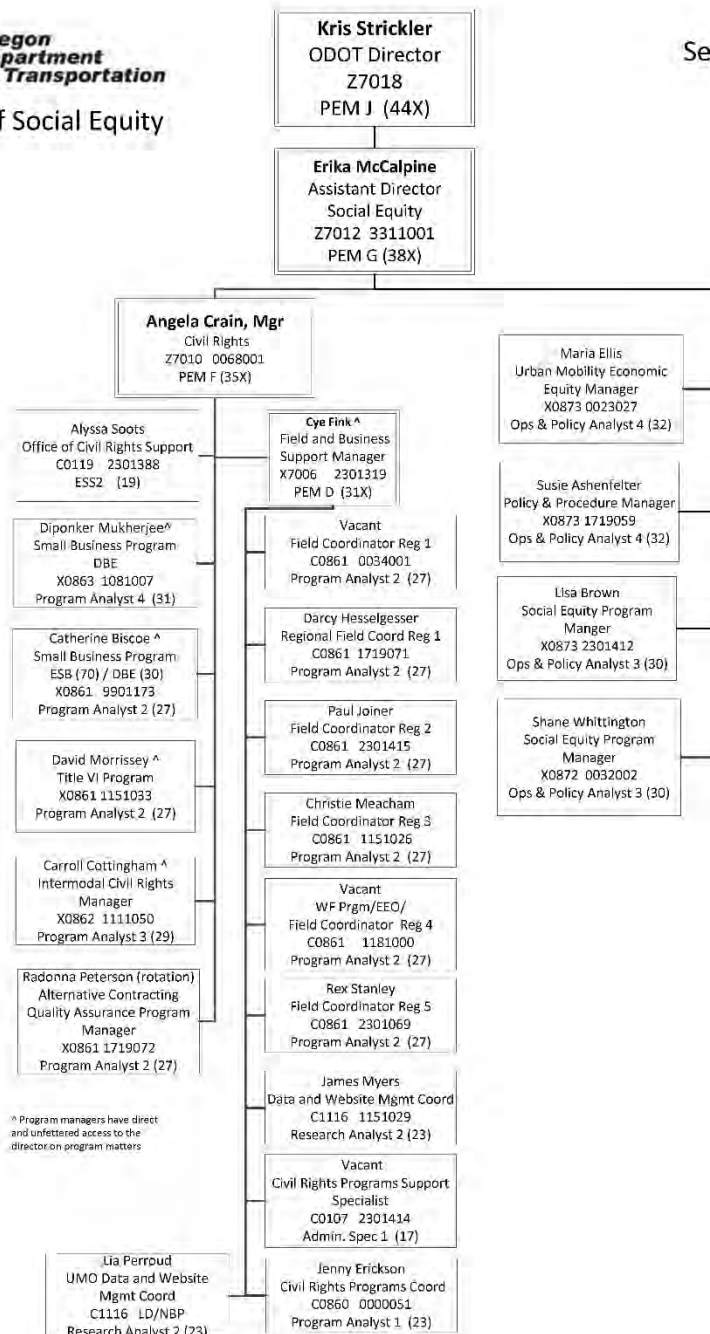
cooperation of affected ODOT staff, as needed, in implementing ODOT's Title VI compliance activities, including compliance with 49 C.F.R. part 21 (Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation - Effectuation Of Title VI Of The Civil Rights Act Of 1964).

The following organizational chart illustrates the position of the Office of Civil Rights within the Office of Social Equity and these programs' relationship to the Office of the ODOT Director:



# Office of Social Equity

September 2022



## PROGRAM AREA REVIEW PROCEDURES

The Office of Civil Rights Title VI program staff reviews ODOT programs and organizational sections to assess compliance, support nondiscrimination enforcement through technical assistance and reporting, and identify opportunities for systems improvement, including through training.

OCR staff also work in partnership with Title VI Nondiscrimination **Subject Matter Experts (SMEs)**, based in key program areas across the agency, who serve as focal points for nondiscrimination information and compliance practices within their program. The positioning of Title VI SMEs within the agency is a primary collaborative strategy for implementing, monitoring and reporting Title VI functions, including language access for persons with limited English proficiency (LEP).

Key organizational sections engaged in ongoing Title VI compliance, data collection or reporting, and related content development include:

### ❖ **Construction:**

ODOT's Construction Section leads and administers continuous improvement of the roads, highways, and bridges statewide construction program. The Construction Section:

- ❑ Partners with local entities to ensure successful construction and project delivery for the local agency construction program.
- ❑ Gathers data illustrating minority, disadvantaged, emerging small business entities participating in construction contracts and subcontracts.
- ❑ Ensures that Appendix A of the FHWA Standard Assurances for Title VI and other Nondiscrimination Statutes and Regulations are included in prime contracts and consultant agreements.
- ❑ Ensures that prime contractors include the FHWA Standard Assurances in all subcontracts, regardless of tier.
- ❑ Collaborates with the Office of Civil Rights in outreach and training efforts to address labor compliance while doing business with ODOT.

