

City of ABC (City)
 Title VI Program Compliance Review Report
 Federal Fiscal Year (FFY) 2023
 Compliance Review Findings and Recommendations.
 Review Period: FFY 2022 (October 1, 2021, to September 30, 2022)

Item #	Item Reviewed	Observations / Findings	Recommendations / Action Items
1.	Title VI Accomplishments and Goals Report <input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant	<p><u>Observations:</u> During the 2022 FFY, City departments reported 10 out of 10 months. Departments reporting at least 8 out of 10 months are considered compliant. The report also included accomplishments and goals that followed the S.M.A.R.T. Criteria. All City departments were included in the City Title VI Accomplishments and Goals report.</p> <p><u>Findings:</u> None.</p>	<p>Regulations require all departments within the City to set S.M.A.R.T goals to work towards for the next FFY to show a progression of its Title VI program. Also, investigate public impact in addition to public contact and see where Title VI can be applicable.</p> <p>Final Title VI Accomplishments and Goals are due to the City Department of Public Works (DPW) by August 1 of each year so that the City has adequate time to prepare the final report. Collecting this monthly, even if there was not any activity, helps the City not to scramble at the end of the reporting period.</p> <p><u>Recommendations:</u> None.</p> <p><u>Action Items:</u> None.</p> <hr/> <p><u>Completed on:</u></p> <p><u>Manager's Initials:</u></p>
2.	Dissemination of Title VI Information <input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant	<p><u>Observations:</u> City departments reported to have the following reportable items posted in publicly accessible areas.</p> <ul style="list-style-type: none"> • Non-Discrimination Policy Statement (English) 	<p><u>Recommendations:</u> DPW recommends posting Title VI information on project websites. This will ensure adequate dissemination of Title VI information. Also continue to have the <i>City and You-Your Rights Under Title VI and Related Statutes</i> brochures (Arabic, Armenian, Chinese, English, Hmong, Khmer, Korean, Russian, Spanish, Tagalog,</p>

		<ul style="list-style-type: none"> • Non-Discrimination Policy Statement (Spanish) • Title VI Brochures (Arabic, Armenian, Chinese, English, Hmong, Khmer, Korean, Russian, Spanish, Tagalog, Vietnamese) • Title VI Poster (English) • Title VI Poster (Spanish) <p>In addition, Title VI information was disseminated through various ways such as providing Title VI Brochures to employees, partners, tenants, and visitors. Title VI Information was provided during pre-construction meetings, given to contractors in attendance during construction. Title VI information is also disseminated on intranet sites.</p> <p><u>Findings:</u> None.</p>	<p>Vietnamese) available at all public meetings and at public counters.</p> <p>City DPW encourages disseminating the City's Title VI Policy to all staff in the City to ensure staff are aware of Title VI and its requirements.</p> <p>Disseminate Title VI information (in other languages when necessary as identified in the Four-Factor Analysis in the Language Access Plan) at public events or meetings (if hosting or co-hosting) to ensure the public is aware of their Title VI rights.</p> <p><u>Action Items:</u> None.</p> <p>Completed on:</p> <p>Manager's Initials:</p>
3.	<p>Title VI Training for City Staff</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> As of December 2022, the City has 2754 employees, and 523 employees have not taken their Title VI Mandated Online Training. This results in the City having a compliance rate of 81.0%, surpassing the minimum threshold of 75%.</p> <p>In addition to the Title VI Mandated Training, the City also conducted Title VI Training(s) during this reporting period by providing Title VI information through various methods such as emails, quarterly meetings, brochures, posters, and senior meetings.</p> <p><u>Findings:</u> None.</p>	<p>DPW recommends that City employees who have not taken the Title VI mandated training to take it to reach as close to 100% compliance with Title VI training for the City Department. DPW will provide a noncompliance report monthly, posted on the Title VI Online Training website. Staff are required to take this training every two years to maintain compliance with Title VI Online Training requirements as referenced in the City's Title VI Policy.</p> <p><u>Recommendations:</u> DPW recommends City departments to conduct a department-wide Title VI training in addition to the training forms previously stated in the Title VI Accomplishments and Goals Report. The training would be in efforts of teaching staff on Title VI activities while dealing with the public since we are coming out of COVID-19 restrictions, and also to further deliver the</p>

