

 <p style="text-align: center;">Bulletin Statewide Programs Unit Certification Program Office (CPO)</p>	NUMBER 101_47	SUPERSEDES NA
	EFFECTIVE DATE 08/21/2020	PAGE NUMBER Page 1 of 2
	REFERENCE ODOT Certification Program	
	TARGET AUDIENCE Certified Local Public Agencies, Region Managers and Local Agency Liaisons	
SUBJECT Civil Rights: Title VI Program Updates – Action Required	CC ODOT Statewide Investments Management Section Manager, FHWA, ODOT Statewide Programs Unit, ODOT Subject Matter Resource (Office of Civil Rights)	

PURPOSE:

To notify Certified Local Public Agencies (LPAs) about the following updates to ODOT’s Title VI Annual Accomplishments Report (AAR) requirements, including:

- Certified LPA’s obligation to review and update their Title VI plan every 3 years
- Certified LPA’s to submit an AAR by COB on October 1st of each year
- Description of the submittal process for the Title VI plan and AAR

BULLETIN INFORMATION:

1. Background:

ODOT’s Office of Civil Rights (OCR) and Certified Programs Office (CPO) share a vision of Oregon as a national leader in compliance with FHWA guidance on Title VI of the Civil Rights Act of 1964. Oregon’s Certified LPAs are essential partners with ODOT in implementing Title VI safeguards and assuring nondiscrimination across the state’s highway programs. All local FHWA subrecipients must maintain compliance with Title VI, and Certified LPAs must fulfill two ongoing requirements that illustrate their efforts: adoption of a Title VI implementation plan and submission of Title VI AAR to ODOT’s OCR.

2. Title VI Implementation Plan:

The Title VI Implementation Plan is a foundational document necessary for achieving certification with ODOT. Implementation plans are used to ensure compliance with Title VI and provide a detailed “roadmap” of the agency’s Title VI program. Once a Certified LPA has a plan approved by OCR and formally adopted by the agency, the Certified LPA is only required to review their plan and update it as necessary every three years, with submission of a revised plan to ODOT when changes or updates have been made. OCR is available to answer questions when a Certified LPA is revising its plan, and requests that updated plans be submitted via the contact information in item 4, along with the local agency’s Annual Accomplishment Report for that year.

3. Title VI Annual Accomplishment Report:

An AAR must be submitted to OCR annually. An AAR summarizes the subrecipient’s Title VI compliance activities related to transportation projects, including any major revisions to their Title VI plan. While there is no template for an AAR, agencies should address the following topic areas:

- a. **Activities and accomplishments** from the reporting period such as public engagement activities, staff trainings, and the processing of any discrimination complaints received
- b. **Changes or updates** to any aspects of your agency’s current and approved Title VI plan, including identification of the person serving as your agency’s Title VI Coordinator
- c. **Analysis of Title VI data** such as how did community data guide your agency’s public outreach, language access, public participation recruitment, and decision-making efforts this year?

Effective as of the date of this bulletin, the reporting period to cover in an AAR is the previous Oregon state fiscal year (July 1 through June 30). OCR requests that AARs be submitted by October 1 each year. OCR recognizes this approach to AAR compliance may alter an agency’s plan for 2020 submission, so the office will remain flexible by providing reasonable extensions upon request from the agency.

4. Submittal procedure:

Submit electronic AAR & Title VI Program documents to ODOT.TitleVI@odot.state.or.us.

OCR plans to review AAR submissions and respond to those sub recipients who meet the October 1 submission goal date by December 31, with a copy to CPO.

5. Technical Assistance: Contact the Title VI email box above, ODOT’s Civil Rights Programs Coordinator Yolonda Garcia (503) 986-3343, or Title VI Program Manager David Morrissey (503) 986-3870

6. Webpage links:

- [ODOT Office of Civil Rights Title VI](#)

Feedback: We are always trying to improve. Please send any feedback regarding this document to the Certification Program Manager or Certification Program Office mailbox, or contact us by phone.

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