

Sub-Recipient Title VI Compliance Assessment Tool

In accordance with 23 Code of Federal Regulations (CFR) Part 200, the Pennsylvania Department of Transportation (PennDOT) is required to conduct periodic reviews of cities, counties, planning agencies and other recipients of federal-aid highway funds to ensure they are complying with Title VI of the Civil Rights Act of 1964. Title VI states that “no person in the United States shall be excluded from participation, denied the benefits of, or be subjected to discrimination in any Federally-funded program, policy or activity on the basis of race, color or national origin.” Section 162 of the Federal-Aid Highway Act of 1973 (section 324, Title 23 U.S.C.) further extends this definition to bar discrimination based on sex (gender).

PennDOT has developed this assessment as a means of determining sub-recipient compliance; helping sub-recipients understand their Title VI responsibilities; and assisting PennDOT in planning future training and technical assistance. This assessment is part of PennDOT’s compliance review process and has been designed to take only a few minutes of your time.

Please submit the completed assessment with attachments to PennDOT’s Title VI Specialist via fax at (717) 772-4026, or via-email penndoteoreports@state.pa.us. You may also send via regular mail to the following: PennDOT, Bureau of Equal Opportunity, ATTN: Title VI Specialist, P.O. Box 3251, Harrisburg, PA 17105-3251. Questions or concerns may be directed to the Title VI Specialist at the e-mail address above or via telephone at 717-783-1370 or 800-468-4201.

Baseline Assessment

Name of Your Agency	
1. Who is the Title VI contact person for your agency? Does this person accept complaints from the public? If not, who does? Please include title, e-mail and telephone number for each person listed.	
2. In the past three years, has your agency been named in a discrimination complaint or lawsuit? If so, when and what was the nature of the complaint or lawsuit and the outcome?	
3. Does your agency have a written discrimination complaint process? If so, please provide a copy as an attachment.	
4. Has your agency made the public aware of the right to file a complaint? If so, by what mechanism? Please provide as an attachment.	

5. Does your agency provide free translation services for persons with Limited English Proficiency (LEP)? Explain.

6. In the past 12 months, what has your agency done to receive and consider input from all citizen groups, especially minority, low income, disabled and transit-dependent? Please provide attachment, if applicable.

7. Does your agency have a method to collect racial and ethnic data on citizens impacted by your projects? If so, please describe.

8. Has your agency provided written Title VI Assurances to PennDOT? If so, please attach a copy.

9. Does your agency include the required DBE assurance language at 49 CFR 26.13 (a) and (b) verbatim in all financial agreements, contracts, and subcontracts?

10. Does your agency physically include the Civil Rights Special Provisions (FHWA-1273) in all contracts and ensure they are included in all subcontracts, including the third tier?

11. Does your agency monitor DBEs on construction projects to ensure they are performing a commercially useful function (CUF)? If so, where is this documented? If a DBE is not performing a CUF, what actions or steps have you taken? Who do you notify?

12. Number of full-time and part-time employees.

13. Do you have any questions regarding this assessment or Title VI? Please include them here, along with your e-mail address or phone and a PennDOT representative will respond.

14. Would your agency like Title VI training or other Civil Rights technical assistance from PennDOT? If yes, please explain. Does your agency have teleconferencing or web conferencing ability?

15. Please provide the Name, Title, and contact information of the person who completed this baseline assessment.

16. Please list each attachment provided with the assessment.