

 Bulletin Statewide Programs Unit Certification Program Office (CPO)	NUMBER	101-47-Rev-5	SUPERSEDES	101-47-Rev-4
	EFFECTIVE DATE	08/21/2020 Revised: 8/19/2024 Reissued: 8/25/2025	PAGE NUMBER	Page 1 of 3
	REFERENCE	ODOT Certification Program		
	TARGET AUDIENCE	Certified Local Public Agencies, Region Managers and Local Agency Liaisons		
	SUBJECT	CC ODOT Statewide Investments Management Section Manager, Statewide Programs Unit, Subject Matter Resource (Office of Engagement & Civil Rights), FHWA		

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 by October 1 every 3 years.
- Certified LPA’s obligation to obtain signed standard Title VI assurances and non-discrimination provisions (USDOT Order 1050.2A) and submit with the Title VI plan every 3 years.
- Certified LPAs to submit an AAR by close of business on October 1 of each year.
- Description of the submittal process for the Title VI plan and AAR, including requirement to complete an ODOT cover questionnaire.

Note: Substantive Rev-5 revisions are shown in underline text.

BULLETIN INFORMATION:

Background:

ODOT’s Office of Engagement and Civil Rights (OECR) and Certification Program 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 OECR.

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 accepted by OECR and formally adopted by the agency, the Certified LPA is only required to review their plan and update it **every three years**. Standard Title VI assurances and non-discrimination provisions (USDOT Order 1050.2A) must be signed in the same calendar year of the plan update. Signed assurances should be submitted as Appendix A to the Title VI plan. Revisions to Title VI plans should include updated signed assurances, organizational chart updates, and updated demographic data. Certified LPAs must submit revised plans to ODOT by October 1 every three years. OECR is available to answer questions when a Certified LPA is revising its plan, and requests that updated plans be submitted via the contact information below, along with the local agency’s Annual Accomplishment Report for that year.

Title VI Annual Accomplishment Report:

An AAR must be submitted to OECR 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?

AAR Due Date:

OECR requests that AARs be submitted **by October 1 each year**. ODOT recognizes reporting cycles may vary and requests Certified LPAs submit their *most recently completed* AAR each October. For example, if the AAR covers the Oregon state fiscal year (July 1 to June 30), the AAR submitted in October should cover the period ending June 30 of the same year. If the AAR covers the calendar year, the AAR submitted in October should cover the period ending December 31 of the prior year.

Submittal procedure:

Certified LPAs must submit two items annually: an AAR and a Title VI Annual Accomplishments Questionnaire. Complete the short Title VI Annual Accomplishments Questionnaire, located [here](#). After submitting the form, click ‘View Results’ to view your responses. We recommend saving or printing a copy of your response for your records. Your questionnaire responses should **briefly summarize** the

information contained in the AAR. Review the questions below prior to completing the form, as the form must be completed in one session (no ability to save and return later):

1. Has your agency made any changes to its Title VI program administration during the program year that varies from the most recently submitted Title VI Implementation Plan? If so, briefly summarize (including contact information if changes to designated staff).
2. Did your agency receive any discrimination complaints during the past program year? If so, briefly summarize.
3. Did your agency arrange or provide any civil rights training programs for agency staff or contractors during the past program year? If so, briefly summarize topics and participation.
4. Does your agency's Annual Accomplishment Report set any goals or describe any activities for the program year ahead? If so, briefly summarize.

After submitting the questionnaire, email your agency's Annual Accomplishment Report and any accompanying documents, if applicable, to ODOT.TitleVI@odot.oregon.gov. OECR will acknowledge receipt of AAR submissions and respond to individual subrecipients as necessary, with a copy to CPO.

Technical Assistance:

Contact the Title VI email box above or Title VI Program Manager Brenda Gessner (971) 372-9291.

Webpage links:

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

Questions, concerns, or need an ADA accommodation or alternate format? Please contact us at:

Tiffany Hamilton Local Agency Certification Program Manager Tiffany.HAMILTON@odot.oregon.gov 503-986-3649	Certification Program Office ODOT Statewide Investments Management Section Statewide Programs Unit ODOTCertification@odot.oregon.gov
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