### ❖ **Driver and Motor Vehicle Services:**

ODOT's Driver and Motor Vehicle Services (DMV) is by far the division that has the most direct interaction with Oregonians. DMV strives to provide excellent service to all customers regardless of race, color, national origin, sex, age, disability, income and limited English proficiency. The Oregon DMV:

- Provides the noncommercial knowledge test in seven languages.
- Employs 196 bilingual employees in key positions and with language skills needed to assist customer base in specific service area.
- Hosts the online Oregon Driver Manual in HTML for ease of use with web-based translation programs.
- Maintains field offices that comply with ADA requirements of accessibility.
- Works closely with ODOT's Office of Civil Rights to resolve complaints received from customers.
- Learns from specific cases to identify if additional training of employees is needed.

❖ **Maintenance and Operations:**

The Maintenance and Operations Branch leads and supports highway maintenance activities throughout the State by developing and implementing programs to ensure efficient, effective, and consistent maintenance of Oregon's transportation infrastructure. The Maintenance and Operations Branch:

- ☐ Ensures that the development and implementation of the Maintenance Program is compliant with Title VI/Nondiscrimination requirements.
- ☐ Periodically reviews its processes to ensure the Maintenance Program is being implemented in a nondiscriminatory manner.

❖ **Environmental Program:**

The National Environmental Policy Act (NEPA) is a broad-reaching mandate for federal agencies to work together with state, local, and tribal governments, public and private organizations, and the public, to achieve and balance social, economic, and environmental goals while accomplishing their missions. ODOT's NEPA program:

- ☐ Develops and provides guidance and tools for region NEPA staff to adequately address environmental justice (EJ), Limited English Proficiency (LEP) and other FHWA directives as required.
- ☐ Uses training and current knowledge to address NEPA and other environmental laws related to historically underserved communities.
- ☐ Ensures NEPA processes and FHWA-ODOT established exemptions are followed for conducting detailed environmental justice analyses.
- ☐ Assist in determining which NEPA classified projects meet EJ exemption conditions due to their pre-approved conditions in avoiding impacts to EJ communities.

❖ **Policy, Data, and Analysis:**

The Policy, Data, and Analysis unit develops the long-term transportation system statewide plans and guidance documents affecting Oregon transportation agencies and planners. They establish a vision and policy foundation to guide transportation system development and investment. The unit provides:

- ☐ Statistical data on race, color, national origin, age, disability, or sex of participants in attendance at public participation opportunities.
- ☐ Data relating to LEP populations including census analysis, surveys, public meetings, focus groups, online open house sources.
- ☐ Information on demographics of members of advisory councils and policy boards.
- ☐ Public involvement opportunities (hearings, open houses, public meetings) including special outreach to minority and low-income populations.
- ☐ Alternative languages used in the translation of vital documents or communicating with LEP populations.
- ☐ Requests for accommodation at public meetings.
- ☐ Ensures that all State planning and research (SPR) and metropolitan funds (PL) used for research are awarded in a nondiscriminatory manner.

❖ **Procurement:**

The ODOT Procurement Office (OPO) collaborates with the Office of Civil Rights to provide training, tools, and engagement/outreach opportunities promoting small businesses, equity and inclusion, and ensuring nondiscrimination in the provision of solicitations. The Procurement branch:

- ☐ Ensures that all procurement solicitation and contract documents include the Title VI nondiscrimination provisions.
- ☐ Ensures competition in all publicly advertised solicitations is fair and open.
- ☐ Ensures procurement mechanisms for language access services, such as interpretation and translation, are understood by OPO staff for guiding other ODOT offices when requested.
- ☐ Actively seek engagement/outreach/networking opportunities (such as Capitol Connections, Governor's Marketplace, etc.)
- ☐ Follow procurement processes and data reporting agreed to by OCR and OPO related to the Disadvantaged Business Enterprise (DBE) Program
- ☐ Assist with processes related to the Emerging Small Business (ESB) Program. Participates in the Subject Matter Expert Title VI and LEP Program.

❖ **Right of Way:**

The Right of Way division provides expertise in real estate to ODOT. They are responsible for the appraisal, acquisition, and management of property acquired for public projects. The Right of Way provides:

- ☐ Demographic data on relocatees and shares annual reports with FHWA and the ODOT Office of Civil Rights.
- ☐ Maintains database records regarding approved relocation and acquisition consultants and appraisers. All ODOT consultants performing relocation or appraisal activities are vetted and preapproved; consultants and/or local agency staff performing acquisition tasks are preapproved by the Region Right of Way Manager.
- ☐ Provides supporting data that illustrates objectivity when valuing property. All ODOT appraisal reports are required to illustrate objectivity in valuing property, and all appraisal reports are reviewed and approved for accuracy and compliance.
- ☐ Implements standard FHWA Standard Assurances for Title VI and other nondiscrimination statutes and regulations.
- ☐ Management, appraisers, the appraisal review process, relocation/condemnation liaisons, and the FHWA Right of Way Liaison all support Title VI compliance.

