

 <p style="text-align: center;"><b>Bulletin</b> <b>Statewide Programs Unit</b> <b>Certification Program Office</b> <b>(CPO)</b></p>	<small>NUMBER</small> <p style="text-align: center;">101_47-Rev-4</p>	<small>SUPERSEDES</small> <p style="text-align: center;">101_47-Rev-3</p>
	<small>EFFECTIVE DATE</small> <p style="text-align: center;">08/21/2020 Revised: 8/16/2023</p>	<small>PAGE NUMBER</small> <p style="text-align: center;">Page 1 of 3</p>
	<small>REFERENCE</small> <p>ODOT Certification Program</p>	
	<small>TARGET AUDIENCE</small> <p>Certified Local Public Agencies, Region Managers and Local Agency Liaisons</p>	
<small>SUBJECT</small> <p><b>Civil Rights: Title VI Program AAR – Action Required</b></p>	<small>CC</small> <p>ODOT Statewide Investments Management Section Manager, FHWA, ODOT Statewide Programs Unit, ODOT Subject Matter Resource (Office of Equity &amp; Civil Rights)</p>	

**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 LPAs to submit an AAR by close of business on October 1st 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-4 revisions are shown in underline text.

**BULLETIN INFORMATION:**

**Background:**

ODOT’s Office of Equity 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 approved by OECR 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. 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, 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:**

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](mailto:ODOT.TitleVI@odot.oregon.gov). OECR will acknowledge receipt of AAR submissions and respond to individual sub recipients as necessary, with a copy to CPO.

**Technical Assistance:**

Contact the Title VI email box above, ODOT’s Civil Rights Programs Coordinator Jennifer Erickson (503) 871-2977, or Title VI Program Manager David Morrissey (503) 986-5827

**Webpage links:**

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

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

<p><b>Tiffany Hamilton</b>                  Local Agency Certification Program Manager  <a href="mailto:Tiffany.HAMILTON@odot.oregon.gov">Tiffany.HAMILTON@odot.oregon.gov</a>                  503-986-3649</p>	<p><b>Certification Program Office</b>                  ODOT Statewide Investments Management Section                  Statewide Programs Unit  <a href="mailto:ODOTCertification@odot.oregon.gov">ODOTCertification@odot.oregon.gov</a></p>
--	--