			<p>importance of Title VI public contact and/or impact so employees are aware in what kind of resources and plans are in place in case they come into a situation where Title VI applies.</p> <p><u>Action Items:</u> None.</p>
			<p>Completed on:</p> <p>Manager's Initials:</p>
4.	<p>Title VI Complaints</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> No Title VI complaints were received from City departments during this reviewing period. The complaint process was reviewed based on the Title VI Accomplishments and Goals report. Each City Department that reported on the FFY 2022 Title VI Accomplishments and Goals Report has a Title VI complaint process that varies minimally. Not all Title VI complaint processes mentioned the City Title VI Coordinator as part of the process.</p> <p><u>Findings:</u> None.</p>	<p><u>Recommendations:</u> DPW recommends that all Title VI complaint processes include the City Title VI Coordinator.</p> <p>Additionally, please ensure that the complaint processes are easily accessible and visible to members of the public such as at public counters where people from the public can use it. For those City Departments that are reporting and already do this, please ensure that it is clearly stated in the monthly reporting as part of the complaint process.</p> <p><u>Action Items:</u> None.</p>
			<p>Completed on:</p> <p>Manager's Initials:</p>
5.	<p>City Title VI Liaisons</p> <p><input checked="" type="checkbox"/> – Compliant</p>	<p><u>Observations:</u> Based on the FFY 2022 Title VI Accomplishments and Goals Report, the City Title VI team is clearly identified. The City Title VI Liaison has attended the DPW Title VI Quarterly Meetings during this reporting period and actively participated</p>	<p><u>Recommendations:</u> DPW encourages all City Title VI Liaisons from the City Departments to attend Title VI trainings and quarterly meetings to be able to actively participate in discussions relating to Title VI and ask any</p>

	<input type="checkbox"/> – Non-Compliant	<p>by asking questions to enhance their department's Title VI Program.</p> <p><u>Findings:</u> None.</p>	<p>questions that may remain unanswered.</p> <p><u>Action Items:</u> None.</p> <p><u>Completed on:</u></p> <p><u>Manager's Initials:</u></p>
6.	<p>Language Access to Limited English Proficient (LEP) Individuals</p> <p><input checked="" type="checkbox"/> – Compliant</p> <p><input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The City Department reported on their Title VI Accomplishments and Goals report that they have the Language Identification Card posted in publicly accessible areas.</p> <p>The City Department conducted 12 interpretation services and translated documents such as notice of availability and transportation surveys.</p> <p>Each City Department reported having separate processes on how to process Title VI Interpretation or Translation Requests.</p> <p>Staff are aware of City resources such as Language Interpreter Services, but there are City Departments that use their own separate processes for translating and/or interpreting while others did not report any processes at all.</p> <p>There was no mentioning of the City Department utilizing the LEP Four Factor Analysis which is an important tool to identify what languages must be translated/interpreted in a given geographical section of the City Department.</p> <p>Outreach has been conducted with efforts of providing resources and/or services in languages other than English. Those languages being Spanish and Mandarin.</p> <p>City Departments have reported that they have proactively collected LEP forms and information during the reporting period.</p>	<p><u>Recommendations:</u> DPW recommends that if each City Department chooses to have their own process for translating/interpreting, each City Department must specifically detail their processes for interpretation and translation requests on the Title VI Accomplishments and Goals Report. It is understandable if there is no change in this process as the FFY's progress, but we still need to verify that these processes are included on the Title VI Accomplishments and Goals Report. This will allow us to ensure all City Departments know how to process these requests.</p> <p>DPW recommends that the City Department utilizes the LEP Four Factor Analysis. There was no mentioning of it during the Title VI Accomplishments and Goals Report. If City Departments are already utilizing the LEP Four Factor Analysis, then please include that information on the public outreach section of the report as stated in the instructions.</p> <p>DPW recommends City Departments report all interpretation and translation services provided to the public. Use the LEP Data Reporting Form or develop a tracking method to track all translations and/or interpretations for reporting to DPW.</p> <p><u>Action Items:</u> None.</p>

		<p><u>Findings:</u> None.</p>	<p>Completed on:</p> <p>Manager's Initials:</p>
7.	<p>Contracts, Grants, and Agreements</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The Title VI Accomplishments and Goals Report for this reporting period mentioned that staff monitored federally funded contracts to ensure Title VI compliance.</p> <p>A spot check was conducted during this review to ensure the City Department federally funded contracts that were executed contained Title VI language, specifically the FHWA 1273. The contracts that were reviewed all contained this Title VI language. Those Contract Numbers are:</p> <ul style="list-style-type: none"> • FY22-049043 • FY22-301704 • FY22-306614 • FY22-307024 • FY22-316004 • FY22-319304 <p><u>Findings:</u> None.</p>	<p><u>Recommendations:</u> Develop a procedure, or otherwise report current efforts, to monitor City Department contracts to ensure contracts include the appropriate Title VI language.</p> <p>Ensure that the required Title VI Assurances Appendices A and E are included in federal aid contract documents, including sub-contracts and sub-agreements.</p> <p><u>Action Items:</u> None.</p> <p>Completed on:</p> <p>Manager's Initials:</p>
8.	<p>Public Participation</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The City Department reported that they provided inclusive materials when there was a meeting or event that dealt with the public. Materials include information that was translated for members of the public for that specific meeting or event, and also information packets such as Title VI Brochures. The types of outreach events that were conducted were town hall meetings to solicit public opinions and educate the public on the upcoming projects.</p>	<p><u>Recommendations:</u> DPW recommends for City Department staff to be more inclusive about where they provide public meetings. Including areas where the public might face LEP challenges and will need proper translation services in order to be aware of what the City is doing with the projects within their geographical location.</p> <p>Additionally, DPW recommends whenever there is a meeting with the public and it has to deal with projects that are federally funded, we must provide the appropriate resources to describe the nature of the project in different languages.</p>