❖ **Statewide Project Selection & Delivery:**

Project selection results from a variety of processes and organizational units, including Planning, Procurement, and region-based project management and public engagement staff. Processes include stakeholder involvement, problem and solution identification, prioritization, development of area programs, as well as system planning programs described below. Compliance responsibilities include:

- Ensure stakeholder involvement processes and techniques are designed to surface potential Title VI issues in the project selection phase.
- Ensure that DBE's have maximum opportunity to compete for and participate in consultant contract work.
- Where appropriate, make special efforts to contact and involve historically marginalized communities and low-income groups (population) in the project selection phase.

❖ **Transportation Safety:**

The Transportation Safety unit provides data-driven solutions and education to encourage safe practices to save lives, reduce injuries, and costs due to crashes on Oregon roads.

Transportation Safety:

- Ensures subrecipients receiving federal funds include the Title VI Assurances.
- Ensures that all Project Development phases for Safety projects follow the same processes that non-Safety projects follow.
- The development of the Highway Safety Improvement Plan (HSIP), Strategic Highway Safety Plan (SHSP), TSAP, and other Safety related documents requiring public input need to be developed according to ODOT's Public Participation Process.

## **SUBRECIPIENT MONITORING PROGRAM**

All subrecipients of federal funding through ODOT are subject to Title VI compliance reviews. Subrecipients include metropolitan planning organizations (MPOs) and local public agencies (LPAs) like cities and counties. Their responsibilities include maintaining a Title VI Implementation Plan and annually reporting their program accomplishments. Moreover, contractors who perform work at the direction of subrecipients must agree to comply with federal nondiscrimination laws and applicable regulations.

Annually, the Title VI Manager conducts up to four external compliance reviews of ODOT subrecipients. At a minimum, two LPA and one MPO review will take place each year. A Title VI compliance review consists of multiple processes. First, a desk review involves examining a subrecipient's self-completed questionnaire and their agency's Title VI implementation plan. Second, ODOT's Office of Civil Rights representatives conduct an onsite panel review and discussion with the subrecipient agency's staff.

Selection of subrecipients eligible for review includes all local agencies receiving federal funds through ODOT, those subrecipients with the greatest potential impact on populations served, and those with previously identified corrective action requirements. Additional factors for consideration include population size, federal funding received from ODOT, and history of reviews.

Critical elements for Title VI program reviews include signed FHWA Assurances for Title VI and other Nondiscrimination Statutes and Regulations at least every three years; the application of Title VI Nondiscrimination Assurance annexes in all solicitations for bid requests, proposals, prime and sub contracts, including the FHWA-funded Project Agreement paragraph; requiring the identification of a Title VI Coordinator; a Title VI Implementation Plan that is updated every third anniversary year of the original approved Plan; data-informed planning and public participation strategies, including in service

to LEP individuals; and a complaint process that ensures prompt processing, investigation, and resolution.

**ODOT's Certified Programs Office (CPO)** collaborates with OCR to ensure the compliance of certified LPAs in Oregon. OCR tracks which subrecipients comply with the federal requirements found in Title 23, CFR Part 200.0 (b) (11) and shares that information with the CPO. Additionally, a new database tool has been developed to track each Title VI Plan and Annual Accomplishments Report submitted to OCR. This information is shared with the Local Certification Program staff for up-to-date and accurate LPA information.

ODOT subrecipients are also charged with Title VI responsibilities such as submitting a Title VI Plan and an Annual Accomplishment Report. In 2021-22, the Title VI Program Manager communicated the annual Title VI reporting requirement for subrecipients through a series of training events and written communication toward a goal of broader functional compliance, timely annual report submission and statewide capacity building for Title VI Nondiscrimination implementation.

## **DATA COLLECTION AND ANALYSIS METHODS**

The collection of Title VI nondiscrimination and community demographics data is crucial for examining whether burdens disproportionately impact specific populations. Each organizational area will collect and review respective data for reporting purposes. Similarly, collected data can identify trends or patterns to suggest training needs and other issues. Data analysis also provides a measure of monitoring to ensure ODOT's services, projects, and programs address nondiscrimination.

Examples of relevant data collection include:

- Statistical data on race, national origin, age and sex, and statements of disability of participants in and beneficiaries of ODOT programs based on surveys and questionnaires completed by impacted individuals.
- The number of complaints filed each year and the outcomes reached.
- Summary statements (final reports) of compliance reviews.
- Training and technical assistance provided.
- Public engagement processes.
- Diversity of community representation on public advisory boards.

