

# Title VI Implementation Plan Checklist

Use this checklist to review your Title VI Implementation Plan for program elements required under 23 CFR 200.9.

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## STANDARD DOT TITLE VI ASSURANCES

- Does the plan include a signed copy of the DOT Standard Title VI Assurances with Appendices “A,” “B,” “C,” “D,” and “E”? (This can be attached as an appendix to the plan)
- Are the assurances signed with a current date?

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## ORGANIZATION AND STAFFING

- Does the Plan identify the Title VI Coordinator who has easy access to the head of the agency as well as others who have Title VI responsibilities in the agency (Title VI specialists and liaisons)?
- Is there an organizational chart that identifies a Civil Rights Unit, and its placement in the agency?

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## PROGRAM REVIEW PROCEDURES

- Does the Plan have a brief description of the recipient’s program areas, the Title VI responsibilities in each program area and include procedures for conducting reviews of the program areas?

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## SUB-RECIPIENT REVIEW PROCEDURES

- Does the Plan describe the process for determining how many and which subrecipients will be reviewed each year and the process for conducting reviews of subrecipients?

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## DATA COLLECTION – REPORTING – ANALYSIS

- Does the Plan contain a process for collecting, analyzing, and reporting Title VI data on race, color, national origin for each of its program areas and in the subrecipient reviews? (This may be more effective by including data collection/reporting/analysis by program area)

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## TITLE VI TRAINING

- Does the Plan describe the process the state uses to conduct Title VI training of staff members and subrecipients?

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## COMPLAINT PROCEDURES

- Does the Plan contain complaint procedures which describe the process for investigations and disposition of Title VI complaints that conforms to the FHWA complaints procedures found in the FHWA Title VI Complaints Q and A?

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## DISSEMINATION OF TITLE VI INFORMATION

- Does the Plan contain community outreach and public education procedures as well as how the public outreach data is collected/analyzed to ensure effectiveness?

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## REVIEW OF STA DIRECTIVES

- Does the Plan describe how the STA reviews directives to determine if there are Title VI implications, and interpret how directives impact Title VI program areas?

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## COMPLIANCE AND ENFORCEMENT PROCEDURES

- Does the Plan outline Title VI Program compliance and enforcement procedures to address deficiencies or when noncompliance is determined for internal program areas and subrecipients?

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## LIMITED ENGLISH PROFICIENCY

- Does the Plan explain how LEP populations are identified statewide and per project as well as how the 4-factor analysis is applied to each in determining what translations are appropriate?