		<p>City Department provided examples of project announcements that were created for the public. These announcements were translated to Spanish.</p> <p>City Department Title VI Liaison also provided a Scoping Summary Report regarding the Expresslanes Extension Project which includes Title VI information that was provided to the public. This information includes providing the Title VI brochures to the public and a Title VI PowerPoint slide for their meeting presentations which was provided to reach as many public entities as possible.</p> <p><u>Findings:</u> None.</p>	<p><u>Action Items:</u> None.</p> <p>Completed on:</p> <p>Manager's Initials:</p>
9.	<p>Website</p> <p><input type="checkbox"/> – Compliant <input checked="" type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The internet website included an up-to-date link that routed the user to the Title VI internet page.</p> <p><u>Findings:</u> The Title VI intranet link on the City Department's website is out of date.</p>	<p><u>Recommendations:</u> DPW recommends including a Title VI link on City internet project websites where Title VI applies, so the public is aware of what their rights are under Title VI and if they want to request project information in their own language.</p> <p><u>Action Items:</u> The City Department is required to update the intranet with the updated DPW Title VI links immediately.</p> <p>Completed on:</p> <p>Manager's Initials:</p>
10.	<p>Data Collection</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The City Department provided survey links during their public meetings to capture Title VI demographic data of their public attendance. A QR code was also provided with these links. This information being collected through the links mentioned, is being utilized to document and analyze the effectiveness and usefulness of their public outreach efforts, and to ensure they are meeting their goal of being inclusive of all LEP populations.</p>	<p><u>Recommendations:</u> In addition to collecting data to ensure public outreach efforts are being inclusive, DPW recommends monitoring/analyzing the data that is being collected for any potential discriminatory effects, also known as disparate impact. Disparate Impact (or adverse impact) discrimination happens under Title VI when a recipient of federal funds from the US DOT adopts a procedure or engages in a practice that has a disproportionate, adverse impact on individuals who are</p>

		<p><u>Findings:</u> None.</p>	<p>distinguishable. Please click on this link to view FHWA's guidance on disparate impact and how to navigate it.</p> <p><u>Action Items:</u> None.</p> <hr/> <p>Completed on:</p> <p>Manager's Initials:</p>
11.	<p>Self-monitoring</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The City Department reported that they self-monitor in various ways. A way they ensure this is by conducting internal audits with security staff at the public facing counters to ensure they have Title VI brochures, forms, an updated list of City interpreters/translators, and Language Interpreter Services. Title VI information is collected throughout various points of each month to ensure Title VI information is being captured.</p> <p>Right of Way staff are monitored by reviewing their diary to review that Title VI information was distributed to the public, property owners, and tenants.</p> <p><u>Findings:</u> None.</p>	<p><u>Recommendations:</u> DPW recommends visiting the Title VI Implementation Plan for information on self-monitoring procedures, and to visit DPW's intranet page for more information regarding data collection and how to incorporate data collection into current processes already established.</p> <p><u>Action Items:</u> None.</p> <hr/> <p>Completed on:</p> <p>Manager's Initials:</p>
12.	<p>External Monitoring and Educating</p> <p><input checked="" type="checkbox"/> – Compliant <input type="checkbox"/> – Non-Compliant</p>	<p><u>Observations:</u> The City Department reported monitoring sub-recipients by ensuring they (other local partners and contractors) are following their contract agreements and are complying with federal and state guidelines related to Title VI through project oversight.</p>	<p><u>Recommendations:</u> DPW recommends for the City Department to actively monitor its sub-recipients for Title VI Compliance. Monitoring them through various ways such as conducting spot checks of their contracts, documents made for the public, public websites for Title VI language and/or links, and ensuring they have proper resources to assist LEP individuals.</p>

		<p>Contract Managers/Procurement send reminders to sub-recipients such as contractors and suppliers to comply with Title VI.</p> <p><u>Findings:</u> None.</p>	<p>In addition to this, DPW recommends that these activities are reported on the Title VI Accomplishments and Goals Report. When reporting this information, the expectation is to get specific and detailed instances of when these monitoring events took place. Provide information such as dates, what was the results of the monitoring, who was monitored, if any discrepancies were found, and what is the course of action to resolve those discrepancies. DPW expects to get this information from City Departments that this pertains to which have contact/impact with the public.</p> <p><u>Action Items:</u> None.</p> <p>Completed on:</p> <p>Manager's Initials:</p>
	<p>Title VI Compliance Review Total Score</p>	<p>The City Department is compliant in 11 items and non-compliant in 1 item.</p> <p>The City Department is requested to make changes highlighted in this report.</p> <p>Action Items must be remediated and signed off on by the City Department Director. Explanations of remediations can be included in a separate document.</p>	<p>DPW envisages recommendations implemented throughout the Federal Fiscal Year.</p> <p>Action Items in this review are to be completed within 90 days of receipt unless procedural steps prevent them from being completed within this time frame.</p> <p>Action items and recommendations are to be addressed and reported in the Title VI Accomplishments and Goals Report.</p>

The City Department acknowledges all recommended action items have been completed to resolve any outstanding Title VI deficiencies.

Signature

City Department Director
Title

Date