ODOT utilizes both qualitative and quantitative data to inform decision-making. Applied data sources include:

**EJScreen** - <https://ejscreen.epa.gov/mapper/>

- The Environmental Protection Agency (EPA) developed a tool to identify EJ disparities in US populations. The tool utilizes the US Census and the American Community Survey to calculate demographic data through GIS. The software analyzes demographic and environmental factors from the area of study. It compares them to different geographic locations, states, or the rest of the US to answer whether environmental values are rare or common.

**ODOT DBE Disparity Study** - <https://www.oregon.gov/odot/Business/OCR/Pages/Disadvantaged-Business-Enterprise.aspx>

- Beginning in 2021, ODOT contracted with Keen Independent Research to develop a disparity study that would analyze whether there is a level playing field for minority- and woman-owned businesses in the Oregon transportation contracting industry. The Draft 2022 DBE Disparity Study Report and ODOT's Proposed FHWA Overall DBE Goal FFY 2023-2025 are now available. It calculates the relative availability and participation of minority- and women-owned firms in ODOT's contracts. It also provides recommendations and specific steps to foster the utilization of all small businesses in ODOT contracting and programs specific to DBEs.

**TransGIS** - <https://gis.odot.state.or.us/transgis/>

- The application presents an interactive map format offering multi-level views of Oregon's transportation system needs and accomplishments. TransGIS content includes transportation management system data, asset inventory, Statewide Transportation Improvement Program (STIP) projects. Also, environmental data is accessible for analysis, planning, and research needs (Limited English Proficiency is not a function of this application.)

**ODOT ADA CQCR Database** – Accessible to ODOT staff

- ODOT maintains a database of customer-submitted accommodation requests and inquiries related to the Americans with Disabilities Act. The ADA Comments, Questions, Concerns or Requests (CQCR) system facilitates timely customer response, solution-focused processes, and analysis for effective ADA implementation monitoring and reporting.

**ArcGIS Social Equity Map** -

<https://geo.maps.arcgis.com/apps/View/index.html?appid=bbd3d9861fcd40ffa4085d457e4361a7>

- The Social Equity Map is an ArcGIS geographical tool that analyzes recent block group data from the American Community Survey. It estimates the degree to which Oregonians may be experiencing less than excellence in service and public service investments. This tool assists with improving ODOT's equitable transit decisions that impact the quality of life for Oregon's vulnerable populations by examining the age, disability, poverty status, limited English proficiency, and non-white population of communities.

**REMIX Transportation Planning Tools** – Accessible to ODOT staff

- REMIX is an online data management tool that examines impacts in public transportation design and informs planning decisions. REMIX allows users to map Census demographic variables alongside other real-time transportation datasets for specific geographic areas useful in Title VI applications. ODOT offers statewide REMIX access for approved internal staff and public transportation providers and funding recipients to access the application.

Other relevant data collected will vary depending on each program area. Each organizational area Subject Matter Expert will work with staff in their respective area to gather data for reporting purposes. The SME will analyze the data to assist the Title VI Program Manager in identifying training needs and any compliance issues that may require addressing.

## TRAINING

OCR provides Title VI training and technical assistance opportunities for both ODOT internal staff and external stakeholders. Diverse interest groups such as LPA's, regional Civil Rights Field Coordinators, and federal partners like FHWA regularly attend the OCR training events. OCR provides responsive training solutions to the core elements of Title VI and other civil rights programs, including subrecipient compliance, Disadvantaged Business Enterprises, Americans with Disabilities Act implementation, and language access for LEP individuals. OCR's training events include:

- Title VI Implementation Planning and Reporting
- Nondiscrimination for New Employees of the Commerce & Compliance Division
- Title VI Compliance Framework Training for Subject Matter Experts
- Title VI & ADA Complaint Disposition Practice for Subrecipients (in development)
- Language Access for LEP: Census Data Review and Implementation Planning
- Environmental Justice Foundational Concepts for Civil Rights Staff

Nondiscrimination Subject Matter Experts (SMEs) engaged in Title VI training planning and design processes to help incorporate into their respective offices. Their guidance ensures OCR's training capacity serves ODOT organizational sections with correct information and procedures.

## COMPLAINT DISPOSITION PROCESS

ODOT has a unified discrimination complaint procedure for receiving formal complaints under Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, and related authorities. The process for filing a complaint is posted on the ODOT web page about the Title VI program, a link to which is posted in the footer of all ODOT web pages as well as a QR code on all public posters. Web-based and PDF Discrimination Complaint Forms are also available on the Title VI program page.

