

## Title VI/Non-Discrimination Compliance Assessment

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@pa.us](mailto:penndoteoreports@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 Coordinator for your agency? Please include contact information and a brief discription of their role and responsibilities within the agency as the Title VI Coordinator.	
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 written procedures for a Title VI complaint? Do they include instructions to the public regarding how to file a discrimination complaint and a form to file the complaint? If so, please provide a copy.	
4. Has your agency made the public aware of the Title VI policy and their right to file a complaint? If so, how and where and by what mechanism did this take place? Please provide a copy of Title VI Policy and location of its posting.	

5. Does your agency provide free interpretation services for persons with Limited English Proficiency (LEP)? Explain how the agency provides this service and attach a copy of the current LEP plan.

6. In the past 3 years, 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 and the Public Participation Plan.

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

8. Does your agency keep a log of Title VI complaints or any type discrimination lawsuits?

9. Provide a copy of board minutes, resolution, or appropriate documentation showing the governing entity reviewed and approved the Title VI Policy, Title VI Complaint Procedures, Title VI Complaint Form and Title VI Complaint log.

10. Does your agency have a method to perform an Environmental Justice (EJ) Analysis? If so, provide the procedures for the EJ analysis and conclusions.

11. Does your agency monitor DBEs on MPO/RPO sponsored 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 concerning Title VI program, limited English proficiency or EJ? 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 or persons who completed this baseline assessment.

16. Please make sure the documents listed below are attached to this assessment.

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| 1. Title VI Policy                       | 6. Public Participation Plan                                 |
| 2. Title VI Complaint Procedures         | 7. Appointment of a Title VI Coordinator                     |
| 3. Title VI Complaint Form               | 8. Environmental Justice Analysis (Procedures)               |
| 4. Title VI Complaint Log                | 9. Demographic Data Breakdown of Area served - data from ACS |
| 5. LimitedEnglish Proficiency (LEP) Plan | 10. Title VI Assurances                                      |
|  | 11. Current Organization Chart                               |