

TITLE VI CHECKLIST FOR METROPOLITAN PLANNING ORGANIZATIONS

As a steward of federal funds, CDOT is required to monitor MPOs in Colorado for compliance with Title VI of the Civil Rights Act of 1964. MPOs are subject to the Title VI program requirements of the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA).

FTA Title VI requirements are described in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." For more information, visit <https://www.codot.gov/business/civilrights/accessibility/titlevi/title-vi-requirements-for-grant-partners>.

FHWA's Title VI regulations are in 23 CFR Part 200. For more information about FHWA Title VI requirements, visit <https://www.codot.gov/business/civilrights/accessibility/titlevi/title-vi-subrecipients>.

The following is a checklist of FTA and FHWA Title VI Program requirements. For assistance with developing a Title VI Program, please contact the Civil Rights Business & Resource Center at 303-757-9234 or dot_civilrights@state.co.us.

General Requirements (FTA Circular Chapter III)

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program

Specific Requirements of MPOs (FTA Circular Chapter VI)

Metropolitan Planning Organizations and other planning entities must submit:

- Demographic profile of the metropolitan area
- A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
- Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts
- Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)
- Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)

Additional FHWA Requirements (23 CFR Part 200)

The following are additional FHWA requirements that are not included in the FTA requirements listed above.

- Non-Discrimination Policy Statement signed by the agency's top official.
- USDOT's Standard Title VI Assurance signed by the agency's top official.
- A Title VI Coordinator designated for managing and monitoring Title VI compliance.
- A description of the agency's Primary Program Areas, including how the agency seeks to ensure non-discrimination in each area.
- Procedures for identifying potential discrimination within the agency and a description of how the agency's pertinent program areas are reviewed for Title VI compliance.
- Procedures for the collection of statistical data (race, color, sex, and national origin) of participants in, and beneficiaries of the agency's programs. Procedures must describe how the agency collects Title VI-related data on an on-going basis for its primary program areas.
- Annual Title VI Goals & Accomplishments Report (Due annually to CDOT)

Other CDOT Requirements

The following are required in order to assist CDOT with its Title VI oversight efforts.

- List of local agencies to which the MPO provides federal funding