- **ODOT Nondiscrimination/Title VI Program page**  
<https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx>
- **Discrimination Complaint Process Overview**  
[https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non\\_Dis\\_Main\\_List/EditForm/ODOT\\_DIS%20CMPLNT\\_PRCSS\\_2020.pdf](https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non_Dis_Main_List/EditForm/ODOT_DIS%20CMPLNT_PRCSS_2020.pdf)
- **Web-based Discrimination Complaint Form**  
[https://www.oregon.gov/odot/Business/OCR/Pages/DIS\\_CMPLNT\\_FRM.aspx](https://www.oregon.gov/odot/Business/OCR/Pages/DIS_CMPLNT_FRM.aspx)
- **PDF Discrimination Complaint Form**  
[https://www.oregon.gov/odot/Business/OCR/Documents/734\\_5008\\_Accessible.pdf](https://www.oregon.gov/odot/Business/OCR/Documents/734_5008_Accessible.pdf)

The Discrimination Complaint Process Overview informs members of the public that they have a right to file a complaint with ODOT if they feel they have been discriminated against on the basis of a protected class. Complaints must be filed within 180 days of the alleged discriminatory event or practice and are requested in writing, but complainants may contact the Office of Civil Rights if they need assistance, alternate formats, or translation. ODOT will confirm receipt of the complaint within 10 working days and complete its investigation within 60 days. The Overview also informs complainants of their right to file



with outside enforcement agencies, the right to appeal, and the prohibition against retaliation by ODOT staff. The complaint form and process overview are also available in Spanish on the program web page.

Complaints are investigated and resolved using the procedures laid out in FHWA's

[Procedures Manual for Processing External Complaints of Discrimination](#). Complaint disposition includes investigation of a complaint if ODOT determines that an investigation is warranted.

The ODOT Office of Civil Rights maintains a secure log of complaints with potential Title VI implications. It includes a summary of those complaints in its annual Title VI Goals and Accomplishments Report to the Federal Highway Administration. This log contains the name of the complainant; the basis of the complaint (i.e., race, color, national origin, age, sex, disability, income level, or Limited English Proficiency.); allegation(s); complaint date; date of Report of Investigation; determination made and date; and any other relevant information as deemed appropriate. ODOT also maintains case files of complaint investigations.

ODOT shall make case files and the complaint log available to the Federal Highway Administration upon request. If dissatisfied with how ODOT disposed of their complaint, a Complainant may file a separate complaint with FHWA or other relevant modal units of USDOT.

## DISSEMINATION OF TITLE VI INFORMATION

A poster notifying ODOT employees of its nondiscrimination policy is available in multiple languages. Copies of the annually updated posters are in the appendix at the end of this document. The poster illustrates ODOT's nondiscrimination policy, compliance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities. It provides additional information for filing complaints of discrimination. The updated poster is disseminated annually to all ODOT facilities for public display.

ODOT's [website](#) displays its nondiscrimination policy statement. ODOT's website is compliant with Section 508 of the Rehabilitation Act of 1974 and accessible to visitors with disabilities. The website provides submission forms for filing complaints under Title VI and the Americans with Disabilities Act. **A discrimination complaint phone line, 855-840-6655**, is also disseminated online and through various ODOT printed materials, including a QR code on Title VI notification posters. All ODOT representatives participating in project delivery are responsible for fostering effective public involvement.

Accordingly, the methods used to include the public will vary based on the composition of the population impacted by the project. Planning, Project Development, Right-of-Way, NEPA and other program areas implement public involvement based on the needs within the program area. Regardless of the strategy, a Public Involvement Plan is required for each project.

ODOT's core objectives in carrying out its public participation obligations include:

- Tailor outreach to underrepresented groups such as minority, low-income, elderly, and disabled populations to gather input to determine the targeted community's issues and concerns.
- Ensure outreach is translated to reach limited English proficient populations.
- Maintain a record of all updates or significant changes to the project based on information obtained through public engagement.

Providing access for persons with disabilities is key for ODOT projects. ODOT teams and public information officers utilize the nondiscrimination policy statement, offer the availability of reasonable accommodations, inform the public of their rights in transportation planning processes, announce construction project updates, and hold public participation events.

Oregon employs several guidelines for inclusive public involvement:

- **ODOT Public Involvement Policy**, Oregon Transportation Commission-11, October 2020.  
[https://www.oregon.gov/odot/Planning/Documents/OTCpolicy\\_policy\\_Final\\_for\\_public\\_posting.pdf](https://www.oregon.gov/odot/Planning/Documents/OTCpolicy_policy_Final_for_public_posting.pdf). This 2020 Public Involvement Policy provides policy direction applicable to the Public Involvement Policies and Procedures adopted by the Oregon Transportation Commission.
- **ODOT Project Delivery Leadership Team Operational Notice** – June 25, 2015  
[https://www.oregon.gov/ODOT/Engineering/Doc\\_TechnicalGuidance/PDLTNotice12.pdf](https://www.oregon.gov/ODOT/Engineering/Doc_TechnicalGuidance/PDLTNotice12.pdf)  
This 2015 Project Delivery Leadership Team Operational Notice provides guidance in Project Management and Public Involvement Expectations for Project Delivery.

The following guidelines strive to aid local jurisdictions in preparing or updating their transportation system plans:

- **ODOT 2023 Title VI Implementation Plan**  
[https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non\\_Dis\\_Main\\_List/EditForm/ODOT\\_Title\\_VI\\_Implementation\\_Plan\\_2023\\_FINAL.pdf](https://www.oregon.gov/odot/Business/OCR/SiteAssets/Lists/Non_Dis_Main_List/EditForm/ODOT_Title_VI_Implementation_Plan_2023_FINAL.pdf)
- **Statewide Transportation Improvement Program (STIP) 2021-2024**  
<https://www.oregon.gov/ODOT/STIP/Pages/index.aspx>  
ODOT provides a 45-day public review period of the draft STIP and a 45-day public review period for any significant revisions.
- **Oregon Transportation Plan Goals, Policies and Strategies**  
<https://www.oregon.gov/ODOT/Planning/Pages/Plans.aspx>  
Provide equal access to public information and decision-making about transportation planning, financing, construction, operations and maintenance activities.

The development of each STIP involves early citizen participation. Citizens can get involved in the transportation planning process in their community and can influence what projects get included in adopted plans. Local plans that are used to prepare the STIP to include:

- City and county transportation system plans (TSP)
- Regional transportation plans for metropolitan areas (RTP)
- Transit agency plans
- Tribal government transportation improvement plans (TIP)
- ODOT facility plans

ODOT accomplishes significant public involvement on project selection for STIP through collaborations with Area Commissions on Transportation (ACTs) and Metropolitan Planning

Organizations (MPOs). ACTs provide a critical communication link for ODOT with local governments, the business community and the public. Federal agencies, tribal governments, and local officials, including MPOs, are members of an ACT. For regional and local planning, planners should maintain a customized stakeholder list with appropriate local representatives of these groups.

The following agencies and interest groups are involved in project selection and the STIP development process:

- Area Commissions on Transportation (ACT)
- Cities and counties
- Federal agencies
- Freight Advisory Committee (FAC)
- Indian tribal governments
- Metropolitan Planning Organizations (MPO)
- ODOT program advisory groups
- Transit districts, port districts

The OCR Title VI Managers collaborate with the Planning and Communications units of ODOT. They assist in reviewing public participation plans and outreach tools within ODOT to enhance capabilities and foster inclusive processes for public involvement.

## **LIMITED ENGLISH PROFICIENCY**

Protection from discrimination based on national origin is a component of Title VI implementation. Thus, language access is provided for Limited English Proficiency (LEP) populations to benefit from or have access to federally conducted and funded involved programs, including activities, facilities, and services.

The ODOT **Limited English Proficiency Plan** was adopted in 2010 to provide ODOT divisions and business lines with guidelines and resources to help fulfill ODOT's commitment to the LEP populations. The plan aims to establish how ODOT will assess the relevance of the LEP programs executed by the agencies and organizations that are ODOT subrecipients of Federal Highway Administration funds.

In developing the plan, OCR aims to provide a framework to help ODOT Program, Region and Area Managers, and ODOT subrecipients better serve Oregon's LEP members. The plan includes providing the 2017 U.S. Census Bureau American Community Survey demographic state profile, completing the Four Factor Analysis for Language Access, and resources available to procure interpretation and translation services. ODOT Directors, Division Administrators, and other managers develop meaningful services to LEP persons in their respective divisions, programs and regions. Additionally, region-based OCR Field Coordinators and Title VI Subject Matter Experts are available to provide guidance or referral to the Office of Civil Rights on matters relating to serving LEP individuals.

**ODOT's Limited English Proficiency Plan** was reissued with updated demographic data and other clarifying edits in 2020 and can be accessed online here:

[https://www.oregon.gov/odot/Business/OCR/Documents/FINAL\\_VI\\_LEP\\_PLAN.pdf](https://www.oregon.gov/odot/Business/OCR/Documents/FINAL_VI_LEP_PLAN.pdf)

## **REVIEW OF STATE TRANSPORTATION AUTHORITY DIRECTIVES**

Under the administration of the ODOT Director and the Assistant Director of Social Equity, OCR participates in policy development and review processes. Agency policies are submitted to the OCR Manager, particularly when identified as potentially implicating for Title VI, the Americans with Disabilities Act, or related authorities. The OCR Manager tasks relevant OCR program managers and other technical staff to review the processes and conduct the necessary research for evaluation. Evaluated policies are returned with comments to the Office for Social Equity and the originating department. The ODOT Office of the Director and the Oregon Department of Justice can be included for assistance in reconciling any unresolved implications or related staff concerns regarding a policy directive and nondiscrimination issues, at the discretion of the Manager of the Office of Civil Rights or higher ODOT authority.

## **COMPLIANCE AND ENFORCEMENT PROCEDURES**

ODOT directors, division administrators, and other managers ensure the meaningful implementation of nondiscrimination protections under Title VI and related authorities in their respective program areas. ODOT managers monitor their programs for nondiscrimination staff training needs, patterns of discrimination, and accountability in ensuring compliance with Title VI and related authorities. The Title VI Program Manager in 2023 will continue to position and promote OCR for visibility as the agency's resource for addressing these critical concerns. The manager of OCR will continue to foster Title VI connectivity, accountability to agency leadership and management processes.

Additionally, regional Civil Rights Field Coordinators and Title VI SMEs provide guidance within their program areas. They assist OCR managers with Title VI implementation obligations, functions, and goal completion. Their assistance helps connect all individuals, such as those with Limited English Proficiency, to have access to participate in meaningful ways in ODOT programs, activities, and services. ODOT regions and organizational sections' appropriate use of the information and methodologies detailed in this Title VI Implementation Plan, as well as ODOT's LEP Plan document and related resources, to reflect ODOT's overall commitment to full compliance with Title VI.

# **APPENDICES**

**The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination**

**Assurances**

**DOT Order No. 1050.2A**

The Oregon Department of Transportation (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Federal Highway Administration, is subject to and will comply with the following:

**Statutory/Regulatory Authorities**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

**General Assurances**

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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 otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

**Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Transportation Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal Transportation Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Oregon Department of Transportation in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, Oregon Department of Transportation also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

Oregon Department of Transportation gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration. This ASSURANCE is binding on Oregon, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Transportation Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Oregon Department of Transportation  
(Name of Recipient)

by   
(Signature of Authorized Official)

DATED September 6, 2022



## APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
  - a. withholding payments to the contractor under the contract until the contractor complies; and/or
  - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The

contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

## **APPENDIX D**

### **CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM**

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Oregon Department of Transportation pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Oregon Department of Transportation will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.\*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Oregon Department of Transportation will there upon revert to and vest in and become the absolute property of Oregon Department of Transportation and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

## APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

### **Pertinent Non-Discrimination Authorities:**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

# Your Rights under Title VI of the Civil Rights Act and the Americans with Disabilities Act (ADA)

The Oregon Department of Transportation (ODOT) complies with the Civil Rights Act of 1964, the Americans with Disabilities Act, and other federal nondiscrimination authorities. These authorities prohibit discrimination based on race, color, national origin, age, disability, sex, income level, and Limited English Proficiency in ODOT's programs, activities, services, operations, delivery of benefits, and opportunities to participate.

To ensure equitable access, ODOT provides accessibility aids, translation, and interpretation services for all public events and vital documents, free of charge, upon request. You can obtain these services by providing reasonable advance notice.

- Need Title VI or ADA related assistance or information?
- Need translation of an ODOT publication?
- Need interpretation for an ODOT event or activity?
- Need an accessibility aid for an ODOT event or activity?
- Need to submit a discrimination or accessibility complaint?

## Please contact the ODOT Office of Civil Rights

Title VI Officer  
ODOT.TITLEVI@ODOT.Oregon.Gov

ADA Program Manager  
ODOT\_ADA@ODOT.Oregon.Gov

Toll Free: (855) 540-6655  
For an Interpreter: 711  
Internet Relay:  
<http://www.sprintip.com>  
Fax: (503) 986-6382



Scan for details

# Sus derechos conforme al Título VI de la Ley de derechos civiles y la Ley de estadounidenses con discapacidades (ADA)

El Departamento de Transporte de Oregon (Oregon Department of Transportation, ODOT) cumple con la Ley de derechos civiles de 1964, la Ley de estadounidenses con discapacidades (Americans with Disabilities Act, ADA) y lo establecido por otras autoridades federales contra la discriminación. Estas autoridades prohíben la discriminación por motivo de raza, color, origen nacional, edad, discapacidad, sexo, nivel de ingresos y dominio limitado del inglés en los programas, actividades, servicios, operaciones, entrega de beneficios y oportunidades para participar que brinda el ODOT.

Para garantizar el acceso igualitario para todos, el ODOT brinda asistencia y servicios de traducción e interpretación para todos los eventos públicos y los documentos públicos, sin cargo, a petición de los interesados. Puede obtener estos servicios si lo solicita con anticipación razonable.

- ¿Necesita asistencia o información relacionada con el Título VI o la ADA?
- ¿Necesita una traducción de una publicación del ODOT?
- ¿Necesita servicios de interpretación para un evento o actividad del ODOT?
- ¿Necesita asistencia con el acceso para un evento o actividad del ODOT?
- ¿Necesita presentar una queja por discriminación o por un problema de accesibilidad?

## Contacte a la Oficina de derechos civiles del ODOT

Director del Título VI  
ODOT.TITLEVI@ODOT.Oregon.Gov

Gerente del Programa ADA  
ODOT\_ADA@ODOT.Oregon.Gov



Línea gratuita: (855) 540-6655

Para un intérprete: 711

Servicio de retransmisión por Internet:  
<http://www.sprintip.com>

Fax: (503) 986-6382



Escanear para ver la  
información detallada

# Ваши права согласно разделу VI закона «О гражданских правах» и по закону «Об американцах с ограниченными возможностями» (ADA)

Департамент транспорта штата Орегон (ODOT) соблюдает закон «О гражданских правах» от 1964 г., закон «Об американцах с ограниченными возможностями» и другие федеральные постановления, запрещающие дискриминацию. Эти постановления запрещают дискриминацию на основе расы, цвета кожи, национальности, возраста, ограничения возможностей, пола, уровня дохода и ограниченного владения английским языком при участии в программах, мероприятиях или операциях департамента ODOT и при использовании его услуг, предоставляемых им льгот или возможностей.

С целью обеспечения равноправного доступа департамент ODOT бесплатно предоставляет по требованию в рамках всех общественных мероприятий средства доступа, услуги письменных и устных переводчиков, а также актуальные документы. Вы можете пользоваться такими услугами, заблаговременно известив о желательности их предоставления.

- Нуждаетесь ли вы в помощи или в информации, предоставляемых согласно разделу VI или по закону ADA?
- Нуждаетесь ли вы в письменном переводе материалов департамента ODOT?
- Нуждаетесь ли вы в устном переводе во время мероприятия департамента ODOT?
- Нуждаетесь ли вы в средстве доступа к мероприятию департамента ODOT?
- Желаете ли вы подать жалобу на дискриминацию или на непредоставление доступа?

## Пожалуйста, обращайтесь в Управление по гражданским правам департамента ODOT

Должностное лицо, ответственное за  
соблюдение раздела VI  
ODOT.TITLEVI@ODOT.Oregon.Gov

Менеджер программы  
соблюдения закона ADA  
ODOT\_ADA@ODOT.Oregon.Gov

Тел. (бесплатный вызов):  
(855) 540-6655  
Устный перевод: 711  
Сетевая трансляция:  
<http://www.sprintip.com>  
Факс: (503) 986-6382



Сканировать подробности



# 您根据《民权法案》第六篇和《美国残疾人法案》(ADA) 享有的权利

俄勒冈州交通部 (Oregon Department of Transportation, ODOT) 遵守《1964 年民权法案》(Civil Rights Act of 1964)、《美国残疾人法案》(Americans with Disabilities Act) 和其他联邦非歧视机构的规定。这些机构禁止 ODOT 的项目、活动、服务、运营、福利发放和参与机会中

存在基于种族、肤色、原籍国、年龄、残疾、性别、收入水平、英语水平有限的歧视。

为确保公平使用，ODOT 应要求为所有公共事件和重要文件免费提供无障碍辅助、翻译和口译服务。您可以通过提供合理的事先通知来获得这些服务。

- 需要与第六篇或 ADA 相关的帮助或信息？
- 需要 ODOT 出版物的译文？
- 需要 ODOT 事件或活动的口译服务？
- 需要 ODOT 事件或活动的无障碍辅助？
- 需要提交歧视或无障碍投诉？

请联系 **ODOT 民权办公室 (Office of Civil Rights)**

第六篇工作人员

ODOT.TITLEVI@ODOT.Oregon.Gov

ADA 项目经理

ODOT\_ADA@ODOT.Oregon.Gov

免费电话：(855) 540-6655

如需口译员服务：711 在

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# Quyền của Quý vị theo Title VI của Đạo luật Dân quyền và Đạo luật Người Mỹ Khuyết tật (ADA)

Sở Giao thông Oregon (ODOT) tuân thủ Đạo luật Dân Quyền năm 1964, Đạo luật Người Mỹ Khuyết tật và các cơ quan không phân biệt đối xử khác của liên bang. Các cơ quan này nghiêm cấm hành vi phân biệt đối xử dựa trên chủng tộc, màu da, quốc gia xuất xứ, tuổi tác, tình trạng khuyết tật, giới tính, mức thu nhập và Trình độ Thông thạo Tiếng Anh Hạn chế trong các chương trình, hoạt động, dịch vụ, cung cấp quyền lợi và cơ hội tham gia của ODOT.

Để đảm bảo tiếp cận công bằng, ODOT cung cấp dịch vụ hỗ trợ tiếp cận, biên dịch và phiên dịch cho tất cả các sự kiện công cộng và các tài liệu quan trọng, miễn phí, theo yêu cầu. Quý vị có thể nhận được các dịch vụ này bằng cách cung cấp thông báo trước hợp lý.

- Quý vị cần được hỗ trợ hoặc xem thông tin liên quan đến Title VI hoặc ADA?
- Quý vị cần bản dịch của một ấn phẩm ODOT?
- Quý vị cần thông dịch cho một sự kiện hoặc hoạt động ODOT?
- Quý vị cần dịch vụ hỗ trợ tiếp cận cho một sự kiện hoặc hoạt động ODOT?
- Quý vị cần gửi khiếu nại về hành vi phân biệt đối xử hoặc khả năng tiếp cận?

## Vui lòng liên hệ với Văn phòng Dân Quyền của ODOT

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